



Housing Action Subcommittee

Thursday, July 18, 2024

9:30 AM-11:00 AM

Tribal Conference Room – City Hall Lobby

Virtual meeting information below

TIMES GIVEN ARE AN ESTIMATE AND ARE SUBJECT TO CHANGE

	Land Acknowledgement + Welcome
9:30 – 9:35	Land Acknowledgement
9:35 – 9:40	Introductions + Announcements
	Public Comment
9:40 – 9:45	Public Comment (3 minutes each) <ul style="list-style-type: none"> ➤ Members of the public are invited to speak on any topic related to the Housing Action Subcommittee
	Subcommittee Work Session:
9:45 – 10:00	1590 RFP Update <ul style="list-style-type: none"> ➤ Discussion on Mapping + Improving RFP Process
10:00 – 10:20	2025-2029 Consolidated Plan Update <ul style="list-style-type: none"> ➤ Presentation + Discussion
10:20 – 10:40	2024 Fair Housing Plan DRAFT <ul style="list-style-type: none"> ➤ Presentation + Discussion
10:40 – 11:00	City Council Housing + Homelessness Updates
	Adjournment
	Virtual Meeting Information Below:
	<p>Join from the meeting link: Click here to join the meeting https://teams.microsoft.com/l/meetup-join/19%3ameeting_MDIhMzMzNjctNWUzYS00M2M2LThkYzYtMzk0NTI5ZDU3M2Mz%40thread.v2/0?context=%7b%22Tid%22%3a%2295fa1d6e-6a27-496e-9117-fc34d9076661%22%2c%22Oid%22%3a%22ec0423b-0336-4f70-817d-e7ff3e9fc055%22%7d</p> <p>Meeting ID: 291 798 739 417 Passcode: v5za7o Video Conference ID: 114 943 085 8 Alternate VTC instructions Join by phone +1 424-566-7556,,878975113# Phone Conference ID: 878 975 113#</p> <hr/> <p>AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION: The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Human Resources at 509.625.6237, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or mpiccolo@spokanecity.org. Persons who are deaf or hard of hearing may contact Human Resources through the Washington Relay Service at 7 1 1. Please contact us forty-eight (48) hours before the meeting date.</p>

Event/Action	Dept/Entity	Description	Notes + Questions
RFP Drafted	CHHS Department	The request for proposals is drafted with funding sources and allowable uses outlined. In addition to timeline of process, minimum qualifications to apply etc.	
RFP Internal Review	City Legal; Finance; Procurement	Review RFP before it is released to the public	
RFP Publicly Noticed	IT	On website	
	CHHS Clerk	Emails listserv	
		Newspaper? Gazette?	
RFP Open	Service Providers/Applicants	Submit applications	
	CHHS Staff	Hold Tech sessions to answer questions	
RFP Closes	CHHS Staff	Reviewed for eligibility and risk assessment	
RFP Evaluation	CHHS Staff	CHHS Staff report and assessment	
	CHHS Board <ul style="list-style-type: none"> - Affordable Housing Committee - Evaluation + RFP Committee 	The relevant Committee of the CHHS Board reviews and evaluates RFP using the scoring documents provided in the RFP, then meet to discuss their scores, and come to a consensus on a recommendation to send to the CHHS Board	
RFP Recommendations	CHHS Board <ul style="list-style-type: none"> - Affordable Housing Committee - Evaluation + RFP Committee 	The Committee of the CHHS Board that reviewed and evaluated the RFP, presents their recommendations to the full CHHS Board for a vote.	
	CHHS Board	Votes to approve or reject the recommendations, which then go before Council	
Council Votes on Recommendations			
Submit to OnBase	CHHS Department	CHHS Staff submits the recommendations to OnBase for a Council	

		Committee (Urban Experience)	
Council Committee (Urban Experience)	CHHS Department/Staff	CHHS Staff presents at Committee	
	Council	Council discusses (If on discussion) Assuming 2 Council Sponsors, and no Council direction to send the item to a subcommittee, the item advances out of Committee.	
Council Briefing Session (Advance Agenda)	CHHS Department/Staff	CHHS Staff presents at Briefing Session	
	Council	Discuss; adopt any amendments/substitutions; general consider any motions to defer etc.	
Council Legislative Session	CHHS Department/Staff	CHHS Staff occasionally asked to be present to answer questions or present to the public	
	Council	Receive public testimony; discuss; vote to approve or reject	



2020 – 2024 Consolidated Plan

Community Development Block Grant Program (CDBG): 24 CFR Part 570

HOME Investment Partnerships Program (HOME): 24 CFR Part 92

Emergency Solutions Grant Program (ESG): 24 CFR Part 576

July 1, 2020 – June 30, 2024

Community, Housing and Human Services Department

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Spokane's mission is to deliver efficient and effective services that facilitate economic opportunity and enhance the quality of life for its citizens. The Spokane Five-Year Consolidated Plan and individual Annual Plans provide a roadmap for allocating resources to achieve those objectives. The Consolidated Plan establishes local priorities consistent with national objectives established by HUD (US Department of Housing and Urban Development) to utilize funds allocated by the Community Development Block Grant (CDBG) and the HOME Investment Partnership Program.

Exact annual allocations will be published in each Annual Action Plan. Anticipated resources identified in this Consolidated Plan are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechhs@spokanecity.org.

The City of Spokane encourages public engagement in the Consolidated Planning process to identify targeted needs and goals. The overarching goal of this planning process is to develop community based programming that addresses the needs of low and moderate income individuals.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

- Increase coordination and communication between food programs
- Increase capacity of providers to build infrastructure and collaborative ventures around food programs
- Reduce and remove access barriers to food programs
- Expand capacity and diversity of supported employment programs
- Expand paid work experiences/on-the-job training opportunities
- Formalize connections and referral pipelines between workforce programs and other services systems such as housing, mental health, and childcare)
- Expand affordable housing options
- Increase co-location of coordinated entry services, behavioral health services, and substance abuse/detox services at shelters
- Enhance and expand diversion and prevention programs, including outreach and education services
- Expand childcare services
- Offer evening and weekend supportive services
- Increase access to transportation services
- Integrate behavioral health and victim services

3. Evaluation of past performance

The City of Spokane made significant progress toward achieving the needs and goals outlined in the 2015-2019 Consolidated Plan. A copy of the 2019 Program Year (7/1/19-6/30/2020) Consolidated Annual Performance Evaluation Report (CAPER) is not available at the time of this writing. Citizens are encouraged to review a copy of the 2018 Program Year (7/1/18-6/30/19) CAPER on the CHHS webpage to review progress made toward achieving the following needs and goals:

1. Safe Affordable Housing Choice
2. Basic and Special Needs, and Reduce Homelessness
3. Community Development, and Economic Opportunities

A copy of the 2019 Program Year CAPER will be posted to the CHHS website once HUD has accepted the final draft.

<https://my.spokanecity.org/chhs/documents/>

4. Summary of citizen participation process and consultation process

- Consultation with City of Spokane Planning Department
- Consultation with Spokane City Council and Administration
- Consultation with Service Providers
- Consultation with Financial Institutions and Housing Developers
- Consultation with Neighborhood Councils
- Community (partner agencies and citizens) Consultation RE: 5-Year NOFA Priorities
- Consultation with CHHS Board and Respective Committees
- Consultation with Northwest Fair Housing Alliance RE: Analysis of Impediments to Fair Housing Choice
- Alignment with City of Spokane Comprehensive Plan
- Alignment with Spokane CoC Plan to Prevent and End Homelessness

5. Summary of public comments

The City of Spokane held a Public Hearing on Wednesday, July 8, 2020 to present the draft 2020-2024 Consolidated Plan for public comment. The CHHS Board concluded the public comment period and approved the 2020-2024 Consolidated Plan on Monday, August 10, 2020 with no formal or informal public comment received by the City of Spokane. Additional opportunity for Public Comment was offered at the Spokane City Council Advance and Current agendas (7/27/20 & 8/3/20).

Copies of the Draft 2020-2024 Consolidated Plan and Public Hearing presentation were hosted on the CHHS Department website prior to the Public Hearing held on 7/8/2020. These documents remain in the

CHHS website. A copy of the final (HUD approved) 2020-2024 Consolidated Plan will be posted to the CHHS website shortly.

CHHS will continue to engage with community stakeholders in an effort to increase citizen participation in all planning documents.

Community, Housing, and Human Services Department (CHHS) website:

<https://my.spokanecity.org/chhs/documents/>

How to make Comment

- During Public Hearings
- During City Council Meetings
- During CHHS Board Meetings
- Email to CHHS (spokanechhs@spokanecity.org)
- In person (808 W. Spokane Falls Blvd., Spokane, WA 99201)
- Social Media (City accounts)
- Phone (509-625-6325)

Public Comment Period

- Begins Wednesday, July 8, 2020
- Ends Monday, August 10, 2020
- CHHS response to Public Comments on or before
- Tuesday, August 25, 2020

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

The City of Spokane did not receive any public comments related to the draft 2020-2024 Consolidated Plan.

7. Summary

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SPOKANE	
CDBG Administrator	SPOKANE	Community, Housing and Human Services Department
HOPWA Administrator		NA
HOME Administrator	SPOKANE	Community, Housing and Human Services Department
ESG Administrator	SPOKANE	Community, Housing and Human Services Department
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City of Spokane’s Community, Housing and Human Services Department is the lead entity for consulting with and assembling the 2020 – 2024 Consolidated Plan.

Consolidated Plan Public Contact Information

City of Spokane
 Community, Housing and Human Services Department
 808 W. Spokane Falls Blvd.
 Spokane, WA 99201
 (509) 625-6325
spokanechhs@spokanecity.org
<https://my.spokanecity.org/chhs/>

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

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

Spokane County offers numerous emergency hotlines. Eastern Washington 211 is a free and confidential service via an easy access phone number which individuals can call or text to receive information about health and human services from a trained Referral Specialist. 211 can provide information about food subsidy applications, homeless housing pre-screenings, health and wellness support, utility/energy assistance, veteran services, legal resources, disaster and crisis support, transportation, free tax preparation, and veterinarian services. However, if an individual has a distinct issue that they need help with, there are other specialized hotlines for assistance. The YWCA offers a 24-hour domestic violence helpline where an advocate located at their safe shelter is prepared to help to discuss options, safety plans, and other community resources. Lutheran Community Services offers a 24-hour crisis line for survivors of sexual assault to seek out information about their options in terms of medical care, healing and legal services. Additionally, Frontier Behavioral Health offers a mental health or substance use condition disorder hotline called the 24 Hour Regional Crisis Line, which gives assessments to those in crisis whose health and/or safety are in crisis.

Spokane Fire Department has partnered with FBH to create a Behavioral Response Unit that responds exclusively to mental health calls. The program staffs one paramedic who is paired with a licensed mental health counselor. Once it has been established that there is a behavioral health case, the mental health counselor and paramedic approach the individual to try to talk and find what their needs are and the best ways to support them through their crisis. Spokane Police Department has a similar program called the Community Diversion Unit which also pairs with mental health professionals to respond to individuals in the community experiencing a mental health crisis, aiming to divert individuals away from jails and hospitals and connect them to the services and resources they may need.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. <https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf>

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

The current CoC governance structure was implemented in 2017 and was designed to connect a variety of sectors that intersect with homelessness in an effort to provide a holistic perspective to address complex needs and leverage available resources.

The CoC Board is comprised of more than 20 representatives, including people with lived homeless experience, homeless service providers, public housing, behavioral health and chemical dependency, workforce, healthcare, law and justice, advocates, education, funders, local business, and regional government. These representatives are system leaders who are able to make decisions that quickly change the way we address key challenges and be responsive to changing needs. There are also five standing committees (Executive, Planning and Implementation, HMIS and Evaluation, Funding and RFP, and Diversion) and four population-specific sub-committees (Youth, Families, Single Adults, and Veterans). These committees and sub-committees consist of front-line staff, people with lived homeless experience, and experts that advise the CoC Board and help to guide the homeless crisis response system.

In 2019, the Spokane City/County Continuum of Care was awarded Unified Funding Agency (UFA) designation. This is a prestigious designation, with only ten communities in the country holding it, and is awarded because of the Collaborative Applicant's expertise in financial management, monitoring and evaluation, governance, and strategic leadership. UFA communities have increased control over certain federal funding streams, leading to better ability to manage projects locally and allocate funds to meet changing needs.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. <https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf>

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

As more projects contribute data to the HMIS, the depth and scope of knowledge continues to increase. This local data, alongside best practice research from around the country, has led to the design of data-driven programs.

The City of Spokane has moved towards performance-based funding in its most recent five-year funding cycle for state and local funds. As part of this, the City of Spokane released a Performance Management Plan that was approved by the CoC Board. The Performance Management Plan sets both minimum performance standards and performance targets for all homeless service projects. As outlined in the plan, quarterly performance reports will be shared with the CoC Board and will be posted on the City of Spokane's website. Funding decisions will be made, in part, based on performance achieved by projects on an annual basis, ensuring that the community is investing in interventions that are meeting or exceeding outcomes for our system.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. <https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf>

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community, Housing, and Human Services Board
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The CHHS Board helps set funding priorities (needs & goals) and provides funding recommendations to the Spokane City Council. CHHS staff work closely with the Board to discuss community needs for low and moderate income individuals.
2	Agency/Group/Organization	SPOKANE HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Assistance with public housing sections of the Consolidated Plan
3	Agency/Group/Organization	Spokane City Council
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Assistance with priority setting based on community needs and constituent feedback.
4	Agency/Group/Organization	Spokane Regional Continuum of Care Board
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The CoC Board is comprised of more than 20 representatives, including people with lived homeless experience, homeless service providers, public housing, behavioral health and chemical dependency, workforce, healthcare, law and justice, advocates, education, funders, local business, and regional government. These representatives are system leaders who are able to make decisions that quickly change the way we address key challenges and be responsive to changing needs. There are also five standing committees (Executive, Planning and Implementation, HMIS and Evaluation, Funding and RFP, and Diversion) and four population-specific sub-committees (Youth, Families, Single Adults, and Veterans). These committees and sub-committees consist of front-line staff, people with lived homeless experience, and experts that advise the CoC Board and help to guide the homeless crisis response system</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

CHHS consults with numerous community stakeholders to ensure resources are provided to citizens in need of public assistance. The list of organization listed above are representative of government agencies, service providers, educators, veteran services, schools, and public health. CHHS provides an inclusive opportunity for citizen engagement in all planning processes.

No major agencies involved in housing or community development were intentionally excluded from consultation. Every effort was made to ensure advance publication of meetings and opportunities to contribute.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Spokane CHHS Department	For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

CHHS coordinates with City representatives on several ongoing committees consisting of public agencies, nonprofit providers and other members of the community. The committees of particular relevance to ongoing implementation of the Consolidated Plan and associated planning documents include: Spokane Area Workforce Development Council, Spokane Low-Income Housing Consortium, United Way, Spokane Regional Health District and Greater Spokane Incorporated.

The Spokane Housing Authority was consulted throughout the process of developing the Consolidated Plan and the City continues to work closely with the SHA and other housing providers in a supportive and participatory manner to assure progress is made in increasing affordable housing in the community. The Spokane Continuum of Care was consulted during the development of the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness, components of which are integrated into the Consolidated Plan.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. <https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf>

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City of Spokane initiated a 12 month public engagement process to establish community needs and goals for the 2020-2024 Consolidated Plan. CHHS hosted two separate community workshops during June of 2017 to get community feedback. The result of these meetings was a focus on creating stakeholder workgroups to access needs and gaps in service. CHHS provided staffing support for the following workgroups:

1. Food Security
2. Housing Stability and Community Support
3. Workforce Development

Each workgroup met independently over the next 10-12 months to review local data and set priority needs. CHHS provided regular updates to the CHHS Board, partner agencies, neighborhood councils, CoC Board, Spokane Mayor’s Office, and Spokane City Council.

CHHS has posted summary reports for each workgroup and their final recommendations. CHHS has also posted resources that summarize the process for establishing priorities/goals. For more information, please visit: <https://my.spokanecity.org/chhs/funding-opportunities/>

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	Public stakeholder meetings/workshops to start the process of establishing community needs and goals Meetings held on 6/28/2017 and 6/29/2017	General public comments regarding community needs and priorities.	All comments were taken into consideration during these workshops	https://my.spokanecity.org/chhs/funding-opportunities/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Public Meeting	Non-targeted/broad community	Public stakeholder meetings to summarize and report out priority needs and goals for future planning and funding decisions. Meetings held on 6/20/2018 and 6/21/2018	Each stakeholder workgroup presented recommendations developed during meetings and engagement with the community.	All comments were taken into consideration during these workshops	https://my.spokanecity.org/chhs/funding-opportunities/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Meeting	Non-targeted/broad community	General updates to the CHHS Board regarding the 2020-2024 Consolidated Plan	General updates with questions regarding timeline and progress completing the draft plan.	All comments received were general questions regarding the plan draft and were taken into consideration. Please refer to CHHS Board meeting agenda packets for copies of the Consolidated Plan briefing papers.	https://my.spokanecity.org/bcc/boards/community-housing-and-human-services-board/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Hearing	Non-targeted/broad community	July 8, 2020 Public Hearing to present the Draft 2020-2024 Consolidated Plan for public review and comment.	Meeting was hosted via WebEx (virtual). No public comments were received. A complete copy of the presentation and public comment summary is attached in the AD-25 section of this document.	No public comments were received during the Public Hearing.	https://static.spokanecity.org/documents/bcc/boards/community-housing-services-board/board/agendas/2020/07/chhs-agenda-2020-07-08.pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
5	Public Hearing	Non-targeted/broad community	August 5, 2020 CHHS Board meeting to present public comments (none were received) and general update on the draft 2020-2024 Consolidated Plan.	Meeting was hosted via WebEx (virtual). No public comments were received. A complete copy of the presentation and public comment summary is attached in the AD-25 section of this document.	No public comments were received during the Public Hearing.	https://static.spokanecity.org/documents/bcc/boards/community-housing-services-board/board/agendas/2020/08/chhs-agenda-2020-08-05.pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6	Public Meeting	Non-targeted/broad community	7/27/2020 Spokane City Council meeting to present the 2020-2024 Consolidated Plan. Resolution number 2020-0051	Meeting was hosted via WebEx (virtual). No public comments were received. A complete copy of the presentation and public comment summary is attached in the AD-25 section of this document.	No public comments were received during the Public Hearing.	https://static.spokanecity.org/documents/city-council/advance-agendas/2020/08/city-council-advance-agenda-2020-08-03.pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
7	Public Meeting	Non-targeted/broad community	8/3/2020 Spokane City Council meeting to approve the 2020-2024 Consolidated Plan. Resolution number 2020-0051	Meeting was hosted via WebEx (virtual). No public comments were received. A complete copy of the presentation and public comment summary is attached in the AD-25 section of this document.	No public comments were received during the Public Hearing.	https://static.spokanecity.org/documents/city-council/current-agendas/2020/08/city-council-current-agenda-2020-08-03.pdf

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The data provided in this needs assessment section is auto populated by the Department of Housing and Human Services (HUD) via the Integrated Disbursement and Information System (IDIS). The data is a combination of sources from the American Community Survey (ACS) and Comprehensive Housing Affordability Strategy (CHAS). The sources are dated, but provided a good overview of community needs to assist the City of Spokane in establishing needs and goals.

In addition to the data provided by HUD, the City of Spokane regularly consults with partner agencies to address changing needs within the community. The Community, Housing and Human Services Department works in collaboration with the regional Continuum of Care, Affordable Housing Steering Committee, Planning Department, Spokane County, and Neighborhood Councils to set priority needs and goals.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The City of Spokane has experienced significant population and employment growth since the 2015 Consolidated Plan was written. Access to safe affordable housing choices remains a challenge for low and moderate income households. Historically low vacancy rates and rising rent cost burdens have made it increasingly difficult for renters throughout Spokane. The U.S. Census Bureau reported a decrease in Spokane's overall vacancy rate from 4.7% in 2015 to 2.1% in 2018. Low vacancy rates drive up rent costs and make it increasingly difficult for low and moderate income households to afford rental housing.

Where are we?

During 2018 the total number of **renters** with 30% or more of their household income going towards housing costs in:

- The City of Spokane was 18,522, increasing from 14,658 or by 21% since 2006.

During 2018, the share of **renters** who were paying 30% or more of their household income for rent in:

- The City of Spokane was 45.9%, increasing from 41.1% in 2006.

During 2018, the total number of **homeowners** paying 30% or more of their household income on housing costs in:

- The City of Spokane was 13,666, decreasing by 2.3%, or from 13,981 since 2006.

During 2018, the share of **homeowners** paying 30% or more of their household income for housing costs in:

- The City of Spokane was 26.2%, decreasing from 27.9% in 2006.

For more information, please visit the Spokane Trends website:

<http://www.spokanetrends.org/index.cfm>

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	208,916	210,695	1%
Households	85,345	87,625	3%
Median Income	\$39,306.00	\$42,386.00	8%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	13,815	12,595	15,370	8,925	36,920
Small Family Households	3,445	3,615	5,410	3,240	17,765
Large Family Households	590	665	990	525	2,320
Household contains at least one person 62-74 years of age	2,005	2,685	2,750	1,835	7,675
Household contains at least one person age 75 or older	1,535	2,055	2,345	1,060	2,725
Households with one or more children 6 years old or younger	1,970	2,185	2,670	1,360	4,415

Table 6 - Total Households Table

Data 2011-2015 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	335	245	225	80	885	25	40	15	0	80
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	105	105	80	15	305	0	20	4	20	44
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	75	180	160	20	435	4	80	110	40	234
Housing cost burden greater than 50% of income (and none of the above problems)	7,190	2,195	355	25	9,765	1,825	1,485	885	130	4,325

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	1,065	3,840	2,890	375	8,170	330	1,330	2,605	1,325	5,590
Zero/negative Income (and none of the above problems)	705	0	0	0	705	290	0	0	0	290

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	7,705	2,725	820	135	11,385	1,860	1,630	1,020	190	4,700
Having none of four housing problems	2,640	5,450	7,290	3,330	18,710	615	2,790	6,240	5,265	14,910
Household has negative income, but none of the other housing problems	705	0	0	0	705	290	0	0	0	290

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,545	2,280	1,205	6,030	445	785	1,500	2,730
Large Related	360	300	275	935	170	285	320	775
Elderly	1,375	1,355	840	3,570	840	1,200	1,000	3,040
Other	4,350	2,545	1,150	8,045	725	635	760	2,120
Total need by income	8,630	6,480	3,470	18,580	2,180	2,905	3,580	8,665

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,260	800	40	3,100	410	360	370	1,140
Large Related	325	140	10	475	155	105	50	310
Elderly	1,030	595	195	1,820	615	570	260	1,445
Other	3,855	770	175	4,800	670	465	210	1,345
Total need by income	7,470	2,305	420	10,195	1,850	1,500	890	4,240

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	160	230	210	20	620	4	90	59	45	198
Multiple, unrelated family households	4	20	30	0	54	0	15	55	15	85

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	15	35	25	15	90	0	0	0	0	0
Total need by income	179	285	265	35	764	4	105	114	60	283

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

Over one-third of households in Spokane consisted of people living alone, according to 2008-2012 American Community Survey estimates. This will likely increase because of a number of factors – young people starting out on their own, an increasing share of seniors looking for a change in living, and people opting to live independently for other reasons. Not all will be able to achieve this on their own. Certainly low income in relation to housing costs will be a primary contributor to this inability. Economic needs are not the only concern that must be considered going forward, needs also extend to accessibility. Safe housing for seniors on their own and persons with disabilities includes sufficient units on a single level, with safe transportation, near amenities and services.

The Washington Center for Real Estate Research housing market condition report (Spring 2020) for Spokane indicated a demand for smaller rental units. There was a lower vacancy rate for 1-bedroom units and studios (2.1%) than for overall multifamily units (4.3%). A 2016 SLIHC survey limited to publicly-assisted rental housing units in the area revealed a strong demand for housing for singles, particularly studios. The study found that the vacancy rate for studios stood at .2%.

A further view of the need for affordable housing for singles is found in the Spokane Continuum of Care data estimate that in 2020, 1,115 persons in households with only adults experienced homelessness during the annual PIT Count. The vast majority of these households were single persons and 462 were chronically homeless individuals, a particularly vulnerable population.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Victims served by YWCA of Spokane is one way to estimate a need for housing support – in 2014 the agency provided counseling to 1,797 victims and shelter to 465 victims. The Spokane 2020 Point-in-Time Count found 152 of those counted had experienced domestic violence. Certainly domestic violence is a significant contributor to family disruption and homelessness, particularly for those without resources to escape violence on their own. Safe housing for people with disabilities and victims of domestic violence means affordable, secure housing for some and services for most.

Disability-related medical coverage rates and housing assistance needs are linked. In a SFY 2011 report of housing assistance recipients in Washington State indicate that 79% of all HMIS-DSHS clients covered by primarily the Medicaid program (DSHS 2011 - Number 11.166). Results reflect a strong link between participants in DSHS provided medical coverage programming and homeless housing assistance programs with a total of 80% of homeless prevention and Rapid Re-housing participants receiving DSHS medical coverage, 76% of those receiving Emergency Shelter Services, 88% of those receiving Transitional Housing services, and 88% of those receiving Permanent and Permanent Supportive Housing (PSH) Services. Many households living with a disability experience limitations to earning enough income and/or maintaining employment which can lead to episodes of homelessness and significant financial hardship.

What are the most common housing problems?

Housing problems include cost in excess of 30% of household income, lack of complete plumbing/kitchen facilities, and crowding defined as between 1.0 and 1.5 persons per room. Severe housing problems are defined as cost greater than 50% of household income, lack of complete plumbing/kitchen facilities, and crowding defined as greater than 1.5 persons per room. By far the most prevalent problem was cost in relation to income. However, that was not the only problem. An estimated 11,250 renter households and 4,510 owners were living in substandard housing, defined as lacking complete plumbing or kitchen facilities. Another 740 renters and 283 owners were living in severely overcrowded conditions, defined as more than 1.5 persons per room.

According to CHAS data, there were 41,780 households in Spokane with incomes below Area Median (AMI). It is clear from the figures that:

- There were many more renter households than owners with incomes at or below 30% of AMI and with incomes between 30% and 50% of AMI.
- 67% of both renter and owner households with incomes at or below 30% of AMI had one or more severe housing problems . By far the greatest need or condition was cost in relation to income.
- The majority of both renter and owner households with incomes between 30% and 50% of AMI had housing problems.

Are any populations/household types more affected than others by these problems?

It is not possible to draw conclusions from CHAS data regarding needs by household type. The 2015 *State of Washington Housing Needs Assessment* expresses concerns about several populations. By age and composition, elderly households are and will be looking for different types of housing to meet changing needs – possibly smaller rental units. This demand may compete with other renters. Younger householders are also likely to be challenged, particularly by cost. The *Needs Assessment* (page 42) points out that in Washington close to 60% of younger householders (under 24) were burdened by high costs of housing. The report further points out that single person-households (including the elderly) are most cost-burdened – 61% are – compared to other sizes of households. Finally, people with disabilities have as a rule far less to spend on housing and, therefore, most likely to have housing problems.

HOME funds may be allocated to affordable housing projects providing preference to a particular segment of the population. Such preference is permitted for priority need populations identified in the Consolidated Plan housing priority need population (see SP-25 table 53). Such preference is not discriminatory because it promotes HUD-required Affirmative marketing whereby the HOME unit preference provides housing for those least likely to apply.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The most common issues faci

The most common issues facing households at risk of homelessness are lack of income and unaffordable housing. Vulnerable populations need living wage jobs to pay for the adequate housing. Lacking income, housing subsidies to maintain affordable rents are necessary. For many of those at risk, the availability of affordable rental housing with community supports can prevent their homelessness. Rapid Rehousing

resources using the Housing First model of placement is a promising method of preventing homelessness as well as returning persons who have fallen into homelessness, back to stability. For other at-risk persons with major difficulties such as substance use, mental illness or physical illness, the availability of stabilizing housing with supportive services is key. Permanent Supportive Housing is the primary form of housing that can prevent these subpopulations from falling into homelessness or returning to homelessness. Spokane's subsidized rental housing inventory has the variety of housing types needed to help prevent homelessness. However, it lacks sufficient numbers (housing units) to meet all the needs of its at-risk residents, let alone those who are cost-burdened.

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If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

There are no reliable data at the community level to make a valid estimate of the number of households at risk of homelessness. Persons with extreme cost burdens and, in general, populations with very low incomes (30% or less of AMI) are among the most vulnerable to homelessness. While the CHAS data can be a beginning point for estimates in terms of numbers of very low income households, a combination of factors contribute to risk, such as domestic violence, illness, addiction, high health and housing costs, and unemployment.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Among the housing issues facing persons at risk of homelessness are doubling up or overcrowding (often aggravating family dysfunction or domestic violence), substandard housing, high maintenance costs (for

homeowners), unaffordable rental costs, and the high cost of utilities. Homeless providers in the City, via Coordinated Entry Assessments, consider these conditions and seek successful housing placements to prevent returns to homelessness.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

The four housing problems are:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room
4. Cost burden greater than 30%

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,960	1,865	995
White	8,805	1,515	790
Black / African American	300	4	4
Asian	250	45	60
American Indian, Alaska Native	275	139	4
Pacific Islander	165	35	0
Hispanic	675	110	10

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,525	3,070	0
White	7,895	2,570	0
Black / African American	460	179	0
Asian	345	70	0
American Indian, Alaska Native	160	80	0
Pacific Islander	50	4	0
Hispanic	305	120	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,335	8,035	0
White	6,620	6,870	0
Black / African American	135	190	0
Asian	125	310	0
American Indian, Alaska Native	80	100	0
Pacific Islander	10	0	0
Hispanic	175	315	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,030	6,895	0
White	1,905	6,150	0
Black / African American	4	125	0
Asian	60	145	0
American Indian, Alaska Native	30	155	0
Pacific Islander	0	0	0
Hispanic	20	165	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

The four severe housing problems are:

- Lacks complete kitchen facilities
- Lacks complete plumbing facilities
- More than 1.5 persons per room
- Cost burden over 50%

Severe housing problems include:

- Overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms
- Households with cost burdens of more than 50 percent of income

This screen displays:

- Disproportionately Greater Need—Severe Housing Problems 0-30% AMI
- Disproportionately Greater Need—Severe Housing Problems 30-50% AMI
- Disproportionately Greater Need—Severe Housing Problems 50-80% AMI
- Disproportionately Greater Need—Severe Housing Problems 80-100% AMI

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,565	3,255	995
White	7,705	2,615	790
Black / African American	245	65	4
Asian	180	115	60

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	255	159	4
Pacific Islander	165	35	0
Hispanic	595	190	10

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,355	8,240	0
White	3,725	6,735	0
Black / African American	175	455	0
Asian	155	260	0
American Indian, Alaska Native	45	190	0
Pacific Islander	50	4	0
Hispanic	130	290	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,840	13,530	0
White	1,620	11,865	0
Black / African American	50	270	0
Asian	45	395	0
American Indian, Alaska Native	45	130	0
Pacific Islander	0	10	0
Hispanic	20	465	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	325	8,595	0
White	310	7,750	0
Black / African American	0	130	0
Asian	20	180	0
American Indian, Alaska Native	0	185	0
Pacific Islander	0	0	0
Hispanic	0	180	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	55,030	16,710	14,815	1,070
White	49,015	14,445	12,385	865
Black / African American	945	545	435	4
Asian	1,260	465	310	60
American Indian, Alaska Native	735	235	315	4
Pacific Islander	80	20	205	0
Hispanic	1,945	515	635	10

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The median income in Spokane in 2017 was \$44,768. Median household income includes all households, singles and families. Median household income for the City of Spokane was \$7,391 less than for the County, and \$21,406 less than for households in the State overall. Median family income in Spokane was \$59,129, higher than median household income (which may be due to multiple wage earners), but again lower than County and State median family incomes. Median family income includes only households defined by the census as families by relationships, marriage or the presence of children. Median earnings for males working full-time, year-around was about 24% higher than that for equivalently working female workers. Median earnings for all workers was \$12,850 below the median for full-time workers. This indicates that significant numbers of workers in Spokane are likely employed part-time or only seasonally.

HUD periodically identifies by block group the percent of the population living in households earning less than 80% of Area Median Income (AMI). Block groups in which 51% or more of the population live in households at or below 80% of AMI qualify as low-mod areas. The latest HUD tabulations (using 2011-2015 ACS data) showed 118 qualifying block groups in Spokane County.

19.4% of all people in the City of Spokane were living below the poverty line between 2013 and 2017. "ALICE" is an acronym for Asset Limited, Income Constrained, and Employed, which are households with income above the Federal Poverty Level but below the basic cost of living. A household includes all people who occupy a housing unit, but does not include group quarters such as a dorm, nursing home, or prison. According to the 2018 United Way ALICE Report, 38% of all households in Spokane County meet the definition for ALICE.

In Spokane 37% of all female-headed family households (with no husband present) lived in poverty between 2013-2017. The percent of people living in poverty in Spokane was higher in the City in all categories than in Spokane County as a whole or the State of Washington.

White non-Hispanics have a higher poverty index in Spokane, 44.46, compared to 33.51 for blacks (a difference of 10.95 percentage points), 37.24 for Hispanics (7.22 difference), 39.51 for Asians and Pacific Islanders (4.95 difference), and 31.57 for Native Americans (12.89 difference). These disparities persist even when only measuring the population below the federal poverty line: 30.59 for white non-Hispanics, compared to 22.68 for blacks, 24.30 for Hispanics, and 25.37 for Native Americans. Only Asian and Pacific Islanders had a higher Low Poverty Index (34.52) than whites, below the poverty line.

38.5% of all households in Spokane were experiencing at least one of four housing problems in 2013. See HUD AFFH-T Table 9. The percent of white non-Hispanic households experiencing at least 1 household problem was similar, at 37.4%. Black, Hispanic, Asian / Pacific Islander, and Native American households experienced at least one problem at the following higher rates: 49%, 44%, 44% and 48.5%. 19% of all households in Spokane experienced at least one severe housing problem. See Table 9. The rates for white non-Hispanic, Black, Hispanic, Asian / Pacific Islander, and Native American households were: 18%, 31%, 23%, 26%, and 30.5%.

If they have needs not identified above, what are those needs?

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The City of Spokane published an updated Analysis of Impediments to Fair Housing Choice (AI) in 2019. Citizens are encouraged to review the data and maps represented in the 2019 AI to evaluate racial or ethnic groups located in specific areas or neighborhoods in your community (see Section III – page 15). A copy of the 2019 AI can be accessed through the CHHS webpage. Citizens wishing to review a print copy of this document may make a formal request to CHHS (spokanechhs@spokanecity.org).
<https://my.spokanecity.org/chhs/documents/>

NA-35 Public Housing – 91.205(b)

Introduction

A number of nonprofit organizations and governmental agencies provide publicly assisted housing within the City of Spokane. On the federal level HUD and, to a lesser extent, the Veterans Administration, provide housing resources, allowing for deep subsidies to support some of the lowest income populations. Section 8 Vouchers, public housing operating subsidies, HOME funds, Community Development Block Grant and McKinney-Vento Homeless funds are provided by HUD while the VA allocates Housing Vouchers specifically for veterans and their families under the VASH Program.

At the State level, the Department of Commerce’s Housing Trust Fund provides localities with funds for housing development, acquisition, rehabilitation, operations and tenant-based rental assistance (TBRA). In addition, the Washington State Housing Finance Commission assists organizations with homeownership and multifamily rental housing assistance, largely through its programs for low-income housing tax credits.

Locally, the City of Spokane Department of CHHS utilizes resources provided by HUD and the State (primarily through the HOME, Program, CDBG and State pass-through 2160 and 2163 funds generated by local real estate fees). The Spokane Housing Authority operates deep subsidy multifamily programs with HUD program resources and also administers other housing resources with funding from State and local governments to provide, principally, rental housing. The Spokane Housing Authority administers rental assistance programs, including HUD-subsidized project based apartment units and properties with rental assistance “attached” to the unit.

As of 11/1/2019, the Spokane Housing Authority (SHA) no longer owns or operates Public Housing units. SHA has utilized HUD’s Rental Demonstration Program (RAD) to convert all Public Housing units to project based housing vouchers under the Housing Choice Voucher program. In order to ensure that Public Housing participants are not adversely affected by this conversion, the housing authority has created a Relocation Specialist position dedicated to relocating these families to affordable housing units in the community and offering continuing rental assistance through the Housing Choice Voucher program. In addition, all families who were on the Public Housing waiting list at the time of conversion, were given the opportunity to be placed on the HCV waiting list for the same time and date that they had originally applied to the Public Housing Program.

Other local organizations also play key roles in the planning and delivery of publicly assisted housing in Spokane. The Spokane Continuum of Care plans for and allocates McKinney-Vento Program funds, and the Greater Spokane Low Income Housing Development Consortium (Spokane Low Income Housing Consortium or SLIHC) provides a platform for developing partnerships among developers and operators of publicly assisted

housing as well serving as an advocate for lower income affordable housing. Finally, a number of nonprofit housing development and housing operations entities, most of which are members of SLIHC, develop, operate and/or own subsidized housing for residents of Spokane.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	120	4,665	63	4,294	70	73	139

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	12,298	10,710	6,356	10,807	8,598	10,750	
Average length of stay	0	0	5	5	0	5	0	3	
Average Household size	0	0	2	2	1	2	1	3	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	4	125	33	80	4	1
# of Elderly Program Participants (>62)	0	0	7	712	0	695	9	1
# of Disabled Families	0	0	57	2,109	51	1,841	60	11
# of Families requesting accessibility features	0	0	120	4,665	63	4,294	70	73
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	92	3,954	54	3,627	60	65	125
Black/African American	0	0	7	315	3	292	10	2	6
Asian	0	0	6	96	0	96	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	14	280	6	259	0	6	8
Pacific Islander	0	0	1	20	0	20	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	4	184	3	172	3	3	2
Not Hispanic	0	0	116	4,481	60	4,122	67	70	137

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As stated above, SHA no longer owns or manages public housing units. However, that being said, Spokane Housing Authority residents and clients have the same access to the accommodations described below regardless of the type of program that they are part of.

Residents of any property owned or managed by SHA can request a reasonable accommodation or modification at any time. Requests are processed and responded to within a few days. The SHA application form includes a section that provides the applicant with an opportunity to list any specific features or accommodations they may need to accommodate their disability. If a current tenant or applicant needs a specially designed accessible unit and there is an occupant living in the unit not needing the accessibility features, SHA transfers the current resident to a non-accessible unit to make the unit available to the tenant or applicant that does need the features of the unit.

For residents at SHA owned or managed properties, most accommodation or modification requests received by SHA are for service animals, the need for ground floor units, or minor modifications such as grab bars.

In July 2014, the Spokane Housing Authority (SHA) completed a comprehensive program review/unit accessibility review, assessing agency compliance with section 504 requirements. At the time of the report SHA managed 25 substantially accessible units which represented just 3% of the total units. In 2016, SHA converted 11 units at the Valley 206 Apartments to meet 504 standards, with another 3 units converted in 2018 at the Hifumi-En Apartments to meet 504 standards. In 2020, SHA plans to convert 4 more units at their Cedarwest property to also meet 504 standards.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The housing authority last opened its wait list for three days in January of 2016 and received nearly 4500 applications, all of which were placed on the housing authority's waiting list for tenant based housing vouchers. As of March 2020, our waiting list remains closed with over 950 families of the initial 4500 applicants still waiting for a voucher. Nearly 300 of these families have indicated that they have a disabled head or co-head. In addition, there are more than 7500 households currently on our project based waiting lists who are waiting for subsidized units at nearly 20 properties in the Spokane area. It's important to note that a household may be on multiple property lists, so the number 7500 is not a clear indication of how many separate households this number represents, that being said, it still clearly demonstrates the continued need for rental subsidy in the Spokane area. Aside from the immediate need for rental assistance, other needs for many applicants include assistance with paperwork and help obtaining required verifications. Lack of transportation can also be a major barrier to housing for many, particularly for those who are disabled.

Reasonable accommodation requests from voucher holders participating in the Housing Choice Voucher Program primarily involve the extension of voucher search time expiration dates, the need for a larger voucher size, and requests for a larger voucher payment standard.

How do these needs compare to the housing needs of the population at large

The applicants on the current wait lists for housing programs generally have far fewer resources than the households in the population at large. Lack of income and lack of living wage jobs are common among applicants, therefore, their need for affordable units is often greater than the population at large who tend to have more resources and greater incomes. For those households who have a lack of income combined with a disability, and may require the need for both accessibility and affordability, they will have even more limited housing options than the population at large as they compete for the small amount of these units that are currently available in the community.

Discussion

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	19	283	302	745	697	94
Persons in Households with Only Children	1	21	22	88	75	28
Persons in Households with Only Adults	295	690	985	1,162	1,172	65
Chronically Homeless Individuals	84	147	231	180	337	128
Chronically Homeless Families	3	23	26	5	44	136
Veterans	19	66	85	139	86	65
Unaccompanied Child	1	21	22	88	75	28
Persons with HIV	1	7	8	10	10	70

Table 26 - Homeless Needs Assessment

Data Source Comments:

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	720	236
Black or African American	101	20
Asian	3	0
American Indian or Alaska Native	66	33
Pacific Islander	26	3
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	911	290
Not Hispanic	83	25

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Persons in homeless families with children represent about 22% of all homeless persons found in Spokane. Progress in improving the intake and assessment/placement process for families resulted in more families with children are being referred to housing under the Housing First model. The 2020 Point-in-Time (PIT) count identified 343 people in families with children who are experiencing homelessness and of those 8 were unsheltered. Two veterans with families were identified in the PIT count.

Families are particularly vulnerable to lack of affordable housing. This population requires housing affordable to them that is near schools, transportation and job centers. Rapid rehousing resources, including tenant-based rental assistance, are generally a good match for their needs.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The 2020 Spokane County Point-in-Time count indicates that minorities were generally overrepresented among the homeless populations. Racial minority populations in the county make up approximately 11% of the population, they make up approximately 30% of the homeless counted in 2020. By ethnicity, American Indian or Alaskan Natives make up 12% of the homeless population and 2% of the general population; Black or African American individuals make up 7% of the homeless population and 2% of the general population; Native Hawaiian or Other Pacific Islander make up 2% of the homeless population and 1% of the general population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Among those counted in the 2020 Spokane County Point-in-Time count, 67% were temporarily housed in shelters or transitional housing and 33% were unsheltered. The majority of families with children were sheltered (97% were). The majority of single adults (57%) were also sheltered.

Discussion:

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Some populations are especially vulnerable. It is assumed that they will have temporary or long-term requirements for additional support. Those populations are introduced in following sections. While the topics are introduced somewhat independently, the special needs often overlap.

Describe the characteristics of special needs populations in your community:

Seniors: As of 2018, 15.8% of the Spokane population is 65+. At the same time that care needs of an aging population increase, the share of working age individuals will decline relative to the population dependent upon them. The elderly are vulnerable on many fronts. During 2018 in Spokane, the estimated number of seniors ages 65+ living at or below the Federal Poverty Level (FPL) was 6,706, increasing from 4,279, or by 56.7%, since 2005 (Spokane Community Indicators). According to the National Council on Aging, 21% of married Social Security recipients and 43% of single recipients aged 65+ depend on Social Security for 90% or more of their income as of 2016. One-third of senior households in the United States have no money left after meeting essential expenses.

Persons with Disabilities: The 2019 ACS estimates indicate that 10.9% of Spokane's population under age 64 had a disability. People 65+ represent the largest cohort with disabilities at 28.7% (2019 BLS). Workers under 65 with disabilities are overrepresented in entry-level positions with lower earnings, physically demanding, and low-skilled jobs. Statewide, the employment rate of working age people with disabilities was 41.7%, compared with 80.2% for persons without disabilities in WA State (2019 Cornell University). The 2017 ACS indicates that 17.6% were receiving SSI & 23.4% were living in poverty compared to 8.5% of working-age adults without a disability. DSHS served 4,144 clients with developmental disabilities and 18,734 with mental health services in Spokane between July 2016 and June 2017.

Veterans: The majority of homeless veterans suffer from mental illness and/or alcohol or substance abuse. Veterans who have experienced combat may suffer from PTSD and/or have suffered from brain injuries or trauma. These injuries leave them vulnerable to family disruption. Lack of education or training outside of the military adds to the stress of transferring military skills to civilian life. The 2020 Spokane PIT Count identified 143 of homeless persons counted were veterans with 48 being unsheltered.

Substance Abuse: DSHS served 7,045 clients with alcohol and substance abuse-related services in Spokane between July 2016 and June 2017. Most of the services were outpatient treatment and assessments. Substance abuse disorders may accompany mental illness and are often co-occurring disorders. Both mental illness and substance abuse disorders are risk factors of homelessness.

Domestic Violence: DV in the home and in relationships cuts across societal measures – income, occupation, race, and ethnicity. The National Network to End Domestic Violence reports on violence from the perspective of those seeking help from agencies. This is more a snapshot of the more vulnerable – those who experience barriers in escaping violence such as lack of income, lack of personal esteem, immigrant status, absence of family or peer support. The 2019 Domestic Violence Counts statistics for the 24-hour count in Washington State, the Network reported that 2,915 victims were served in one day. A total of 485 unmet requests for services on the one day in September occurred and 73% were for housing and emergency shelter.

What are the housing and supportive service needs of these populations and how are these needs determined?

The aging population will need additional supportive services in the years ahead which are mirrored in other populations with special needs. For all, the overriding understanding is that self-sufficiency and independence are primary goals, while being connected to the community and family. Supportive services and case management are necessary during crisis intervention and stabilization and, for some, on an ongoing basis. For victims of domestic violence and persons with disabilities, the needs go beyond crisis and short-term intervention. A flexible system of support is required to assist the individual or family to achieve self-sufficiency. There is an increased burden on the system of services, on family and on friends for caregiving.

Consistent with Aging and Long Term Care of Eastern Washington spending priorities, discretionary funds in Spokane County are awarded to agencies providing a number of services, top among them are case management, information and referral, home delivered meals, and limited in-home care. Sharing results of recent focus groups in contributing to this Consolidated Plan, ALTCEW identified the need to address high costs of living, the need for “aging friendly” communities (housing on one level, access to amenities), walkable communities (sidewalks clear of snow), and safe and accessible transportation, to name some of the early concerns.

An array of services is available in Spokane for persons with developmental disabilities of all ages, although not enough to meet needs. While needs of persons with intellectual or developmental disabilities (I/DD) depend on the nature and extent of the disability, needs tend to be ongoing, met largely within the family and usually with inadequate additional public support. Family caregivers need support as well, including respite. That many caregivers are aging raises new concerns for the future. The needs are often misunderstood leading to unnecessary social isolation and missed opportunities for fulfilling employment, healthy relationships, and maximum independence.

Providing appropriate and timely assessment, treatment and support services for persons with mental illness is a challenge made more difficult by lack of adequate funding. Contributors to the development of this Consolidated Plan consistently mentioned the need for crisis intervention, housing and supportive services for persons with mental illness. Mental illness is a primary factor in homelessness, including homeless veterans.

In addition to those actually homeless, another estimated 1.4 million veterans nationally are considered to be at risk of homelessness due to poverty and lack of support networks. Housing and services are major needs, particularly affordable housing, medical care, and mental health care. The Veterans Administration has introduced a major national initiative to end homelessness for veterans and to provide an array of services and housing supports to those at risk of homelessness. While still insufficient, the Spokane area has taken advantage of health care for homeless veterans and significant resources for housing vouchers.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to Washington State HIV Surveillance Report (2019), there were 17 new cases of HIV diagnosed in Spokane County, for a total cumulative diagnosis from 2014-2018 of 1922 cases. As of the end of December 2018, 652 persons in Spokane County were known to be living with HIV (not AIDS). The local incidence of HIV/AIDS is relatively small; however, the disease is becoming more prevalent in suburban and rural areas. In addition 24% of new cases in Spokane County were late HIV diagnoses (diagnosed with AIDS within 12 months of being diagnosed with HIV).

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The City of Spokane has been a supporter programs and facilities that provide programming to seniors, youth, homeless, persons with disabilities, victims of domestic violence, community health and other services. CHHS supports each of the four community centers with general operation support and necessary capital facility improvements. The four community centers include:

- **Northeast Community Center**
- *4001 N Cook St, Spokane, WA 99207*
- **MLK/East Central Community Center**
- *500 S Stone St, Spokane, WA 99202*
- **West Central Community Center**
- *1603 N Belt St, Spokane, WA 99205*
- **Southwest Community Center**
- *310 S Spruce St, Spokane, WA 99201*

<https://my.spokanecity.org/recreation/facilities/>

The City of Spokane has worked with community centers to complete capital needs assessments to assist with prioritizing public improvements. Several facilities are in need of roofing, flooring, and HVAC improvements. Public facilities are an essential investment for the City of Spokane to support programming for low and moderate income individuals. Examples include: homeless day facilities, senior centers, youth and child care facilities, and meal programs.

The City of Spokane also updates annually a Capital Improvement Plan for public facilities. For more information, please visit: <https://my.spokanecity.org/projects/capital-programs/>.

How were these needs determined?

The City of Spokane works closely with community service providers to help determine community need. Community input is provided via boards and committees help formulate funding priorities and address pressing community needs related to affordable housing, homeless services, and community based services for seniors, youth, child care, and meal programs. Each service/program is tied to a capital facility that required ongoing maintenance to ensure a safe delivery of program.

Describe the jurisdiction’s need for Public Improvements:

Many of our programs deliver services in aging facilities where operation costs create barriers. Many of our community based service providers seek assistance from the City of Spokane to repair damaged

and/or broken facilities. Examples include: roofs, security improvements, HVAC, windows, parking lots, accessibility improvements, etc. The City relies on partner agencies to deliver program through facilities open to the public. Investing in these facilities ensures sustainable service delivery for low and moderate income individuals.

How were these needs determined?

The City of Spokane relies on partner agencies to evaluate their facilities and make funding application based on the most pressing needs. An example of community based needs came from a partnership with a local public health provider. Through data analysis, this public health provider was able to determine several areas within the City that had limited access to oral health care. The City of Spokane partnered with this organization to remodel an existing healthcare facility. This facility has become a community asset for individuals and families with limited, or no access to oral healthcare. Community partnerships are essential when determining the greatest needs for public infrastructure investments.

Describe the jurisdiction’s need for Public Services:

Community stakeholders have expressed the need for improved access and capacity for public/social services to assist low and moderate income individuals. The Spokane community has a particular need for services that assist individuals with barriers to employment and job skills training. Moreover, there is a significant need for services that assist working parents with childcare needs during nontraditional hours of operation (8am – 5pm). Evening and weekend childcare is a particular community need to assist parents working jobs outside the typical Monday – Friday workweek. Additional public service needs include food security, enhanced transportation services, service that support long-term housing stability, and services to address behavioral health and victim services.

How were these needs determined?

During the development of this 2020-2024 Consolidated Plan, several key public services were identified to support low and moderate income individuals. During late 2018, CHHS partnered with community based organizations to develop a list of priorities to address growing needs for public service type activities. CHHS developed workgroups for the following priorities: Food Security, Workforce Development, and Community Services. Workgroup recommendations helped to establish the need for community base social service programming with a focus on the following key areas:

- Food Security
- Workforce Development
- Housing Stability
- Childcare
- Transportation

- Behavior and Victim Services

For more information regarding the need for community based social service programming, please visit the strategic plan section of this document (SP-25 & SP-45).

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Spokane region has experienced significant strains on the number and availability of affordable housing units. The following bullet points were taken from the Spokane Low Income Housing Consortium's (SLIHC) 2018 annual report (http://www.slihc.org/uploads/2/5/6/1/25613358/2018_annual_report_1.pdf):

- There are only 30 affordable housing units available for every 100 people of Extremely Low Income - \$24,350 for a household of 4.
- 53.1% of Spokane County renters are rent burdened – paying more than 30% of their income on housing.
- We have about 8,000 quality, publicly-financed rentals in Spokane County. The Spokane Housing Authority circulates over 4,000 tenant-based vouchers. Given these resources, about 13,000 households are likely rent-burdened and/or live in substandard housing.
- The vacancy rate among affordable rental homes is under 2%.

For more access to the most current housing data, please visit the Spokane Community Indicators Project: <http://spokanetrends.org/>

In 2019, the Washington Legislature passed E2SHB 1923 to increase residential capacity in cities across Washington. The bill emphasizes the need to increase housing supply for all income levels, and encourages cities to prioritize the creation of affordable, inclusive neighborhoods. The City of Spokane received a grant from Commerce to develop our local housing action plan. This planning process builds on previous City initiatives around infill housing and housing choice, safe and quality housing, affordable housing construction, and re-housing for those experiencing homelessness.

The Housing Action Plan will follow a data-driven, community-informed approach with a focus on equity built on inclusive outreach and engagement with residents, partners, and City leaders. The plan will be developed in collaboration with a stakeholder working group and public input throughout the process, and data and evidence will build a common and accurate understanding of current and future housing needs. The core part of this will be to conduct a housing needs assessment to help us answer questions about our community's housing needs.

The Housing Action Plan will work to answer these important questions and more:

- How much housing, and what types of housing, are needed to meet current and future housing needs?
- How effective are our current policies at increasing options and supply?

- How do we encourage the development of housing for all income levels, including low-income, moderate, and market rate housing?
- What strategies can the City consider to minimize and prevent displacement of low-income residents to support equitable growth for all?
- How can the City, residents, property owners, service providers, businesses, and non-profits work together to improve Spokane's housing options?

Citizens are encouraged to participate in the City of Spokane Housing Action Plan to help address the housing market needs within our community. For more information, please visit:

<https://my.spokanecity.org/housing/spokane-housing-action-plan/>

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

City of Spokane planning is creating the Housing Action Plan to identify gaps in housing supply and recommend methods to reduce housing gaps for owners and renters at all income levels. As Spokane grows, we are facing a gap in housing supply. The plan will provide a strategic approach to quantify housing gaps and address current and future housing needs of the Spokane community. When completed, it will provide a coordinated vision that supports more people being able to find a home that meets their needs with access to opportunities, services and amenities. This process builds upon previous community discussions and initiatives around infill development, housing quality, and affordable housing funding.

The supply of available housing has been very limited throughout Spokane County over the past several years. The result has been increased housing costs and limited market mobility for renters and homeowners. The Housing Action Plan and other planning efforts are designed to address provide relieve to our tight real estate market.

The following bullet points come from the Spokane Trends website. By comparison to Washington State as a whole, Spokane County has a significantly lower monthly supply of housing in all home value categories.

Where are we?

During the fourth quarter of 2019 (19Q4) in Spokane County, the number of month's supply of housing was:

- 0.4 months for homes valued at less than \$80,000, decreasing from 3.3 in 15Q4.
- 0.4 months for homes valued at \$80,000-\$159,999, decreasing from 4 in 15Q4.
- 0.4 months for homes valued at \$160,000-\$249,999, decreasing from 3.3 in 15Q4.
- 0.8 months for homes valued at \$250,000-\$500,000, decreasing from 4.5 in 15Q4.

By comparison during the fourth quarter of 2019 (19Q4) in Washington State, the month's supply of housing with a value of:

- 1.8 months for homes valued at less than \$80,000, decreasing from 3 in 15Q4.
- 1.5 months for homes valued at \$80,000-\$159,999, decreasing from 3.3 in 15Q4.
- 1 months for homes valued at \$160,000-\$249,999, decreasing from 2.2 in 15Q4.
- 0.9 months for homes valued at \$250,000-500,000, decreasing from 2.3 in 15Q4.

Data Sources: University of Washington: Runstad Department of Real Estate - Archived Reports

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	63,055	66%
1-unit, attached structure	2,615	3%
2-4 units	6,915	7%
5-19 units	10,330	11%
20 or more units	11,480	12%
Mobile Home, boat, RV, van, etc	1,489	2%
Total	95,884	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	100	0%	2,475	6%
1 bedroom	1,080	2%	10,940	28%
2 bedrooms	11,770	24%	15,450	40%
3 or more bedrooms	35,660	73%	10,145	26%
Total	48,610	99%	39,010	100%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Federal, state, and local affordable housing programs are targeted to assist renter and owner families at or below 80% of Area Median Income. Most of these programs are targeted to helping low- and extremely-low income households find and maintain affordable housing. For example, the City of Spokane utilizes federal funds to create affordable housing. Currently, there are 75 affordable housing units under construction with an additional 112 expected to be constructed within the next year. City of Spokane continues to offer these funds to attract additional affordable housing development. The City of Spokane also pursues available state sales tax funding to create and support additional affordable housing. When available and programmed, these funds will create additional units of affordable housing.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The City of Spokane does not expect to lose units of affordable housing. Efforts are underway to improve/update and expand the current portfolio of affordable housing in the City of Spokane. The City of Spokane has partnered with several local affordable housing providers to build new affordable housing units.

Does the availability of housing units meet the needs of the population?

Not at this time. The City of Spokane and surrounding region have a shortage of available housing for all income types. This shortage has driven up pricing for rentals and single family homes. In 2018 the rental vacancy in Spokane County was 3.7%. In 2005 the rental vacancy rate was 5.1%

The rate of vacancies is due to several forces: changes in the supply of rental properties, changes in the number of people seeking rentals, as well as a "frictional" level of empty properties due to a timing gap between move-outs and move-ins. The rental market is, in turn, affected by the strength of the owner-occupied housing market. Key determinants of owner-occupied housing in the County are population growth and income growth.

Homeownership has struggled to keep up with the changing market conditions. During calendar year 2018, the share of households who own their home in the City of Spokane was 56.4%, decreasing from 59.1% in 2007. During the fourth quarter of 2019 (19Q4), the median resale value of homes in Spokane County was \$276,900, increasing from \$170,200 or by 62.7% since 09Q4.

Describe the need for specific types of housing:

The City of Spokane is in need of available housing (rental & ownership) for all income levels. Affordability remains a concern for the community as prices in all housing types continues to rise. The Community, Housing and Human Services Department of the City of Spokane continues working with partner agencies and local government to address the growing need for permanent supportive housing. A growing homeless population has placed additional pressure on shelters and affordable housing options that transition individuals and families into permanent housing.

Elderly populations are in need of affordable housing options within our community. Aging and Long Term Care of Eastern Washington has identified Affordable and accessible housing as a primary need for aging populations.

Discussion

The City of Spokane has developed several housing specific programs to address the needs of all populations. The Single-family Rehab program provides homeowners with limited incomes an

opportunity to make important improvements to their home to maintain safe, stable, and affordable housing. The Essential Home Repair program assists homeowners in need of small repairs to maintain housing stability. The Rental Repair Program assists property owners to make necessary improvements to affordable rental units within the City of Spokane. The Derelict Housing Program helps qualified low and moderate income individuals purchase homes that have been rehabilitated.

The HOME Multifamily Housing Program provides additional funding to leverage the construction of new affordable housing units within the City. Needs and populations change over time as market conditions fluctuate from year to year. The City of Spokane will continue collaboration with local housing providers to address the needs of renters and homeowners. Completion of the Housing Action Plan will further assist our efforts to address targeted areas of need within our community.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Housing affordability remains a primary concern within the Spokane community. Homeownership and rental housing has become more of a financial burden for Spokane residents over the past 10 years. The increasing costs of housing make it more difficult for individuals and families to afford other basic needs. The result is greater housing instability and greater probability of homelessness for individuals and households with annual income less than 80% area median income.

Where are we?

During the fourth quarter of 2019 (19Q4), the **median resale value** of homes in:

Spokane County was \$276,900, *increasing* from \$170,200 or by 62.7% since 09Q4.

Where are we?

During 2018, the annual income needed to afford fair market rent for a **one-bedroom** living space in:

- Spokane County was \$26,080, *increasing* from \$20,480, or by 27.3% since 2008.

During 2018, the annual income needed to afford fair market rent for a **two-bedroom** living space in:

- Spokane County was \$34,680, *increasing* from \$26,960, or by 28.6% since 2008.

Where are we?

During 2018 the total number of renters with **30% or more** of their household income going towards housing costs in:

- The City of Spokane was 18,522, *increasing* from 14,658 or by 21% since 2006.

During 2018, the share of renters who were paying **30% or more** of their household income for rent in:

- The City of Spokane was 45.9%, *increasing* from 41.1% in 2006.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	155,100	159,400	3%
Median Contract Rent	547	639	17%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	10,280	26.4%
\$500-999	24,390	62.5%
\$1,000-1,499	3,185	8.2%
\$1,500-1,999	725	1.9%
\$2,000 or more	430	1.1%
Total	39,010	100.0%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,895	No Data
50% HAMFI	11,625	3,115
80% HAMFI	26,920	11,555
100% HAMFI	No Data	18,335
Total	41,440	33,005

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	553	652	867	1,240	1,431
High HOME Rent	553	652	867	1,121	1,231
Low HOME Rent	553	616	740	854	953

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Spokane needs more permanent affordable housing at all income levels. The shortage of available affordable housing is pressuring other support services within our community. Homelessness remains a top priority within the City of Spokane. There is a growing need for housing interventions that assist very low income individuals and households. Affordable/subsidized single- and family-sized units are needed throughout the City to address the growing needs.

How is affordability of housing likely to change considering changes to home values and/or rents?

Housing costs are expected to continue to rise for the foreseeable future due to housing demand exceeding supply. This applies to both renter and owner occupied housing. Although area incomes are generally rising, housing costs are rising at a faster rate. This impacts working household ability to enter the housing market and significantly challenges fixed and limited-income households where rent increases outpace increased income.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HUD's Fair Market Rent is a reasonable approximation of Spokane area rents, as a whole. This is due to the fact that Spokane's housing inventory is predominantly housing constructed prior to 1950. This "naturally affordable" housing typically less costly to rent or buy but requires more maintenance and utility expense. To preserve affordability for the majority of Spokane homes, the City offers home repair assistance to low-income homeowners and rental property owners. This low-cost financing can help preserve safe and quality housing that also remains affordable at or below market rents.

Discussion

Both housing preservation and new construction will play critical roles in the cost of Spokane housing. Spokane's housing stock must be preserved as a source of quality and affordable housing for renters and buyers. Housing supply must also increase to relieve high housing demand and provide move-up opportunity for renters and owners with financial capacity.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The City of Spokane has over 87,000 housing units which is mostly comprised of older (pre-1979 construction) housing. The result is a large quantity of housing units although most units require increased maintenance and/or substantial repair due to advanced age and building component lifespan.

The City has over 31,000 housing units built prior to 1950 which is a housing category with increased incidence of lead-based paint. Deteriorated lead-based paint can present an in-home health hazard to occupants, particularly children under 6 years. The City also has over 32,000 homes built between 1950 – 1979 when residential sewer connections were commonly made with Orangeburg sewer pipe. This compressed tar paper has a 40 to 50-year intended lifespan. Pipe failure can cause sewage backup into a home and require costly replacement.

Alternately, “naturally occurring” affordable housing is more prevalent where older homes cost less to lease or purchase but maintenance and utility costs are higher than newer construction. Consequently, Spokane homeowners and renters may find Spokane real estate prices affordable when compared to state averages. However, monthly family budgets must accommodate higher costs for utilities and maintenance.

Definitions

For purposes of this Consolidated Plan, units are in substandard condition if they cannot meet HUD Housing Quality Standards (HQS) per 24 CFR 982. These units do not meet one or more of HUD’s HQS physical inspection criteria.

For the purposes of this Consolidated Plan, units are substandard and not suitable for rehabilitation if repair costs exceed the lesser of property replacement value or value of surrounding properties. This condition can result from excessive deferred maintenance, significant structural deficiency, or health/safety condition(s).

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	12,370	25%	18,775	48%
With two selected Conditions	255	1%	1,220	3%
With three selected Conditions	55	0%	50	0%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With four selected Conditions	0	0%	0	0%
No selected Conditions	35,940	74%	18,965	49%
Total	48,620	100%	39,010	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,605	9%	4,295	11%
1980-1999	8,085	17%	6,845	18%
1950-1979	17,550	36%	14,595	37%
Before 1950	18,375	38%	13,265	34%
Total	48,615	100%	39,000	100%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	35,925	74%	27,860	71%
Housing Units build before 1980 with children present	3,850	8%	2,090	5%

Table 35 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

Most of the housing in Spokane was built more than 30 years ago. These older homes frequently require substantial reinvestment to repair/replace aged building systems. Deferred maintenance can result in significant housing quality deficiencies or failures, significant repair costs, and potentially housing loss due to substandard housing.

A key strategy to preserving affordable housing is maintaining the existing housing stock. Benefits of home maintenance include safe and sanitary housing as well as preserving home values and desirability of neighborhood housing. To that end, the City of Spokane allocates funds to these home repair programs:

- **Essential Repair:** many homes require only periodic assistance with relatively minor but critical building systems. These repairs help keep a home safe and livable. These repairs include handicap accessibility, plumbing leaks, sewer line clearing, electrical problems, roof leaks, heating system failures, and water heater replacement. The City offers this program assistance as grants to low-income homeowners with a limit on maximum funding assistance.
- **Single Family Rehabilitation:** some homes require more extensive rehabilitation due to more substantial deferred maintenance. Rehabilitation items often include roof replacement, furnace replacement, new electrical service, bedroom egress window installation, sewer line replacement, flooring replacement, and structural repair. Many of these projects occur in housing built before 1978 and will include lead-based paint testing and remediation. The City offers the Single Family Rehabilitation program that provides grants and low-interest loans to complete these more substantial repairs to restore safe and healthy homes while preserving housing affordability.
- **Rental Repair:** some small rental properties require rehabilitation where owners lack funds or financing. Rehabilitation items vary by project but frequently include roof replacement. Improvements for marketability and exterior appeal are also allowed. The City offers the Rental Repair program that provides low-interest loans to owners of 7-unit and smaller rental properties to improve rental housing quality while preserving affordable rents.
- **Multifamily Housing Program:** there is a need to preserve and increase the supply of rental housing leasing at below Fair Market Rent. The City offers the Multifamily Housing Program providing grants and loans to affordable housing developers who will purchase, rehabilitate, and/or construct rental housing having caps on renter income and unit rent.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Lead in paint was banned in 1978. Consequently, homes built prior to 1978 may contain leaded paint. City of Spokane experience gained during the Lead Safe Spokane program (2004-2012) found that most homes built before 1940 will contain some degree of leaded paint. The American Community Survey estimates that 74% of owner-occupied and 71% of renter-occupied housing units were built

before 1979 and may contain leaded paint. Further, 38% of owner-occupied and 34% of renter-occupied housing units were built before 1950 and likely have a higher incidence of leaded paint. American Community Survey data also estimates that 8% of owner-occupied and 5% of renter-occupied housing units (a total of over 5,900 housing units) have children present in the home. Lead-based paint risks are present in a Spokane housing. Consequently, lead-based paint testing and remediation is a component of all CHHS housing rehabilitation projects in pre-1978 housing.

Discussion

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Created in 1972 by the City of Spokane, the Spokane Housing Authority (SHA) serves Spokane, Lincoln, Pend Oreille, Stevens, Ferry, and Whitman counties.

SHA annually provides housing assistance to over 5,500 families of low income through a combination of tenant-based rental assistance, project-based rental assistance, SHA-managed apartment communities, and scattered-site housing.

For more information, please visit:

- <http://www.spokanehousing.org/default.htm>
- http://www.spokanehousing.org/PDF/plansandreports/_AdminPlan-10-01-2019.pdf

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	125	4,724	102	4,622	571	842	1,569
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

As of 11/1/2019, the Spokane Housing Authority (SHA) no longer owns or operates Public Housing units. SHA has utilized HUD's Rental Demonstration Program (RAD) to convert all Public Housing units to project based housing vouchers under the Housing Choice Voucher program. This process began in 2016 with the conversion of 50 public housing units at the Parsons Apartments, and was completed in November of 2019 with the conversion of 74 scattered site properties which represented the remaining public housing units operated by the housing authority. In order to ensure that Public Housing participants are not adversely affected by this conversion, the housing authority has created a Relocation Specialist position dedicated to relocating these families to affordable housing units in the community and offering continuing rental assistance through the Housing Choice Voucher program. In addition, all families who were on the Public Housing waiting list at the time of conversion, were given the opportunity to be placed on the HCV waiting list for the same time and date that they had originally applied to the Public Housing Program.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Not applicable – see narrative above. For more information, please contact the Spokane Housing Authority (<http://www.spokanehousing.org/>).

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Not applicable – see narrative above. For more information, please contact the Spokane Housing Authority (<http://www.spokanehousing.org/>).

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Spokane completes a homeless Housing Inventory Chart (HIC) annually to monitor system capacity and establish housing needs for individuals and families experiencing homelessness. CHHS posts the annual and historic homeless HIC on the HMIS program page. For more information regarding current and past capacity, please visit: <https://my.spokanecity.org/chhs/hmis/reports/>.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	187	70	185	205	0
Households with Only Adults	511	221	91	634	0
Chronically Homeless Households	0	0	0	408	0
Veterans	0	0	26	272	0
Unaccompanied Youth	33	0	9	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Data provided by City of Spokane Homeless Management Information System

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Homeless providers in the Spokane Continuum of Care have been meeting regularly over the years to coordinate the use of mainstream resources and to assure that eligible clients receive benefits for which they are eligible. All major federal mainstream services are available in the community and staff are periodically trained on program provisions and accessibility through SOAR. Mainstream services programs include TANF, WIC, Food Stamps, Medicare, Medicaid, Veterans Healthcare, SSI, and SSDI.

The Spokane Resource Center, a U.S. Department of Housing and Urban Development (HUD) EnVision Center offers help with housing, cultural, financial, legal, pre-employment, and health services. Over 15 area providers work in a one-stop model to provide wrap around services. Many of the mainstream resources are obtained through the Community Services Offices of the Washington State Department of Health and Human Services, the Spokane County Department of Health, the Veterans Administration Offices and Social Security. Case managers from homeless housing providers and service agencies closely coordinate with the local offices to assure appropriate services are made available to their clients and are actually accessed.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

As the table of services in SP40 indicates, a variety of non-mainstream services are available in the Continuum of Care (CoC). A Homeless Pocket Guide was developed that provides contact information for accessing the primary homeless prevention and homeless services resources. Detailed information on specific housing and services resources can be found in the guide found at www.snapwa.org.

The Spokane regional coordinated entry process includes access to diversion programs to prevent individuals and families with children from entering the crisis response system by assisting with their access to community resources. Households at-risk of homelessness with disabilities deemed eligible the WA State Department of Social and Health Services may receive long-term rental assistance through the Housing and Essential Needs program to prevent their homelessness. An intentional shift to focus on permanent housing exits when households enter the homeless system has been transforming the City's homeless system over the past few years. As a result, much of the CoC's efforts to serve homeless households are focused on rapid re-housing rental assistance programs tailored to meet the specific needs of individuals, families with minor children, and young adults. Households who present as chronically homeless with very high barriers may be placed directly into available PSH units or available bridge housing, but are also given the opportunity to obtain permanent through rapid re-housing. Through Medicaid Transformation, overseen by the WA State Healthcare Authority, has allowed providers to offer greater supported employment and housing assistance through the Foundational Community Supports (FCS) program.

The Supportive Services for Veteran Families (SSVF) program provides an essential resource for Veterans and their families who are homeless or at risk. SSVF provides intensive outreach, housing search and placement and continued case management for this population. For Veterans who need more intensive housing services, Spokane Housing Authority (SHA) has a successful partnership with the Veterans Administration to provide VASH vouchers to homeless veterans. All referrals are made through the VA, who also provides complete wrap-around supportive services. Veterans that are not eligible for these programs are prioritized for placement in PSH dedicated to chronically homeless veterans.

The Young Adult Housing Program (YAHP) from the Washington State Department of Commerce's Office of Homeless Youth has provided the community with an essential new resource for the provision of rent assistance, transitional housing, and case management for young adults ages 18 through 24. YAHP provides young adults with housing search assistance, temporary rental assistance, and case management as well as access to transitional or interim housing during the housing search process for youth with the highest barriers.

HOME Tenant-Based Rental Assistance, granted to Spokane Housing Authority, continues to be a critical tool in achieving permanent housing for families and individuals experiencing homelessness.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Over the course of July 2016 - June 2017, the Washington State Department of Social and Health Services (DSHS) served 47% of the Spokane County population via one of their programs. This figure is indicative of the varied needs of Spokane residents which include social support programming for increased independent living and support for seniors; substance use disorder treatment programming; a myriad of services to youth to support their safety and well-being; family support services; developmental disability services including care facilities; Economic Services such as Aged, Blind or Disabled (ABD) Assistance, child support services, emergency Assistance, Housing and Essential Needs (HEN) referrals, SSI-State, TANF and State Family Assistance, and child care services; Medical and mental Health Services; and Vocation Rehabilitation Services.

More than one third of households across the nation live in rental housing. Some households have chosen rental housing due to convenience, cost, or other reasons. Others, particularly lower income families, live in rental housing because homeownership is out of reach. Affordable rental housing for this population is very important not only for the families themselves, but for our communities as a whole.

According to Spokane Community Indicators, during 2018 in **Spokane County**, the estimated:

- Renter median household income was \$36,104, increasing from \$21,818, or by 65.5% since 2005.
- Income needed to afford median rent was \$36,840, increasing from \$24,360, or by 51.2% since 2005.

During 2018, the estimated difference between the median household income of renters and the income needed to afford median gross rent, the housing wage gap, in:

- **Spokane County** was -\$736, compared to -\$2,542 in 2005.
- **Washington State** was -\$1,669, compared to -\$96 in 2005.
- **The U.S.** was -\$1,789, compared to -\$869 in 2005.

As the gap between wages and income continues to increase, residents in Spokane will continue to struggle to meet their basic needs. Social programs and economic assistance needs will continue to increase and require additional support from other funding programs to continue to provide the support these households need to remain independent both physically and financially to avoid crises such as unemployment, episodes of homelessness, domestic violence, and food insecurity.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families,

public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The frail elderly and persons with mental illness, substance abuse, HIV/AIDs developmental disabilities or physical disabilities require long-term housing and services. Housing provided through a range of nonprofit organizations can stabilize these populations and are available throughout the City. Housing facilities available include Inland Empire Residential Resources, ARC of Spokane, Pioneer Human Resources, Frontier Behavioral Health, Catholic Housing Communities, and Volunteers of America. In addition, there are a number of residential communities for seniors that provide supportive housing for the elderly and disabled. Vacancies at many of the facilities are infrequent, indicating a need for more housing resources.

Persons with severe disabilities require permanent supportive housing in which supportive services are provided in a trauma-informed manner to address barriers to maintaining housing and aid in connection to mainstream benefits. People experiencing trimobidity can face barriers to accessing and working through systems of care in which navigators and clinicians can work together with the client to address their needs. The 2020 Point-In-Time Count conducted by the Spokane City/County Continuum of Care indicated that 462 chronically homeless persons were seeking services on this one night in January. People experiencing long-term homelessness have increased medical, mental health, and/or substance use treatment/counseling need that continue once housing is obtained.

Aging and Long Term Care of Eastern Washington (ALTCEW) is the designated Area Agency on Aging. In the 2020-2023 Proposed Plan, the agency set a number of priority issue areas including: healthy aging; mental health & aging; community based supports; Medicaid supported services; and planning with Native American Tribes and Tribal Organizations. ALTCEW continues to work to increase access to and utilization of community resources available to the againing population. The cost for long-care care (in-home) dramatically increases the amount of income a senior, or person with disabilities, needs to be secure. The Elder Economic Security Index (2019) indicates that a single person household renter with poor health would need to maintain \$24,300 per year or \$2,025 per month in income in Spokane County. The greater the assisted living care that the aging population needs significantly increases the income required to sustain independent living. High medical costs, especially amongst the aging population, is a contributing risk factor in potentially experiencing homelessness.

According to data compiled by the Washington State Coalition Against Domestic Violence, having limited options for economic stability can keep victims in relationships with violent abusers. Lack of affordable housing options and income are significant barriers to escaping abuse. Washington State tracks domestic violence-related deaths. While no person in imminent danger is turned away from shelter, making the transition to safety is met with multiple barriers – lack of affordable housing, lack of legal representation, finding suitable employment, and recovering from abuse. While victims of domestic violence are protected from discrimination, the presence of protective orders alone can persuade landlords against renting.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

An agreement between the Regional Support Network (RSN) and Eastern State Hospital facilitates continuity of service supports for persons exiting to the community from the mental health hospital. In addition, the RSN, which provides community-based mental health services for outpatients, works closely with Frontier Behavioral Health Outreach, the Spokane County Supportive Living Program and Behavioral Health Options to create supportive housing placements. The Spokane Continuum of Care, through the the outreach network and funding support, provides outreach and housing for chronically homeless persons with medical needs. In addition, a medial respite program (in collaboration with Providence Health Care, Catholic Community Services and Volunteers of America) provides interim housing while longer-term supportive housing is being identified. The Roads to Community Living Program coordinates with group homes, private landlords and assisted living programs to place Medicare-eligible persons discharging from hospitals, nursing homes and mental health facilities in appropriate housing, including supportive housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The Consolidated Plan and the 2020-2025 Spokane Regional Plan to Prevent and End Homelessness both lay out strategies to be employed in increasing supportive housing and services for persons with special needs. The Consolidated Plan goals of preventing homelessness and creating stable, expanding affordable housing and improving the quality of life are being accomplished through nonprofit and governmental partnerships to create new affordable housing for the most vulnerable populations, including those with disabilities. Additionally, specific actions include funding new affordable multifamily housing, supporting tenant-based rental assistance, improvements to transitional and permanent supportive housing programs, housing counseling programs, senior food programs, Emergency Solutions Grant support to prevention and homeless programs, and youth development programs.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Spokane plans to address housing and supportive service needs during the 2020 program year (7/1/20-6/30/21) but funding activities that specifically address the needs and goals outlined in the

strategic plan. Readers are encouraged to review the list of projects/activities (AP-35) the City will fund for more information. Examples include:

- Food Security
- Dental Voucher
- Community Center Operations
- Homeownership Program
- Homeless Day Center Services for Women
- Youth Development Program
- Food Security Program for Women and Children
- Workforce Training Program for Victims of Domestic Violence
- Single Family Rehab Program
- Essential Repair Program
- COVID-19 Response

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Spokane and State of Washington have enacted legislation to reduce evictions, expand funding, and increase density for affordable housing. The City has not observed negative effects on affordable housing or residential development. Public engagement during the legislative process has eliminated or revised early proposals based on potential negative effects. This public process will produce more affordable housing funding and opportunity.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The Spokane, Washington region is a vibrant metropolitan center serving as the economic, educational and cultural hub of the Intermountain Northwest. Our community has co-created an urban hub that is distinguished by available talent, a thriving business climate and a collaborative spirit to support businesses across a diversity of industries.

The hub serves 2 million people, services, and supply chain businesses, and boasts an attractive cost of doing business—18 percent below the national average. The region’s available workforce, affordable land, buildings, and space, combined with renewable hydroelectric power and some of the lowest rates in the nation, presents an attractive environment for startups and companies allowing them to minimize their cost of operations.

For more information about the Spokane regional economy please visit the following websites:

- <http://spokanetrends.org/index.cfm>
- <https://spokaneworkforce.org/>
- <https://advantagespokane.com/>

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	800	277	1	0	-1
Arts, Entertainment, Accommodations	10,009	12,307	14	13	-1
Construction	3,857	4,585	5	5	0
Education and Health Care Services	19,782	31,575	27	33	6
Finance, Insurance, and Real Estate	5,447	8,160	7	8	1
Information	1,390	2,122	2	2	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Manufacturing	5,935	4,469	8	5	-3
Other Services	2,769	3,380	4	3	-1
Professional, Scientific, Management Services	5,951	9,610	8	10	2
Public Administration	16	0	0	0	0
Retail Trade	11,123	13,632	15	14	-1
Transportation and Warehousing	2,219	1,947	3	2	-1
Wholesale Trade	4,202	4,925	6	5	-1
Total	73,500	96,989	--	--	--

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	102,023
Civilian Employed Population 16 years and over	92,895
Unemployment Rate	8.95
Unemployment Rate for Ages 16-24	24.09
Unemployment Rate for Ages 25-65	5.89

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	21,205
Farming, fisheries and forestry occupations	4,230
Service	12,445
Sales and office	22,860
Construction, extraction, maintenance and repair	6,095
Production, transportation and material moving	4,135

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	69,700	80%
30-59 Minutes	14,900	17%
60 or More Minutes	2,605	3%
Total	87,205	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,420	520	4,215

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	16,785	2,025	8,500
Some college or Associate's degree	28,485	3,055	11,240
Bachelor's degree or higher	25,900	910	5,140

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	130	535	565	1,160	1,410
9th to 12th grade, no diploma	2,400	2,070	1,115	2,710	2,245
High school graduate, GED, or alternative	7,460	8,770	5,688	12,900	8,670
Some college, no degree	10,633	8,950	6,693	13,660	7,265
Associate's degree	1,250	4,070	2,945	6,670	2,005
Bachelor's degree	2,423	6,380	4,910	8,615	4,770
Graduate or professional degree	80	2,790	3,375	6,055	3,515

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	17,986
High school graduate (includes equivalency)	60,334
Some college or Associate's degree	66,754
Bachelor's degree	110,742
Graduate or professional degree	137,837

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Spokane County is the largest labor market in Eastern Washington and Northern Idaho. The local economy survived the Great Recession and emerged more diversified, and steady growth is forecasted

for the future. Spokane has experienced a significant increase in private sector jobs starting in 2014 and we expect these increases to continue in 2016 and beyond. Key industries that are posting increases and emerging as foundation industries for the region are transportation/warehousing, manufacturing, healthcare, finance/insurance, and professional, scientific and technical. Not only are high wage jobs being created but an increasing number of replacement workers are needed for workers who are retiring in these key industries.

Finance & Insurance: Spokane's Finance and Insurance sector offers the highest average annual wages of the five Targeted Industries.

- 10,174 Employed
- \$84,252 Average annual wage

Healthcare: The Healthcare and Social Assistance sector is by far the fastest growing industry in Spokane County.

- 46,321 Employed
- \$52,352 Average annual wage

Manufacturing: The Manufacturing industry in Spokane County has rebounded over the last decade with steady year-over-year job growth.

- 16,801 Employed
- \$54,523 Average annual wage

Professional, Scientific, & Technical Services: The Business and Professional Services sector and its Professional, Scientific, and Technical Services subsector is another vital and growing component of the Spokane area economy.

- 11,792 Employed
- \$61,360 Average annual wage

Transportation & Warehousing: The Business and Professional Services sector and its Professional, Scientific, and Technical Services subsector is another vital and growing component of the Spokane area economy.

- 9,520 Employed
- \$53,812 Average annual wage

For more information, please visit: <https://spokaneworkforce.org/targeted-industries/>

Describe the workforce and infrastructure needs of the business community:

A key component of the workforce roadmap studies conducted by Camoin Associates, which analyzed the regional workforce needs in four of the five targeted sectors (a Healthcare roadmap was completed in June 2015), was distribution of an employer survey. Among all sectors surveyed, employer feedback included a general lacking of “essential skills”, or nontechnical skills necessary for successful employment, within the current labor force. More specifically, among the employers who responded from the Manufacturing and the Transportation and Warehousing sectors, finding workers with relevant work experience was also noted as particularly difficult and finding qualified supervisory level workers in Manufacturing also poses challenges.

For more information, please visit: https://spokaneworkforce.org/wp-content/uploads/2019/03/SAWDC-WIOA-Local-Integrated-Workforce-Plan-for-2016-2020_Final.pdf

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City of Spokane has developed the following goals to promote economic opportunity within our community:

1. COOPERATIVE PARTNERSHIPS: Encourage cooperative partnerships to address the economic expansion of the city and region.
2. LAND AVAILABILITY FOR ECONOMIC ACTIVITIES: Ensure that an adequate supply of useable industrial and commercial property is available for economic development activities.
3. STRONG, DIVERSE, AND SUSTAINABLE ECONOMY: Foster a strong, diverse, and sustainable economy that provides a range of employment and business opportunities.
4. INCOME AND EMPLOYMENT OPPORTUNITY: Enhance the economic future of the community by encouraging the creation of jobs that provide a livable wage and reduce income disparity.
5. EDUCATION AND WORKFORCE DEVELOPMENT: Improve Spokane’s economy through a well-educated citizenry and a qualified labor force that is globally competitive and responds to the changing needs of the workplace.
6. INFRASTRUCTURE: Implement infrastructure maintenance and improvement programs that support new and existing business and that reinforce Spokane’s position as a regional center.
7. REGULATORY ENVIRONMENT AND TAX STRUCTURE: Create a regulatory environment and tax structure that encourage investment, nurture economic activity, and promote a good business climate.
8. QUALITY OF LIFE AND THE ENVIRONMENT: Improve and protect the natural and built environment as assets that attract economic development opportunities and enhance the City of Spokane’s quality of life.

For more information, please visit the following webpages:
<https://my.spokanecity.org/economicdevelopment/strategy/>

<https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/chapter-7-economic-development.pdf>

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The current community workforce includes an excess of persons with limited education and limited skills relative to the growing needs of the businesses and industry in the area. Many of the unemployed and underemployed residents of Spokane are unable to compete for living wage jobs offered in some of the growth businesses in the community. In particular, unskilled laborers with limited job experience have great difficulty obtaining jobs other than at the lowest pay levels.

For more information please review the Spokane Area Workforce Development Council's: Local Integrated Workforce Plan 2016-2020 (https://spokaneworkforce.org/wp-content/uploads/2019/03/SAWDC-WIOA-Local-Integrated-Workforce-Plan-for-2016-2020_Final.pdf).

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Demands from the marketplace in the 21st century require strategic investment and responsiveness to ensure our businesses have a quality workforce. The Spokane Area Workforce Development Council (SAWDC) has a number of locally-driven initiatives which we feel are innovative and responsive to our local area. These initiatives came from strong Council leadership and partnerships at the local, regional, state and federal levels. The collaborative efforts outlined below are at the heart of the work of the Spokane Area Workforce Development Council. It is through these relationships that the SAWDC and its partners will continue to align our work and have a positive impact upon our community.

Current initiatives include:

Work Ready Spokane – In April 2011, the SAWDC and WorkSource system launched the Work Ready Spokane initiative which serves to advance the competitive position of our region by better aligning the needs of employers, educators, job seekers, and economic and workforce developers through the use of WorkKeys testing. This initiative is designed to create a sustainable pool of work-ready job candidates for each of our region's industry clusters. Since launching the initiative, the SAWDC has helped over 15 community colleges and high schools from around the state to create their own Work Ready programs. Locally, over 20 local businesses have formally started accepting the WorkKeys National Career Readiness Certificate.

On-the-Job Training Initiatives - Through a partnership between WorkSource Spokane, SAWDC, Career Path Services, the Employment Security Department, and employers, adult, dislocated worker and veteran job seekers have the opportunity to connect to employment utilizing onthe-job training. The

initiative has proven to be extremely successful in getting targeted populations back to work and we manage several fund sources that support this activity.

For more information please review the Spokane Area Workforce Development Council's: Local Integrated Workforce Plan 2016-2020 (https://spokaneworkforce.org/wp-content/uploads/2019/03/SAWDC-WIOA-Local-Integrated-Workforce-Plan-for-2016-2020_Final.pdf).

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City's economic development policy is to align public investments in neighborhood planning, community development and infrastructure development with private sector investments, resulting in increased opportunities for business growth and to provide its citizens with safe, affordable and quality residential living environments. The Public's investments includes incentives for the private sector as well as public investments.

The City of Spokane plays a major role in economic development by allocating land for manufacturing and commercial uses, connecting water and sewer systems to business sites, providing tax credits and incentives, and completing advance planning to accommodate growth. Building upon economic strengths and unique advantages, examples of activities with economic benefits undertaken by the city include providing an efficient transportation system for all users, encouraging high quality schools, providing affordable housing for all income levels, ensuring efficient permit processes, and providing parks and recreational activities that improve Spokane's quality of life.

For more information, please refer to Chapter 7 of the City of Spokane Comprehensive Plan: <https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/chapter-7-economic-development.pdf>

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The majority of housing in Spokane was built before 1980. Many older units that have not been maintained over the years are in need of repair, some in quite dilapidated condition. While not exclusively the case, some of the areas of concentration of physical housing problems (conditions) mirror areas of concentration of lower income populations discussed below. Some areas would benefit from a targeted housing rehabilitation program to upgrade housing to community standards of safety and energy efficiency.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

According to the Department of Housing and Urban Development's Racially or Ethnically Concentrated Areas of Poverty mapping tool; the City of Spokane does not contain any census tracts where a non-white population is greater than 50%. The City of Spokane contains block groups with high concentrations of low and moderate income residents. These concentrations change over time, but are generally found in the following neighborhood councils:

- Shiloh Hills
- Nevada Heights
- Whitman
- Hillyard
- Bemiss
- Logan
- Chief Garry Park
- East Central
- Riverside
- West Central
- Emerson/Garfield

What are the characteristics of the market in these areas/neighborhoods?

The neighborhoods listed above are generally located within the City's central core. Housing stock is generally older and in need of maintenance/repair. CHHS partners with SNAP to deliver single-family rehab and repair programs to address housing needs for qualified low and moderate income homeowners.

Are there any community assets in these areas/neighborhoods?

Yes, the central City neighborhoods have access to multiple services. Healthcare, schools, community, youth and senior services all exist within close proximity. Additionally, the Spokane Transit Authority provides bus and paratransit services to residents in these neighborhoods.

Are there other strategic opportunities in any of these areas?

Yes, the City of Spokane has developed economic and housing strategies to serve these and other neighborhoods throughout the City. Examples of strategic investments and programing include:

Public Development Authorities (PDA):

- West Plains PDA
- University District PDA
- Northeast (The Yard) PDA

Tax Increment Financing Districts

Business Improvement Districts (BID)

Multi-Family Tax Exemption (MFTE)

For more information, please visit: <https://my.spokanecity.org/economicdevelopment/strategy/>, and <https://my.spokanecity.org/economicdevelopment/incentives/multi-family-tax-exemption/>

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Total and Share of Households with Internet Connection

As internet access and computer use have grown in importance to American household, corporate and government users, Census officials have begun to track data related to Internet use and computer ownership. The internet has transformed the lives of most who have access to it. Essentially, much of the information and the tools offered on the internet used to take hours or days to procure, if it was available at all. Yet, not all Americans have access to the internet.

According to information from the American Community Survey, Census workers have questioned Americans about their computer use (since 1984) and Internet use (since 1997) for decades. Mobile devices have recently become an increasingly popular way to access the Internet as well, changing the way people search, shop, access information and view entertainment. The internet is also significantly reshaping the education industry and healthcare.

Information from this indicator is useful to business owners and public officials interested in consumer habits. As people change the way they shop, pay bills and search for information, businesses and government entities will need to adapt to keep up. The annual snapshots might also guide policy that aims at providing internet connection to all parts of the country (“bridging the digital divide.”)

This indicator measures the number of households in Spokane County, with an internet connection of any kind. Washington State and the U.S. are offered as benchmarks.

Where are we?

During 2018, the total number of households with an internet connection in Spokane County was 184,842, increasing from 147,821, or by 20.4% since 2013.

By comparison during 2018, the estimated share of homes with an internet connection of any type in:

- Spokane County was 89.6%, increasing from 79.3% in 2013
- Washington State was 90.2%, increasing from 78.9% in 2013
- The U.S. was 85.3%, increasing from 74.4% in 2013

Share of Internet Connection by Type

This indicator measures the share of homes in Spokane County both individually and combined, that have internet access, distributed by type (dial-up alone; cellular data plan; cable, fiber-optic, or DSL; satellite and other). Washington State and the U.S. are offered as benchmarks.

Where are we?

During 2018 in **Spokane County**, the share of households with an internet connections that were:

- Broadband was 82.4%
- Cellular Alone was 8.9%
- Dial-up Alone was 0.97%
- Other was 7.7%

During 2018, the share of households in **Washington State** with internet connections that were:

- Broadband was 85.6%
- Cellular Alone was 10.2%
- Dial-up Alone was 0.28%
- Other was 3.9%

During 2018, the share of households in the **U.S.** with internet connections that were:

- Broadband was 81.6%
- Cellular Alone was 13.6%
- Dial-up Alone was 0.31%
- Other was 4.5%

Data Sources:

http://www.spokanetrends.org/graph.cfm?cat_id=0&sub_cat_id=3&ind_id=5

http://www.spokanetrends.org/graph.cfm?cat_id=0&sub_cat_id=3&ind_id=6

U.S. Census Bureau: American Community Survey (ACS) - Explore Census Data

- Table B28002

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The City of Spokane is fortunate to have multiple broadband internet service providers. According to HighSpeedInternet.com (<https://www.highspeedinternet.com/wa/spokane>), Spokane residents have access to 11 separate internet service providers. Connection types range from DSL, fiber, cable, fixed

wireless, and satellite. City-wide coverage ranges from 100% (fixed wireless and satellite) to a low of 15% (cable).

In February 2020, the Spokane City Council recently passed an ordinance allowing a new cable internet (TV & phone) provider to offer services to Spokane residents. This resolution will provide additional service opportunities for residents and increase market competition.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

On December 17th, 2018, the Spokane City Council passed Resolution 2018-0110 forming the Sustainability Action Subcommittee (SAS) of the City Council's Public Infrastructure, Environment, and Sustainability (PIES) Committee. The Sustainability Action Subcommittee is focused on issues surrounding climate change and its effects on Spokane and the region. SAS is tasked to research solutions the City and its residents can take to both mitigate our contribution to climate change and help make our community more resilient in the face of these changes.

A trend of warming and a change in Spokane winter precipitation patterns is bringing more rain and less snow. Members of the Sustainability Action Subcommittee, or SAS are noting a winter sports season that has shortened, impacts to agriculture, more intense wildfires, and changing water flows in the Spokane River. Rising temperatures and smoke have already affected cherished community events like Bloomsday, Spokefest, and Hoopfest.

According to a survey of Spokane residents conducted by the SAS; wild fires pose the most significant natural hazard risk to our region. Like much of the western U.S., our region has seen an increase in the number of unhealthy air quality days caused by wildfire smoke. During four of the last five years, smoke from wildfires resulted in 44 days of unhealthy air in the Spokane County metro area.

Wildfire smoke contains harmful compounds and fine particles. When inhaled, microscopic smoke particles bypass the body's natural defense system and travel deep into the lungs.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Health Equity Review

Social inequities across our community play a significant role in the health outcomes of our citizens. Because of this, the effects of climate change are expected to more significantly impact our most vulnerable residents. Also referred to as social determinants of health, these disparities are influenced by education, income, race, access to healthcare, and even by the neighborhoods in which we live. For more information on health equity and climate change, visit the World Health Organization's website or the Washington State Department of Health's website.

Each policy recommendation is to follow this review process prior to being implemented by Council:

1. Submit the recommendation to the Health Equity team for review a minimum of one week prior to presentation at the monthly SAS meeting
2. Health Equity team will meet and review the recommendation prior to the SAS meeting

3. At the SAS meeting Health Equity team provides brief oral feedback; alternatively written feedback is provided directly to the workgroup sponsoring the initiative
4. Written feedback will be saved to the workgroup's shared drive for reference

Notes on Health Equity process:

- This process allows for recommendations to be vetted through a health equity lens before they go before the entire SAS – this will more carefully vet and improve ideas by identifying unintended health consequences before the entire committee weighs in.
- Refer to the May 2019 Public Health Presentation for a review on health equity
- The concept can be difficult to grasp due to the high number of various environmental factors that can impact public health and equity

For more information, please visit:

<https://my.spokanecity.org/bcc/committees/public-infrastructure-environment-and-sustainability/sustainability-action-subcommittee/#:~:text=Communication,the%20issue%20of%20climate%20change>.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Spokane has developed a set of priorities and strategies to guide the community's efforts to meet the needs of low and moderate income households over the next five years. The following identifies priority needs, describes potential resources available to meet those needs, and sets goals and outcomes.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Spokane has identified several areas for targeted community investment. These areas will be supported where applicable with funding sources identified in this Consolidated Plan. Primary investments will seek to support the creation, or expansion of affordable housing, urgent public health and safety response, and community based social service programming for the benefit of primarily low and moderate income individuals and families.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Improve affordable housing access & availability
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Housing Stability
	Description	Fund projects and activities that acquire, rehabilitate, or build additional affordable housing within the Spokane community.
	Basis for Relative Priority	
2	Priority Need Name	Urgent public health & safety Response

	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Health and Safety
	Description	Adaptive response to changing community needs related to sheltering homeless populations, natural disasters, and public health pandemics.
	Basis for Relative Priority	
3	Priority Need Name	Community based social service programming
	Priority Level	Low

<p>Population</p>	<p>Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development</p>
<p>Geographic Areas Affected</p>	
<p>Associated Goals</p>	<p>Community Based Social Services</p>
<p>Description</p>	<p>Community based services that address the following areas: Food Security, Workforce Development, Housing Stability, Childcare, Transportation, behavior and victim services.</p>
<p>Basis for Relative Priority</p>	

Narrative (Optional)

The City of Spokane has prioritized basic community needs that support a diverse range of individuals and families in need of basic assistance. Access to safe and affordable housing choice remains a priority need within our community. The City will remain adaptive to changing needs within our community throughout the duration of this Consolidated Plan. One such need identified in this planning process is the need for a flexible community response to urgent health and safety concerns such as COVID-19.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Homeless and extremely-low income renters experience difficulty finding affordable rental housing. Section 8 rent assistance is a traditional source of rent assistance; however, funding levels do not fully support need. City of Spokane allocates HOME funds to TBRA to support families prepared to transition to new rental housing but unable to afford or find other resources.
TBRA for Non-Homeless Special Needs	City of Spokane has expanded its TBRA rent assistance to help COVID-impacted renters remain in their current rental housing despite lost income due to the pandemic.
New Unit Production	New production of affordable housing is needed in the current housing market. An undersupply of housing is reducing availability and increasing price. The City of Spokane leverages its HOME and CDBG funds to create new affordable rental housing. Its HOME program prioritizes developments that expand the affordable housing supply. We utilize over \$1M each year to fund these housing developments. Its CDBG programs prioritize expanding the supply of affordable housing. Recent investments include over \$2M for land acquisition and improvements that will result in new affordable housing construction.
Rehabilitation	Spokane's housing inventory is predominantly housing constructed prior to 1950. These older homes typically require more and frequent maintenance and have higher utility costs. It is important to preserve this significant housing supply as safe, healthy, and affordable. Such preservation increases housing supply and affordability for current occupants and new renters/buyers. City programs target low-income homeowners, who are the predominant users of our older housing stock.
Acquisition, including preservation	Given limited supply of housing (and housing affordable to low-income renters), acquisition and preservation of existing housing can help retain existing housing as safe and affordable. Given that most existing housing is lower cost than new construction, the most efficient use of public housing funds is preserving existing housing as safe and affordable. City programs target privately-owned rentals that could preserve affordable housing for existing low-income tenants.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Over the five-year period of the Consolidated Plan, the City estimates that the following funds will be available to carry out Plan objectives. The allocation of funds to these programs is appropriated annually, so the exact amounts that will be available are unknown.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,384,101	1,600,000	500,000	5,484,101	23,000,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechhs@spokanecity.org . Please include public comment in your subject line.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,336,999	200,000	1,252,670	2,789,669	6,000,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechs@spokanecity.org . Please include public comment in your subject line.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	287,494	0	0	287,494	1,400,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechhs@spokanecity.org . Please include public comment in your subject line.

Table 50 - Anticipated Resources

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

The City of Spokane will fund projects that have a minimum match contribution of 10% the total amount of funds being requested for all Community Development Block Grant (CDBG) awards. The HOME Program will meet basic match requirements at a program level for tenant-

based rental assistance, single family rehabilitation and down payment assistance, and development of affordable rental units. Match is generated when affordable rental unit development is financed with permanent investments of non-federal, non-owner funds.

The City of Spokane intends to partner with local housing and service providers to pursue HUD's Section 108 Loan Guarantee Program. A section 108 Loan Guarantee would allow the City to access/leverage future CDBG allocation to address current community needs such as affordable housing.

The City of Spokane will also partner with the Washington State Department of Commerce for funding to address homelessness. These funding sources will be used to leverage goals outlined in the Strategic Plan to Prevent and End Homelessness.

Additional clarity regarding sources of leverage will be provided to the Spokane community through the Annual Action Plan.

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

The City of Spokane supports multiple partner agencies operating in publicly owned facilities. Support for these facilities will remain throughout the duration of this Consolidated Plan. Moreover, the City will seek partnerships with affordable housing developers to acquire, or rehabilitate properties that expand affordable housing within our community.

Discussion

All funding allocations will meet basic eligibility requirements as noted in the Code of Federal Regulations. An emphasis will be placed on activities that support the needs of low and moderate income individuals and families. For more information regarding the eligible use of these funds, please contact the Community, Housing and Human Services Department at spokanechhs@spokanecity.org.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Spokane CHHS Dept	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The institutional delivery system has a strong capacity for planning and implementing housing, community/economic development and essential services activities through the CDBG, ESG and HOME Programs. In particular, the City has had a long and successful history in planning and managing housing assistance including housing development and housing rehabilitation. The City’s nonprofit partners and the Spokane Housing Authority have offered a ready source of capable organizations, many specializing in affordable housing for particular subpopulations of low income households.

The Spokane Community, Housing and Human Services (CHHS) Board and its subcommittees provide an added strength to the system through the extensive experience of its members and their role as advisory to the City. The City Department of CHHS and its predecessor have had a long history in assisting and supporting the Spokane Continuum of Care and its partner agencies, utilizing ESG funds and state and federal resources. The Continuum has been successful in building a broad range of housing and services for homeless and vulnerable special needs populations with strong outcome results.

The lack of adequate financial resources to support priorities of the City is a primary weakness in the institutional delivery system. While there has been some success over the years, the development of major funding sources has been limited, exacerbated by the economic recession and reductions in federal and state resources in recent years. The City has reorganized its departments to increase capacity to undertake coordinated approaches to solving multi-faceted housing, community/economic

development and services needs in the community. A major focus is increasing resources for projects meeting the needs of its low and moderate income households.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Spokane has a large number of high-capacity agencies delivering services. These include agencies which provide homeless services and those which provide services to special needs populations, including homelessness prevention services. A strength of the delivery system is the Homeless Families Coordinated Assessment (HFCA) system managed by Catholic Charities of Spokane and the Singles Homeless Coordinated Assessment (SHCA) program operated by SNAP in collaboration of several nonprofit organizations and the City. Implementation of the CE system has resulted in increased

coordination of available housing units, shorter waits for housing, elimination of barriers to housing placement and maximized use of limited services resources. In addition, the Homeless Management Information System (HMIS) is generating performance reports to help the Continuum of Care evaluate program outcomes of housing and services. While improvements are still ongoing, the health care system has been strengthening its capacity to coordinate among partnering agencies including the CoC Board and committees. Finally, the CoC, along with agencies providing services to non-homeless persons, has been increasingly able to successfully connect clients to the mainstream resources for which they are eligible through increased access and sustainability of the SOAR program to assist with successful SSI/SSDI applications. Providers are required, under the CoC Program, to facilitate connection to mainstream benefits such as TANF, food stamps, substance abuse programs, and other relevant programs such as HIV/AIDS programming to increase housing stability and social support networks. Other services such as senior food nutrition, mental health counseling, life skills, affordable day care, job readiness, case management and refugee/immigrant language skills are provided via local nonprofits within the community and collaborate with the CoC Board and its multiple subcommittees.

There are several areas where services capacity does not match the need. Among the notable gaps include lack of enough low-barrier housing facilities such as a low-barrier, targeted-capacity emergency shelter, transitional housing, and permanent supportive housing facilities that allows persons actively using substances to remain in housing while barriers to maintaining housing are addressed. Outreach services and shelter of unaccompanied youth is currently not adequate to meet the needs of homeless youth living on the streets. Additionally, housing programs that can provide assistance to households considered "doubled-up" is a significant need.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Spokane has a large number of high-capacity agencies that provide housing and support services to special needs groups including those experiencing homelessness. Homeless housing and service providers funded via the CHHS department programs (CDBG, CoC, local funds) are required to participate in HMIS and our local Coordinated Entry System (CES - HFCA & SHCA) to create a centralized process for access the Diversion program and CES that includes housing programs targeted to households experiencing homelessness and/or interested in programming for those living with HIV/AIDS. Households that are eligible to access tailored programming such as veterans and households fleeing DV can also be connected to providers via the CES portals. The goals of the Spokane CoC's 2020-2025 Five-Year Strategic Plan to Prevent and End Homelessness is to streamline resources and the CES accessibility (including marketing) to create a "one-stop shop" in which households can connect, get assessed (when appropriate), and ultimately be placed on the prioritization lists. We continue to work towards increasing coordination and workflow across service providers for each client to reduce barriers to accessing and retaining permanent housing for people experiencing homelessness as well as streamlining street outreach and program collaboration to assist clients obtain necessary

documentation to access programs.

Spokane continues to have a very low housing vacancy rate with a lack of sufficient affordable housing stock which limits the community's ability to provide services that are needed. While we continue to collaborate with housing developers and affordable housing providers, the high costs of new construction of PSH buildings, and operational costs of service provision, even while leveraging HTF/LIHTC and Foundational Community Supports (FCS), has limited sufficient housing stock & supportive programs needed.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

In order to address the very low housing vacancy rate and lack of sufficient affordable housing stock, the Spokane CoC Board, comprised of 23 different sector leaders that have the ability to leverage resources to address the needs of people at-risk of homelessness, literally homeless, and special populations experiencing housing crises are working toward developing partnerships to raise financial resources and service-delivery capacity across the continuum. The Spokane CoC's Five-Year (2020-2025) Strategic Plan to Prevent and End Homelessness has five (5) primary goals: (1) Quick identification of people experiencing homelessness, (2) Prioritization of homeless housing for households with the greatest needs, (3) Effective & efficient crisis response system that swiftly moves people in stable permanent housing, (4) Clear projection of current and future needs of homeless housing & services needs, and (5) Address racial and cultural disparities among people experiencing homelessness. Each goal in the plan identifies specific strategies to meet each goal which include: data-driven decision making through frequent monitoring of system inputs and outputs (resources) and performance outcomes (e.g. successful outreach service contacts, successful CES referrals, increased income and connection to mainstream benefits, exits to/retention of permanent housing).

The CoC is taking many steps to increase the lack of affordable housing stock and housing to serve high acuity homeless households. The Landlord Liaison subcommittee of the CoC is responsible for ensuring existing landlords are supported by case managers of clients being housed in their units. This also includes increasing education among private landlords about the rental subsidy programs and the benefits of the supportive services provided that can also benefit landlord needs to maintain quality housing and avoid costly evictions.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Stability	2020	2024	Affordable Housing		Improve affordable housing access & availability		Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit

2	Public Health and Safety	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development		Urgent public health & safety Response	<p>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted</p> <p>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted</p> <p>Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted</p> <p>Facade treatment/business building rehabilitation: 0 Business</p> <p>Brownfield acres remediated: 0 Acre</p> <p>Rental units constructed: 0 Household Housing Unit</p>
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								Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 50 Beds Homelessness Prevention: 0 Persons Assisted Jobs created/retained: 10 Jobs
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Consolidated Plan

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Businesses assisted: 0 Businesses Assisted Housing for Homeless added: 0 Household Housing Unit Housing for People with HIV/AIDS added: 0 Household Housing Unit HIV/AIDS Housing Operations: 0 Household Housing Unit Buildings Demolished: 0 Buildings Housing Code Enforcement/Foreclosed Property Care: 0 Household Housing Unit Other: 0 Other

3	Community Based Social Services	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development		Community based social service programming		<p>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted</p> <p>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted</p> <p>Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted</p> <p>Facade treatment/business building rehabilitation: 0 Business</p> <p>Brownfield acres remediated: 0 Acre</p> <p>Rental units constructed: 0 Household Housing Unit</p>
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								Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted Homeless Person Overnight Shelter: 250 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 250 Persons Assisted Jobs created/retained: 50 Jobs
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Consolidated Plan

SPOKANE

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Businesses assisted: 0 Businesses Assisted Housing for Homeless added: 0 Household Housing Unit Housing for People with HIV/AIDS added: 0 Household Housing Unit HIV/AIDS Housing Operations: 0 Household Housing Unit Buildings Demolished: 0 Buildings Housing Code Enforcement/Foreclosed Property Care: 0 Household Housing Unit Other: 0 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Stability
	Goal Description	Expand the number of affordable housing options for low and moderate income individuals and households. The City will fund proposals that address the needs of target populations including, but not limited to homeownership, rental housing, communal living, etc. Additionally the City will prioritize proposals that integrate service that help stabilize permanent housing for high barrier populations. The goal of housing stability is to prevent and divert individuals and families from entering into the homeless response system.
2	Goal Name	Public Health and Safety
	Goal Description	Adaptive response to changing community needs related to sheltering homeless populations, natural disasters, and public health pandemics.
3	Goal Name	Community Based Social Services
	Goal Description	Community based services that address the following areas: Food Security, Workforce Development, Housing Stability, Childcare, Transportation, behavior and victim services.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Spokane will primarily focus on low and moderate income individuals and households throughout this Consolidate Plan. Particular focus is on the creation and rehabilitation of affordable housing to assist low and moderate income residents. The City intends to develop and/or retain affordable housing units through partnerships with local government and housing developers. The City will update the actual numbers of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing in each Annual Action Plan, Substantial Amendment (where applicable), and Consolidated Annual Performance Evaluation Report (CAPER). Our estimated goal will be to assist 50 households per year with access to housing stability.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Since 2016 The Spokane Housing Authority has increased the number of 504 units in our entire portfolio by the following:

1. 2016 – Converted 11 units at Valley 206 to meet 504 standards
2. 2018 - Converted 3 units in Hifumi-en Apartments to meet 504 standards.
3. 2020 – We will convert an additional four (4) units at Cedarwest to meet 504 standards.

While none of these upgrades are in public housing (as we no longer own/operate a public housing portfolio), Number 3 above was required as a result of the RAD conversion of our remaining 74 units of public housing which occurred in November 2019. 40 units of RAD subsidy were placed on Cedarwest, and as a result we needed to bring the property up to 504 standards.

Activities to Increase Resident Involvements

As we no longer own or maintain public housing units, this is not answered.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

Not applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Spokane and State of Washington have enacted legislation to reduce evictions, expand funding, and increase density for affordable housing. The City has not observed negative effects on affordable housing or residential development. Public engagement during the legislative process has eliminated or revised early proposals based on potential negative effects. This public process will produce more affordable housing funding and opportunity.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Spokane continues to remedy affordable housing issues by engaging the public and community partners. For example, a 2016 Mayor's Housing Quality Task Force generated discussion of rent, license, and inspection requirements.

- Abandoned Homes
- Vacant Residential Lots
- Chronic Nuisance Properties
- Homes in Foreclosure and,
- Housing Affordability

A complete copy of this report is available on the City of Spokane website:

<https://static.spokanecity.org/documents/projects/mayors-housing-quality-task-force/housing-quality-task-force-final-report.pdf>

The City has also pursued a public infill housing strategies process to better utilize developable land. The Infill Development Project report can be viewed at <https://static.spokanecity.org/documents/projects/infill-housing-strategies-infill-development/2016-10-06-infill-report-rec-combined.pdf>. This process and report resulted in 6 City Ordinances passed by City Council.

Recently, the City of Spokane has initiated a City-wide Housing Action Plan to identify and address housing needs. The City received a grant from the Washington Department of Commerce to complete the plan, which is expected to be adopted by City Council in April 2021. Spokane's Housing Action Plan will:

- Encourage construction of additional affordable and market rate housing that are accessible to a variety of income levels. This includes options accessible to people and families with low and moderate incomes and cost-burdened households.

- Examine population, workforce and housing trends.
- Assess housing policies, development regulations, and other city programs that influence the development of housing.
- Consider strategies to minimize displacement, particularly in neighborhoods with communities at high risk of displacement.

Also, the current Mayor is assembling community stakeholders for a new housing task force to address housing issues.

SP-60 Homelessness Strategy – 91.215(d)

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

Spokane's strategic plan goals are to increase housing stability, public health & safety, and community-based social services which align with the goals of the Spokane CoC's Five-Year Plan to Prevent and End Homelessness which seeks to improve service provision connection and identification of the needs of households experiencing homelessness. Currently, the CoC employs two Coordinated Entry (CE) systems to meet the differing needs of households without minor children and families. Homeless Families Coordinated Assessment (HFCA) operates a centralized model at a safe location with flexible hours of operation and a variety of services available for families, including childcare. Singles Homeless Coordinated Assessment (SHCA) operates a hub model with a main office where individuals can be assessed, as well as, trained satellite assessors at a variety of locations, such as shelters, day centers, meal sites, workforce programs and the Spokane Resource Center (A HUD Envision Center) across the CoC's geographic area.

Additionally, Spokane County operates 211 services and an online portal to assist in the triage and referral to CE and emergency services. The CoC employs a street outreach (SO) team as a component of CE to identify individuals and households experiencing unsheltered homelessness who are not currently connected with services. This team has expertise in behavioral health counseling and coordinates its outreach efforts with other outreach teams in the jurisdiction, including PATH, SSVF, STR, and RHY-funded SO projects, as well as, locally funded workforce and physical health specialized SO teams. Both CE portals utilize the SPDAT series of assessments to prioritize households for services and to inform referrals to the appropriate intervention. All RRH services are collocated at both CE portals to ensure that households assessed for this intervention are immediately connected to a housing specialist. Households that assess for PSH are included in the CoC's chronically homeless master list which is case conferenced bi-weekly to expedite move-in.

Addressing the emergency and transitional housing needs of homeless persons

In terms of preventing and reducing homelessness, it is essential that assessment services provided via the CES can accurately determine a household's immediate needs. Spokane seeks to provide adequate support and funding to programs that provide educational materials and services to the community on resources for households in need of emergency shelter and housing. One major way this is done is through the City's investment in street outreach capacity. The City of Spokane funds a street outreach program which is a collaboration between Singles Homeless Coordinated Assessment (SHCA) and Spokane's major provider of behavioral health services which is the local PATH recipient. This team's target population is homeless adults with the longest lengths of homelessness. Daily, the team patrols areas of regular encampment activity in both the urban center of the city and the outlying, more rural parts of the community. Local data indicates that individuals occupying encampments are the least likely to request assistance by accessing shelter or coordinated entry. Individuals encountered receive

food, water, and a first aid kit; are referred to emergency shelter; and provided with a resource guide and detailed service map. Once a relationship has been developed, households are assessed for permanent housing. This can be done in the field or at a scheduled appointment. A case management relationship is maintained until/unless a warm hand-off can be made to another provider or housing can be secured. Individuals with the highest levels of acuity are case conferenced bi-weekly at a meeting led by SHCA/street outreach and staffed by partner agencies including emergency shelters, emergency healthcare providers, community court, and other frontline staff from service providers who regularly interact with the chronically homeless. In order to ensure 100% coverage of the jurisdiction, the City of Spokane has doubled its investment in street outreach has facilitated increased collaboration between the PATH-, Opioid STR-, SSVF-, and RHY-funded street outreach teams as well as the locally funded workforce connections outreach team and the free clinic's health outreach team. Outreach is conducted on a daily basis and the new funding has allowed the outreach team to expand its evening and weekend hours.

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

The national best practice Diversion focuses in helping people self-resolve their homelessness includes assistance with mitigation of landlord issues, opportunities for increasing income through mainstream benefits, job training programs, etc. Families are also assessed through coordinated entry to determine acuity and housing interventions they may qualify for. Once placed on the list, clients are encouraged to return via inperson or phone should their situation change for re-assessment. Households are prioritized based on level of acuity, length of time homeless, and disability factors. Client choice is incorporated into the referral process as well. As part of our strategy to rehouse families quickly, we are consistently working to build our housing stock through development and construction of additional units. To ensure families successfully maintain their housing once assistance ends, clients are encouraged to connect with their case managers, peer navigators, and their support network to address issues as they arise before they impact their housing, employment, and other aspects of their life. Providers conduct follow-ups, but households can also connect with case managers for additional assistance at any time.

Spokane has experienced economic growth and has seen similar increases in the cost of housing and a consistently low vacancy. Low-income and homeless households face many barriers to housing in a highly competitive rental market. To increase the rate of permanent housing (PH) placement from shelter, transitional housing (TH), and rapid rehousing (RRH) the City and the Spokane CoC has increased its investment in landlord incentive strategies, facilitated greater coordination between landlord liaisons (LLs), and supported legislative actions to decrease barriers for homeless households. The Spokane CoC reallocated some existing resources to provide rental assistance programs more opportunities to incentivize landlords to rent to homeless households

and mitigate perceived risk of renting to them. We have also reallocated existing resources and the CoC facilitated the acquisition of new resources to create new LLs positions with local rental assistance providers, including the public housing authority (PHA), to provide more intentional relationship management with landlords and develop relationships with new landlords. These experts are codifying the CoC's Five-Year Plan to Prevent and End Homelessness Objective 3 and related strategy around landlord engagement, creating a unified set of standards for the CoC's LLs, developing a comprehensive interested landlord list, and engaging the local landlord association more strategically. The City passed local legislation to prevent landlords from discriminating against potential tenants for their source of rental income. The legislation reinforces similar legislation at the state level which established a landlord mitigation fund to which all state rental assistance providers have access. The City also sits on the WA State Advisory Council on Homelessness that will release a joint recommendation to the governor and state legislature with State Re-Entry Council to "ban the box" on rental applications to prevent landlords from discriminating against tenants for certain kinds of criminal history.</p>

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The CoC works with mainstream service providers, such as WA State Department of Social and Health Services (DSHS), and institutions/systems that discharge individuals including county jail, child welfare, juvenile justice, hospitals, and behavioral healthcare providers to refine local understanding of the primary risk factors for homeless. Additionally, vulnerability, as assessed by the SPDAT tool, is the primary tool used to assess households' likelihood of becoming homeless for the first time. The CoC's CE process is a diversion-first model whereby CE staff explore a household's strengths and resources and help them better utilize this support network before intake into the homeless system. Diversion services include mediation with landlords, education on tenants' rights, housing search assistance, connection to mainstream benefits/employment resources, as well as limited financial support. The City of Spokane is seeking to increase its investment in diversion to expand this highly successful model. Several at-risk household types have been identified locally as being especially vulnerable to experiencing homelessness for the first time without a higher level of intervention, including short-term rental assistance. At-risk veteran households are referred to the prevention component of SSVF, while at-risk individuals deemed disabled by DSHS are referred to the Housing and Essential Needs program.

Additionally, in 2019 the Spokane Resource Center, a HUD EnVision Center, opened its doors as a way to try to help with people's housing, cultural, financial, legal, pre-employment, health resources, as well as basic needs before they become homeless as a form of diversion. Over 15 area providers, gather together in one centralized location with the intent to provide a wide range of necessary resources to keep those already in housing housed by providing them with desired and needed wrap around services. We are continuously assessing ways to expand aftercare services for individuals and families to have

ongoing support for emerging needs and allow for immediate prevention services should they be needed. Increasing PSH stock to ensure housing stability for those who may need a permanent subsidy is also key.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Use of lead in paint was banned in 1978, but used prior to that time with increased frequency in earlier decades. According to American Community Survey estimates (2008-2012), 40% of owner-occupied and 34% of renter-occupied units in Spokane were built before 1950; 35% of owner-occupied and 39% of renter-occupied units were built between 1950 and 1980.

Spokane’s housing program actively works repair LBP hazards in eligible owner and renter housing.

These programs will continue to coordinate with the Washington State Lead-Based Paint program for contractor certifications, lead-safe renovation, and regulation technical assistance. Typical lead hazard control begins with an inspection to guide the scope of work. Contractors certified as Abatement Supervisor and EPA Renovators can complete projects in compliance with HUD’s Title X regulation. These projects typically include wet scraping, painting, eliminating friction/impact surfaces, mulching bare soil, and cleaning to Clearance.

How are the actions listed above related to the extent of lead poisoning and hazards?

The City’s Single-Family Rehabilitation and Multifamily Housing programs are targeted toward areas that pose lead hazards. This includes pre-1978 housing units and identified lead-based paint hazards in and around those units.

How are the actions listed above integrated into housing policies and procedures?

Spokane has fully integrated HUD Title X and EPA Renovator (RRP) requirements into its Single-Family Rehabilitation and Multifamily Housing programs. These programs offer visual assessment trained HQS inspection; XRF Lead Inspection and Risk Assessment; copies of the “Renovate Right” pre-renovation pamphlet; copies of the “Protect Your Family” pre-housing-contract pamphlet; lead-safe renovation from RRP Renovator and Abatement Supervisor certified contractors; and Clearance testing of leaded surfaces disturbed during rehabilitation.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Spokane’s Community, Housing and Human Services Board has addressed anti-poverty strategies by prioritizing activities that directly benefit low and moderate income individuals and households. Activities funded under this Consolidated Plan must address the following community goals:

Food Security

- Increase coordination and communication between food programs
- Increase capacity of providers to build infrastructure and collaborative ventures around food programs
- Reduce and remove access barriers to food programs

Workforce Development

- Expand capacity and diversity of supported employment programs
- Expand paid work experiences/on-the-job training opportunities
- Formalize connections and referral pipelines between workforce programs and other services systems such as housing, mental health, and childcare)

Housing Stability (Improve affordable housing access & availability)

- Expand affordable housing options
- Increase co-location of coordinated entry services, behavioral health services, and substance abuse/detox services at shelters
- Enhance and expand diversion and prevention programs, including outreach and education services

Community Services

- Expand childcare services
- Offer evening and weekend supportive services
- Increase access to transportation services
- Integrate behavioral health and victim services

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City considers improvement of the affordable housing delivery system a high priority and has devoted significant staff resources to assure its effectiveness and success in increasing the supply and

accessibility of affordable housing. The City works in concert with for-profit and nonprofit housing developers in the area to develop partnerships and obtain financial resources for projects providing affordable housing to its residents. The affordable housing assistance managed by the City has consistently focused on projects which provide rental subsidies sufficient to support the ability of families in poverty to obtain housing stability and reach toward self-sufficiency.

In the process of soliciting HOME multifamily proposals, the City encourages the development of partnerships with both for-profit and nonprofit entities including CHDOs. The City encourages affordable housing developers to prepare HOME program proposals which include resources from other potential funding partners such as the Washington State Housing Trust Fund or the LIHTC program of the Washington Housing Finance Commission.

To assure the affordable housing stock remains viable, the City monitors its assisted rental housing projects to assure the physical condition of the structures is maintained. In cases where both the City's assisted affordable housing stock or other affordable housing stock in the community is in need of rehabilitation or upgrading, the City works with developers to find financing and/or supports the efforts with HOME resources.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Spokane has adopted and implemented a comprehensive Grants and Financial Assistance Guide containing policies, procedures, and specific staff responsibilities in order to establish, implement, and maintain meaningful oversight and coordination of grant awards throughout the entire award lifecycle and improve the efficiency and impact of programs and services funded. The policies and procedures are in compliance with funding requirements as defined by HUD and the Code of Federal Regulations, State of Washington and City of Spokane regulations.

Overall management of the CDBG, HOME and ESG awards is the responsibility of the City's Community, Housing and Human Services (CHHS) Department, in conjunction with the City's central Grants Management and Financial Assistance Department. Some of the projects under CDBG specifically related to community and economic development are carried out by other City department such as Parks or Engineering, in coordination with the City's CHHS and Grants Management Departments.

Many of the projects funded through CDBG, HOME and ESG are managed by community-based agencies under a sub-award from the City of Spokane. All contracts with subrecipient agencies contain the federal, state and local program requirements and are prepared using the recommended contract templates provided by the US Department of Housing and Urban Development.

The City's assigned program manager and grants/contracts administrator meet with subrecipient agencies to review contractual requirements prior to execution of the contract and provide technical assistance and monitoring after contract execution. Contractual requirements include monthly progress billings and performance reporting supported by backup documentation so City staff may verify that project expenses are allowable, can be allocated and are reasonable, as well as program performance and beneficiary information.

The City's Grants Management Department has developed and implemented a system of preventive and detective internal controls to assist in ensuring that subrecipient agencies are in compliance with Federal regulations and contract terms and are meeting performance standards. Included in the monitoring process is compliance with Section 3 requirements and affirmative action requirements. Contracts include the specific HUD requirements. Monitoring of subrecipients routinely involves reviewing documents and outreach plans to assure the requirements have been met.

Grants Management performs routine desk monitoring through the approval of subrecipient reimbursement requests and allocation plans, A-133 Single Audit report review and ongoing monitoring of performance reports. In addition, training and detailed technical assistance is provided based on

determination of administrative and financial risk. On-site monitoring is scheduled and completed in accordance with agency risk status and Federal requirements.

Expected Resources

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

Introduction

Over the five-year period of the Consolidated Plan, the City estimates that the following funds will be available to carry out Plan objectives. The allocation of funds to these programs is appropriated annually, so the exact amounts that will be available are unknown.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,384,101	1,600,000	500,000	5,484,101	23,000,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechhs@spokanecity.org . Please include public comment in your subject line.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,336,999	200,000	1,252,670	2,789,669	6,000,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechs@spokanecity.org . Please include public comment in your subject line.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	287,494	0	0	287,494	1,400,000	Exact annual allocations will be published in each Annual Action Plan. The figures provided in this section are estimates based on prior year funding awards and program income generated by the Single-family Rehab Program. Please direct questions to the Community, Housing and Human Services Department at spokanechhs@spokanecity.org . Please include public comment in your subject line.

Table 54 - Expected Resources – Priority Table

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

The City of Spokane will fund projects that have a minimum match contribution of 10% the total amount of funds being requested for all Community Development Block Grant (CDBG) awards. The HOME Program will meet basic match requirements at a program level for tenant-based rental assistance, single family rehabilitation and down payment assistance, and development of affordable rental units. Match is generated when affordable rental unit development is financed with permanent investments of non-federal, non-owner funds.

The City of Spokane intends to partner with local housing and service providers to pursue HUD’s Section 108 Loan Guarantee Program. A section 108 Loan Guarantee would allow the City to access/leverage future CDBG allocation to address current community needs such as affordable housing.

The City of Spokane will also partner with the Washington State Department of Commerce for funding to address homelessness. These funding sources will be used to leverage goals outlined in the Strategic Plan to Prevent and End Homelessness.

Additional clarity regarding sources of leverage will be provided to the Spokane community through the Annual Action Plan.

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

The City of Spokane supports multiple partner agencies operating in publicly owned facilities. Support for these facilities will remain throughout the duration of this Consolidated Plan. Moreover, the City will seek partnerships with affordable housing developers to acquire, or rehabilitate properties that expand affordable housing within our community.

Discussion

All funding allocations will meet basic eligibility requirements as noted in the Code of Federal Regulations. An emphasis will be placed on activities that support the needs of low and moderate income individuals and families. For more information regarding the eligible use of these funds, please contact the Community, Housing and Human Services Department at spokanechhs@spokanecity.org.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Stability	2020	2024	Affordable Housing		Improve affordable housing access & availability	CDBG: \$3,961,393 HOME: \$1,203,300 ESG: \$287,494	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 2 Households Assisted Rental units constructed: 10 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 293 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted
2	Public Health and Safety	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development		Urgent public health & safety Response	CDBG: \$1,990,689 HOME: \$0 ESG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added: 50 Beds

3	Community Based Social Services	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development		Community based social service programming	CDBG: \$722,708 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 19918 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted Facade treatment/business building rehabilitation: 0 Business Brownfield acres remediated: 0 Acre Rental units constructed: 0 Household Housing Unit Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted Overnight/Emergency
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Shelter/Transitional Housing Beds added: 0 Beds Businesses assisted: 0 Businesses Assisted Housing for Homeless added: 0 Household Housing Unit Housing for People with HIV/AIDS added: 0 Household Housing Unit HIV/AIDS Housing Operations: 0 Household Housing Unit Buildings Demolished: 0 Buildings Housing Code Enforcement/Foreclosed Property Care: 0 Household Housing Unit Other: 0 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Stability
	Goal Description	
2	Goal Name	Public Health and Safety
	Goal Description	

3	Goal Name	Community Based Social Services
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

During program year 2020 (7/1/20 – 6/30/21), The City of Spokane will fund activities that address basic community need through the activities listed below. CHHS encourages citizens to review the list of projects below to become familiar with services designed to assist low and moderate income individuals and families residing within the City of Spokane.

CHHS may amend the list of projects below throughout the program year as needs shift within the Spokane community. In the event that CHHS must make an adjustment, citizens will be informed as outlined in the 2018 Citizen Participation Plan.

For more information related to the list of projects below, please contact CHHS at spokanechhs@spokanecity.org.

Projects

#	Project Name
1	2020 Public Services - Food Security Program
2	2020 Public Services - CHAS Dental Voucher Program
3	2020 Public Service - ECCC Operations
4	2020 Public Service - NECC Operations
5	2020 Public Services - Homeownership Program
6	2020 Public Service - Southwest Community Center Operations
7	2020 Public Services - Women's Hearth
8	2020 Public Service - West Central Youth Development
9	2020 Public Service - West Central Operations
10	2020 Public Services - Improving Food Security for Spokane's Hungry Women & Children
11	2020 Public Services - YWCA Women in the Workforce
12	2020 Housing - Single Family Rehab Program
13	2020 Housing - Rental Repair Program
14	2020 Housing - Essential Home Repair Program
15	2020 Perpetual Housing, Acquisition, and Capital Improvements Program
16	2020 Neighborhood Community Development Program - Activities TBD
17	2020 Administration - CDBG Program
19	2020 Multi-Family Projects - HOME
20	2020 Administration - HOME Program
21	2020 ESG Program Delivery

Table 56 – Project Information

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

AP-38 Project Summary
Project Summary Information

1	Project Name	2020 Public Services - Food Security Program
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$40,000
	Description	General operations and staffing expenses related to the delivery of protein rich foods through the Futures-Food Security Program.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	Project will provide food security and protein rich food sources to qualified low and moderate income households.
	Location Description	Second Harvest Food Bank 1234 E. Front Ave, Spokane, WA 99202 https://2-harvest.org/
Planned Activities	Food distribution services	
2	Project Name	2020 Public Services - CHAS Dental Voucher Program
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$50,000
	Description	Dental Voucher assistance/subsidies for qualifying low/moderate income individuals
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Subsidized dental care for approximately 250 low and moderate income individuals.

	Location Description	CHAS Health 203 N. Washington St, Suite 300, Spokane, WA 99201 https://chas.org/
	Planned Activities	Dental vouchers for low and moderate income individuals
3	Project Name	2020 Public Service - ECCC Operations
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$60,000
	Description	General Operations and staffing support costs associated with maintenance and operations of East Central Community Center.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The East Central Community Center hosts numerous social services to assist low and moderate income persons residing in the East Central and lower south hill. During this period of performance the East Central Community Center will serve approximately 5,000 individuals. Services Include: Food Bank, Police Athletic League, Summer Youth Academy, FAME, ECEAP, Early Head Start, SNAP, WIC, Senior & Citizen Program
	Location Description	500 S. Sone St. Spokane, WA 99202 Phone: (509) 868-0856 Email: info@mlkspokane.org Website: https://mlkspokane.org
Planned Activities	General Operations and staffing support costs associated with maintenance and operations of East Central Community Center.	
4	Project Name	2020 Public Service - NECC Operations
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$80,000
	Description	General operations and staffing support costs associated with maintenance and operations of Northeast Community Center.
	Target Date	6/30/2121

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>The Northeast Community Center houses multiple organizations that assist those living in the Northeast Neighborhood of Spokane. The Northeast Community Center provides social services to approximately 5,000 low and moderate income individuals annually.</p> <ul style="list-style-type: none"> • Children’s Home Society provides a comprehensive continuum of care in early learning, family support, out-of-home care, child and family counseling, adoption and advocacy. Intake line (509) 598-4131. • ECEAP and Head Start are programs that offer classroom learning for preschool-age children of low-income families. They can be reached by phone at (509) 279-6351. • The Hillyard Senior Center gives senior citizens an outlet for recreation, nutritional meals, health and social services. They can be reached by phone at (509) 482-0803. • SNAP offers budget counseling, energy assistance, weatherization, and minor home repair. They can be reached by phone at (509) 456-7627. • WIC is a nutrition education and breastfeeding support program for pregnant, breastfeeding and postpartum women and caregivers of infants and children under the age of five who qualify. They can be reached by phone at (509) 323-2828. • Unify Community Health, & Dental Experienced family physicians provide a full spectrum of care, including prenatal care, delivery, and care for children. The medical office can be reached by phone at (509) 483-3427, and the dental office at (509) 326-4382. 										
<p>Location Description</p>	<p>4001 N. Cook St. Spokane, WA 99207 Phone: (509) 487-1603 Website: https://www.necommunitycenter.com/wp/</p>										
<p>Planned Activities</p>	<p>General operations and staffing support costs associated with maintenance and operations of Northeast Community Center.</p>										
<p>5</p>	<table border="1"> <tr> <td data-bbox="245 1604 495 1661"> <p>Project Name</p> </td> <td data-bbox="495 1604 1430 1661"> <p>2020 Public Services - Homeownership Program</p> </td> </tr> <tr> <td data-bbox="245 1661 495 1717"> <p>Target Area</p> </td> <td data-bbox="495 1661 1430 1717"> </td> </tr> <tr> <td data-bbox="245 1717 495 1774"> <p>Goals Supported</p> </td> <td data-bbox="495 1717 1430 1774"> <p>Community Based Social Services</p> </td> </tr> <tr> <td data-bbox="245 1774 495 1831"> <p>Needs Addressed</p> </td> <td data-bbox="495 1774 1430 1831"> <p>Community based social service programming</p> </td> </tr> <tr> <td data-bbox="245 1831 495 1883"> <p>Funding</p> </td> <td data-bbox="495 1831 1430 1883"> <p>CDBG: \$184,172</p> </td> </tr> </table>	<p>Project Name</p>	<p>2020 Public Services - Homeownership Program</p>	<p>Target Area</p>		<p>Goals Supported</p>	<p>Community Based Social Services</p>	<p>Needs Addressed</p>	<p>Community based social service programming</p>	<p>Funding</p>	<p>CDBG: \$184,172</p>
<p>Project Name</p>	<p>2020 Public Services - Homeownership Program</p>										
<p>Target Area</p>											
<p>Goals Supported</p>	<p>Community Based Social Services</p>										
<p>Needs Addressed</p>	<p>Community based social service programming</p>										
<p>Funding</p>	<p>CDBG: \$184,172</p>										

	Description	General Operation and staffing costs associated with Homeownership program delivery. Loans will be made to qualifying low/moderate income individuals seeking first-time homebuyer assistance.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	SNAP's Homeownership Program provides assistance to low/moderate income individuals through multiple interventions. After assessing the unique needs of each client, SNAP will provide one (or more) of the following services: home buyer education, pre-purchase counseling, down payment assistance, foreclosure prevention, credit building, money management, and financial counseling. SNAP will assist approximately 150 unduplicated low/mod income individuals during the contracted period of performance.
	Location Description	SNAP's Financial Access Program is offered at: 500 S. Stone St. Spokane, WA 99202 (East Central Community Center)
	Planned Activities	General Operation and staffing costs associated with Homeownership program delivery. Loans will be made to qualifying low/moderate income individuals seeking first-time homebuyer assistance.
6	Project Name	2020 Public Service - Southwest Community Center Operations
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$20,000
	Description	General operations support for Southwest Community Center.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	The Southwest Community Center provides low-cost childcare and afterschool youth programming to assist low/moderate income households in southwest Spokane. Approximately 250 unduplicated low/moderate income individuals will be served during the contracted period of performance.
	Location Description	Southwest Community Center is located at: 310 S Spruce St. Spokane, WA 99201
	Planned Activities	General operations support for Southwest Community Center.

7	Project Name	2020 Public Services - Women's Hearth
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$38,323
	Description	General Operations and staffing expenses related to persons served at Women's Hearth.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	The Hearth is a safe, welcoming community that promotes growth and well-being in body, mind, and spirit for women of diverse backgrounds. It fosters nurturing relationships, encourages self-determination, and advocates for change in systems that oppress women. During this program year the Women's Hearth will serve approximately 250 individuals with social services targeted towards homeless and formerly homeless individuals.
	Location Description	920 W 2nd Ave. Spokane, WA 99201 Website: http://www.help4women.org/programs/womens-hearth
Planned Activities	The Women's Hearth is a one-of-a-kind downtown day center for women providing community, activities, classes, social service referrals and housing-search case management in a compassionate and supportive environment 7 days a week. Participants also have access to phones, computers, internet, healthy food, hygiene supplies, free showers, and a respite room.	
8	Project Name	2020 Public Service - West Central Youth Development
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$25,000
	Description	General operational support for West Central Community Center Youth Development & Recreation Program.
	Target Date	6/30/2121

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>This award will support approximately 150 youth with activities/services at the West Central Community Center. Activities include the following:</p> <ul style="list-style-type: none"> • The Recreation & Fitness program has a variety of programs and services for families and individuals. We offer before and after school, summer youth programs, teen programs and numerous clubs and classes. • The Youth Development programs offered at West Central provide children and teens numerous opportunities to participate in fun, active and educational activities in a safe and nurturing environment. 																
<p>Location Description</p>	<p>1603 N Belt St, Spokane, WA 99205 Website: https://www.westcentralcc.org/</p>																
<p>Planned Activities</p>	<p>The Recreation & Fitness program has a variety of programs and services for families and individuals. We offer before and after school, summer youth programs, teen programs and numerous clubs and classes.</p> <p>The Youth Development programs offered at West Central provide children and teens numerous opportunities to participate in fun, active and educational activities in a safe and nurturing environment.</p> <p>For more information, please visit the following website: https://www.westcentralcc.org/recreation-fitness</p>																
<p>9</p>	<table border="1"> <tr> <td data-bbox="495 1136 1055 1192"> <p>Project Name</p> </td> <td data-bbox="1055 1136 1432 1192"> <p>2020 Public Service - West Central Operations</p> </td> </tr> <tr> <td data-bbox="495 1192 1055 1249"> <p>Target Area</p> </td> <td data-bbox="1055 1192 1432 1249"></td> </tr> <tr> <td data-bbox="495 1249 1055 1306"> <p>Goals Supported</p> </td> <td data-bbox="1055 1249 1432 1306"> <p>Community Based Social Services</p> </td> </tr> <tr> <td data-bbox="495 1306 1055 1362"> <p>Needs Addressed</p> </td> <td data-bbox="1055 1306 1432 1362"> <p>Community based social service programming</p> </td> </tr> <tr> <td data-bbox="495 1362 1055 1419"> <p>Funding</p> </td> <td data-bbox="1055 1362 1432 1419"> <p>CDBG: \$90,000</p> </td> </tr> <tr> <td data-bbox="495 1419 1055 1476"> <p>Description</p> </td> <td data-bbox="1055 1419 1432 1476"> <p>General operations support for West Central Community Center.</p> </td> </tr> <tr> <td data-bbox="495 1476 1055 1533"> <p>Target Date</p> </td> <td data-bbox="1055 1476 1432 1533"> <p>6/30/2121</p> </td> </tr> <tr> <td data-bbox="495 1533 1055 1785"> <p>Estimate the number and type of families that will benefit from the proposed activities</p> </td> <td data-bbox="1055 1533 1432 1785"> <p>The West Central Community Center provides multiple community programs (WIC, childcare, ECEAP, senior services, ADA services, etc.) to assist low/moderate income households in west central Spokane. Approximately 1,500 unduplicated low/moderate income individuals will be served during the contracted period of performance.</p> </td> </tr> </table>	<p>Project Name</p>	<p>2020 Public Service - West Central Operations</p>	<p>Target Area</p>		<p>Goals Supported</p>	<p>Community Based Social Services</p>	<p>Needs Addressed</p>	<p>Community based social service programming</p>	<p>Funding</p>	<p>CDBG: \$90,000</p>	<p>Description</p>	<p>General operations support for West Central Community Center.</p>	<p>Target Date</p>	<p>6/30/2121</p>	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>The West Central Community Center provides multiple community programs (WIC, childcare, ECEAP, senior services, ADA services, etc.) to assist low/moderate income households in west central Spokane. Approximately 1,500 unduplicated low/moderate income individuals will be served during the contracted period of performance.</p>
<p>Project Name</p>	<p>2020 Public Service - West Central Operations</p>																
<p>Target Area</p>																	
<p>Goals Supported</p>	<p>Community Based Social Services</p>																
<p>Needs Addressed</p>	<p>Community based social service programming</p>																
<p>Funding</p>	<p>CDBG: \$90,000</p>																
<p>Description</p>	<p>General operations support for West Central Community Center.</p>																
<p>Target Date</p>	<p>6/30/2121</p>																
<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>The West Central Community Center provides multiple community programs (WIC, childcare, ECEAP, senior services, ADA services, etc.) to assist low/moderate income households in west central Spokane. Approximately 1,500 unduplicated low/moderate income individuals will be served during the contracted period of performance.</p>																

	Location Description	West Central Community Center is located at: 1603 N Belt St. Spokane, WA 99205
	Planned Activities	General operations support for West Central Community Center.
10	Project Name	2020 Public Services - Improving Food Security for Spokane's Hungry Women & Children
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$65,000
	Description	Meal service program for low/moderate income women and children.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	Women and Children Free Restaurant provides prepared nutrient rich meals to low/mod income individuals. This program will assist approximately 2,500 unduplicated individuals during the contracted period of performance.
	Location Description	Women and Children Free Restaurant is located at: 1408 N Washington St. Spokane, WA 99201
	Planned Activities	Meal service program for low/moderate income women and children.
11	Project Name	2020 Public Services - YWCA Women in the Workforce
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$70,213
	Description	General operation and staffing costs related to the delivery of Women in the Workforce Program
	Target Date	6/30/2121

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>Funding to support this program will assist 18 individuals with job readiness programming. Approximately 11 individuals will graduate this program employed.</p>
<p>Location Description</p>	<p>930 N. Monroe St. Spokane, WA 99201 Website: https://ywcaspokane.org/programs/heal-and-grow/women-to-work/</p>

<p>Planned Activities</p>	<p>A JOB READINESS EMPLOYMENT PROGRAM</p> <p>The Women to Work program is for women in Spokane who are actively looking for employment. With the support from BFET (Basic-Food, Employment and Training) funds, the Women to Work program can help remove or reduce barriers to employment, in-turn creating a more open pathway to securing and retaining employment.</p> <p>Who Is The Program For</p> <p>This program is supported by BFET funds which assists individuals who are experiencing barriers to employment and who are not currently receiving TANF services. Barriers might include homelessness, domestic violence, mental and physical disabilities, poverty, lack of childcare, and transportation issues.</p> <p>How to Qualify</p> <p>In addition to actively looking for work, qualifying participants must be receiving DSHS (Department of Social and Health Services) food benefits or EBT Card funds, and are not currently receiving TANF (Temporary Assistance for Needy Families).</p> <p>Call 789-9299 with any questions or to schedule an appointment to see if you qualify.</p> <p>Support Included</p> <p>Participants will receive full access to our computer lab, networking opportunities, skill-building classes, and one-on-one support from area professionals, staff and volunteers who can assist with creating a resume, cover letter and systems to successfully seek employment.</p> <p>Program Benefits</p> <p>Resources to overcome barriers to employment, such as transportation & childcare.</p> <p>A professional job portfolio including a targeted resume, cover letter, references, & application.</p> <p>Access to our staffed computer lab to build your computer skills, attend workshops & apply for jobs.</p> <p>An ability to identify & communicate strengths.</p> <p>Motivation from our weekly Action Group.</p> <p>A boost in confidence for employment success.</p> <p>Opportunities to network with employers.</p> <p>Professional interview and work clothing.</p> <p>Help preparing for the interview.</p>
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		<p>Financial Coach support. How to Enroll</p> <p>Call the Program Manager at 789-9299 or email women2work@ywcaspokane.org to learn more about this program or to sign up for our next orientation.</p>
12	Project Name	2020 Housing - Single Family Rehab Program
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$1,553,096
	Description	Provide low-cost loans for needed home repairs to assist low-income homeowners maintain a safe and efficient home. These home repairs address health and safety deficiencies and reduce operating costs (to the extent practicable).
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	33 home rehabilitation loans delivered per year to qualified low and moderate income homeowners.
Location Description	<p>Various locations throughout the City of Spokane.</p> <p>SNAP Armory 212 W. Second Spokane, WA 99201 Phone: (509) 456-SNAP (7627) Fax: (509) 744-3374</p> <p>Hours of operation: M/T/W/F: 8:00-4:30 (closed between 12-1 pm) TH: 10:30-4:30 (closed between 12-1 pm)</p> <p>Housing Improvements, Weatherization, Home Repair, Conservation Education, Energy Assistance Appointments</p>	

	Planned Activities	<p>Provide low-cost loans for needed home repairs to assist low-income homeowners maintain a safe and efficient home. These home repairs address health and safety deficiencies and reduce operating costs (to the extent practicable).</p> <p>Many low-income homeowners do not have the means to repair or maintain their homes, yet affordable housing often has dangerous or unhealthy defects. SNAP has several types of Home Repair Programs that can make repairs, or provide access to loans, for items in your home that pose health or safety hazards such as roof leaks, sewer problems, no water, and accessibility modifications.</p> <p>For more information visit: https://www.snapwa.org/home-repair, or call (509) 319-3083</p>
13	Project Name	2020 Housing - Rental Repair Program
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$413,966
	Description	Provide low-cost loans for needed repairs to rental property owners that serve low-income renters. These repairs address health and safety deficiencies and reduce operating costs (to the extent practicable).
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Provide approximately ten (10) rental repair loans that improve housing quality, tenant safety, energy efficiency, and appearance to owners of small (1 to 7 unit) rental properties where at least 51% of renters in each property are below 80% of Area Median Income.

	Location Description	<p>Various locations throughout the City of Spokane.</p> <p>SNAP Armory 212 W. Second Spokane, WA 99201 Phone: (509) 456-SNAP (7627) Fax: (509) 744-3374</p> <p>Hours of operation: M/T/W/F: 8:00-4:30 (closed between 12-1 pm) TH: 10:30-4:30 (closed between 12-1 pm)</p> <p>Housing Improvements, Weatherization, Home Repair, Conservation Education, Energy Assistance Appointments</p>
	Planned Activities	Provide approximately ten (10) rental repair loans that improve housing quality, tenant safety, energy efficiency, and appearance to owners of small (1 to 7 unit) rental properties where at least 51% of renters in each property are below 80% of Area Median Income.
14	Project Name	2020 Housing - Essential Home Repair Program
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$585,600
	Description	Provide minor home repairs as grants to homeowners at/below 80% Area Median Income, as defined and annually updated by HUD. Minor home repairs should address health hazards, safety hazards, and/or accessibility issues that may make the homes unsafe or uninhabitable. This includes, but is not limited to, security, plumbing, heating, electrical, roof, weatherization, and sewer repairs and accessibility modifications. Not more than \$150,000 of the total Program budget shall have an eligibility requirement that the funds be granted for repairs up to \$10,000 per grant to homeowners also receiving a Single Family Rehabilitation program loan.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	SNAP will provide minor/essential home repair services to approximately 260 low and moderate income homeowners during the 12 month period of performance.

	Location Description	Various locations throughout the City of Spokane. SNAP Armory 212 W. Second Spokane, WA 99201 Phone: (509) 456-SNAP (7627) Fax: (509) 744-3374 Hours of operation: M/T/W/F: 8:00-4:30 (closed between 12-1 pm) TH: 10:30-4:30 (closed between 12-1 pm) Housing Improvements, Weatherization, Home Repair, Conservation Education, Energy Assistance Appointments
	Planned Activities	Provide minor home repairs as grants to homeowners at/below 80% Area Median Income, as defined and annually updated by HUD. Minor home repairs should address health hazards, safety hazards, and/or accessibility issues that may make the homes unsafe or uninhabitable. This includes, but is not limited to, security, plumbing, heating, electrical, roof, weatherization, and sewer repairs and accessibility modifications. Not more than \$150,000 of the total Program budget shall have an eligibility requirement that the funds be granted for repairs up to \$10,000 per grant to homeowners also receiving a Single Family Rehabilitation program loan.
15	Project Name	2020 Perpetual Housing, Acquisition, and Capital Improvements Program
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$1,008,731
	Description	The Community, Housing and Human Services Department (CHHS) has developed a simplified application process to address changing and urgent community needs. The Perpetual Housing, Acquisition, and Capital Improvements Program (PHACIP) allows partner agencies an opportunity to apply for CHHS funding sources on a monthly basis, or until funding is no longer available. Interested partner agencies are encouraged to submit an application packet to CHHS.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Reserve project for activities that provide funding to support qualifying Housing, Acquisition, and Capital Improvements. CHHS will provide additional details through the substantial amendment process (open public hearings and public comment) as project(s) are identified. This set-aside is for capital/construction based programming and not available for public service qualifying activities. For more information, please contact the Community, Housing and Human Services Department (CHHS) at spokanechhs@spokanecity.org.
	Location Description	Location to be determined. CHHS will identify the location(s) through substantial the substantial amendment process. For more information, please contact CHHS at spokanechhs@spokanecity.org.
	Planned Activities	Reserve project for activities that provide funding to support qualifying Housing, Acquisition, and Capital Improvements. CHHS will provide additional details through the substantial amendment process (open public hearings and public comment) as project(s) are identified. This set-aside is for capital/construction based programming and not available for public service qualifying activities. For more information, please contact the Community, Housing and Human Services Department (CHHS) at spokanechhs@spokanecity.org.
16	Project Name	2020 Neighborhood Community Development Program - Activities TBD
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$400,000
	Description	The Community, Housing, and Human Services Department (CHHS) allocates approximately \$400,000 to support community development programming that directly benefit low and moderate individuals and households. Neighborhood Councils are encouraged to coordinate and identify priority community based projects. Program Website: https://my.spokanecity.org/chhs/funding-opportunities/neighborhood/
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Reserve project for activities that provide funding to support qualifying Neighborhood Community Development Program activities. CHHS will provide additional details through the substantial amendment process (open public hearings and public comment) as project(s) are identified. This set-aside is for capital/construction based programming and not available for public service qualifying activities. For more information, please contact the Community, Housing and Human Services Department (CHHS) at spokanechhs@spokanecity.org .
	Location Description	Location to be determined. CHHS will identify the location(s) through substantial the substantial amendment process. For more information, please contact CHHS at spokanechhs@spokanecity.org .
	Planned Activities	Reserve project for activities that provide funding to support qualifying Neighborhood Community Development Program activities. CHHS will provide additional details through the substantial amendment process (open public hearings and public comment) as project(s) are identified. This set-aside is for capital/construction based programming and not available for public service qualifying activities. For more information, please contact the Community, Housing and Human Services Department (CHHS) at spokanechhs@spokanecity.org . Program Website: https://my.spokanecity.org/chhs/funding-opportunities/neighborhood/
17	Project Name	2020 Administration - CDBG Program
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$800,000
	Description	Administrative costs associated with the management of Community Development Block Grant Program (CDBG).
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	NA

	Location Description	808 W. Spokane Falls Blvd. Spokane, WA 99201 https://my.spokanecity.org/chhs/
	Planned Activities	Administrative costs associated with the management of Community Development Block Grant Program (CDBG).
18	Project Name	2020 Multi-Family Projects - HOME
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	HOME: \$1,203,300
	Description	HOME multi-family funding will support the development and redevelopment of approximately 10 affordable housing units within the City of Spokane. All units will be reserved for low income households.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	HOME multi-family funding will support the development and redevelopment of approximately 10 affordable housing units within the City of Spokane. All units will be reserved for low income households.
	Location Description	Unknown at this time - CHHS will issue funding notices throughout the 2020 Program Year to support proposals that fall under this general activity. CHHS will provide a substantial amendment to this Action Plan with an opportunity to make public comment once funding decisions have been made. Citizens will have 30 days to review the amended plan and offer public comment. The HOME Program is administered by staff in the Community, Housing and Human Services Department (CHHS) located at: Spokane City Hall 808 W Spokane Falls Blvd. Spokane, WA 99201
Planned Activities	HOME multi-family funding will support the development and redevelopment of approximately 10 affordable housing units within the City of Spokane. All units will be reserved for low income households.	
Project Name	2020 Administration - HOME Program	

19	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	HOME: \$133,673
	Description	General administration of the HOME Program. Administrative activities include community engagement, planning, reporting to funder, making grant awards, technical assistance, environmental reviews, procurement, compliance monitoring, certified payroll review, etc.
	Target Date	6/30/2121
	Estimate the number and type of families that will benefit from the proposed activities	General administration of the HOME Program. Administrative activities include community engagement, planning, reporting to funder, making grant awards, technical assistance, environmental reviews, procurement, compliance monitoring, certified payroll review, etc.
	Location Description	The HOME Program is administered by staff in the Community, Housing and Human Services Department (CHHS) located at: Spokane City Hall: 808 W Spokane Falls Blvd. Spokane, WA 99201
	Planned Activities	General administration of the HOME Program. Administrative activities include community engagement, planning, reporting to funder, making grant awards, technical assistance, environmental reviews, procurement, compliance monitoring, certified payroll review, etc.
20	Project Name	2020 ESG Program Delivery
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	ESG: \$287,494
	Description	Operational costs associated with homeless shelter response network.
	Target Date	12/31/2021

Estimate the number and type of families that will benefit from the proposed activities	Funding through this activity is expected to serve approximately 500 homeless individuals and families with overnight shelter beds.
Location Description	This activity will provide financial support for operation expenses related to homeless emergency shelters. The exact location is not know at this time. The City of Spokane will inform the public via Public Hearing and Substantial Amendment process once specific activities and locations have been identified. For more information, please contact CHHS at spokanechhs@spokanecity.org .
Planned Activities	Operational costs associated with homeless shelter response network.

AP-50 Geographic Distribution – 91.220(f)

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

The City of Spokane will not direct funding to any one targeted area of the City. Rather, funding will be allocated based on present needs within the community and quality of project application. The City will work in partnership with social service providers, local businesses, elected officials, and neighborhood councils to ensure changing community needs are being met.

Geographic Distribution

Target Area	Percentage of Funds

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

There will be no funding allocation to specific geographic areas within the City. This Consolidated Plan will make funding decisions based on the needs of low and moderate income individuals and families regardless of their location.

Discussion

The City of Spokane will present all future funding awards and target populations at open public hearings, followed by a 30-day public comment period.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Spokane is focused on providing safe affordable housing choices for low and moderate income residents. During program year 2020, the City will prioritize activities that move individuals into permanent affordable housing units through the construction, acquisition, and rehabilitation of new units. Several projects are underway and expected to complete on, or before 12/31/2021.

One Year Goals for the Number of Households to be Supported	
Homeless	350
Non-Homeless	19,830
Special-Needs	0
Total	20,180

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	50
The Production of New Units	10
Rehab of Existing Units	303
Acquisition of Existing Units	10
Total	373

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

Spokane Housing Authority (SHA) began in 1972 as the Housing Authority of the City of Spokane is now a multi-jurisdictional agency serving many cities and six counties in Eastern Washington. The partnership between SHA and the City of Spokane continues to provide affordable housing for thousands of households. SHA is governed by a seven-member Board of Commissioners to include one “directly assisted Commissioner” and six commissioners appointed by the following: Two (2) individuals appointed by the Mayor of the city of Spokane, two (2) individuals appointed by the City Council of the City of Spokane Valley, and two (2) individuals appointed by the Spokane County Commissioners. Each member serves a five-year term of office, with terms rotating in such a manner that one appointment is made each year. The Board has full authority in the establishment of SHA policies, long-term direction, and oversight of programs that accomplish the Agency’s mission.

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

Spokane Housing Authority has always had an extremely small public housing program. Initially, just 125 total public housing units were in SHA’s inventory. In 2015, SHA was given permission to move forward with a Rental Assistance Demonstration (RAD) Program portfolio project to divest its public housing inventory.

As of November 1, 2019, the Spokane Housing Authority (SHA) no longer owns or operates Public Housing units. SHA has utilized HUD’s Rental Demonstration Program (RAD) to convert all Public Housing units to project based housing vouchers under the Housing Choice Voucher program. This process began in 2016 with the conversion of 50 public housing units at the Parsons Apartments, and was completed in November of 2019 with the conversion of 74 scattered site properties that represented the remaining public housing units operated by the Housing Authority. In 2016, one single family home (part of SHA’s scattered site public housing inventory), was sold to the Washington State Department of Transportation through eminent domain to facilitate the north/south freeway extension. In order to ensure that Public Housing participants were not adversely affected by this conversion, the Housing Authority created a Relocation Specialist position dedicated to relocating these families to affordable and comparable housing units in the community and offering continuing rental assistance through the Housing Choice Voucher program. In addition, all families who were on the Public Housing waiting list at the time of conversion, were given the opportunity to be placed on the HCV waiting list for the same time and date that they had originally applied to the Public Housing Program.

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

SHA updated its Administrative Plan to provide an avenue for the 74-scattered site public housing residents to participate in the Housing Choice Voucher Homeownership program if they meet the qualifications. All 74 were given the first right of refusal to purchase the home in which they reside or

another available from the inventory. In 2019, the authority met with households to understand if homeownership is something they wish to pursue. As mentioned in previous years, the homeownership track is more involved and has more hurdles to overcome, not every household will be capable of or have the means to achieve this option. The remainder of 2020 and 2021 will be spent working with current households to begin implementing their future housing option, which includes this homeownership alternative. To date, we have successfully assisted three families previously on public housing with acquisition of their unit or another in the portfolio.

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

Not applicable. The Housing Authority is designated as a high performer.

Discussion

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

Introduction

The Spokane City/County Continuum of Care, in support of the 2015-2020 Strategic Plan to End Homelessness, will focus on action steps aimed at obtaining the following objectives: increase leadership, collaboration and civic engagement; increase access to stable and affordable housing; support effective pathways toward self-sufficiency and reduced financial vulnerability; transform homeless services to crisis response systems leading to improved health and safety; and advance health and housing stability for youth experiencing homelessness, including unaccompanied homeless youth and youth aging out of systems such as foster care.

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

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

In an effort to reach out to the unsheltered population, the community has implemented a number of street outreach initiatives. The City of Spokane's CHHS Department work with other City entities such as Code Enforcement and Police to support the Homeless Street Outreach Team, a collaboration between homeless housing providers, coordinated assessment, and mental health providers to identify and provide outreach to individuals occupying homeless encampments. This interagency collaboration includes both a City-funded street outreach team and a PATH-fund outreach team for homeless individuals with mental illness and provides a pipeline for housing and support services to the chronically homeless unsheltered population in our community. The City has identified the need for additional investment in street outreach in the next year and has targeted these funds to both expand the capacity of existing efforts and to facilitate better alignment of services between City-, PATH-, SSVF-, RHY-, and STR Opioid Crisis-funded street outreach teams. This new street outreach collaborative meets on a bi-weekly to case conference common clients and coordinate outreach services to ensure 100% geographic coverage of the jurisdiction and that clients are matched to the appropriate service provider. The goal for the next year is to complete assessment of the collaborative's geographic coverage with a particular emphasis on identifying gaps in rural coverage.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC identifies the need to provide emergency response to families and individuals who are homeless and recognizes the continued need for shelter beds that are available when a person is unsheltered. Although the CoC is moving towards providing permanent, rather than temporary, housing options, there are some special populations, such as youth, households fleeing domestic violence, clients exiting institutions, and families with children involved with the child welfare system,

who continue to benefit from a supportive transitional housing program.

The jurisdiction's goal is to operate a comprehensive shelter system that meet the needs of all households regardless of composition and quickly transitions households from homelessness back into permanent housing. Currently the shelter system includes programs to serve the specific needs of homeless adult men, adult women, unaccompanied youth, and households with children, however youth who are in transition (18-24) do not have a dedicated shelter program. The City identified a partner agency at the end of 2017 through an RFI process to take the lead in the development of a shelter for young adults. In July of 2018, the City was selected by A Way Home Washington to participate in their Anchor Community Initiative around ending youth and young adult homelessness is currently working to utilize the financial resources available through the initiative to develop, with this partner agency, to develop a young adult shelter in the next year.

These efforts connect directly to the goals of transforming homeless services in to a crisis response system and the system goal of reducing the length of time households experience homelessness.

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

The jurisdiction's coordinated entry process includes access to diversion programs to prevent individuals and families with children from entering the crisis response system by assisting with their access to community resources. ESG is funding rapid re-housing and emergency shelter operations. An intentional shift to focus on permanent housing exits when households enter the homeless system has been transforming the City's homeless system over the past few years. As a result, much of the CoC efforts to serve homeless households are focused on rapid re-housing. Households who present as chronically homeless with very high barriers are placed directly into available PSH units or available bridge housing. These efforts shorten the time families are homeless and increase stability. The one year for these populations is complete for the CoC to complete its evaluation of the prioritization policies of singles and families coordinated assessment and implement any necessary changes to how households are matched with housing intervention.

The Supportive Services for Veteran Families (SSVF) program provides an essential resource for Veterans and their families who are homeless or at risk. SSVF provides intensive outreach, housing search and placement and continued case management for this population. For Veterans who need more intensive housing services, Spokane Housing Authority (SHA) has a successful partnership with the Veterans Administration to provide VASH vouchers to homeless veterans. All referrals are made through the VA, who also provides complete wrap-around supportive services. Veterans that are not eligible for these

programs are prioritized for placement in PSH dedicated to chronically homeless veterans.

The Young Adult Housing Program (YAHP) from the Washington State Department of Commerce's Office of Homeless Youth has provided the jurisdiction with an essential new resource for the provision of rent assistance, transitional housing, and case management for young adults ages 18 through 24. YAHP provides young adults with housing search assistance, temporary rental assistance, and case management as well as access to transitional or interim housing during the housing search process for youth with the highest barriers. The one-year goal for this population is to complete the evaluation of the joint transitional housing-rapid rehousing pilot program for YAHP to determine if this an effective model for transition vulnerable young people to permanent housing.

HOME Tenant-Based Rental Assistance, granted to Spokane Housing Authority, continues to be a critical tool in achieving permanent housing for families and individuals experiencing homelessness.

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

The jurisdiction works with the following housing and health care partners on the implementation of an integrated care program: Empire Health Foundation, Providence Health Care, Community Health Association of Spokane, and Volunteers of America. The program strives to ensure eligible homeless clients are not discharged from in-patient hospital care or emergency room visit into homelessness. The Roads to Community Living Program coordinates with group homes, assisted living program and private landlords to ensure that long term Medicare eligible clients discharging from hospitals, nursing homes and mental health facilities are not being discharged into homelessness.

The Spokane County Regional Behavioral Health Division (SCRBH) is responsible for all community-based mental health services for inpatient and outpatient care services. Eastern State Hospital works in conjunction with Frontier Behavioral Health Outreach Team, Spokane County Supportive Living Program, and Behavioral Health Options. These programs work with the clients and the outpatient mental health provider to create a plan for housing and continued services.

The CoC has ensured that its members have written procedures to address discharge planning of youth exiting foster care. The Department of Children, Youth, and Families procedures provide for Independent Living Services and require an Independent Living Plan to assist the youth toward a successful transition to adulthood. Local DCYF Social Workers and other community stakeholders work with youth as they near 18 to establish an ILP to guide the services and housing assistance until they are

21.

Spokane County has taken the lead in housing individuals as they exit from correctional institutions through the Re-Entry Initiative (REI) Program, a community re-entry program dedicated to transitioning formerly homeless exiting institutional settings into adjusted citizens, engaging, working and living in stable housing with limited to no subsidy. Through their partnership with Goodwill Industries of the Inland Northwest, they provide permanent housing through a short term rental assistance program to persons exiting correctional institutions. Airway Heights Corrections facility and the local jail works with Pioneer Human Services who operates a 55-bed work release facility for women and an 80-bed work release facility for men. A formalized discharge plan, in which housing is a requirement, is created for each client as they discharge from these facilities.

Discussion

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

Introduction:

The City of Spokane is working to address barriers to affordable housing by developing a plan that addresses all aspects of housing choice. The City is working with the Washington State Department of Commerce, Spokane County, and the City of Spokane Valley to increase access to housing within the region.

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

The City of Spokane is creating the Housing Action Plan to help increase housing options that are affordable and accessible for people and families of all incomes. As Spokane grows, we are facing a gap in housing supply. The plan will provide a strategic approach to address current and future housing needs of the Spokane community. When completed, it will provide a coordinated vision that supports more people being able to find a home that meets their needs with access to opportunities, services and amenities. This process builds upon previous community discussions and initiatives around infill development, housing quality, and affordable housing funding.

Spokane's Housing Action Plan will:

- Encourage construction of additional affordable and market rate housing that are accessible to a variety of income levels. This includes options accessible to people and families with low and moderate incomes and cost-burdened households.
- Examine population, workforce and housing trends.
- Assess housing policies, development regulations, and other city programs that influence the development of housing.
- Consider strategies to minimize displacement, particularly in neighborhoods with communities at high risk of displacement.

The City received a grant from the Washington Department of Commerce to complete the plan, which is expected to be adopted by City Council in April 2021.

Discussion:

Citizens are encouraged to participate in the planning efforts as the City of Spokane develops the Housing Action Plan. These planning efforts will benefit all citizens by developing goals and policies that create more affordable housing options within the City.

For more information about the Housing Action Plan, please visit:

<https://my.spokanecity.org/housing/spokane-housing-action-plan/>

AP-85 Other Actions – 91.220(k)

Introduction:

The following actions are intended to align with the needs and goals identified in the 2020 – 2024 Consolidated Plan. The Community, Housing and Human Services Department will remain adaptive and ready to serve as needs arise and the response system must be tailored to meet community needs.

Actions planned to address obstacles to meeting underserved needs

The City of Spokane will continue to engage with partner and local agencies to ensure unmet and changing needs within our community are addressed. The COVID-19 pandemic has created needs with our community that are likely to evolve over time. CHHS will rely on the expertise of public health officials and others to ensure resources are used to protect the health and safety of vulnerable populations. Citizens are encouraged to engage in public processes to support the needs and goals identified in this Consolidated Plan.

1. Improve affordable housing access & availability
2. Urgent public health & safety Response
3. Community based social service programming

Actions planned to foster and maintain affordable housing

Given the high demand for affordable housing, the City recognizes the importance of fostering affordable housing development and maintaining existing affordable housing stock. The City also provides Tenant Based Rental Assistance to extremely low-income/homeless families to create affordable housing options at market rate rental housing located across the City. The City fosters relationships with both for-profit and nonprofit (including CHDO) housing developers when soliciting HOME Multifamily Housing Program funding proposals. The City offers developers the opportunity to leverage limited City HOME funding with Low-Income Housing Tax Credits, housing bonds, Washington State Housing Trust Fund dollars, and Federal Home Loan Bank grants. Typically, City HOME funds account for only a fraction of the total cost but deliver large projects providing a large number of long-term affordable rental housing units.

The City maintains its HOME investment in affordable housing by monitoring rental housing occupancy and physical condition over HUD's minimum compliance periods required by 24 CFR 92.254. The City imposes an additional 10-year local compliance period to retain these rental units as affordable housing available to low-income households. The City also grants and loans CDBG funds to repair low-income owner-occupied homes enabling existing homeowners to enjoy a safe and healthy home that they can afford to operate and maintain. The City plans to address foreclosed, abandoned and derelict properties

by acquisition and/or renovation to create affordable homeownership opportunities.

Actions planned to reduce lead-based paint hazards

Spokane's Single Family Rehabilitation and Multifamily Housing programs are active in identifying and repairing lead-based paint hazards in eligible owner and renter housing. HUD Title X and EPA Renovator (RRP) requirements are integrated into CDBG and HOME funded programs that rehabilitate housing units constructed prior to 1978. Typical lead hazard control begins with an XRF lead inspection to guide the scope of work. Certified workers complete lead hazard control work in compliance with HUD's Title X and EPA RRP regulations. These projects typically include wet scraping, painting, eliminating friction/impact surfaces, mulching bare soil, and cleaning to Clearance. Each rehabilitated housing unit will achieve Clearance as part of project completion, as proscribed by HUD's Title X regulation.

Actions planned to reduce the number of poverty-level families

The City's anti-poverty strategies are implemented through the following established goals of the Consolidated Plan: preserving and expanding quality, safe, affordable housing choices; providing opportunities to improve the quality of life; and, expanding economic opportunities. The CDBG and HOME program are the principle funding sources targeted at reducing the number of poverty-level families but the ESG program also seeks to stabilize families and individuals so they are able to return to self-sufficiency, which Homeless Housing Assistance Act fund provide prevention assistance. Importantly, the resource management responsibilities of these programs provide staff of the Department of Community, Housing and Human Services an opportunity to facilitate coordination among a range of social and housing programs, operated by other City departments, governmental agencies and the nonprofit community, that together enhance the opportunities to reduce poverty for families.

CDBG program resources are targeted to meet the community development, infrastructure and economic opportunities needs in the community. The City allocates CDBG funding for several economic development activities providing opportunities for both low and moderate income family members to receive living wage employment and low and moderate income business owners to improve and expand their businesses, increasing their profitability and income. Public services activities also include programs for stabilizing families, while the housing rehabilitation program reduces and stabilizes low and moderate income homeowner's housing expenses. CDBG public services activities, such as the housing counseling program and the rental assistance case management program, assist low and moderate income families on the edge of poverty to help them to economic security.

HOME program resources are allocated to address the needs for safe, affordable housing. Program activities that are designed to reduce housing expenses and offer the opportunity to help move families out of poverty are tenant-based-rental assistance and the multifamily development program, which maintains and expands affordable housing. These rental support programs help provide economic

stability to the households assisted and are key to the goal of reducing the number of families facing poverty.

Actions planned to develop institutional structure

The City of Spokane works closely with partner agencies and community stakeholders to develop social response programs based on community need. Examples include the Homeless Coordinated Assessment, Emergency Shelters, Homeless Warming Shelter Response, Affordable Housing Committee, Continuum of Care Committee and Neighborhood Community Development Programs. Each program provides a response by the City to respond to the institutional needs of community partners and the individuals they serve.

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

The City has established a number of cooperative partnerships and collaborations with public and supportive housing providers, private and government health, local government, mental health and social service agencies to address its priority needs and will continue to do so.

Examples include:

- **Multi-family Housing:** the City works closely with Spokane County, the WA State Department of Commerce, and the WA State Housing Finance Commission to coordinate the funding, development and monitoring of multi-family housing units funded through the HOME program.
- **Tenant-Based Rental Assistance:** the City partners with the local housing authority to manage the HOME tenant-based rental assistance program. The TBRA program has been prioritized for high needs households and individuals. Referrals to the TBRA program via the community Coordinated Assessment program. Support Services are provided for all TBRA households through CoC Program and local Homeless Housing Assistance Act funded programs.
- **Fair Housing:** the City partners with HUD, Spokane County and the NW Fair Housing Alliance to fund, plan and host a regional Fair Housing Conference during the month of April (fair housing month).
- **Strong Families Initiative:** a City-led partnership between the City, the Spokane Housing Authority, Child Protective Services and non-profit housing and services providers to improve the lives and housing stability of families engaged with child welfare.

The City is the convener and the Collaborative Applicant for the City/County Continuum of Care. The City coordinates a number of homelessness reduction system-wide strategies involving both public and private agencies such as Coordinated Assessment, Housing First and Rapid Re-housing through the

Continuum of Care.

Discussion:

Program Specific Requirements

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

Introduction:

See narratives below for additional information about the Community Development Block Grant Program (CDBG), HOME Program, and Emergency Solutions Grant Program (ESG).

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

as follows:

Spokane does not plan to directly use other forms of investment beyond those listed in 92.205.

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

HOME regulation 92.254 describes qualifications of homeownership activities as affordable housing. City of Spokane has not budgeted HOME funds for homeownership activities. The City retains written agreements used in a previous homeownership program. These agreements include a recapture provision triggered if a borrower sells, transfers, refinances, or changes the use of the property during the HOME period of affordability. This loan provision limits recaptured funds to net proceeds available from the sale rather than the entire HOME investment. The City's Single Family Rehabilitation program uses this same loan recapture provision which limits recaptured funds to net proceeds of a sale. Consequently, the City is not required to repay HUD should any sale, short sale, foreclosure, involuntary sale, etc. of a program-assisted home provide insufficient funds to fully repay the amount of loaned HUD funding.

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

HOME regulation 92.254(a)(4) describes the minimum HOME period of affordability based upon the amount of HOME homeownership assistance. The City of Spokane has not budgeted HOME funds for homeownership activities. The City previously established maximum HOME assistance for each homebuyer transaction and that HOME assistance required a 10-year period of affordability. Earlier homeownership assistance loan documents provided some debt forgiveness over the 10-year HOME affordability period. All City homeownership assistance written agreements included a recapture provision that triggered repayment if a borrower sells, transfers, refinances, or changes the use of the property during the HOME period of affordability. This recapture provision limits recaptured funds to any net proceeds available from the sale rather than the entire HOME investment.

Similarly, HOME-funded affordable rental housing projects include acquisition, new construction, and/or renovation trigger minimum periods of affordability per 24 CFR 92.252(e). New construction projects are always subject to the regulation's 20-year affordability period but acquisition and/or rehab projects commonly trigger a 5, 10, or 15-year HOME affordability period. The City-imposed chooses to independently extend the periods of affordability is ten years longer than the minimum HOME affordability period and initially runs concurrently with the HOME affordability period. . These City-imposed affordability periods are described further in the HOME Multifamily Housing Program Description and agreements.

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

HOME funds will not be used to refinance existing debt secured by housing that is being rehabilitated with HOME funds under 24 CFR 92.206(b). However, HOME funds may be used to pay off principal and interest of a construction loan, bridge financing loan, or guaranteed loan as provided under 24 CFR 92.206(g).

Emergency Solutions Grant (ESG) Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

The Emergency Solutions Grant funds, in conjunction with additional funding sources, are currently funding Coordinated Assessment Initiatives through rapid re-housing, and shelter activities. The following program standards have been developed with community feedback, based on the feedback from CoC programs administering these funded activities. The standards continue to take into account the smaller resources and even greater targeting needed for ESG. These standards are included in program specific guidelines for all ESG funded programs.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Households seeking homeless assistance can access services through the Spokane Continuum of Care's Coordinated Assessment (CA) system. The local CA system operates two portals to better meet the disparate needs of different household types. Households with minor children are served through Homeless Families Coordinated Assessment (HFCA) system, which coordinates all family homeless service programs to provide prevention and rapid re-housing assistance in addition to placement in interim, transitional, and permanent supportive housing, if applicable. The program utilizes the Family Service Prioritization Decision Assistance Tool (F-SPDAT) and Family Vulnerability Index Service Prioritization Decision Assistance Tool (F-VI-SPDAT) to assess families for appropriate housing and service interventions based on vulnerability rather than a first come first serve model. The F-VI-SPDAT and F-SPDAT provide a consistent way of assessing households across the Continuum of Care and assists HFCA in connecting families with an appropriate housing intervention based on their level of need.

Households without children can access services through the Singles Homeless Coordinated Assessment (SHCA) System. SHCA operates as a decentralized assessment system with a lead agency to facilitate the training and coordination of assessment sites. SHCA uses the singles versions of the VI-SDPAT and SPDAT tools to provide common outcome data and measurable results. Household where every member is between the age of 18 and 24 that present at SHCA are assessed using the

Transition Age Youth Vulnerability Index Service Prioritization Decision Assistance Tool (TAY-VI-SPDAT) and the Youth Service Prioritization Decision Assistance Tool (Y-SPDAT). Once the appropriate assessment is completed in HMIS, a housing referral can be made to the appropriate housing track based on the household's vulnerability and desired housing intervention.

Households may access the program through one of two entry points:

1. By walking into either the HFCA or SHCA program offices for an assessment; or
2. Through targeted outreach and screening with a partnering service provider such as an emergency shelter or street outreach program.

The CA system has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC grantees.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Locally, the City of Spokane receives and administers ESG funds. As the CoC lead the City of Spokane works, through the Continuum of Care Governance Board and Community Housing and Human Services Board (CHHS), to determine priorities for homeless funding. Spokane County staff sits on both the Continuum of Care Governance Board and CHHS Board and is an integral part in determining how all homeless funds, including ESG funds, are allocated in the community. During the application process for homeless funding, the RFP and Evaluation Committee of CoC reviews applications and makes funding recommendations to CoC Governance Board.

Applicants eligible to apply for ESG funds include:

- City or County governments
 - Public and private nonprofit organizations (501(c)(3))
 - Private for profit organizations or individuals may implement certain economic development, low income housing rehabilitation and microenterprise activities.
 - Faith based organizations
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City currently meets the homeless participation requirement detailed in 24 CFR 576.405(1) through formerly homeless individuals' membership on the Community, Housing and Human Services Board subcommittees, Continuum of Care Governance Board, and the CoC RFP and Evaluation Committee. These committees are responsible for recommending policies and making funding decisions.

5. Describe performance standards for evaluating ESG.

All programs funded through ESG are evaluated for performance quarterly. Data for these evaluations is pulled from the Homeless Management Information System. In addition, all ESG funded programs are required to ensure HMIS data quality by the 5th of each month. Programs funded for rapid re-housing are measured by the percentage of households exiting to permanent housing, the percentage of households with increased income at exit, and the average length of time from identified eligibility to being housed. Programs funded for emergency shelter operations are required to enter universal data into the HMIS system and record entry and exit dates. In addition, these programs are measured by the percentage of households who exit from the emergency shelter into permanent housing, the average length of time individuals are homeless in emergency shelter, average length of time between enrollment and clients' date of engagement.

Citizens with additional questions regarding the CDBG, HOME and ESG Programs are encouraged to contact the Community, Housing and Human Services Department (CHHS) for additional information.

CHHS Contact Information:

- Email to CHHS at spokanechhs@spokanecity.org
- Phone CHHS at 625-6325
- Attend a Public Hearing and make comment directly to the CHHS Board
- Visit CHHS at Spokane City Hall
- 808 W. Spokane Falls Blvd, Spokane, WA 99201

Attachments

Citizen Participation Comments

2020-2024 Consolidated Plan: No Public Comments Received

The City of Spokane held a Public Hearing on Wednesday, July 8, 2020 to present the draft 2020-2024 Consolidated Plan for public comment. The CHHS Board concluded the public comment period and approved the 2020-2024 Consolidated Plan on Monday, August 10, 2020 with no formal or informal public comment received by the City of Spokane. Additional opportunity for Public Comment was offered at the Spokane City Council Advance and Current agendas (7/27/20 & 8/3/20).

Copies of the Draft 2020-2024 Consolidated Plan and Public Hearing presentation were hosted on the CHHS Department website prior to the Public Hearing held on 7/8/2020. These documents remain in the CHHS website. A copy of the final (HUD approved) 2020-2024 Consolidated Plan will be posted to the CHHS website shortly.

CHHS will continue to engage with community stakeholders in an effort to increase citizen participation in all planning documents.

Community, Housing, and Human Services Department (CHHS) website:

<https://my.spokanecity.org/chhs/documents/>

How to make Comment

- During Public Hearings
- During City Council Meetings
- During CHHS Board Meetings
- Email to CHHS (spokanechhs@spokanecity.org)
- In person (808 W. Spokane Falls Blvd., Spokane, WA 99201)
- Social Media (City accounts)
- Phone (509-625-6325)

Public Comment Period

- Begins Wednesday, July 8, 2020
- Ends Monday, August 10, 2020
- CHHS response to Public Comments on or before
- Tuesday, August 25, 2020



Public Hearing: 2020-2024 Consolidated Plan

July 8, 2020

Community, Housing and Human Services Department

[24 CFR Part 91](#)



Consolidated Plan Overview

- **5-Year Plan to Address Community Needs**
 - Section of the Plan
 1. Needs Assessment
 2. Market Analysis
 3. Strategic Plan
 4. Annual Action Plan

Consolidated Plan

- **Needs Assessment**

The Needs Assessment of the Consolidated Plan, in conjunction with information gathered through consultations and the citizen participation process, will provide a clear picture of a jurisdiction's needs related to affordable housing, special needs housing, community development, and homelessness. From this Needs Assessment, the grantee will identify those needs with the highest priority, which will form the basis for the Strategic Plan and the programs and projects to be administered.

Needs Assessment

NA-10 Overview
NA-10 Housing Needs Assessment
NA-15 Disproportionately Greater Need: Housing Problems
NA-20 Disproportionately Greater Need: Severe Housing Problems
NA-25 Disproportionately Greater Need: Housing Cost Burdens
NA-30 Disproportionately Greater Need: Discussion
NA-35 Public Housing
NA-40 Homeless Needs Assessment
NA-45 Non-Homeless Special Needs Assessment
NA-50 Non-Housing Community Development Needs

Consolidated Plan

- **Market Analysis**

The purpose of the Market Analysis is to provide a clear picture of the environment in which the grantee must administer their programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis will provide the basis for the Strategic Plan and the programs and projects to be administered.

Market Analysis

- MA-05 Overview
- MA-10 Number of Housing Units
- MA-15 Cost of Housing
- MA-20 Condition of Housing
- MA-25 Public and Assisted Housing
- MA-30 Homeless Facilities
- MA-35 Special Needs Facilities and Services
- MA-40 Barriers to Affordable Housing
- MA-45 Non-Housing Community Development Assets
- MA-50 Needs and Market Analysis Discussion
- MA-60 Broadband Needs of Housing
- MA-65 Hazard Mitigation

Consolidated Plan

- **Strategic Plan**

The plan must identify the priority needs of the jurisdiction and describe strategies that the jurisdiction will undertake to serve the priority needs.

Strategic Plan:
SP-05 Overview
SP-10 Geographic Priorities
SP-25 Priority Needs
SP-30 Influence of Market Conditions
SP-35 Anticipated Resources
SP-40 Institutional Delivery Structure
SP-45 Goals
SP-50 Public Housing Accessibility and Involvement
SP-55 Barriers to affordable housing
SP-60 Homelessness Strategy
SP-65 Lead based paint Hazards
SP-70 Anti-Poverty Strategy
SP-80 Monitoring

Consolidated Plan

- **Annual Action Plan**

In the Action Plan, the jurisdiction must provide a concise summary of the actions, activities, and programs that will take place during the program year to address the priority needs and goals identified by the Strategic Plan. In the template, the information collected for the first-year Action Plan will differ slightly from other years in that some of the sections have been integrated into the Consolidated Plan and are not repeated in the Year 1 Action Plan. These include the Executive Summary, Consultation, and Citizen Participation sections.

Consolidated Plan

- **Priority Needs**

1. Improve affordable housing access & availability
2. Urgent public health & safety Response
3. Community based social service programming

Priority Needs

1. Improve affordable housing access & availability

Expand the number of affordable housing options for low and moderate income individuals and households. The City will fund proposals that address the needs of target populations including, but not limited to homeownership, rental housing, communal living, etc. Additionally the City will prioritize proposals that integrate service that help stabilize permanent housing for high barrier populations. The goal of housing stability is to prevent and divert individuals and families from entering into the homeless response system.

Priority Needs

2. Urgent public health & safety Response

Adaptive response to changing community needs related to sheltering homeless populations, natural disasters, and public health pandemics.




Priority Needs

3. Community based social service programming

Community based services that address the following areas:

- *Food Security*
- *Workforce Development*
- *Housing Stability*
- *Childcare*
- *Transportation*
- *Behavior and victim services*

Annual Action Plan

- AP-15 Expected Resources
 - AP-20 Annual Goals and Objectives
 - AP-35 Projects
 - AP-50 Geographic Distribution
 - AP-55 Affordable Housing
 - AP-60 Public Housing
 - AP-65 Homeless & Other Special Needs Activities
- 

Annual Action Plan (cont.)

- AP-75 Barriers to Affordable Housing
- AP-85 Other Actions
- AP-90 Program Specific Requirements

AP-15 Expected Resources (CDBG)

Expected Amount Available	
Annual Allocation (CDBG)	\$3,384,101.00
CDBG-CV1	\$1,990,689.00
CDBG-CV3	TBD
Program Income	\$1,600,000.00
Prior Year Resources	\$500,000.00
Total	\$7,474,790.00

AP-15 Expected Resources (HOME)

Expected Amount Available	
Annual Allocation	\$1,336,999.00
Program Income	\$200,000.00
Prior Year Resources	TBD
Total	\$1,536,999.00

AP-15 Expected Resources (ESG)

Expected Amount Available	
Annual Allocation	\$287,494.00
Program Income	\$0.00
Prior Year Resources	\$0.00
Total	\$287,494.00

AP-35 Projects

Project Title	Amount Funded
2020 Public Services - Food Security Program	\$40,000
2020 Public Services - CHAS Dental Voucher Program	\$50,000
2020 Public Service - ECCC Operations	\$60,000
2020 Public Service - NECC Operations	\$80,000
2020 Public Services - Homeownership Program	\$184,172
2020 Public Service - Southwest Community Center Operations	\$20,000
2020 Public Services - Women's Hearth	\$38,323
2020 Public Service - West Central Youth Development	\$25,000
2020 Public Service - West Central Operations	\$90,000

AP-35 Projects (cont.)


Project Title	Amount Funded
2020 Public Services - Improving Food Security for Hungry Women & Children	\$65,000
2020 Public Services - YWCA Women in the Workforce	\$70,213
2020 Housing - Single Family Rehab Program	\$1,553,096
2020 Housing - Rental Repair Program	\$413,966
2020 Housing - Essential Home Repair Program	\$585,600
2020 Perpetual Housing, Acquisition, and Capital Improvements Program	\$1,008,731
2020 Neighborhood Community Development Program Activities TBD	\$400,000
2020 COVID-19 Response	\$1,990,689
2020 Administration - CDBG Program	\$800,000

AP-35 Projects (cont.)

Project Title	Amount Funded
2020 Multi-Family Projects – HOME	\$1,203,300
2020 Administration - HOME Program	\$133,699
2020 ESG Program Delivery	\$287,494

Annual Action Plan

Citizen Participation:

- Hold Public Hearing to review amended projects
 - Allow for public comment period (30 days)
 - Emphasis to engage with the following populations:
 - Low- and moderate-income persons
 - Residents of slums, blighted areas, and predominately low- and moderate-income areas
 - Non-English speaking persons
 - Persons with disabilities
 - Public housing residents and low-income residents of targeted revitalization areas
- 

Citizen Participation Plan (CPP)

Objectives

- Provide guidance to the Spokane community that will promote and expand citizen participation in the Consolidated Planning Process
- Provide citizens with an avenue for making public comment
- Support transparent communication between CHHS and the Spokane community

Public Comment

How to make Comment

- During Public Hearings
 - During City Council Meetings
 - During CHHS Board Meetings
 - Email to CHHS (spokanechhs@spokanecity.org)
 - In person (808 W. Spokane Falls Blvd., Spokane, WA 99201)
 - Social Media (City accounts)
 - Phone (509-625-6325)
- 

Response to Public Comment

Public Comment Reviewed by CHHS

- All Public Comments will be Considered
- Response will follow close of Public Comment period
- Response to comment within 15 working days following end of comment period
- Plans will include Public Comment received and CHHS response to comment

Annual Action Plan

Public Comment Period

- Begins Wednesday, July 8, 2020
- Ends Monday, August 10, 2020
- CHHS response to Public Comments on or before
 - Tuesday, August 25, 2020

Questions?

Thank You



Grantee Unique Appendices

CoC-ESG Written Standards

Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG

Households seeking homeless assistance can access services through the Spokane Continuum of Care's Coordinated Assessment (CA) system. The local CA system operates two portals to better meet the disparate needs of different household types. Households with minor children are served through Homeless Families Coordinated Assessment (HFCA) system, which coordinates all family homeless service programs to provide prevention and rapid re-housing assistance in addition to placement in interim, transitional, and permanent supportive housing, if applicable. The program utilizes the Family Service Prioritization Decision Assistance Tool (F-SPDAT) and Family Vulnerability Index Service Prioritization Decision Assistance Tool (F-VI-SPDAT) to assess families for appropriate housing and service interventions based on vulnerability rather than a first come first serve model. The F-VI-SPDAT and F-SPDAT provide a consistent way of assessing households across the Continuum of Care and assists HFCA in connecting families with an appropriate housing intervention based on their level of need.

Households without children can access services through the Singles Homeless Coordinated Assessment (SHCA) System. SHCA operates as a decentralized assessment system with a lead agency to facilitate the training and coordination of assessment sites. SHCA uses the singles versions of the VI-SDPAT and SPDAT tools to provide common outcome data and measurable results. Household where every member is between the age of 18 and 24 that present at SHCA are assessed using the Transition Age Youth Vulnerability Index Service Prioritization Decision Assistance Tool (TAY-VI-SPDAT) and the Youth Service Prioritization Decision Assistance Tool (Y-SPDAT). Once the appropriate assessment is completed in HMIS, a housing referral can be made to the appropriate housing track based on the household's vulnerability and desired housing intervention.

Through the local Coordinated Assessment system, a network of service providers, in coordination with each lead agency, provide rapid re-housing and targeted prevention/diversion services in a coordinated manner, using standard, shared policies for evaluating eligibility.

Households may access the program through one of two entry points:

1. By walking into either the HFCA or SHCA program offices for an assessment; or
2. Through targeted outreach and screening with a partnering service provider such as an emergency shelter or street outreach program.

The CA system has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC grantees. See the [Spokane City/County Continuum of Care: Coordinated Entry Policies and Procedures](#), for further detail.

Standards for targeting and providing essential services related to street outreach

The Collaborative Applicant does not currently use ESG or CoC funds for the purposes of street outreach. For more details on policies and procedures for the provision of essential services related to street outreach, please see the applicable sections of the City of Spokane's [Homeless Housing, Operations, and Services Consolidated Grant Guidelines](#).

Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence,

sexual assault, and stalking, and individuals and families who have the highest barriers to housing and are likely to be homeless the longest

To the extent practicable, recipients will prioritize unsheltered households for admission and service. Unsheltered households are defined as households who have an identified prior residence as living in places not designed for, or not ordinarily used as, human habitation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. A problem-solving diversion conversation should occur prior to a full, standardized assessment.

To the degree practicable, households exiting emergency shelter will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

Providers primarily serving victims of domestic violence, dating violence, sexual assault, and stalking are required to comply with the VAWA final rule and the locally adopted [VAWA Written Standards](#), including Emergency Transfer Plan.

Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter

Grantees must assess each household's housing needs and facilitate planning with the goal of obtaining or maintaining housing stability. Housing stability planning must be housing-focused and client-driven. Obtaining appropriate housing, particularly permanent housing, and addressing the most immediate and manageable barriers is the priority for emergency shelters. Emergency Shelters must operate a maximum 90-day project model. To the extent practicable, participants will be assisted in obtaining housing within 30 days of entry into the emergency shelter. All shelters will strive to reduce the average length of stay. However, participants may stay longer in order to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. Given the expected short-period of assistance, the focus of providing essential services is on those barriers that can be addressed during the timeframe of assistance.

Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers other homeless assistance providers and mainstream service and housing providers (see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable)

All programs funded with CoC and ESG funds coordinate through subpopulation-focused committees (youth, families, veterans, and the chronically homeless) as a part of the CoC's governance structure and are chaired by a member of the CoC's Governance Board. These committees meet monthly to review the effectiveness of the crisis response system for their respective subpopulations and make recommendations for modifications to the CoC's policies and procedures around service for that subpopulation. Case managers, program directors, and representatives from other stakeholders (including individuals with lived experience) participate in the committees which serve as a forum to discuss information on case management and housing stabilization challenges and strategies.

HFCA and SHCA staff coordinate with participating shelters, transitional housing and permanent supportive housing providers, on a daily basis as they determine housing availability and placement of

households into the appropriate housing intervention based on the family or individual's assessed vulnerability. HFCA and SHCA staff also have strong coordination and referral relationships to other service providers that offer support services including employment training and placement, food pantry, health care and other services.

All participating homeless providers in the county are connected through the HMIS system, which allows providers to see the service connections clients have, and to follow up on referrals.

In addition to the CoC committee meetings, the Spokane Homeless Coalition meeting serves as an opportunity for all homeless service providers and stakeholders in ending homelessness to coordinate services beyond the publicly-funded homeless crisis response.

Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid rehousing assistance

Eligible households that are literally homeless at the time of contacting the program and are living in shelter or in a place not meant for human habitation will receive rapid re-housing services. Eligibility for Rapid Re-housing is based both on the VI-SPDAT score and housing status and services are prioritized by highest VI-SDPAT score, not first come first served.

Households that contact coordinated assessment will qualify for prevention assistance if they meet the definition of "at risk of homelessness" and if their prior experience indicates they are most likely to lead to a shelter entry –prior stay in shelter or transitional housing program and/or experienced homelessness in the past 18 months. Prevention assistance is not funded through ESG or CoC Program funds at this time, however it is funded through local homeless funds.

Coordinated Assessment may provide diversion support to households to maintain their current housing if that situation is safe and sustainable. Support for these households comes in the form of landlord mediation, case management and connection to resources.

Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance

The philosophy adopted by programs providing rapid rehousing rental assistance is based on the philosophy of progressive engagement - providing "the least amount of assistance for the least amount of time" while proving enough support to be reasonably sure that the housing will be sustained. To accomplish this providers administering rapid re-housing are using a progressive engagement model of financial assistance and services.

Any household moving to new housing will receive up to 100% of deposit and one month's rent based on the households need. Households can pay up to 30% of gross income towards their deposit and rent. Households are assessed monthly for continuing financial and support need. Households will continue to qualify for assistance, based on an identified need, for up to 90 days. Extensions can be permitted with prior approval when a household is identified with higher barriers. Households that score in the range for PSH using the SPDAT tool can access rapid re-housing while a PSH unit is obtained. Utility assistance will be referred to other programs, such as the LIHEAP program and other local utility assistance programs.

Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time

All programs providing rental assistance with ESG or CoC funds will utilize a "progressive engagement" model, intended to provide the minimum support needed to divert or re-house households quickly in order to reserve resources to the extent practicable for provision of service to as households as possible, while leaving the door open for increased assistance if needed.

As described above, households will be assessed monthly for continuing financial and support need. Households will continue to qualify for assistance, based on an identified need, for up to 90 days. Extensions can be permitted with prior approval. Monthly assessments allow for household's to receive services based on their need or to be moved to another housing program if higher need warrant more intensive supports.

Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance or the maximum number of times the program participant may receive assistance

The "progressive engagement" model also utilized to determine the type, amount, and duration of housing stabilization and/or relocation services. All households will receive an initial assessment and referrals to appropriate community-based services through the HFCA and SHCA programs. Money management/budgeting training will be provided for any household receiving assistance if desired by the household. Program staff is expected to work with households to obtain benefits, including income and health coverage, or make referrals to agencies that can assist with this. Households in need of housing search assistance will receive help identifying units and making referrals to landlords and assist with applications, as needed. Eligible households will receive housing and income-focused support services, focused on ensuring that the household has the support needed to make progress on the housing stabilization plan and that the landlord is satisfied that the household is receiving support for housing related needs.

When households are determined over income, rent assistance can be extended for up to an additional 3 months and case management can continue for up to an additional 6 months to support households transition to self-sufficiency.

Grantee SF-424's and Certification(s)

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COMMUNITY, HOUSING, AND
HUMAN SERVICES DEPARTMENT
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201
509.625.6325
FAX 509.625.6315

August 10, 2020

Jack Peters, Director
U.S. Department of Housing and Urban Development
Seattle Federal Office Building
909 First Avenue, Suite 300
Seattle, WA 98104

RE: 2020-2024 Consolidated Plan Submission (CDBG, HOME and ESG Programs)

Dear Mr. Peters

Please find attached an original copy of the City of Spokane's Entitlement SF-424 and required certifications for the 2020-2024 Consolidate Plan. Please let me know if you need additional information or have any questions regarding our Action Plan submission.

Sincerely,

DocuSigned by
Tim Sigler
DocuSignature
Tim Sigler, Director



CERTIFICATIONS

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

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

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

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

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

<small>DocuSigned by:</small> <i>Tim Sigler</i>	8/11/2020
_____ Signature of Authorized Official	_____ Date

CHHS Director
Title

CDBG

SF-424 &

Certifications

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

<small>DocuSigned by:</small> <i>Tim Sigler</i>	8/11/2020
_____ Signature of Authorized Official	_____ Date

CHHS Director

Title

[View Burden Statement](#)

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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

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

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


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE CHHS Director
APPLICANT ORGANIZATION City of Spokane	DATE SUBMITTED 8/11/2020

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

[View Burden Statement](#)

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
State Use Only:			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text" value="City of Spokane"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="91-6001280"/>		* c. Organizational DUNS: <input type="text" value="1155281890000"/>	
d. Address:			
* Street1:	<input type="text" value="808 W. Spokane Falls Blvd"/>		
Street2:	<input type="text"/>		
* City:	<input type="text" value="Spokane"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text" value="WA: Washington"/>		
Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="99201-0017"/>		
e. Organizational Unit:			
Department Name: <input type="text" value="CHRS"/>		Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Tim"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Sigler"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Director, CHRS"/>		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	<input type="text" value="509-625-6053"/>	Fax Number:	<input type="text"/>
* Email:	<input type="text" value="tsigler@spokanecity.org"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development (HUD)"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.218"/> CFDA Title: <input type="text" value="Community Development Block Grant Program (CDBG)"/>	
* 12. Funding Opportunity Number: <input type="text" value="Entitlement Program - not applicable"/> * Title: <input type="text" value="Entitlement Program - not applicable"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Program Year 2020 Annual Action Plan (7/1/2020 6/30/2021)"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="5"/>	* b. Program/Project: <input type="text" value="5"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="3,388,101.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value="500,000.00"/>
* e. Other	<input type="text" value="1,600,000.00"/>
* f. Program Income	<input type="text" value="5,488,101.00"/>
* g. TOTAL	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="MR."/>	* First Name: <input type="text" value="Tim"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Sigler"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Director, CRBB"/>	
* Telephone Number: <input type="text" value="509-625-6055"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="tsigler@spokaneccity.org"/>	
* Signature of Authorized Representative: <input type="text" value="Joe Sigler"/>	* Date Signed: <input type="text" value="8/11/2020"/>

HOME

SF-424 &

Certifications

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

DocuSigned by: <i>Tim Sigler</i>	8/11/2020
_____ Signature of Authorized Official	_____ Date

CHHS Director

Title

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>DocuSigned by: <i>Tim Sigler</i></p>	<p>TITLE</p> <p>CHHS Director</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Spokane</p>	<p>DATE SUBMITTED</p> <p>8/11/2020</p>

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Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
State Use Only:			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text" value="City of Spokane"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="91-6001280"/>		* c. Organizational DUNS: <input type="text" value="1155281890000"/>	
d. Address:			
* Street1:	<input type="text" value="808 W. Spokane Falls Blvd"/>		
Street2:	<input type="text"/>		
* City:	<input type="text" value="Spokane"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text" value="WA: Washington"/>		
Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="99201-0017"/>		
e. Organizational Unit:			
Department Name: <input type="text" value="CHRS"/>		Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Tim"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Sigler"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Director, CHRS"/>		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	<input type="text" value="509-625-6053"/>	Fax Number:	<input type="text"/>
* Email:	<input type="text" value="tsigler@spokanecity.org"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development (HUD)"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.239"/> CFDA Title: <input type="text" value="Home Investment Partnerships Program (HOME)"/>	
* 12. Funding Opportunity Number: <input type="text" value="Entitlement Program - not applicable"/> * Title: <input type="text" value="Entitlement Program - not applicable"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Program Year 2020 Annual Action Plan (7/1/2020 6/30/2021)"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="5"/>	* b. Program/Project: <input type="text" value="5"/>
Attach an additional list of Program/Project Congressional Districts if needed: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="1,336,999.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value="1,252,670.00"/>
* e. Other	<input type="text" value="200,000.00"/>
* f. Program Income	<input type="text" value="2,789,669.00"/>
* g. TOTAL	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="MR."/>	* First Name: <input type="text" value="Tim"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Sigler"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Director, CRBB"/>	
* Telephone Number: <input type="text" value="509-625-6055"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="tsigler@spokaneacity.org"/>	
* Signature of Authorized Representative: <input type="text" value="DocuSigned by: Tim Sigler"/>	* Date Signed: <input type="text" value="8/11/2020"/>

ESG

SF-424 &

Certifications

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

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

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

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

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

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

DocuSigned by:
Tim Sigler 8/11/2020
Signature of Authorized Official Date

CHMS Director
Title

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

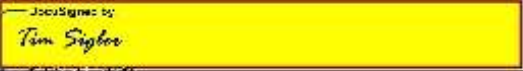
<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>DocuSigned by: <i>Tim Sigler</i></p>	<p>TITLE</p> <p>CHHS Director</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Spokane</p>	<p>DATE SUBMITTED</p> <p>6/11/2020</p>

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

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Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
State Use Only:			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text" value="City of Spokane"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="91-6001280"/>		* c. Organizational DUNS: <input type="text" value="1155281890000"/>	
d. Address:			
* Street1:	<input type="text" value="808 W. Spokane Falls Blvd"/>		
Street2:	<input type="text"/>		
* City:	<input type="text" value="Spokane"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text" value="WA: Washington"/>		
Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="99201-0017"/>		
e. Organizational Unit:			
Department Name: <input type="text" value="CHRS"/>		Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Tim"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Sigler"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Director, CHRS"/>		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	<input type="text" value="509-625-6053"/>	Fax Number:	<input type="text"/>
* Email:	<input type="text" value="tsigler@spokanecity.org"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development (HUD)"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.231"/> CFDA Title: <input type="text" value="Emergency Solutions Grant Program (ESG)"/>	
* 12. Funding Opportunity Number: <input type="text" value="Entitlement Program - not applicable"/> * Title: <input type="text" value="Entitlement Program - not applicable"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Program Year 2020 Annual Action Plan (7/1/2020 6/30/2021)"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="5"/>	* b. Program/Project: <input type="text" value="5"/>
Attach an additional list of Program/Project Congressional Districts if needed: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="287,494.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="287,494.00"/>
* g. TOTAL	<input type="text" value=""/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="MR."/>	* First Name: <input type="text" value="Tim"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Sigler"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Director, CRBB"/>	
* Telephone Number: <input type="text" value="509-625-6055"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="tsigler@spokaneccity.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8/11/2020"/>

Appendix - Alternate/Local Data Sources



2024 FAIR HOUSING PLAN

DRAFT APRIL 2024

Prepared by:

Northwest Fair Housing Alliance

35W Main, Suite 250

Spokane, WA 99201

(509) 325-2665

1 (888) 376-6308 (Fax)

www.nwfairhouse.org



**NORTHWEST FAIR
HOUSING ALLIANCE**

"Working to Ensure Equal Housing Opportunity for All"

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Cover Sheet

1. Submission date:
2. Submitter name: The City of Spokane
3. Type of submission (e.g., single program participant, joint submission): Single program participant
4. Type of program participant(s) (e.g., consolidated plan participant, PHA): Consolidated plan participant
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
 - a. Name:
 - b. Title:
 - c. Department:
 - d. Street address:
 - e. City:
 - f. State: Washington
 - g. Zip code:
8. Period covered by this assessment: 2023-2027
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

*** (Print Name) (Program Participant/Title) (Signature) (date)

Comments

Overview

As a participant in Community Planning and Development (CPD) programs, the City of Spokane (“the City” or “Spokane”) is subject to the affirmatively furthering fair housing requirements of the Fair Housing Act. The City receives annual funding from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions (ESG) CPD programs. HUD administers these funds, and the City is therefore subject to the affirmatively furthering fair housing requirements of the Fair Housing Act.¹ The City is required to submit certifications that it will affirmatively further fair housing in connection with its consolidated plans and annual action plans and undertake Fair Housing Planning (FHP). Additional information about HUD’s Affirmatively Furthering Fair Housing rule is available in **Appendix A**.

The City of Spokane’s Community Housing and Human Services Department contracted with Northwest Fair Housing Alliance (NWFHA) to complete a Fair Housing Plan to assist the City with compliance with its certifications to AFFH, and for use in its 2025-2029 Consolidated Plan. NWFHA is a HUD designated Qualified Fair Housing Organization and has provided nonprofit fair housing services since 1994. NWFHA’s mission is to eliminate housing discrimination and ensure equal housing opportunity for the people of Washington State through education, counseling and advocacy.

Purpose:

The purpose of this Fair Housing Plan is to assist the City with its obligation to affirmatively further fair housing and engage in fair housing planning, by **identifying fair housing issues** in Spokane, based on race, color, religion, sex, disability, familial status, or national origin (“protected classes” in the federal Fair Housing Act (FHA)²), and to establish goals to overcome identified fair housing issues. Fair housing issues based on marital status, creed, sexual orientation, veteran or military status, and immigration / citizenship status, protected classes in the Washington State Law Against Discrimination (WLAD)³, and source of income (protected in the Washington Residential Landlord Tenant Act⁴) are also identified. This Fair Housing Plan further **establishes Goals to eliminate or reduce identified fair housing issues**.

Methodology

HUD has provided guidance resources to assist program participants undertaking fair housing planning, which NWFHA will utilize in preparing the 2024 Fair Housing Plan:

- Assessment Tool for Local Governments, <https://www.hud.gov/AFFH>
- AFFH Rule Guidebook
- AFFH Data and Mapping Tool (AFFH-T): HUD periodically update the AFFH-T, a publicly available, interactive tool that provides access to HUD-provided data

¹ The Sec. of the U.S. Department of Housing and Urban Development (HUD) is required by Sec. 808(c) (5) of the Fair Housing Act to administer HUD’s programs in a manner that affirmatively furthers fair housing (AFFH). Entitlement jurisdictions that receive federal funds to administer HUD’s Community Planning and Development programs are also required by federal regulations to certify that they will AFFH and undertake Fair Housing Planning (FHP).

² 42 U.S.C. 3601 et seq.

³ RCW 49.60.

⁴ RCW 59.18.255.

Data and information was reviewed and referenced from a variety of relevant sources, including but not limited to:

- Community Survey results
- Stakeholder interviews
- Public meeting comments
- Complaint Data from:
 - The U.S. Dept. of Housing & Urban Development, Fair Housing & Equal Opportunity
 - The Washington State Human Rights Commission (WSHRC)
 - Northwest Fair Housing Alliance (NWFHA)
- Past Spokane Analysis of Impediments to Fair Housing Choice
- 2020 WA State Analysis of Impediments to Fair Housing Choice
- United for ALICE, 2023 WA Report, https://www.unitedforalice.org/Attachments/AllReports/23UFA_Report_Washington_4.11.23_Final.pdf
- Federal, State, and Spokane City laws and ordinances
- Census and American Community Survey Data, US Census Bureau
- Spokane Trends, Indicators, <https://www.spokanetrends.org/>
- WA Office of Financial Management population and demographics data
- HUD AFFH Data and Mapping Tool, <https://egis.hud.gov/affht/>
- HUD LIHTC Database Access, <https://lihtc.huduser.gov/>
- HUD Exchange, <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>
- PolicyMap online mapping and data, <https://www.policymap.com/>
- National Equity Atlas Indicators | National Equity Atlas
- Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/data>
- Home Mortgage Disclosure Act (HMDA) data
- WA Office of Superintendent of Public Instruction SBA and WCAS test data
- Spokane Transit Authority Maps
- Spokane Housing Authority PIC and reasonable accommodation and modification request data
- Spokane County Consolidated Plan, 2020-2024, Housing Needs Assessment
- ZipAtlas.com, <http://zipatlas.com/us/washington.htm#demographics>
- [Final-Report-on-Implementation-of-Tenant-Appointment-Counsel-Program-10-2023.pdf \(wa.gov\)](#)
- Spokane County Maps, <https://spokanecounty.maps.arcgis.com/home/index.html>
- <https://qz.com/1462111/map-what-story-does-your-neighborhoods-life-expectancy-tell/>
- <https://static.spokanecity.org/documents/chhs/hmis/subrecipient-resources/hud-media-family-income-limits-2023.pdf>
- <https://my.spokanecity.org/opendata/gis/neighborhoods/>
- National Low Income Housing Coalition ([Out of Reach | National Low Income Housing Coalition \(nlihc.org\)](#))
- The Eviction Lab, <https://evictionlab.org/>
- *Spokane Housing Action Plan*, 7/26/21, <https://my.spokanecity.org/housing/spokane-housing-action-plan/>
- *Action Steps to Increase Spokane's Housing Supply*, Spokane Assoc. of Realtors, 12/2021, [/https://www.spokanerealtor.com/wp-content/uploads/2021/12/CRE-Consulting-Corps-Spokane-Housing-Recommendations.pdf](https://www.spokanerealtor.com/wp-content/uploads/2021/12/CRE-Consulting-Corps-Spokane-Housing-Recommendations.pdf)

Executive Summary

Planning for Fair Housing: Affordability, Access & Equity

An assessment of a jurisdiction’s impediments to fair housing choice focuses on barriers that limit access to and retention of housing for classes of people protected by fair housing laws. Housing discrimination, both intentional and resulting from discriminatory policies and practices that perpetuate negative disparate impacts on protected classes, is the primary purview of a fair housing assessment. However, discrimination does not exist in a vacuum, and the disparities caused by past and present discrimination are exacerbated by housing market environments, such as the supply of housing. Such is the state in Spokane, where affordability and rising housing costs were primary concerns shared by nearly everyone providing input on this Fair Housing Plan. Insufficient housing supply to meet demand, low rental vacancy rates, and increasing housing costs are increasing the percentages of people in our community who are housing cost burdened (paying more than 30% of their income for housing and utilities), or unhoused. People with disabilities, and Black, Indigenous, and other people of color (“BIPOC”), disproportionately reside in poverty, have lower incomes, are housing cost burdened, and more often renters rather than homeowners. Accordingly, this fair housing analysis necessarily takes into consideration issues of housing availability, affordability, and tenant protections.

The following summarizes data and public input received for this Fair Housing Plan. Additional detail and citations can be found within the Fair Housing Plan sections. Based on the information collected and analyzed, the last section of the Fair Housing Plan sets out a list of fair housing issues, goals, strategies and actions for consideration that the City can undertake to address identified fair housing issues.

Who Lives In Spokane?

Race and National Origin

The population of Spokane is predominantly white, non-Hispanic; however, it is slightly more diverse than the rest of the county. Out of the total City population, 79.3% are white, 7% are Hispanic, 2.8% are Asian, 2.7% are Black or African American, 1.9% are American Indian or Alaskan Native / Indigenous, 1.2% are Native Hawaiian or Other Pacific Islanders, and 2.4% identify as another race. Almost ten percent are two or more races.

The white non-Hispanic population in Spokane has been gradually decreasing, from 87.5% in 2000 to 77% in 2020. During this time, all other races increased, and “Hispanic or Latino”, “some other race alone”, and “two or more races” more than doubled.

Almost six percent of the Spokane population were born outside the United States, a much lower rate than the State (14.9%). The most common countries of foreign birth in Spokane are Iraq (8% of all foreign-born people in Spokane) and Mexico (8%), followed by Vietnam (6%), the Philippines (5%), the Ukraine (5%), Canada (5%), Russia (4%), China (4%), and the Marshall Islands (4%).

Limited English Proficiency and Language Needs

- Of the overall Spokane population over age 5, at least 3.2% have limited English proficiency and speak English less than “very well.”
- 8.2% of the total Spokane population age five and over speaks a language other than English at home. 2.6% speak Spanish, 2.6% speak other Indo-European languages, and 2.2% speak Asian and Pacific Islander languages.
- Community survey participants identified the 5 top non-English languages needed for fair housing education as Spanish, Ukrainian, Russian, Marshallese, and Arabic, as well as sign-languages. Vietnamese and Farsi were also chosen as needed languages by 1 in 5 surveyed.
- Survey participants and stakeholder interviewees identified the lack of interpreting and translation in housing transactions and legal documents as a barrier to housing access and retention for people with limited English proficiency.

People with Disabilities

- 16.6% of the non-institutionalized population in Spokane has a disability, a higher percentage than the County or the State (15.6% of Spokane County and 13% WA).
- However, disability rates range widely in 3 zip codes, with 99201 and 99202 having the highest rates, and 99203 the lowest.

Sex

- Females are almost 2% more of the Spokane population than males. Spokane has a slightly higher percentage of females and lower percentage of males than the County or State.

Age

- The median age in Spokane is 36.3 years, younger than the County, State, and USA.
- Median age in Spokane increased by 2.8 years since 1990, following regional and national trends of aging populations.
- Median ages of Black (30), Latino (27), Pacific Islander (23), and multi-racial (20) people in Spokane are significantly lower than that of white (39), Asian (38), and Native American (37) people.
- More BIPOC people are youth than senior aged; however, the percentage of BIPOC people who are seniors is growing faster than youth. Between 1980 and 2020, the percentage of people who are BIPOC youth tripled, from 10% to 30%, while the percentage of seniors who are BIPOC quadrupled from 2% to 8%.
- 21% of the Spokane population is under the age of 18, similar to the County and State. Spokane has a slightly lower percentage of people aged 65 years or older than the County, and slightly higher than the State. The majority of people are between 18 and 64.
- Spokane has a lower percentage of households with children (23.6%) than the County (26.4%) and State (27.4%).
- Spokane has a higher percentage of people living alone (35.5%) than the County (29.3%) or the State (27%).

Residents of Publicly Supported Housing

- People who are Black, Native American / Alaskan Native / Indigenous, Asian, Pacific Islander participate in publicly supported housing programs at higher rates than white people.
- Native Americans and Alaska Natives have remained 4 to 5% of the households participating in HUD subsidized housing programs in Spokane since at least 2014.
- The percent of households participating in HUD subsidized housing programs who are Black and non-Hispanic in Spokane has been steady between 7 and 8% since at least 2014.
- The percent of households participating in HUD subsidized housing programs who are Asian or Pacific Islander and non-Hispanic in Spokane has remained between 3 and 5% since 2014.
- Hispanic people are underrepresented in publicly supported housing. Hispanic people are 7% of the Spokane population but have been 4% - 5% of HUD subsidized housing program participants since 2014.
- People with disabilities are exceptionally disproportionately represented among public supported housing programs, making up over 40% of participants. The percentage of people residing in HUD subsidized housing who live with a person with a disability has steadily increased from 31% in 2014 to 40% in 2021.
- In 2021, all non-white Spokane Housing Authority HCV holders were more likely to reside in 4, 5, 6, 7, and 8-person households than white HCV holders, while white HCV holders were more likely to reside in 1 person households.
- SHA HCV participants in 2021 were more likely to be female (65.6%) than male (34.4%).

Segregation and Integration

White non-Hispanic populations range between 70 to 90% of the Spokane population depending on the census tract; they are over 90% in 7 tracts. Systemic and institutionalized racism, including redlining, steering, and racially restrictive covenants, as well as individual discrimination, has determined where BIPOC people could live in Spokane. There is still evidence of the impact of these policies and practices in housing patterns today.

In 1960, 63% of all Black people lived in three census tracts. Today many BIPOC people are still concentrated in 99202, the zip code that includes the East Central neighborhood, one of the redlined neighborhoods. BIPOC people in Spokane are most concentrated in 18 tracts, all which have 25-40% non-white populations.

Disproportionate Concentrations of Non-White Populations

HUD defines a racially or ethnically concentrated area of poverty (R/ECAP) as having a non-white population of 50% or more, where 40% or more of the population is at or below the poverty line (or the poverty rate is greater than 3 times the average poverty rate in the area). Spokane does not have any R/ECAP designated tracts. Accordingly, an alternative analysis has been used to review disproportionate concentrations of non-white populations.

Areas of disproportionate concentration are those in which there is a greater than 10% difference than the jurisdiction as a whole. Again, there are no areas in Spokane where one non-white race meets that definition for a disproportionate concentration. However, combining all non-white races with Hispanic ethnicity in Spokane, so that “racial and ethnic minority” is defined as

Hispanic and/or a race other than white alone, 23% of the population in Spokane is minority. Thus, any census tract with greater than 33% minority population is considered to have a disproportionate minority concentration. Spokane has five census tracts with non-white populations over 33%.

Diversity Index

The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities. Values between 0 and 20 suggest more homogeneity and values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas may sometimes represent concentrated poverty or wealth or indicate past or present discriminatory housing policies or barriers. Between 2017 and 2021, Spokane's diversity index was 34.7. Eight tracts had index values of more than 49, while 11 tracts had values of 22 or less.

The National Equity Atlas also calculates a diversity index, which measures racial/ethnic diversity of residents based on seven major racial/ethnic groups. The maximum diversity score (1.95) would occur if each group were evenly represented in the region. Spokane's Diversity Index increased from .59 in 2000 to .79 in 2020.

Access to Community Assets

HUD provides 7 opportunity indexes (most recent data is 2012 – 2018): Low Poverty Index, School Proficiency Index, Labor Market Index, Transit Index, Low Transportation Cost Index, Jobs Proximity Index, and Environmental Health Index. There were disparities based on race, in favor of white Spokane residents, in all indicators except Transit Index, Low Transportation Cost Index, and Jobs Proximity Index.

Education

Across the Spokane School District, children who are American Indian or Alaskan Native, Black or African American, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, or Two or More Races, performed less well on Smarter Balanced Assessments and the Comprehensive Assessment of Science compared to the average scores for all students and Asian and white non-Hispanic students. Also performing lower on standardized assessments were low-income students, students with disabilities, English language learners, migrant students, students in foster care, and students experiencing homelessness.

Employment

The Jobs Proximity Index is one of the measures where BIPOC people in most instances (except Asian/ Pacific Islanders below the poverty line) had higher or equivalent rates to white, non-Hispanic people in Spokane. BIPOC people in Spokane are more concentrated in central census tracts, which may explain the closer proximity to job locations. The index rates rose for all races when only measuring people under the poverty line, compared to the total population, possibly also explained by wealthier people able to live further from the City center.

While low income and BIPOC people may have close proximity to job centers, whether they are able to obtain those jobs is of concern, given the disparities in the Labor Market Engagement Index. The HUD provided labor market engagement index describes the relative intensity of labor market engagement and human capital in a neighborhood, based on 2011-2015 ACS data. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood. The labor market index for white, non-Hispanics, exceeded that for all other races, for both the total population and the population below the federal poverty line.

Transportation

Several stakeholders who were interviewed identified the need to have affordable housing near public transportation. They cited transportation as a driving force for equity. Transportation centered housing, built along transit lines, is needed, so that renters don't have to travel great distances. One interviewee described having to walk ten blocks to the nearest bus line when they lived on the South Hill. Housing built away from transit is less affordable, centers on cars, is further from services, and causes sprawl.

Similar to the Job Proximity Index, BIPOC people had higher Transit Trip Index rates than white non-Hispanics in Spokane (based on 2012-2016 HUD-provided data), and people below the federal poverty line have higher rates than the total population. The greater use of public transit by low income and BIPOC people may again be explained by the greater frequency that they reside in centrally located neighborhoods near bus lines, and also have lower incomes with which to purchase and maintain a private vehicle.

Like the Job Proximity and Transit Trip Indexes, BIPOC people had higher Low Transportation Cost Indexes (2012-2016). When only people below the poverty line are considered black and Asian or Pacific Islander had lower transportation cost indexes than white non-Hispanic people.

Access to Low Poverty Neighborhoods

As of 2022, 14.8% of Spokane residents live in poverty. The rate of poverty varies considerably by census tract, with 53063010701 having a very low rate of less than 1%, and 53063002503 with a high of 50%.

BIPOC people are on average more likely to live in poverty throughout the City than white people. In Spokane, 21.8% of Black people, 36.7% of Native Americans / Alaska Natives, 29% of Hawaiian Native and Pacific Islanders, 18% Hispanics, 15% of Asians, and 13.6% of whites live below the poverty level. (2018-2022).

As of the most recent HUD-provided data (2011-2015 ACS) white non-Hispanic people had a higher poverty index (less likely to live in low poverty neighborhoods) in Spokane compared to Black, Hispanic, Asian, Pacific Islander, and Native American residents. These disparities persisted even when only measuring the population below the federal poverty line. Black non-Hispanic and Native American people were most likely to live in low poverty areas. When only people below the poverty line were considered Hispanic and Black people were most likely to live in low poverty areas.

In Spokane, in 2022:

- 24% of female-headed family households (no spouse present) lived in poverty
- 26% of people with disabilities lived in poverty
- 16% of children lived in poverty

Access to Environmentally Healthy Neighborhoods

Life Expectancy

The 2020 life expectancy of a white person in Spokane County (78 yrs.) was more than 4 years longer than that of a Black person (73.7 yrs.) and more than 7 years longer than that of an American Indian / Alaska Native indigenous person (70.6).

The zip code that one resides in makes a difference for quality and longevity of life. According to the Centers for Disease Control, the overall Spokane County life expectancy was 79 years, with the lowest ages being 66 (Tract 300-3200), 68 (SE West Central), 71 (300-3400), and 72 (East Central and Bemiss) years, while the South Hill had a life expectancy of 81 years.

Access to Technology / Telecommunications

Based on census data, most households in Spokane do have high access to household computers of any type (>94%), smartphones (>88%), and broadband internet access (90.5%). Broadband internet subscription rates are similar for white non-Hispanics, black and African Americans, Asians, and Hispanic and Latinos (93% – 95.5%). American Indian and Alaska Native households have the lowest broadband subscription rate (88%), and Native Hawaiian and other Pacific Islander households have the highest broadband subscription rate (99%).

Data was not reported for income or disability. Based on anecdotal accounts from stakeholders, it is likely that technology is a barrier for people with certain disabilities and people with fewer financial resources.

Barriers that Deny Individuals with Disabilities Access to Opportunity

Housing Accessibility

- When asked, “What are you most concerned about with respect to fair housing and access to housing opportunities in Spokane? Check your top concerns,” 40% of all survey responders selected “Accessibility of rental properties for individuals with disabilities.”
- Stakeholder interviewees also shared concerns about the insufficient amount of accessible housing in Spokane.
- The length of waitlists for accessible units in publicly supported housing and the lack of available accessible units in non-publicly supported housing available to HCV participants are major barriers to accessing housing for people with disabilities.
- While housing providers that are not federally subsidized must allow people with disabilities to make reasonable modifications to their units at the resident’s own cost, due to many people with disabilities having very low income, modifications often go unmade.

Housing Choice Voucher Acceptance and Rent Standards

Sixty-eight percent of SHA HCV participants have a disability. The majority of these are single person households (76%). However, there is a shortage of available subsidized accessible units and private market units which HCV rent standards will cover.

Zoning and Siting

Most accessible units are in newly constructed multi-family housing, due to the requirements and exemptions in the Fair Housing Act for design and construction. People with disabilities are thus often limited to residing in rental units in zones which allow multi-family housing.

Transportation

People with disabilities are also often dependent upon public transportation, which further limits housing choice to regions of the City where they can access public transportation.

Assistance Animals

A prevalent type of reasonable accommodation request is for a person with a disability and disability-related need for an animal to have an animal as an exception to a no-pets, no-animals, policy. While housing providers can exclude or limit pets (animals not needed for disabilities), when “no pets” policies, or requirements for pet fees, pet rent, pet deposits, or pet insurance are unlawfully applied to people with disabilities who need an animal for their disability, this is a barrier for people with disabilities being able to use and enjoy their dwelling.

Residents of Publicly Supported Housing

People with disabilities, Black and African American, and Native American, Alaska Native, and Indigenous people are disproportionately participating publicly supported housing programs. Barriers to accessing or utilizing these programs, such as housing choice voucher payment standards not keeping up with rising rental rates, and source of income discrimination against voucher holders, will therefore be experienced disproportionately by these groups.

Housing Choice Vouchers

Too Few, Not Accepted, and Falling Behind Actual Rents

Numerous concerns about housing choice vouchers were shared by survey responders, stakeholder interviewees, and public meeting attendees:

- There are not enough to meet need and demand. The majority of those who would be eligible don't have one.
- Even if someone is fortunate to have a voucher, the standard payment often does not cover the actual rent being charged for rental units. This makes it difficult to find housing where the voucher can be used; and if an in-place tenant's rent is raised above the standard after the initial lease and the Housing Assistance Payment (HAP) contract ends, the tenant has to find new housing with rent that the voucher will cover.
- Despite state and local source of income protections, refusal to accept housing vouchers is a prevalent complaint.

Access to Affordable Housing Opportunities

Income and Housing Cost Burdens

Income directly affects whether someone is housing cost burdened or able to qualify for publicly supported housing with income restrictions. As of 2022, white median household income was 2% above overall median income, while Asian, Hispanic, Native Hawaiian / Other Pacific Islander, Black, Native American / Alaska Native, and Two or More Race median incomes were 93%, 97%, 83%, 74%, 55%, and 94% of median income respectively.

Housing is considered affordable when the cost of housing plus utilities equals no more than 30% of household income. As of 2020, 33% of all households in Spokane were cost burdened, and 14% were severely cost burdened (paying more than 50% of household income for housing and utilities).

- Homeowners: 22.7% of homeowner households were cost burdened in Spokane in 2022. 8% of owner households were severely housing cost burdened.
- Renters:
 - Half of all renters in Spokane are cost burdened, and almost one quarter of all renter households in Spokane in 2022 were severely cost burdened.
 - To afford rent for a 2- bedroom unit in 2023, a household needed to earn \$23.04 an hour, which was 146% of the 2023 Washington minimum wage.

As of 2012-2016 HUD provided data, in Spokane, 16% of white non-Hispanic households had a severe housing cost burden. The rates of severe cost burdened households were greater for BIPOC households: 21.4% of Asians and Pacific Islander households, 20.6% of Black households, 24.7% of Native American households, and 23% of Hispanic households had a severe cost burden. With rising housing costs, it is very likely that these percentages have not decreased.

Disparities in Housing Quality

Housing Problems

The US Census collects data identifying instances where “housing problems” or “severe housing problems” exist. “Severe” housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. “Severe” Cost Burden – monthly housing costs (including utilities) exceed 50% of monthly income.

- 35% of all households, and half of all renter households in Spokane were experiencing at least one of four housing problems as of 2020.
- 17% of all households in Spokane experienced at least one “severe” housing problem. The rate was highest for renters at 27%.
- 37% of all households in Spokane were experiencing at least one of four housing problems in 2016 (similar to 2020), per the most recent HUD provided data by race. The percent of white non-Hispanic households experiencing at least 1 household problem was similar (36%). Black, Hispanic, Asian / Pacific Islander, and Native American households experienced at least one problem at the following higher rates: 50%, 39%, 48% and 42%. Nineteen percent of all households in Spokane experienced at least one severe housing problem. The rates for white

non-Hispanic, Black, Hispanic, Asian / Pacific Islander, and Native American households were: 18%, 25%, 27%, 31%, and 28%.

Contributing Factors to Unaffordability

Insufficient Housing Supply

Although the exact shortage is debated, there is broad consensus among stakeholder interviewees, survey participants, public meeting attendees, and industry and City reports, that there is insufficient housing supply of all types to meet demand.

Increasing Housing Costs

Increased demand and insufficient supply have resulted in increased housing costs, making unaffordable housing the primary concern of nearly everyone who provided input for this report.

Rising Rents and Fees

As real estate values and costs increase, housing providers are increasing rents and rental fees (move-in, pet, administrative, etc.) and deposits, which are primary concerns for tenants.

Access to Homeownership Opportunity

Homeownership

There were more owner-occupants than renters in Spokane (57.5% owner-occupants and 42.5% renters) (2018-2022 ACS).

The Racial Homeownership Gap Persists

- Native Hawaiian and Other Pacific Islanders have the lowest homeownership rate in Spokane (20.8%).
- Black and African Americans have the second lowest homeownership rates in Spokane (30%)
- White people have the highest ownership rate in Spokane (60%)
- BIPOC and Hispanic/Latino populations in Spokane have higher renter rates than whites.

Access to Home Mortgage Financing

- In 2021, white applicants made up 76% of all mortgage lending applications and had loan origination and denial rates of 70% and 10%.
- Black and African American applicants made up 1.2% of applications and had the lowest origination rate (55%) and highest denial rate (18%).
- All other reported races also had lower origination and higher origination rates than whites: American Indian / Alaskan Native (63.5% and 13.5%); Asian (62% and 13.5%); Native Hawaiian / Pacific Islander (66.7% and 14%).
- Hispanic and Latino applications made up 2.3% of all applications and had origination and denial rates of 61.6% and 13.7%.
- When applications are separated by income of applicant, racial disparities were still evident.

Local and State Policies and Practices Impacting Fair Housing

Zoning and Land Use Policies

Zoning and land use issues were frequently raised by survey participants and stakeholder interviewees, with broad consensus that zoning changes are needed to allow for more housing choice.

Missing Middle

Stakeholder interviewees had varying opinions about the City's recent efforts to expand Middle Housing. Some were very supportive, but believe it needs to be expanded to include an affordability requirement and allow and incentivize more 6-plex and over multi-family housing, which can be harder to build cost-effectively than larger multi-family complexes. Some tenant advocates are concerned with displacement of tenants that can occur if affordable housing is demolished to make way for new "middle" housing. They fear that affordable housing will be lost and replaced by higher rent units, housing that typically has lower barrier background screening policies will be eliminated and replaced by developments that utilize more stringent screening criteria and check criminal history; remodels, demolition, and building of ADUs will allow tenants to be terminated with no cause notice and displaced. They advocate for a right of first return requirement for displaced tenants; and opening zoning for larger multi-family housing, not just the missing middle type.

Mixed Use/Income/Space Housing

There is a desire and need for increased mixed-use and mixed-income housing. Such housing would include owners, renters, low- and high-income households, seniors, and families with children, with walkable neighborhood development, and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries. As one stakeholder said, this "Community Model" of housing allows people "to thrive, not just survive." A barrier to developing housing in and near grocery and other commercial amenities is zoning laws which limit commercial development in residential-only neighborhoods.

Siting of Affordable & Permanent Supportive Housing

Much of Spokane's affordable housing and permanent supportive housing development has been concentrated downtown, in part due to zoning, available property to build, and central access to social services. However, such clustered housing can put people recovering from substance use disorder near those currently using and make it difficult to escape a cycle of relapse, a serious concern especially amidst the fentanyl epidemic.

Scattered Site Housing

Multiple stakeholders interviewed expressed the need for increased scattered site affordable housing. Scattered site housing allows people more options for neighborhood access and deconcentrates people with low incomes from only living near each other. Scattered site housing also enables people to have different housing experiences besides large apartment building living, access different neighborhoods, and increase equity in school systems.

Rent Stabilization / Rent Control

Public meeting attendees, stakeholder interviewees, and survey responders frequently identified concerns with the lack of laws to ensure rent stabilization or limit rent increases. Rent control is illegal under Washington State Law. Rent stabilization initiatives typically include establishing longer notice periods for housing providers to increase rents. However, landlords often oppose rent stabilization as they say they cannot accurately predict future expenses.

Source of Income Anti-Discrimination Laws

WA Residential Landlord Tenant Act – Source of Income Protection

Source of income discrimination was prohibited by a 2018 WA state legislative amendment to the WA Residential Landlord Tenant Act (RLTA). Despite having state legal protection, source-of-income complaints were frequently reported by interviewees and survey participants.

Refusal of Rental Assistance

Many survey participants and interviewees reported that landlords do not always accept rental assistance. While such payments would seemingly be covered by the WA source of income protections, it is commonly believed that a housing provider does not have to accept rental assistance if a condition of acceptance is making changes to the rental agreement, such as agreeing to retain the tenant for a specified amount of additional time.

Eviction Laws and Practices

An eviction can keep people from being able to access housing again. Eviction filings are increasing, surpassing pre-coronavirus pandemic levels, attributable by tenant advocates to: rent increases being permitted again in late 2021, federal rental assistance ending in summer 2023, the expiration on 4/30/23 of the requirement that housing providers offer reasonable payment plans with any termination notice for debts between 3/1/20 and 4/30/23, and the expiration on 7/1/23 state Eviction Resolution Pilot Program that required landlords to notify a local dispute resolution center before filing for eviction. In Washington, eviction filings more than doubled over the six months 4/1/23 to 10/31/23. In Spokane, monthly filings reached 180 in October 2023, exceeding pre-pandemic rates (est. 118 per day).

While eviction filings by race of the defendant was not available for this report, demographic data included in the August 2023, *Washington State's Appointed Counsel Program: Baseline Report*, states that the statewide racial composition of clients served was 54.8% White, 10.4% Black, 6% Native American, and 4% Latino. This means that Black and Native American people disproportionately participated in the right-to-counsel program available to some defendants in unlawful detainer actions, compared to their percentages in the overall population.

Local Tenant Protections

Just Cause Eviction

The WA Residential Tenant Landlord Act was amended to require landlords to provide one of the enumerated good cause reasons for terminating month-to-month tenancies. The new law sets out the good cause reasons that a landlord can end the tenancy. Landlords can still end a tenancy at the end of a lease without cause if the initial rental term is between six months and one year

and the tenant is given 60 days written notice. Tenant advocates interviewed say that Spokane needs to enact a local ordinance to apply just cause to fixed term leases. Otherwise, housing providers are incentivized to steer people into fixed term leases by offering sometimes significantly higher rental rates for month-to-month rental agreements.

Tenant Screening Requirements

Commonly used tenant screening qualifications and processes are often impediments to accessing safe, affordable housing, including the following:

Criminal History

Lack of a “ban the box” law in Spokane is a major barrier to housing for justice involved people, who are disproportionately Black, Indigenous, and other people of color. Having a criminal history does not mean that someone won’t be a good tenant. Conducting an individualized assessment and considering mitigating factors can sometimes show that a specific criminal history has no bearing on whether a person will be a good tenant. The US Dept. of Housing & Urban Development issued guidance on use of criminal history in housing screening in 2016 and 2022, including prohibiting blanket bans on criminal history, and advising housing providers to conduct an individualized assessment that considers relevant mitigating information beyond that contained in an individual’s criminal record. However, reports of housing denials based on criminal history are prevalent, and applicants and housing providers don’t often know about the right to provide mitigating information as part of an individualized assessment.

Credit Score / History

Like criminal and eviction history, credit scores, or lack thereof, keep people from accessing housing. Credit score requirements have a bigger impact on BIPOC people who have historically had to rely upon non-traditional and unreported lending, and also people with disabilities on fixed incomes.

Universal Background and Credit Check

In February 2023, the City Council passed an ordinance to create a portable background and credit check program to ensure landlords get the data they need to make an informed decision about a prospective tenant, while ensuring that prospective tenants are not unduly burdened by the need to pay multiple background and credit check fees. However, a housing provider is not required to accept the universal background and credit check and can require a different one. The City has yet to implement this program.

Rental Regulation

Tenant advocates contend that regulation of rentals is needed to reduce harm, including ensuring compliance with state and local laws and the safety of tenants.

Rental Registry and Business Licenses

In 2023, the City Council passed an ordinance which established a residential rental registry and clarified that State Law and the Spokane Municipal Code require landlords to have a business license. Effective January 15, 2024, it is prohibited to make available for rent, or rent, lease, or let, to the public any residential housing unit without registering and maintaining registration of the residential rental property at which the unit is located. Landlords who offer below market

rentals to low-income tenants may seek a waiver of the \$15 annual fee by registering with the City's affordable rental housing incentive program that CHHS will develop. The rental registry requirement went into effect in January 2024, but currently the City is relying upon voluntary registrations and not yet engaging in enforcement action against those who are not registered.

Inspections

The housing stock in Spokane is on average older, therefore there is a lot of substandard housing. A 2023 ordinance now requires landlords or property managers to self-inspect units before renting them and certify that they have performed the inspections and that their property complies with all building codes, habitability requirements, and other relevant codes. However, there is no requirement for properties to be inspected by Code Enforcement prior to, or routinely, as a condition of renting them. The City's Code Enforcement Department may conduct periodic and cause-based inspections of residential rental property.

Rental Assistance

An issue supported by all tenant and landlord advocates consulted for this the report is the need for rental assistance. While there were many reports of landlords who refused rental assistance, these refusals may be tied to strategies to get rid of perceived problem tenants.

Homelessness

Protected Classes Still Overrepresented

The January 2023 Point-in-Time Count identified a 36% increase in the Spokane County houseless population. People experiencing houselessness in Spokane belong to all races, but some protected classes continue to be disproportionately represented:

- Black and American Indian/Alaskan Native/Indigenous people were disproportionately represented in the 2023 Point-in-Time Count (7% and 8% respectively).
- Like the PIT Count, data collected from clients served at the Camp Hope and Adams St. encampments, revealed racial disparities: Black and American Indian/Alaskan Native/Indigenous people were each more than 7% of total clients, which is double and triple their percentages in the overall Spokane population.
- 46% of clients served at the Adams St. and Camp Hope Encampments self-reported disabling disabilities, including one or more mental, physical, and/or substance abuse conditions.

Homeless Trends and Needs

A Fentanyl Crisis

The fentanyl crisis is not doubt contributing to those who experience homelessness. Substance abuse was more frequently self-reported to be a disabling condition among clients of the Adams St. and Camp Hope Encampments, more than physical or mental conditions.

In a March 2024 letter addressed to Mayor Brown, Spokane City Council, Spokane County Commissioners, Spokane Regional Health Officer Dr. Velazquez, Spokane Tribal Chair Woman Tonasket and Governor Inslee, members of the Experience Matters Leadership Team say the impact of fentanyl-related incidents has "reached a critical level, necessitating, urgent and comprehensive intervention," adding the crisis has had a disproportionate impact on people of color and those who are homeless.

Permanent Supportive Housing

It is often a difficult adjustment to be in housing after experiencing homelessness. It is a huge challenge to get people into housing, but it is also a challenge to help people remain housed. Community advocates said there are not enough supportive services and too few case managers to meet the need, and that more permanent supportive housing is needed.

Disparities in Adverse Childhood Experiences (ACES)

BIPOC people are disproportionately removed from families and placed in foster care. In turn, youth who age out of foster care often become homeless. Community advocates, however, say that older adults experiencing homelessness are not often asked if they were in foster care as children. They suggest that using surveys or other polling methods could be a way to document the incidence of foster care and other ACES among the adult homeless, to develop social supports for children and youth today before they become homeless.

More Elderly Houseless

Community organization representative interviewed report seeing more elderly people needing homeless and services, often due to increased rents beyond their fixed incomes.

Homeless Planning

Community advocates working with houseless populations who were interviewed say there is a need for funding for a 5-year homeless plan and financial support for the Continuum of Care Board, made up of local government, service providers, stakeholders, and people who have experienced homelessness.

Racial Equity

Representation

BIPOC people need to be included in City and Regional Boards and Commissions. Recently, a draft Regional Homeless Authority plan did not have the support of key community organizations and coalitions, in part because of lack of representation of people with lived experience and homeless service providers on the Board. The plan's included focus on detention and public safety did not reflect the perspectives of impacted persons and stakeholders.

Race Equity Framework

Public and private policies and practices (including redlining, racialized zoning, segregation, predatory lending, urban renewal, disinvestment in BIPOC neighborhoods, and exclusions in the New Deal and the G.I. Bill) have resulted in racial disparities which still impact equitable housing access today. This can be seen in demographic patterns in neighborhoods, the large gap in homeownership rates between white households and households of color, lower mortgage lending origination and higher denial rates, and devaluation of housing in neighborhoods with more BIPOC people. To rectify such inequities, the City should use a racial equity analysis to examine its policies, programs, and practices to identify racial disparities and uncover systemic biases, and then use race-neutral metrics, such as poverty rates and percentages of area median income, to design equitable programs. Policies and practices should not discriminate against any group but should create opportunities for historically marginalized communities. In employing a racial equity framework, the City should look at whether racial groups are excluded from participation in projects or services, and if so, try to discern the reasons. Then, deploy strategies

to address the causes, using race neutral policies that will increase participation of people historically or currently marginalized in housing. Finally, data should be collected and reviewed to determine whether public contracts or public benefits are awarded in an inclusive, nondiscriminatory manner. Other cities and public institutions in Washington have adopted race equity toolkits and analysis tools. It is recommended that Spokane adopt such a tool.

Discrimination or Violations of Civil Rights Law Related to Housing or Access to Community Assets Based on Protected Class

Administrative Fair Housing Complaints Filed with HUD and/or WSHRC

Complaint data for Spokane was obtained from HUD and the Washington State Human Rights Commission. Between 7/1/19 and 3/31/24 at least 62 complaints filed with HUD and / or the WSHRC originated in Spokane:

- Disability-based housing discrimination complaints were the most common basis for filing a complaint (71%). 33 complaints based on disability alone were filed. An additional 11 complaints alleged disability as the primary basis of discrimination, with one or more secondary protected classes (race, sex, familial status, or retaliation).
- Familial Status complaints - 12% of complaints
- Sex and Sexual Orientation & Gender Identity – 11% complaints
- Race complaints - 5% of complaints
- National Origin complaints - 3% of complaints
- Marital status – 1.6% of complaints

In addition to complaints that are referred to HUD or the WSHRC for formal investigation, NWHFA receives over 1500 intakes per year, and opens on average 150 cases in-house with fair housing allegations for investigation, advocacy, and often informal resolution with housing providers (e.g., requests for reasonable accommodations, etc.).

Spokane Human Rights Ordinance – Title 18

The Spokane Human Rights Ordinance does not provide a private cause of action. The commission of an act of discrimination as defined in Title 18 is punishable as a Class 1 civil infraction. Due to the enactment of source of income protections in the WA Residential Landlord Tenant Act effective January 2019, most complainants of source of income discrimination file complaints in Court under the WA RLTA, rather than with the City under Title 18, due to the possibility of recovering damages under the RLTA.

Community Engagement

Summary of Citizen Participation Process and Consultation Process

Spokane has adopted a Citizen Participation Plan⁵. With respect to fair housing, the Plan provides:

DEVELOPMENT OF THE CONSOLIDATED PLAN AND ASSESSMENT OF FAIR HOUSING (AFH)

...

Citizens are encouraged to actively engage in the development of each Consolidated Plan and Assessment of Fair Housing Plan (AFH). Both plans are intended to guide current and future efforts that will benefit the Spokane community. Participation is not limited to any one group or organization. All citizens have the opportunity to provide meaningful feedback that leads to Plans inclusive of all Spokane residents. **30-day public comment periods and a public hearing are required** for Consolidated Plans and **Assessments of Fair Housing**.

Data for Public Review and Comment

CHHS will make information available when developing the Consolidated Plan and Assessment of Fair Housing. Citizens will be given an opportunity to review the Plans via the CHHS website (<https://my.spokanecity.org/chhs/>). Citizens will also have opportunities to comment prior to adoption of the Consolidated Plan and AFH by attending CHHS Board and other related meetings.

Publishing the Consolidated Plan and Assessment of Fair Housing

CHHS will make available draft copies of the Consolidated Plan and AFH on the City's website for review and comment prior to adoption by the City Council. Citizens are encouraged to participate in public outreach efforts and provide public comment related to each draft plan. **Public notice will be provided in the local newspaper legal ads.** Other types of public notice may include the City newsletter, CHHS website, and communication with 29 neighborhood councils through the Community Assembly. Hard copies will be made available upon request to CHHS.

PUBLIC MEETINGS

Citizens are encouraged to attend CHHS Board meetings held on the first Wednesday of every month (beginning annually in February) from 4 to 6 PM (Spokane City Hall: City Council Briefing Center with virtual, hybrid meeting options). The Board allows for public comment on items relevant to the CHHS Board during the first ten (10) minutes of each meeting.

CHHS will hold all public meetings in public locations within the City of Spokane. Consideration will be given to locations meeting ADA accessibility requirements, namely Spokane City Hall and Community Centers (Northeast, West Central and East Central).

PUBLIC HEARINGS

CHHS will host no less than two separate Public Hearings with the CHHS Board during each calendar year. The first public hearing will occur prior to the submission of the Consolidated Plan, AFH Plan, Annual Action Plan, and substantial amendments for prior years' Plans. Public hearings will typically take place during the spring and fall.

⁵ <https://static.spokanecity.org/documents/chhs/plans-reports/planning/2024-citizen-participation-plan.pdf>

The CHHS Board will host **Public Hearings allowing for formal public comment periods. Public Hearings will be held for Consolidated Plans, Assessments of Fair Housing, Annual Action Plans, Substantial Amendments to Prior Years' Plans and Consolidated Annual Performance and Evaluation Report (CAPER).**

Public Hearings are generally held at Spokane City Hall. **CHHS will publish a legal notice announcing each public hearing and comment period in the Spokesman Review at a minimum.** CHHS will accept all public comments and summarize them in the Plans.

Citizens have a third opportunity to provide public comment at the City Council meeting where each Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing is briefed. Citizens will have an opportunity to provide public comment during the initial briefing and again prior to the final City Council vote. CHHS will take all public comments offered to the City Council into consideration.

Community Surveys

Community surveys were designed and distributed to seek information on the knowledge of fair housing laws, resources, and enforcement processes, and community exposure to and perceptions about the frequency of housing discrimination among the public.

Two surveys were designed, one for housing providers (current and former housing providers, including property managers, landlords, real estate brokers, and mortgage lenders and originators, and their advocates (landlord associations and landlord attorneys)) (41 questions), and one for housing consumers and their advocates (including current and former tenants, transitional housing residents, homebuyers / owners, home mortgage borrowers, healthcare providers, tenant advocates, housing counselors, and social service providers) (38 questions).

Surveys were translated to **Spanish, Russian, Vietnamese, Arabic, and Marshallese.** Distribution of the surveys began on 3/8/24 with a return deadline of 4/7/24, although surveys were accepted and reviewed until 4/11/24. On 3/11/24 the City Community Services, Housing and Community Development Department distributed survey links to over 500 email addresses on its email distribution lists. Links to the surveys were posted on NWFHA's website, Twitter account and Facebook Page on 3/8/24, 3/11/24, 3/15/24, and 3/18/24. NWFHA sent 7069 emails containing links to the surveys on 3/8/24, 3/11/24, 3/15/24, and 3/18/24, including but not limited to representatives, employees, and affiliates of organizations owned, led by, or serving protected class populations, including people with disabilities, immigrants, refugees, families with children, veterans, black, indigenous, and other people of color, LGBTQIA2S+; and real estate brokers, property managers, landlords, mortgage lenders and brokers, and shelter, transitional, and permanent supportive housing providers.

Survey Participants

236 surveys were completed (215 housing consumer / advocate surveys (213 English, 1 Russian, and 1 Spanish), and 21 housing provider surveys). Fewer people completed the housing provider survey, but several housing providers took the Housing Consumer survey based on self-identification and narrative comments. At least one self-reported tenant advocate took the Housing Provider survey. Accordingly, where questions were identical in the two surveys, the results have been reported in combination.

All comments were accepted and taken into consideration. See survey summaries in **Appendix C** which include all comments. Summary of survey responders:

- The majority reside in the City of Spokane (74.8% of all responders), 18.4% reside in other cities and towns in the County, 5.1% in unincorporated Spokane County, 1.7% in Washington but outside the County, and 1.3% outside of Washington State.
- 79.4% of all responders were White non-Hispanic, 3.4% were Black or African American, 3.9% Native American or Alaskan Native, 6.9% 2 or more races, 1.3% Asian, 9.5% Hispanic or Latino, .4% Native Hawaiian or Other Pacific Islander, and 2.1% selected Other Race.
- 34% of all responders reported they have a disability
- 30% have children in the household
- 61.5% of responders were female assigned at birth, 26.8% were male assigned at birth, 1.3% were transgender (2 male and 1 female), 3.9% were gender-non-conforming, 1 bi-gender, 1 intersex, and 7.6% selected "Other". Narrative comments for "Other" included people identifying as non-binary (2), 2-spirit (1), male (1), female (2), agender/genderqueer/non-binary (1), and some who stated they did not wish to disclose.
- 68.7% of all responders were heterosexual, 13% bisexual, 7.8% gay or lesbian, 4.3% as pansexual, and 2.6% asexual; 4.8% selected other, and reported they were queer (2) or stated they did not wish to disclose.
- 74.5% of survey responders had annual household income above \$56,200. 2.6% reported income of \$12,000 or less. 2% had \$12,000 - \$18,000. 3% had \$18,000 - \$22,500. 4% had \$22,500 - \$29,960. 7.4% had \$29,960 - \$37,450. 21% had \$37,450 - \$56,200. 18% had \$75,000 - \$103,400. 23.4% reported income of \$103,400 or more
- 65.6% of housing consumer / advocate responders owned or were purchasing their home; 30% rent or lease, and 2.8% were temporarily staying with friends or family.
- 31.5% of housing consumer / advocates identified themselves as tenants; 56.8% as homebuyers or owners, 9% as mortgage borrowers; 7% as tenant advocates, 14.6% as social service providers, 3.3% as housing counselors, 2% as healthcare providers, and 1% as tenant attorneys. In narrative responses, responders also identified themselves as landlords, a student, a realtor, an owner of a property management co., city staff, a former tenant, a volunteer with community court, a former Housing Specialist, a statewide organizer for housing justice, and a friend of people in temporary housing.
- Housing provider / advocate survey responders who own, manage, or provide services at dwelling units were represented at the following unit levels: 11.1% selected 1 unit; 5.6% (2 to 3 units), 5.6% (4 units); 11.1% (5-9), 5.6% (21-30), 5.6% (51-75), 27.8% (201+), and 1 reported 40+ scattered site outreach.
- Housing provider / advocate survey responders reported owning, managing, or providing services at rental units in Spokane (87.5%) other cities or towns in Spokane County (37.5%), unincorporated Spokane County (18.8%), cities in WA outside Spokane County (18.8%); and outside WA (6.3%).

Stakeholder Interviews

Interviews were conducted with individuals employed or affiliated with organizations with membership or missions focused on protected classes and housing, as well as a representative for a rental housing association. Requests for interviews were sent by email beginning on 1/25/24⁶ to these and several other individuals. Broadly distributed email notices for the surveys and public meetings also advised recipients that they could request to be interviewed. Interviews were conducted with 7 individuals who responded and agreed to be interviewed.⁷

Public Meetings

On 3/6/24, 4/3/24, and 5/1/24, NWFHA staff made presentations about the Fair Housing Plan development process, timeline, and updates to the Community, Housing & Human Services Board during its regular meetings. The meetings were noticed on the City website, open to the public, and conducted virtually via Zoom and in-person.

Two additional public meetings were held at various accessible locations and different times to provide opportunity for members of protected class groups and underserved communities, and local community leaders (including but not limited to advocates, community-based organizations, healthcare professionals, and other service providers such as social workers and case managers), opportunities to receive information about and provide input on fair housing planning. Those engaged in providing housing (real estate brokers, property managers, landlords, and public housing authority staff) were also invited to attend.

Public meetings were conducted on 4/2/24 (6 to 7:30 pm at the Northeast Community Center, 4001 N Cook St, Spokane, WA 99207), and on 4/4/24 (12:00pm to 1:30 pm at The Hive, Spokane Public Library, 2904 E Sprague Ave., Spokane, 99202). Both meetings were attended in-person and virtually via Zoom. 29 people registered to attend the 4/2/24 meeting via Zoom; 46 registered to attend the 4/4/24 meeting via Zoom). 19 people attended in person (4 for the NE Community Center and 15 for the Hive); and 39 attended virtually via Zoom (9 on 4/2/24 and 30 on 4/4/24), for a total of 58 attendees. Attendees had affiliations or employment with the City of Spokane, Spokane Regional Health District, Rental Housing Association of WA, Help4women, NW

⁶ Interview invitations were emailed to the following: WA Low Income Housing Alliance, Tenants Union of WA – Spokane, Spokane Low Income Housing Consortium, Parkview Services, Disability Rights Washington, Spokane NAACP, Spectrum Center Spokane, Spokane Housing Authority, The Arc of Spokane, Latinos En Spokane, Asians for Collective Liberation in Spokane, Habitat for Humanity Spokane (Advancing Black Homeownership Program Manager), Jewels Helping Hands, Spokane Human Rights Commission, Spokane Office of Civil Rights, Equity, and Inclusion, American Indian Center, and Futurewise – Spokane.

⁷ Duaa-Rahemaah Hunter, Spokane resident and Statewide Organizer for the Resident Action Project, WA Low Income Housing Alliance – 3/28/24; Ami Manning, Spokane resident, R-O-W Project Housing Director, Spokane Low Income Housing Consortium, and Experience Matters Coalition Leadership Team – 3/29/24; Terri Anderson, Spokane resident and Interim Executive Director and Statewide Policy Director, Tenants Union of WA; Amber Abrahamson, Tenant Advocate and Community Outreach Coordinator; Tenants Union of WA; and Salvador Recinos, Counselor, Educator, and Advocate, Tenants Union of WA – Spokane - 3/29/24; Michelle Pappas, Spokane resident, Spokane Program Manager, Futurewise, and Experience Matters Coalition Leadership Team – 4/1/24; Daniel Klemme, Membership Development & Government Affairs, Rental Housing Association of Washington, and Founder and CEO of Housing Navigator - 4/12/24

Mediation Center, Frontier Behavioral Health, Catholic Charities of Eastern WA, Virginia Mason Franciscan Health, Northeast Youth & Family Services, Pathways, Spokane County, Spokane Workforce, Career Path Services, Transitions, Women's Hearth, Better Health Together, YWCA Spokane, Refugee and Immigrant Connections Spokane, CHAS, Goodwill Industries of the Inland NW, Wells Fargo, WA State Housing Finance Commission, NW Service Animal Alliance, WA Tenants Union, Spokane County Housing & Community Development, WA Low Income Housing Alliance/Resident Action Project, the Carl Maxey Center, Spokane Valley Community Advocates, League of Women Voters Spokane Area, as well as tenants and independent landlords.

A presentation was also made on 4/4/24 at the Carl Maxey Center, 3114 E 5th Ave, Spokane, 99202, to the WA Low Income Housing Alliance Resident Action Project monthly meeting, to 7 attendees (5 in-person and 2 attending virtually).

The draft Fair Housing Plan was made available on the City website for a 30-day public comment period from [REDACTED], 2024 to [REDACTED], 2024.

A public hearing before the CHH Board was held on [REDACTED], 2024 at [REDACTED]. There were [REDACTED] attendees and [REDACTED] people offered comments.

The Fair Housing Plan was approved by the CHHS Board on [REDACTED], 2024 during a regular public meeting on the consent agenda.

The Fair Housing Plan was approved by the City Council on [REDACTED], 2024.

Assessment of Past Goals, Actions and Strategies

Impediments To Fair Housing Identified in 2019

The most recent Analysis of Impediments (AI) for Spokane was prepared in 2019 and adopted by the Community, Housing, and Human Services (CHHS) Board on February 5, 2020.⁸ The 2019 AI identified the following impediments and recommended actions. Progress on recommendations since 2019 is noted under each impediment.

Impediment 1: Fair housing complaints based on disability discrimination are filed with administrative enforcement agencies at a significantly greater rate than any other protected class.

Recommended Actions:

- Provide fair housing education for housing providers about Fair Housing Act requirements for assessing and granting requests for reasonable accommodations and modifications.
- Provide advocacy for people with disabilities.

Progress:

- *Disability continues to be the most common basis for filing fair housing complaints in Spokane.*
- *NWFHA offers fair housing education for housing providers, free of charge if funding permits (primarily with HUD Fair Housing Initiative Program grants), or as fee for service trainings. However, training is voluntary and not required by the City of Spokane.*
- *NWFHA provides advocacy for people with disabilities as funding permits (primarily with HUD Fair Housing Initiative Program grants). However, requests for assistance often exceed available NFWHA resources.*

Impediment 2: People with disabilities have need for assistance requesting and advocating for reasonable accommodations.

Recommended Actions:

- Provide training and technical assistance to advocates who work with people with disabilities about how to request reasonable accommodations and verify disability and need for reasonable accommodations.

Progress:

- *NWFHA provides technical assistance and training for people who work with and advocate for people with disabilities as funding permits (primarily with HUD Fair Housing Initiative Program grants). However, this need is ongoing. There is often high turnover in staffing at under-resourced non-profit agencies, and especially during the coronavirus pandemic.*

Impediment 3: People of color and people with disabilities are more likely to be tenants than homeowners, and therefore at greater risk of housing instability and homelessness due to market forces (e.g., low vacancy rates, rising rents, and high cost of application and screening fees), and 20 day no cause tenancy termination.

⁸static.spokanecity.org/documents/chhs/plans-reports/planning/2020-analysis-of-impediments-to-fair-housing-choice.pdf

Recommended Actions:

- Adopt local ordinance protections that limit the reasons tenancies can be terminated, provide more notice to tenants of terminations, limit the amount of application, screening, and move-in fees that can be charged, and require increased notice prior to raising rent or limit rent increases to a certain percentage over a specific amount of time.

Progress:

- *None of the recommended actions have been enacted locally. The WA Residential Tenant Landlord Act was amended to require landlords to provide one of the enumerated good cause reasons for terminating month-to-month tenancies. The new law enumerates good cause reasons that a landlord can end the tenancy. Landlords can still end a tenancy at the end of a lease without cause if the initial rental term is between six months and one year and the tenant is given 60 days written notice.*
- *In 2024 legislation was introduced in the WA legislature that would have increased the notice time for rent increases; the bill passed the House but not the Senate. In April 2024 an ordinance was introduced in the Spokane City Council to increase the notice time for rent increases.*

Impediment 4: Source of income discrimination and housing provider refusal to accept housing subsidies limits housing choice for people with disabilities who rely on non-employment income such as SSI and SSDI, people with disabilities and people of color who are disproportionately represented in the section 8 voucher program, and veterans with disabilities who receive VASH vouchers.

Recommended Actions:

- Provide education for housing consumers and providers about source of income protections in the WA RLTA and SMC Title 18.
- Fund testing to support source of income discrimination complaints by rental applicants. Source of income is not a protected class in the Fair Housing Act, therefore HUD Fair Housing Initiative Program grants, which primarily fund the local fair housing organization, cannot be used to investigate or advocate for discrimination based on denial of section 8 vouchers.

Progress:

- *Source of income discrimination continues to be a frequent occurrence reported by survey participants, interviewees, public meeting attendees, and NWFHA intake.*
- *The City has not funded education or testing to support source of income discrimination complaints by rental applicants.*

Impediment 5: Overly broad criminal history screening policies limit access to housing for many rental applicants, and have a disparate impact on people color, who are statistically overrepresented among those who are criminal justice system involved.

Recommended Actions:

- Provide education for housing providers about the need for screening policies and procedures to comply with the Fair Housing Act.
- Adopt a “ban the box” ordinance that prohibits soliciting or considering older and less serious criminal history in rental applications.

Progress:

- *Criminal history screening continues to limit access to housing in Spokane, as identified by survey participants, interviewees, and NWFHA intake.*
- *No state or local legislation has been enacted which explicitly limits the type or time period of criminal history that can be considered for rental applicants.*

Impediment 6: People of color are overly represented in the homelessness population compared to their percentages in the overall Spokane population.

Progress:

- *Black and American Indian/Alaskan Native/Indigenous people were disproportionately represented in the 2023 Point-in-Time Count (7% and 8% respectively).*
- *Data collected under the WA State Dept. of Commerce Encampment Resolution Project (ERP), previously known as the State Right of Way (ROW) project in Spokane, WA, from agencies subcontracting under Empire Health Foundation on Spokane's ERP, reveals racial disparities among those served at Camp Hope and the Adams St Encampments. Like the PIT Count, Black and American Indian/Alaskan Native/Indigenous people were each more than 7% of total clients, double to triple their percentages in the overall Spokane population.*

Impediment 7: Multi-family housing continues to be built out of compliance with the Fair Housing Act's design and construction accessibility requirements

Recommended Actions:

- Provide fair housing design and construction training for developers, contractors, architects, engineers, and city planning and development personnel.

Progress:

- *Since 2019 NWFHA filed 2 complaints with HUD based on noncompliance with the Fair Housing Act's design and construction requirements in Spokane.*
- *Training for those involved in the design, construction, and development of multi-family housing is not required by the City of Spokane.*

Impediment 8: Single-family and low-density zoning limits the building of multi-family rental housing to areas of the city where people of color and those with disabilities, most often renters, are already concentrated, and limits opportunity to move to neighborhoods with the highest percentages of white residents, thereby serving to reinforce historic patterns of segregation.

Recommended Actions:

- Explore feasibility of amending land use and zoning ordinances to allow for more variety of housing units, including small and large multi-family housing buildings, in more residential zones.

Progress:

- *In July 2022 Spokane enacted an interim Building Opportunity and Choices for All (BOCA) ordinance to allow for immediate "Middle Housing" development while the City worked on making permanent Comprehensive Plan and Development Code changes. Permanent code changes (Building Opportunity for Housing (B.O.H.)) were approved by the City Council in November 2023. B.O.H. allows design standards for single-unit detached homes and Middle Housing developments, does not require parking for residential uses within ½ mile of a transit stop, has no lot density maximums for lots less than 2 acres in size, reduced lot size minimums,*

expanded the Unit Lot Subdivision process to allow for greater site flexibility, implemented footprint and impervious surface maximums, and increased building height and reduced front and rear setbacks for some zones.

- *On December 14, 2023, the City Council approved an emergency ordinance to limit the number of units in the R1 and R2 zones to 4 units. The ordinance limits the units on a temporary basis, while the state legislature and federal agencies work on further guidance and adjustments to recent state legislation to address federal lending and appraisal requirements. Upon completion of that guidance, future amendments to Title 17 SMC are anticipated to permanently address any conflicts with the recently passed middle housing regulations.*

Impediment 9: There are insufficient vacant affordable rental units in multi-family housing communities, which limits housing choice for renters, including people with disabilities and people of color who are more often renters than homeowners.

Recommended Actions:

- Increase incentives for affordable housing development, utilizing a variety of means, including community land trusts, tax credits, modification of land use regulations and permitting requirements, and sale of surplus city property at reduced-market value in exchange for guaranteed housing of low-income people.

Progress:

- *Section 17C.400.040 Pilot Center and Corridors Development Standards was extended to allow for the completion of additional work currently underway regarding Spokane’s Center and Corridors. Developments with at least 50% of the square footage dedicated to residential uses within a Center and Corridor designation may take advantage of development bonuses until June 18, 2024. SMC Sec. 17C.400.040. The bonuses are not tied to providing affordable housing however.*
- *In February 2023 the City adopted Ordinance C-36330, which established a residential rental registry and imposes a \$15 per unit per year fee. The fee can be waived for landlords offering below market cost rentals to low-income tenants by registering with the City’s affordable rental housing incentive program to be developed by CHHS.*

Impediment 10: People with limited English proficiency need fair housing information provided in Spanish, Russian, Marshallese, Vietnamese and Arabic.

Recommended Actions:

- Provide translation of existing HUD and locally developed fair housing brochures, public service announcements, and websites.

Progress:

- *These 5 languages continue to be needed, as identified by survey participants, with the addition of Ukrainian.*

The 2019 AI also identified the following significant issues for housing choice in Spokane:

A significant issue is defined in the 2019 AI as a barrier that is beyond the reach of traditional fair housing law, but nonetheless restricts housing choice and contributes to the social and economic isolation of protected classes as well as low-income people. The 2019 AI identified the following significant issues:

1. Need for property maintenance code and enforcement of minimum habitability and quality standards in the private rental market
 - **Progress:** *Ordinance C-36366 was passed in February 2023 which requires landlords or property managers to self-inspect the unit(s) before renting them out, certify in a lease that they have performed the inspections and that their property complies with all the building codes, habitability requirements, and other relevant codes preexisting the City and State codes; requires landlords or property managers to make all the necessary repairs to keep the unit in habitable condition as regulated by the City and State codes; requires landlords or property managers to maintain all move-in and move-out inspection records for at least three years; requires landlords, owners, or property managers to disclose to tenants history of mold, methamphetamine manufacturing on the premises.*
2. Need for universal rental screening report accessible to and accepted by all landlords, for one application fee for tenants
 - **Progress:** *In March 2023 Spokane adopted an Ordinance to develop a portable background and credit check program, which would provide background and credit checks that would be paid for by the tenant and valid for 90 days. SMC 10.57.80. A housing provider is not required to accept this background and credit check and can require a different one.*
3. Low Environmental Health Indexes (high exposure to environmental health toxins) in Spokane across all races and incomes
4. High Job Proximity Index for people of color in Spokane, but low Labor Market Engagement Index, meaning close proximity to jobs but low job engagement
5. Desire from housing providers for more coaching support for tenants with little prior rental experience placed in housing by agency programs and subsidies

Jurisdictional Background

The City of Spokane is located in Eastern Washington on land inhabited for centuries by Upper, Middle, and Lower bands of the Spokane Tribe of Indians, an Interior Salish Group, who, along with The Kalispell and Coeur d'Alene Tribes utilized the Spokane River for fishing and encampments. In January 1881, President Rutherford B. Hayes declared the Spokane Indian Reservation the new and smaller home of the Spokane Indians and the three bands were split up among what are now known as the Coeur d'Alene Indian Reservation, the Flathead Indian Reservation, and the Colville Indian Reservation. In November 1881, the Town of Spokane Falls was incorporated.

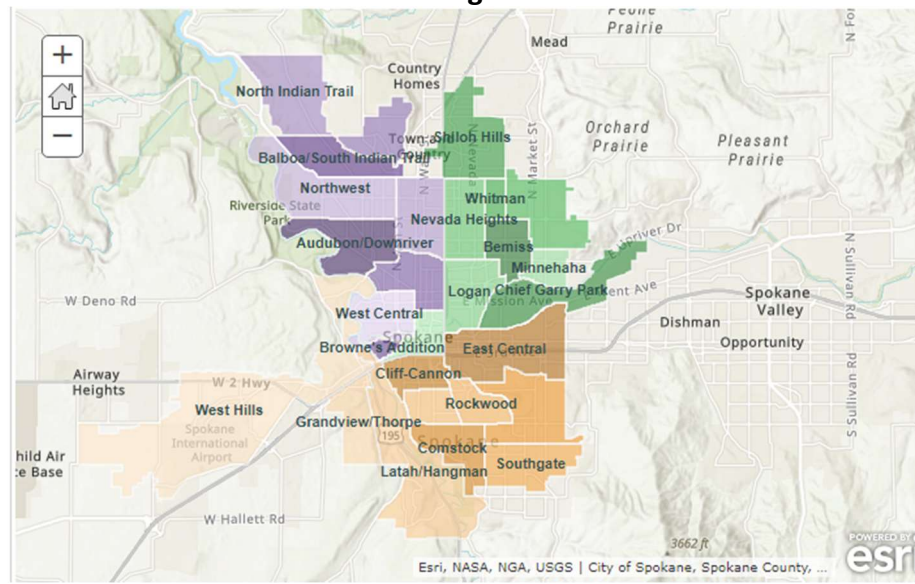
Spokane has an estimated population of 230,160 (US Census Bureau, Est., July 1, 2022). Spokane is the second largest city in Washington State, and the largest city between Seattle, Washington and Minneapolis-St. Paul, Minnesota. Spokane is a major metropolitan center for the Inland Northwest. Spokane offers some of the most modern facilities in the Northwest region including specialized hospitals and several colleges and universities in and nearby: Spokane Community Colleges, Whitworth College, Gonzaga University, Eastern Washington University, and Washington State University.

Spokane Neighborhoods:

Spokane includes the following neighborhoods:

- District 1 Neighborhood Councils: Bemiss, Chief Garry Park, East Central, Hillyard, Logan, Minnehaha, Nevada Heights, Shiloh Hills, and Whitman
- District 2 Neighborhood Councils: Browne's Addition, Cliff/Cannon, Comstock, East Central, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Manito/Cannon Hill, Peaceful Valley, Rockwood, Southgate, Riverside, and West Hills
- District 3 Neighborhood Councils: Audubon/Downriver, Balboa/South Indian Trail, Emerson/Garfield, Five Mile Prairie, North Hill, North Indian Trail, Northwest, and West Central

MAP 1 – Neighborhoods



Source: <https://my.spokanecity.org/opendata/gis/neighborhoods/>

Fair Housing Analysis

Demographics

Total Population:

The City of Spokane has an estimated population of 230,160 (US Census Bureau, Est., July 1, 2022). Spokane’s population increased by 21,244 people from 2010 to 2022, a change of 10.2%. However, the rate of growth has been less than that of the County and State.

LOCATION	CENSUS				CHANGE 2000-10	CHANGE 2010-20	2022 ESTIMATE	CHANGE 2020-22
	1	2000	2010	2020				
Spokane	177,165	195,629	208,916	228,989	6.8%	9.6%	230,160	.5%
Spokane Co.	361,333	417,939	471,221	539,339	12.7%	14.5%	549,690	1.9%
Inc.	195,890	218,920	335,124					
Uninc.	165,443	199,019	136,097					
WA	4,866,659	5,894,121	6,724,540	7,705,281	14%	14.6%	7,784,477	1%

Source: US Census; OFM population estimates

Demographics By Protected Class

Race and Ethnicity

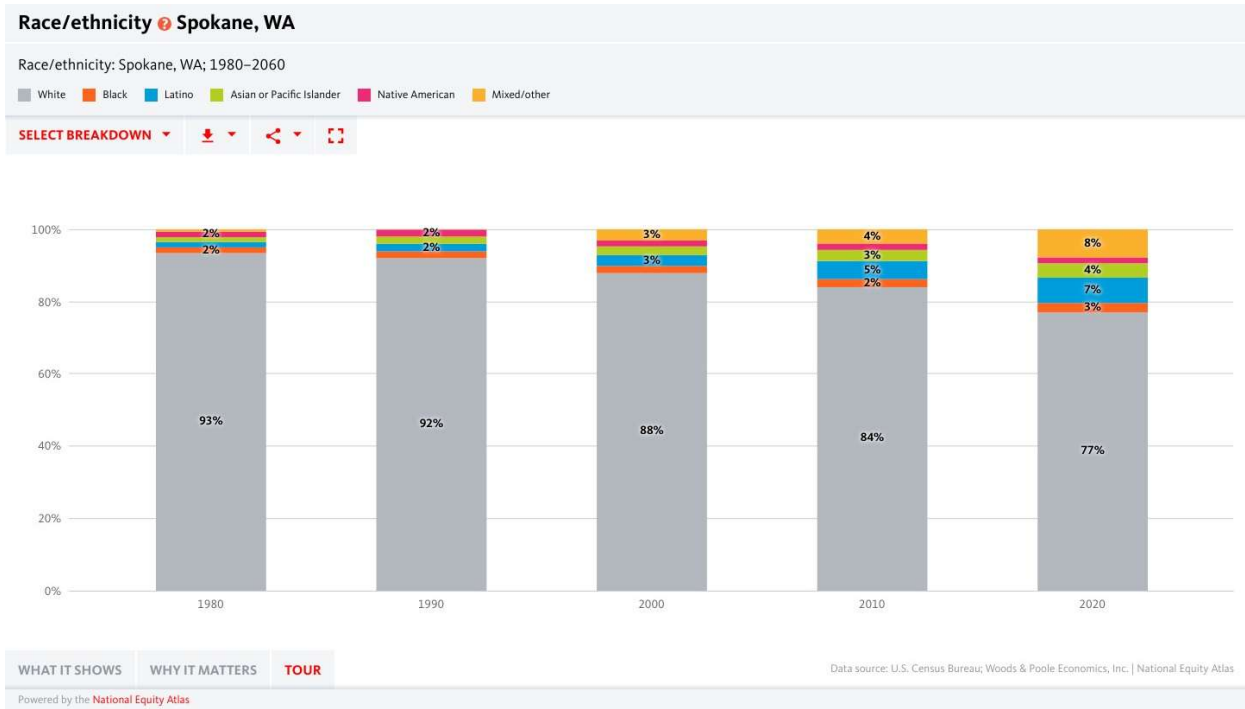
The population of Spokane is predominantly white, non-Hispanic; however, it is slightly more diverse than the rest of the county. Out of the total City population, 79.3% are white, 7% are Hispanic, 2.8% are Asian, 2.7% are black or African American, 1.9% are American Indian or Alaskan Native, 1.2% are Native Hawaiian or Other Pacific Islanders, and 2.4% identify as another race. 9.7% report as two or more races. Table 2.

The white non-Hispanic population in Spokane has been gradually decreasing, from 87.5% in 2000 to 77% in 2020 (Table 2). See also Graphic 1. During this time, all other races increased, and “Hispanic or Latino”, “some other race alone”, and “two or more races” more than doubled.

RACE / ETHNICITY	SPOKANE			COUNTY			WA		
	2000	2010	2020	2000	2010	2020	2000	2010	2020
Race									
White	89.1	86.7	79.3	91.2	89.2	82.1	84.9	77.3	66.6
Black/African American alone	2	2.3	2.7	1.5	1.7	2	3.3	3.6	4
Alaska Native & American Indian	1.8	2	1.9	1.4	1.5	1.5	1.6	1.5	1.6
Asian alone	2.2	2.6	2.8	1.8	2.1	2.3	5.7	7.2	9.5
Native Hawaii & Pacific Islander	.2	.6	1.2	.1	.4	.8	.4	.6	.8
Some other Race	.8	1.3	2.4	.8	1.2	2.2	4	5.2	6.7
Two or more races	3.9	4.6	9.7	3.1	3.8	9	3.8	4.7	10.9
Ethnicity									
Hispanic or Latino	2.9	5	7	2.7	4.5	6.6	7.5	11.2	13.8
Non-Hispanic	97.1	95	93	97.3	95.5	93.4	92.5	88.8	86.3
Race/ethnicity combined									
Minority*	12.5	16	23	10.3	13.3	20	21.1	27.5	36.2
White non-Hispanic alone	87.5	84	77	89.7	86.7	80	78.9	72.5	63.8

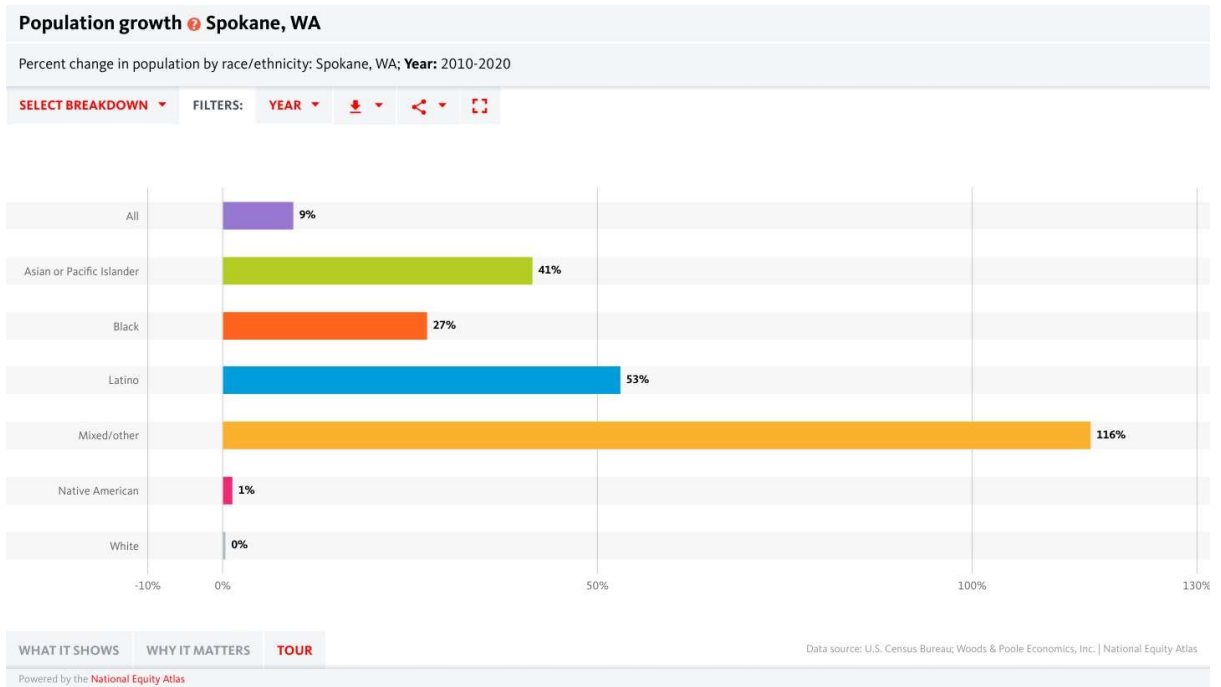
*Hispanic and/or race other than white alone non-Hispanic. Source: US Census

Graphic 1 - Source: National Equity Atlas



Between 2010 and 2020, the white population had 0% growth, while people of mixed race grew by 116%, Latinos by 53%, Asian and Pacific Islanders by 41%, and Black people by 41%.

Graphic 2: Source: National Equity Atlas



Black and African Americans

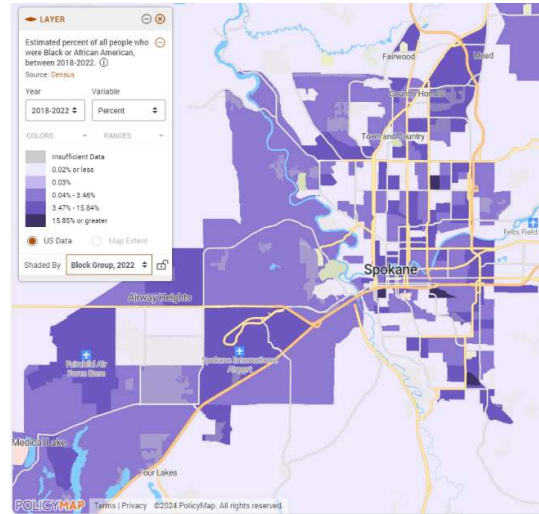
People who are Black and African American alone (without another race) are 2.7% of the Spokane population, a slightly higher percentage than the County of Spokane (2%). Table 2.

Black and African Americans have the highest populations in block groups:

- 530630031001 (16.2%)
- 530630003022 (16.5%)
- 530630050001 (23.8%)
- 530630040011 (26.8%)

MAP 2 – Spokane – Black or African American Population 2018-2022:

Source: <https://www.policymap.com/newmaps#/>



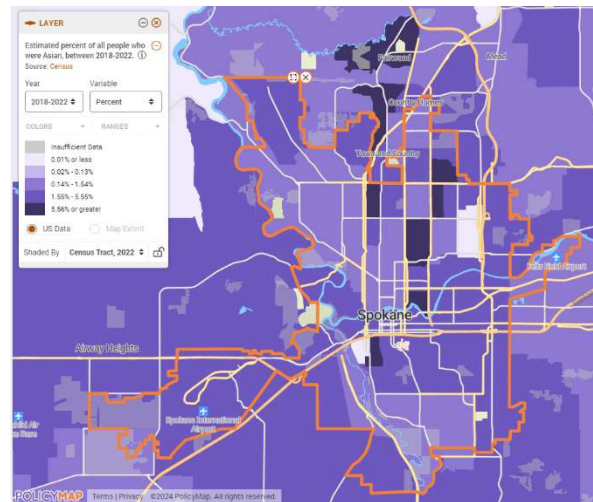
Asian Populations

2.8% of Spokane residents are Asian. The darkest areas on Map 3 have the highest concentrations of Asian people. Six census tracts have Asian populations above 6%:

- 53063001400 (7.7%)
- 53063000302 (7.1%)
- 53063011204 (8.6%)
- 53063000600 (6.2%)
- 53063002503 (8.8%)
- 53063004001 (6.3%)

MAP 3 – Asian Population – 2018 - 2022

Source: <https://www.policymap.com/newmaps#/>



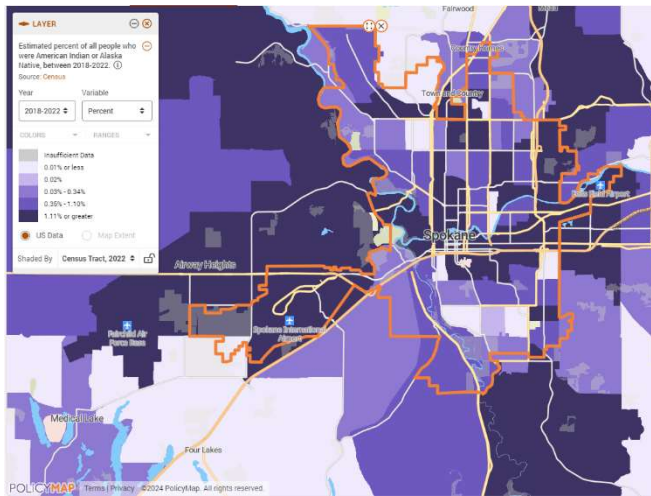
American Indian and Alaska Native – Indigenous Populations

Nearly 2% of the Spokane population are indigenous. Table 3.

Table 3 - Estimated percent of all people who were American Indian or Alaska Native - 2020				
	Spokane Co.	Spokane	WA	USA
% American Indian or Alaskan Native Pop.	1.5%	1.9%	1.58%	1.12%

Source: <https://www.policymap.com/tables>

The darkest areas on Map 4 have the highest concentrations of American Indian and Alaska Native populations, including census tracts:

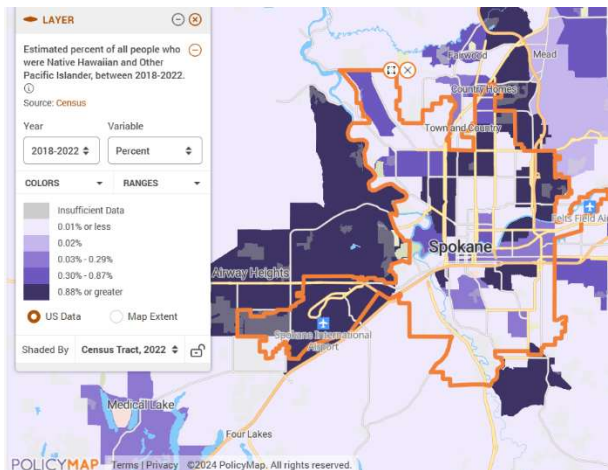


- 53063011103 (4%)
- 53063000400 (3%)
- 53063000202 (2.7%)
- 53063001900 (2.7%)
- 53063002000 (4.3%)
- 53063002400 (4.3%)
- 53063014500 (5.3%)
- 53063004701 (8.5%)
- 53063002300 (5%)
- 53063003601 (3.75%)

MAP 4 – American Indian and Alaka Native Population – 2018 - 2022

Source: <https://www.policymap.com/newmaps#/>

Native Hawaiian and Other Pacific Islanders



1.2% of Spokane residents are Native Hawaiian and Other Pacific Islanders. The darkest areas on Map 5 have the highest concentrations of Asian people.

Six census tracts have populations above 3%:

- 53063014400 (6%)
- 53063001600 (4.5%)
- 53063002100 (4.7%)
- 53063001200 (3%)
- 53063011103 (6%)
- 53063011104 (4%)

MAP 5 – Native Hawaiian and other Pacific Islanders – 2018 - 2022

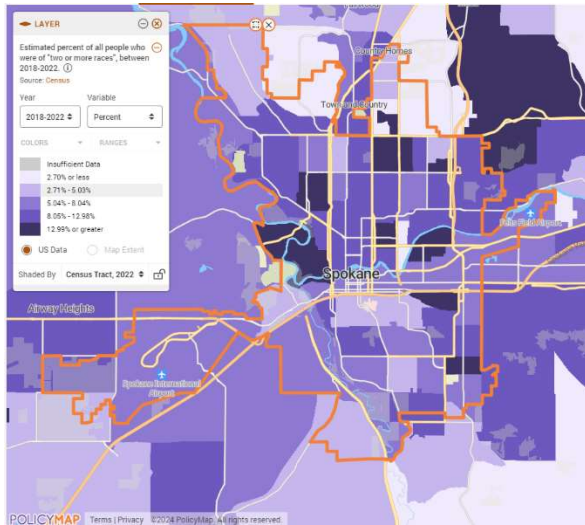
Source: <https://www.policymap.com/newmaps#/>

Two or More Races

People who identify as more than one race make up the largest non-white population in the Spokane (9.7%), well above any single non-white race. The rates have more than doubled in Spokane between 2000 and 2020. Table 4 and Map 6.

Table 4: Estimated percent of all people who were of "two or more races"				
Year	Spokane	Spokane County	WA	USA
2000	3.9%	3.1%	3.9%	2.6%
2010	4.6%	3.8%	4.7%	2.9%
2020	9.7%	9%	10.9%	10.2%

Source: <https://www.policymap.com/tables>



The highest percentages of people who are two or more races reside in census tracts:

- 53063002600 (16.7%)
- 53063003000 (18.5%)
- 53063004701 (14.4%)
- 53063002300 (13.9%)
- 53063001100 (22.1%)
- 53063000400 (15.7%)
- 53063000302 (20.9%)
- 53063000202 (14.6%)

MAP 6 – Spokane

Two or More Races Population (2018 – 2022)

Source: <https://www.policymap.com/newmaps/>

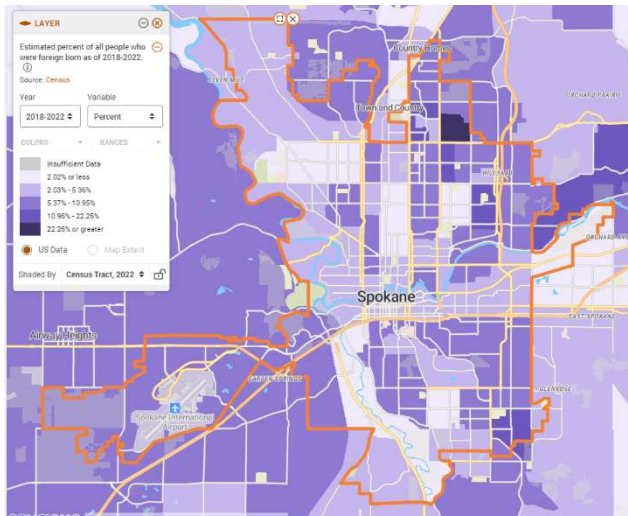
National Origin

Foreign Born Population

Almost six percent of the Spokane population are foreign born, a much lower rate than the State of Washington (14.87%). Table 5.

Table 5: Estimated percent of all people who were foreign born (2018-2022)		
Spokane	Spokane County	WA
5.8%	5.2%	14.9%

Source: <https://www.policymap.com/newmaps/>



The highest percentages of foreign-born people reside in census tracts:

- 53063011204 (25.3%)
- 53063004800 (14.3%)
- 53063011103 (11%)
- 53063001600 (11.4%)
- 53063000302 (12.6%)

MAP 7 – Spokane

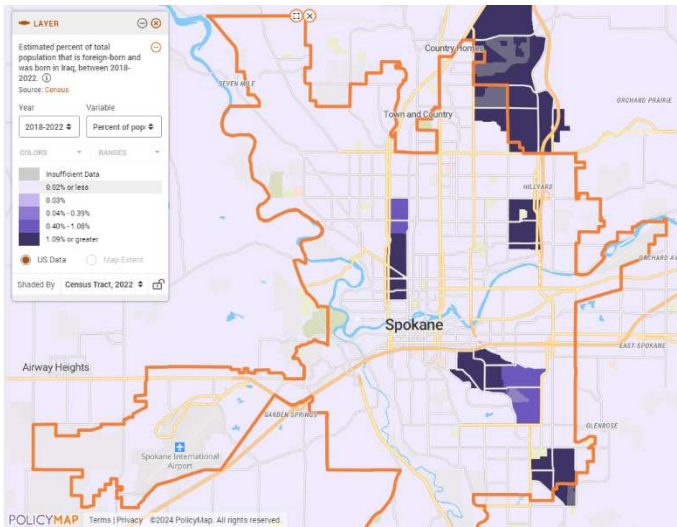
Foreign Born Population 2018 - 2022

Source: <https://www.policymap.com/newmaps/>

Of an estimated 13,198 foreign-born people in Spokane as of 2022, 24% were born in Europe, 45% in Asia, 7% in Africa, 7% in Oceania, 12% in Latin America, 9% in Central America, and 5% in North America. The most common countries of foreign birth in Spokane are Iraq (8%) and Mexico (8%), followed by Vietnam (6%), Philippines (5%), Ukraine (5%), Canada (5%), Russia (4%), China (4%), and Marshall Islands (4%).⁹ Appendix B, Table B-2.

Maps 8 - 15 depict 8 of the 9 most prevalent foreign-born population concentrations in Spokane, from Iraq, Mexico, Vietnam, Philippines, Ukraine, Russia, China, and Marshall Islands (People born in are not represented in maps).

⁹<https://data.census.gov/table/ACSST5Y2022.B05006?t=Place%20of%20Birth&g=160XX00US5367000&tid=ACSST5Y2021.B05006>

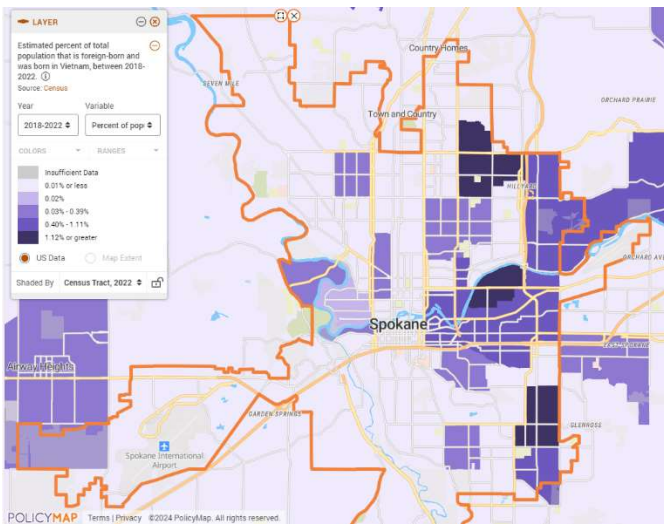


MAP 8
**Estimated percent total pop. that is
 foreign-born and born in
 Iraq
 2018-2022**

The darkest areas have the highest concentrations people born in Iraq, including census tracts:

- 53063001600 (6% of the tract),
- 53063002000 (3.6%)
- 53063004800 (9.3%)
- 53063003100 (2.5%).

Source: <https://www.policymap.com/newmaps/>

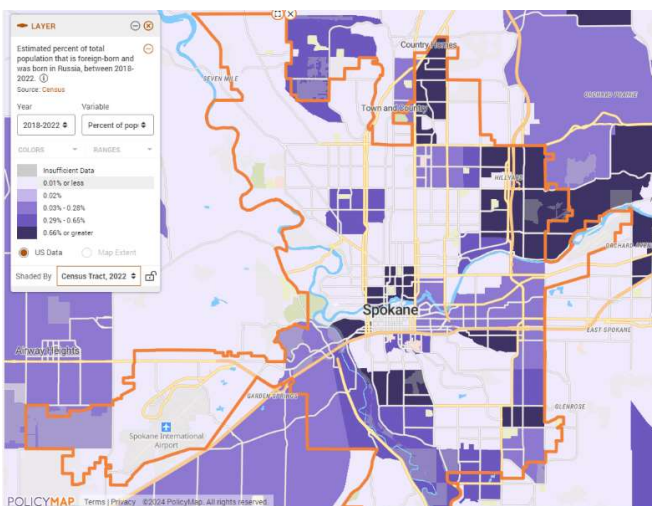


MAP 9
**Estimated percent total pop. that is
 foreign-born and born in
 Vietnam (2018-2022)**

The darkest areas have the highest concentrations people born in Vietnam, including census tracts:

- 53063000302 (4.67% of the tract)
- 53063000301 (3.6%)
- 53063002600 (1.3%)
- 53063011204 (2.5%)
- 53063004701 (2%)
- 53063004602 (1.9%)

Source: <https://www.policymap.com/newmaps/>

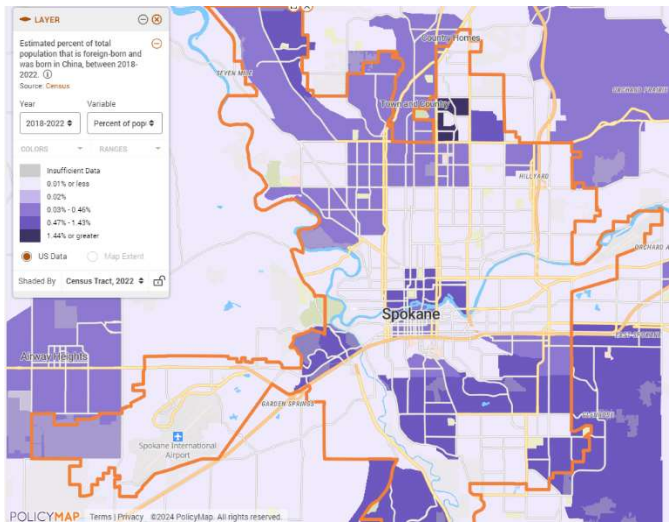


MAP 10
**Estimated percent total pop. that is
 foreign-born and born in Russia
 2018-2022**

The darkest areas have the highest concentrations people born in Russia, including census tracts:

- 53063011102 (.7% of the tract)
- 53063001103 (3%)
- 53063000201 (.9%), 53063014400 (1.9%)
- 53063001600 (1%), 53063003500 (.8%)
- 53063003000 (.7%), 53063004200 (.7%)
- 53063003602 (2.8%), 53063004701 (.7%)

Source: <https://www.policymap.com/newmaps/>



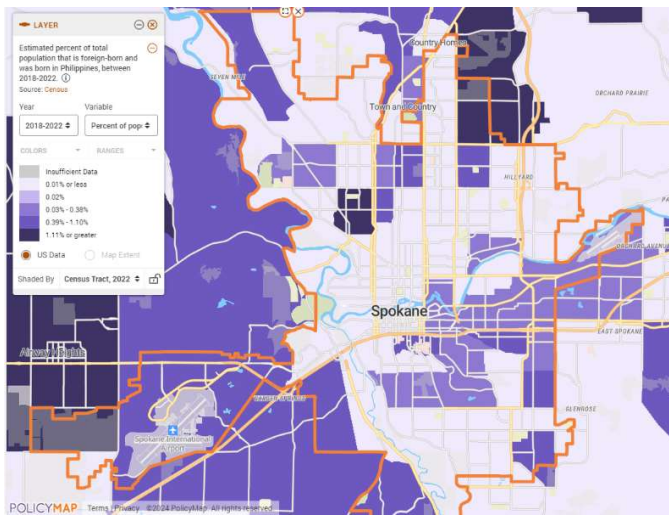
MAP 11

Estimated percent total pop. that is foreign-born and born in China 2018-2022

The darkest areas have the highest concentrations people born in China, including census tracts:

- 53063011103 (1.6% of the tract)
- 53063011204 (1.2%).

Source: <https://www.policymap.com/newmaps/>



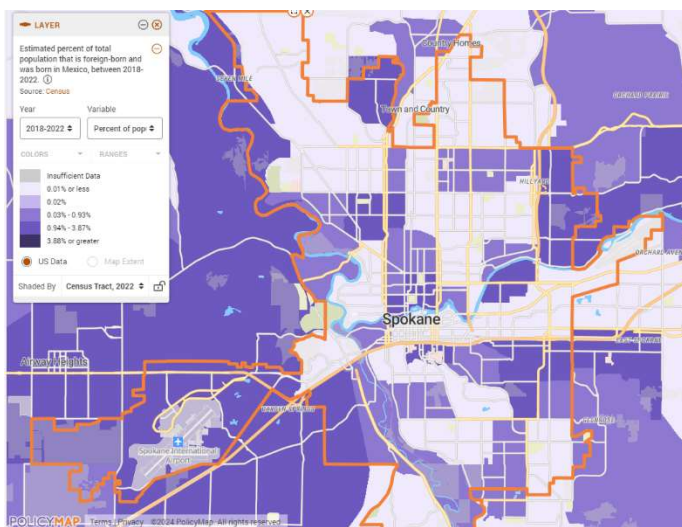
MAP 12

Estimated percent total pop. that is foreign-born and born in Philippines 2018-2022

The darkest areas have the highest concentrations people born in the Philippines, including census tracts:

- 530630111204 (4% of the tract)
- 53063001100 (1.2%).

Source: <https://www.policymap.com/newmaps/>



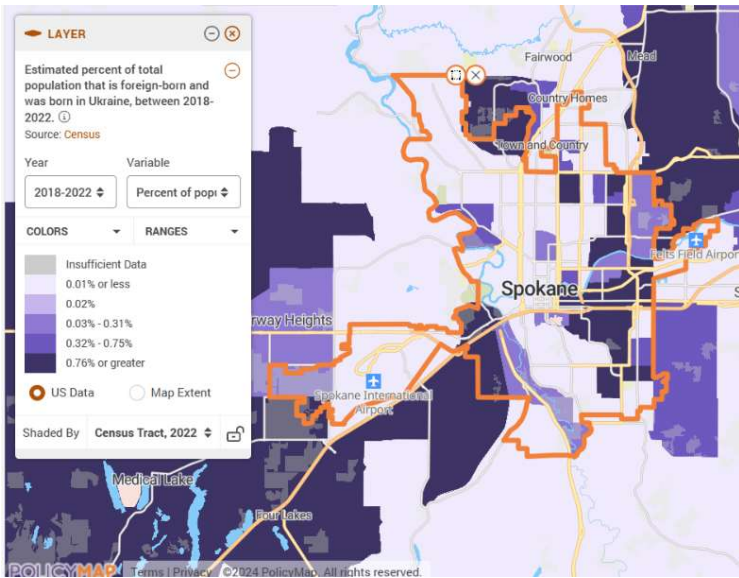
MAP 13

Estimated percent total pop. that is foreign-born and born in Mexico (2018-2022)

The darkest areas have the highest concentrations people born in Mexico, including census tracts:

- 53063010701(2.3% of the tract)
- 53063014400 (1.1%)
- 53063002600 (1.2%)
- 53063004601 (1.1%)
- 53063003000 (1.3%)
- 53063002900 (1%), 53063003200 (2.6%)

Source: <https://www.policymap.com/newmaps/>



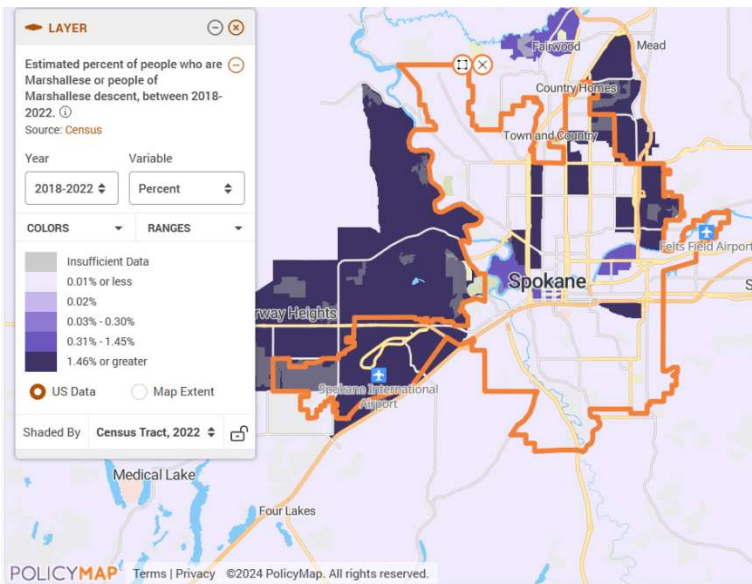
Source: <https://www.policymap.com/newmaps/>

MAP 14

Estimated percent total pop. that is foreign-born and born in **Ukraine** (2018-2022)

The darkest areas have the highest concentrations people born in the Ukraine, including census tracts:

- 53063004702 (1.7% of the tract)
- 53063003000 (1.4%)
- 53063014500 (1.6%)
- 53063003100 (1.1%)
- 53063001800 (2.4%)
- 53063000400 (1.9%)
- 53063000201 (1.9%)



Source: <https://www.policymap.com/newmaps/>

MAP 15

Estimated percent total pop. that is foreign-born and born in the **Marshall Islands** (2018-2022)

The darkest areas have the highest concentrations people born in the Ukraine, including census tracts:

- 53063002100 (3.6% of the tract)
- 53063003000 (2.7%)
- 53063001200 (2.3%)
- 53063002000 (2.2%),
- 53063000600 (2%)
- 53063000400 (1.8%)
- 53063011103 (5.4%)
- 53063001600 (2%)
- 53063014400 (5.4%)

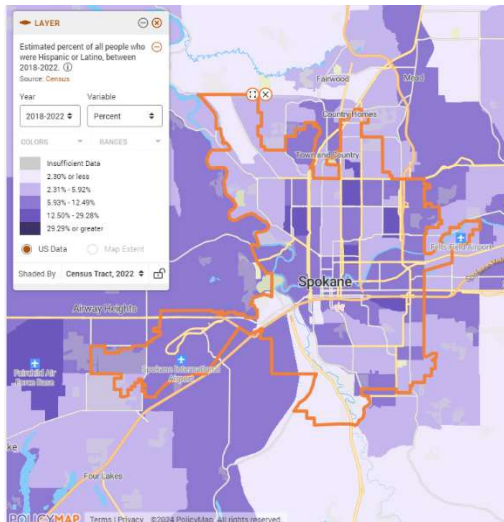
Hispanic / Latino Population

Seven percent of the Spokane population is Hispanic or Latino. Table 6 and Map 16.

Table 6: Percent of all people who are Hispanic or Latino				
Year	Spokane	Spokane Co.	WA	USA
2000	2.9%	2.7%	7.5%	12.5%
2010	5%	4.5%	11.2%	17.3%
2020	7%	6.6%	13.8%	18.7%

Source: <https://www.policymap.com/tables>

Map 16 shows the distribution of people of Hispanic or Latino national origin in Spokane.



MAP 16

Estimated percent of all people who were Hispanic or Latino, 2018-2022

The darkest areas have the highest concentrations who are Hispanic or Latino, including census tracts:

- 53063000400 (13.8% of the tract)
- 53063001100 (17.7%)
- 53063011104 (14.3%)
- 53063002501 (13%)
- 53063003000 (15.3%)

Source: <https://www.policymap.com/newmaps#/>

Limited English Proficiency and Language Needs

Of the overall Spokane population over age 5, at least 3.2% have limited English proficiency (LEP) and speak English less than “very well.” (ACS 2018 – 2022). 8.2% of the total Spokane population age five and over speaks a language other than English at home. Table 7. 2.6% speak Spanish, 2.6% speak other Indo-European languages, and 2.2% speak Asian and Pacific Islander languages.

Table 7 - Percent of Population 5 years and over who Speak a Language other than English			
Language	Spokane	Spokane Co.	WA
Spanish	2.6%	2.4%	8.5%
Other Indo-European Languages	2.6%	2.5%	4%
Asian & Pacific Islander Languages	2.2%	1.7%	6.1%
Other Languages	.8%	0.6%	1.3%
All non-English Languages	8.2%	7.2%	20%

Source: 2020 ACS 5-Year Estimates

Community survey participants identified the 5 top non-English languages needed for fair housing education as Spanish, Ukrainian, Russian, Marshallese, and Arabic, as well as sign-languages. Vietnamese and Farsi were also chosen as needed languages by 1 in 5 survey responders. Table 8.

Table 8 - What languages are most needed for fair housing education materials in Spokane?		
Language	No. Survey Responses	Percent of total responders
Spanish	168	76.7%
Ukrainian	140	63.9%
Russian	127	58.0%
Chinese	36	16.4%
Arabic	62	28.3%
Nepali	17	7.8%
Japanese	20	9.1%
Korean	25	11.4%
French	17	7.8%
Vietnamese	43	19.6%
Marshallese	112	51.1%
Laotian	24	11.0%
Hindi	22	10.0%
Swahili	34	15.5%
Farsi	43	19.6%
Pashto	24	11.0%
Dari	26	11.9%
Tagalog	27	12.3%
Sign Languages	77	35.2%

Language Access

In 2023 the City Council passed a directive to all departments to create and implement a language access plan (LAP) (ORD C36449 Sec. 1). SMC Sec. 18.11.030. Each LAP is to include elements to ensure Cultural and Linguistic Competency and Cultural Humility, and shall consist of both translation of written materials and interpretation of proceedings to “established languages” (a language spoken by individuals comprising 3.5% percent, or 700 residents, whichever is fewer, of the population of persons residing in the City of Spokane. Established Languages may also include other languages as recommended by the Office of Civil Rights, Equity, and Inclusion and subsequently approved by the City Council by resolution.)

Language access is important to understand the rights and obligations of a being tenant. Housing providers that receive federal funds are also required to provide interpreting and translation of vital documents. However, the requirement generally only exists if there is a high enough population of speakers of a specific language. Further, housing providers that do not receive government funds are exempt from providing translation or interpreting services.

Survey participants and stakeholder interviewees identified the lack of interpreting and translation in housing transactions and documents such as leases, rules, notices, and unlawful detainer proceedings as a barrier to housing access and retention for people with limited English proficiency.

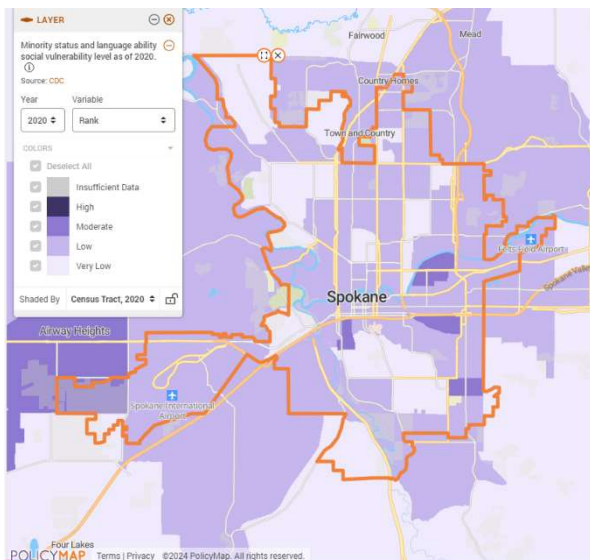
Tenant advocates shared anecdotes of translating for lease signing for a Spanish-speaking person who would otherwise not understand the rules regarding maintenance of the property, and a person who spoke Marshallese not understanding an Unlawful Detainer Summons in English and subsequent Writ of Execution after default. Other concerns shared were that people with limited English proficiency don't often receive assistance with translating and interpreting unless they have a community organization representative, people who do not speak English are often hung-up on, and there are not always interpreters for programs that provide rental assistance, or marketing for such programs in other languages needed by people who need to know about available assistance.

Survey Narrative Responses About Language Included:
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
Lack of interpreting and translation services
not having rental applications in other languages
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
No language translation for Marshallese and other tenants whose first language is not English.

Minority status and language ability social vulnerability level

Social vulnerability refers to populations that are particularly vulnerable to disruption and health problems as a result of natural disasters, human-made disasters, climate change, and extreme weather. The Geospatial Research, Analysis, and Services Program (GRASP) within the CDC created the Social Vulnerability Index (SVI) to help flag areas that will be in greatest need of support and recovery assistance in the case of a disaster or extreme weather event. The index is comprised of four categories of vulnerability—socioeconomic status, household composition and disability, minority status and language, and housing and transportation.

The Minority status and language ability social vulnerability level is one of the four categories of indicators that contribute to the overall Social Vulnerability Index. It includes population that identifies as a race or ethnicity other than non-Hispanic White, and population over the age of 5 that speak English "less than well." This measure can be used to identify areas that may need targeted public outreach and information campaigns or interpretation services. Spokane has 4 census tracts (53063002600, 53063003000, 53063004001, & 53063004701) that have Moderate scores (on range of very low, low, moderate, or high). See Map 17.



Map 17
Minority status and language ability
social vulnerability level (2020)

Source: <https://www.policymap.com/newmaps/>

People with Disabilities

16.6% of the non-institutionalized population in Spokane has a disability, a higher percentage than the County or the State (15.6% of Spokane County and 13% WA State) (2018-2022). Table 9. However, disability rates vary significantly in 3 zip codes, with 99201 and 99202 having the highest rates, and 99203 the lowest in the City.

Spokane	Spokane County	WA	99201	99202	99203
16.6%	15.55%	13%	25.4%	20.8%	12.4%

Source: <https://www.policymap.com/newmaps#/>

Spokane residents have higher rates of disability compared to the County and the State of Washington at all ages, except children under five. Table 10. The likelihood of having a disability varies by age - from 6.4% of people under 18 years old, to 14.9% of people 18 to 64 years old, and 37% of those 65 and over.

AGE GROUP	SPOKANE	COUNTY	WA
Under 5 years	.2%	1%	.6%
Under 18 years	6.4%	6.2%	4.4%
18-64 years	14.9%	13.5%	10.7%
65 and over	37%	35.6%	33.9%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

The most common types of disability in Spokane recorded by the US Census Department are independent living, cognitive, and ambulatory difficulties. (Table 11) 7.9% of the Spokane population has an ambulatory difficulty, which makes accessible housing especially important.

Type of Disability	SPOKANE – CITY	SPOKANE CO.	WA
Hearing Difficulty	4%	4.4%	3.9%
Vision Difficulty	2.8%	2.5%	2.2%
Cognitive Difficulty	8%	7%	5.6%
Ambulatory Difficulty	7.9%	7.5%	6.3%
Self-Care Difficulty	3.6%	3%	2.5%
Independent Living Difficulty	8.1%	7.2%	5.8%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

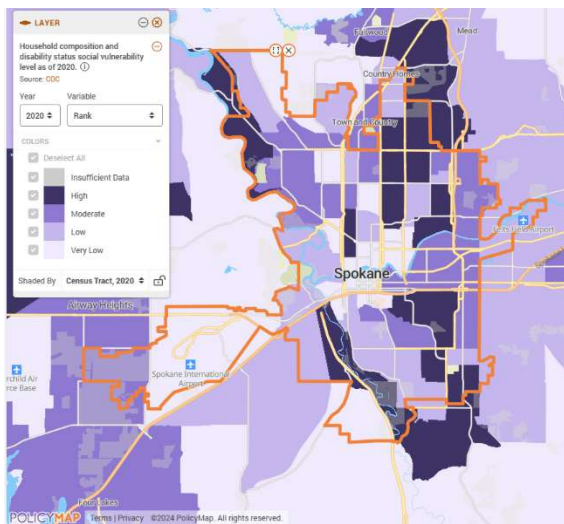
Household composition and disability status social vulnerability level

Social vulnerability refers to populations that are particularly vulnerable to disruption and health problems as a result of natural disasters, human-made disasters, climate change, and extreme weather. The Geospatial Research, Analysis, and Services Program (GRASP) within the CDC created the Social Vulnerability Index (SVI) to help flag areas that will be in greatest need of support and recovery assistance in the case of a disaster or extreme weather event. The index is

comprised of four categories of vulnerability—socioeconomic status, household composition and disability, minority status and language, and housing and transportation.

Household composition and disability status is one of 4 categories of indicators that contribute to the overall Social Vulnerability Index. It includes the population aged 65 or older, children aged 17 or younger, civilians with a disability, and single-parent households. This measure can be used to identify areas with high concentrations of people that may be physically susceptible to health challenges due to adverse conditions or may have specific needs for evacuations.

Spokane has 17 census tracts that rank High (range: very low, low, moderate, high) on the household composition and disability index. Map 18



Map 18
Household composition and disability status social vulnerability level (2020)

High Rank Census Tracts:

- 53063010601 53063004800
- 53063011103 53063003100
- 53063011104 53063001800
- 53063011204 53063004601
- 53063000400 53063003000
- 53063000302 53063001600
- 53063000301 53063002000
- 53063001400 53063004702
- 53063003900

Sex

Females are almost 2% more of the Spokane population than males. Spokane has a slightly higher percentage of females and lower percentage of males than the County or State.

Table 12 – Sex as Percentage of Total Population						
Location	2000		2010		2020	
	Male	Female	Male	Female	Male	Female
Spokane	48.1	51.9	47.1	52.7	49	50.8
Spokane Co.	49	51	49.2	50.8	49.6	50.4
Washington	49.8	50.2	49.8	50.2	50	50

Source: US Census

Age

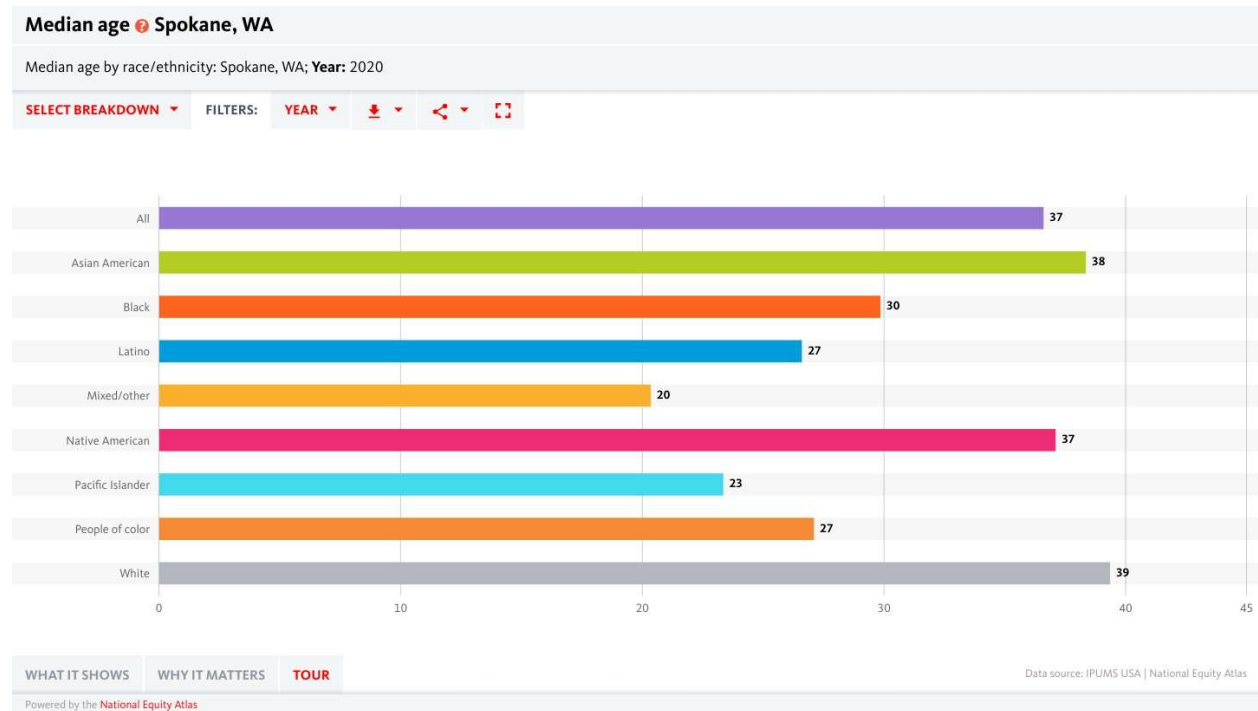
The median age in Spokane is 36.3 years, younger than the County, State, and USA. The median age in Spokane increased by 2.8 years since 1990, following regional and national trends of aging populations. Table 13.

Location	Census			
	1990	2000	2010	2020
Spokane	33.5	34.7	35.0	36.3
Spokane County	32.9	35.4	36.8	37.8
Washington	33.1	35.3	37.2	37.8
United States	32.9	35.3	37.2	38.2

Source: US Census

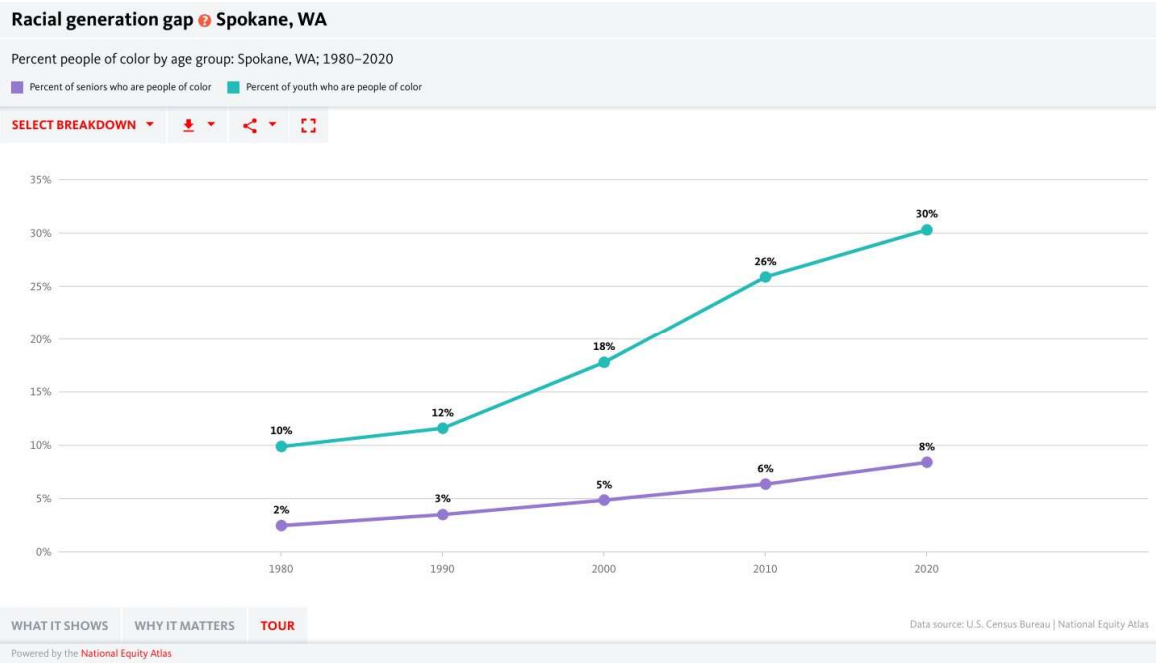
The median ages of Black (30), Latino (27), Pacific Islander (23), and multi-racial (20) people in Spokane are significantly lower than for white (39), Asian (38), and Native American (37) people.

Graphic 3: Source: National Equity Atlas



The racial generation gap can be seen in Graphic 4. More people of color are youth than senior aged; however, the percentage of people who are seniors of color is growing faster than youth. Between 1980 and 2020, the percent of people who are people of color who are youth has tripled, from 10% to 30%, while the percent of seniors who are people of color has quadrupled from 2% to 8%.

Graphic 4: Source: National Equity Atlas



Families With Children

21% of the Spokane population is under the age of 18, which is within 1% of the percentage for the County of Spokane and Washington State. Spokane has a slightly lower percentage of people aged 65 years or older than the County, and slightly higher than the State. The majority of people are between 18 and 64.

	Spokane	Spokane Co.	WA	USA
Pop. under age 18	21.1%	22.1%	22%	22.4%
Pop. age 18-64	63.2%	61.7%	62.6%	61.6%
Pop. age 65 and older	15.7%	16.2%	15.4%	16%

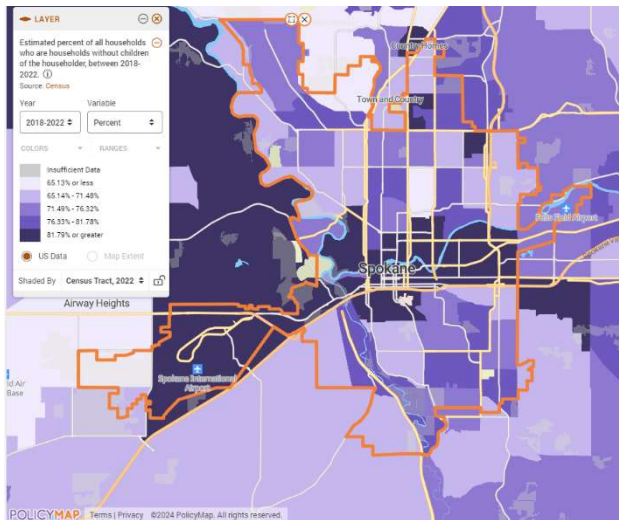
Source: US Census

Spokane has a lower percentage of households with children (23.6%) than the County (26.4%) and State (27.4%). Table 15.

Spokane has a higher percentage of people living alone (35.5%) than the County (29.3%) or the State (27%). Table 15. Map 19.

Types of Households	Spokane	County	WA
Households without children	76.4%	73.6%	72.6%
Households with children	23.6%	26.4%	27.4%
1-person households	35.5%	29.3%	27%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates



MAP 19
Households Without Children
(2018 – 2022)

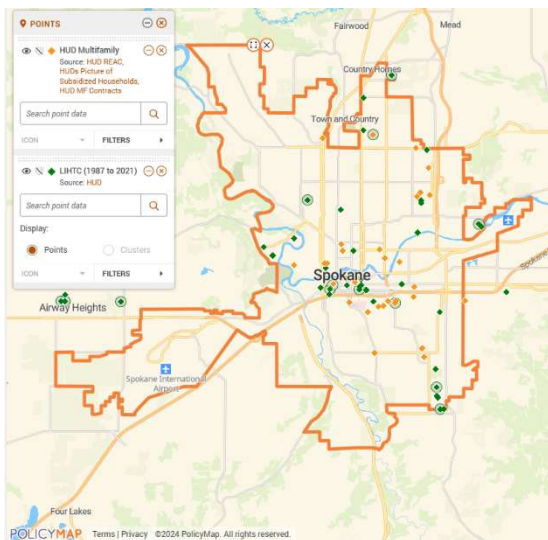
Source: <https://www.policymap.com/newmaps#/>

Residents of Publicly Supported Housing

Types of Publicly Supported Housing

There are several types of publicly assisted housing in Spokane. Some are owned and operated by the Spokane Housing Authority (SHA), others by not-for-profit or for-profit entities. Publicly supported housing includes five program categories: public housing, project-based Section 8, Section 8 tenant-based Housing Choice Vouchers (HCV), Other Multifamily housing (including Sec. 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities), and Low-Income Housing Tax Credit (LIHTC) housing. Each publicly supported housing program has its own unique ownership and operations as well as eligibility requirements.

Location of publicly supported housing in Spokane:



Source: <https://www.policymap.com/newmaps#/>

MAP 20
HUD Multifamily &
LIHTC (1987 to 2021)

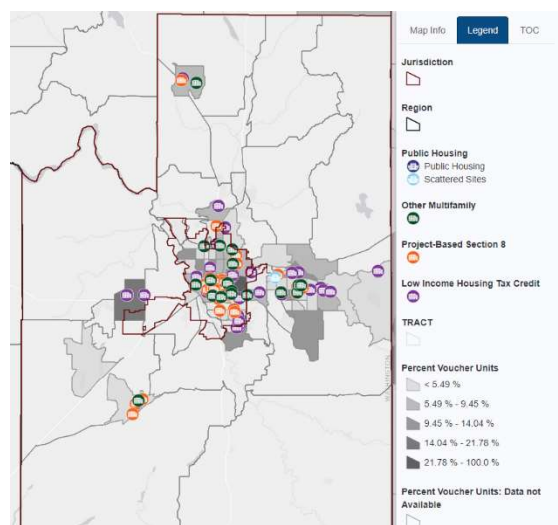
MAP 21

(HUD AFFH-T Map 5)

Spokane County

Publicly Supported Housing
Public Housing, Project-Based Section 8,
Other Multifamily, and LIHTC locations,
distinguishing categories of publicly
supported housing by color

Map 21 shows where publicly supported housing was located as of 2017 (LIHTCs) and 2019. The darker shading also depicts the density of HCV usage by census tract, with darker shading representing heavier concentrations of vouchers.



Low-Income Housing Tax Credit (LIHTC) Housing

As of 2021, there were 4238 LIHTC units in Spokane, located in 10 zip codes: 99201 (1184 units), 99202 (526), 99204 (28), 99205 (255), 99207 (233), 99208 (135), 99217 (480), 99218 (217), 99223 (1033), and 99224 (147).

SHA owns and manages 826 units of affordable housing financed with Bonds or Low-Income Housing Tax Credits (LIHTC) located throughout Spokane County.¹⁰

Project-Based Section 8:

There are an estimated 1552 project-based section 8 units in Spokane. Most are in zip codes 99201 (476), 99202 (372), 99208 (100), and 99223 (263).

More than 7,500 applicants were on the SHA project-based waiting list as of 4/1/20. A household may be on multiple property lists, therefore there may be fewer than 7500 households waiting for project-based section 8 units. In Nov. 2022, and again in March 2024, SHA opened the waiting lists for some PBV units. In March 2024 the opened waiting lists included two (2) and three (3) bedroom units for people with 30%-50% of Area Median Income, who are seniors and / or disabled.

- Black households were overrepresented (5%) in project-based section 8 housing as of 2021. Table 16.

Other HUD Multifamily Housing

As of 2021, there were 630 units of PRAC Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities or Legacy 202 units. They are located in 7 zip codes: 99201 (34 units), 99202 (162), 99203 (59), 99204 (14), 99205 (169), 99207 (118), and 99208 (74), and nearly all are 1-bedroom units.

Public Housing:

Black and Asian and Pacific Islanders had been overrepresented in public housing (7.5% and 6%) (Table 18), but public housing is virtually non-existent in the jurisdiction since 2019.¹¹

As of 11/1/19, Spokane Housing Authority (SHA) had converted all 125 public housing units to project-based vouchers under the Housing Choice Voucher (HCV) program as part of its Rental Assistance Demonstration (RAD) conversion.¹² The process began in 2016 with the conversion of 50 public housing units at the Parsons Apartments and was completed in November 2019 with the conversion of 74 scattered site properties operated by the housing authority. SHA created a Relocation Specialist position to assist families in the public housing units with relocating to affordable housing units in the community and offered continuing rental assistance through the HCV program. All families who were on the Public Housing waiting list at the time of conversion were given the opportunity to be placed on the HCV waiting list for the same time and date that they had originally applied to the Public Housing Program.

Stakeholders interviewed cited the loss of public housing, privatized by the RAD conversion, and said there is a need for project-based housing.

¹⁰Id.

¹¹ Only one property, Hifumi En, remains public housing, a requirement imposed by its Board when sold.

¹² [Microsoft Word - 2020-2024 Con Plan Cover.docx \(spokanecounty.org\)](#) – Consolidated Plan, 2020-2024, Housing Needs Assessment, p. 34 & pp. 53-55.

Demographics of Residents In All Types of Publicly Subsidized Housing

- Black and Indigenous people participate in publicly supported housing programs at higher rates than other people. Table 16.
- Asian and Pacific Islander populations tend to participate in publicly supported housing programs proportionate to their percentage in the overall populations.
- Hispanic people are underrepresented in publicly supported housing.
- White people are overrepresented in project-based section 8 housing.

These participation patterns have largely existed since at least 2012 based on HUD provided data. Table 18.

- People with disabilities are exceptionally disproportionately represented among public supported housing programs, making up over 40% of participants. Table 16.

Table 16 – Publicly Subsidized Households by Race/Ethnicity/Disability – 2021						
Spokane	White	Black	Hispanic	Asian or Pacific Islander	Native American	People with Disabilities
Housing Type	%	%	%	%		
Public Housing	N/A	N/A	N/A	N/A		
Project-Based Section 8	86.9%	5%	2.7%	3%		
HCV Program	77.8%	8%	5%	3%	5%	42%
All subsidized households*	79%	7%	5%	4%	4%	40%

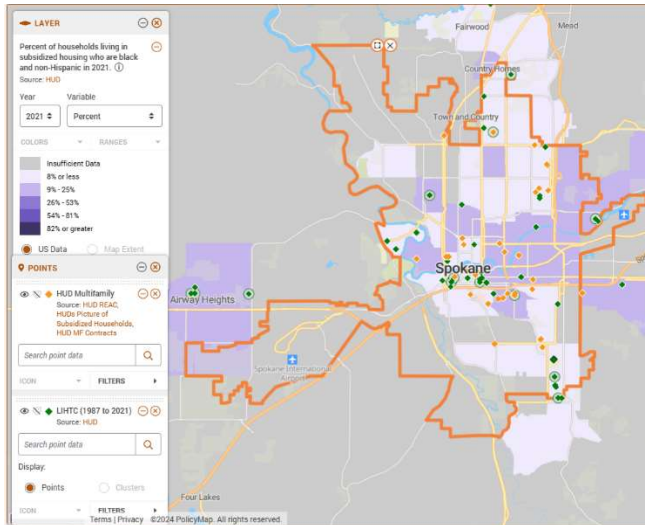
*Subsidized households include only programs from the U.S. Dept. of HUD, including Public Housing, HCVs, Moderate Rehabilitation, Project Based Sec. 8, Rent Supplement/ Rental Assistance Payment, Sec. 236 / Below Market Interest Rate, Sec. 202 /Project Rental Assistance Contract, & Sec. 811 / Project Rental Assistance Contract. Source: <https://www.policymap.com/newmaps#/>

Table 17 (HUD AFFH Table 6) - Publicly Supported Households by Race/Ethnicity								
(Spokane-Spokane Valley, WA) Region	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
<i>Public Housing</i>	48	71.6	5	7.5	4	6	4	6
<i>Project-Based Section 8</i>	1,770	84.7	90	4.3	82	3.9	67	3.2
<i>Other Multifamily</i>	359	88.9	9	2.2	9	2.2	12	3
<i>HCV Program</i>	3,818	79.5	386	8	237	4.9	157	3.3
Total Households	187,135	89.7	3,009	1.4	6,918	3.3	4,219	2
0-30% of AMI	22,615	83.4	640	2.4	1,500	5.5	725	2.7
0-50% of AMI	45,005	84.7	1,384	2.6	2,470	4.7	1,447	2.7
0-80% of AMI	78,120	86.8	1,929	2.1	3,514	3.9	2,354	2.6

Data Sources: Decennial Census; APSH; CHAS 2012-2016

Black and African Americans

The percent of households participating in HUD subsidized housing programs who are black and non-Hispanic in Spokane has remained between 7 and 8% since 2014 (2014-2015: 8%; 2016-2021: 7%). Source: <https://www.policymap.com/newmaps/>



MAP 22

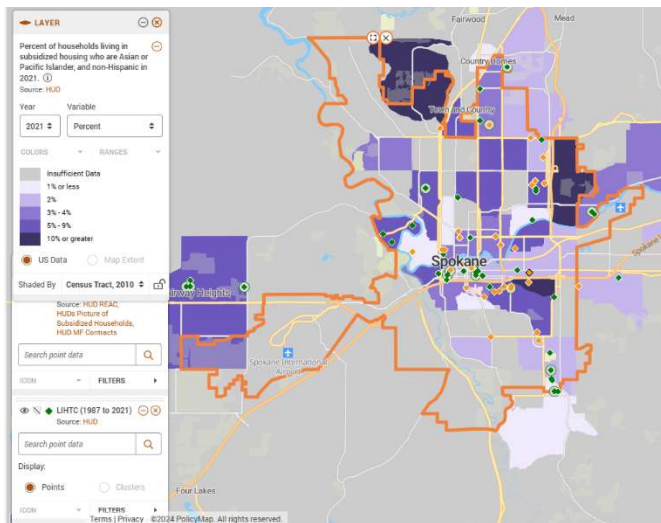
Percent of households participating in HUD subsidized housing programs who are **Black** and non-Hispanic in 2021 / with HUD Multifamily & LIHTC Sites

- Spokane: 7%
- Tracts:
- 53063003100: 17%
- 53063002600: 13%
- 53063002300: 12%
- 53063001100: 17%
- 53063014500: 10%
- 53063001800: 10%

Source: <https://www.policymap.com/newmaps/>

Asian and Pacific Islanders

Asian and Pacific Islanders together are 4% of the Spokane population and as of 2021 were 4% of all HUD subsidized housing program participants. The percent of households participating in HUD subsidized housing programs who are Asian or Pacific Islander and non-Hispanic in Spokane has remained steady between 3 and 5% since 2014: (4% in 2014, 2016-2018, & 2021; 5% in 2015, and 3% in 2020). Source: <https://www.policymap.com/newmaps/>



MAP 23

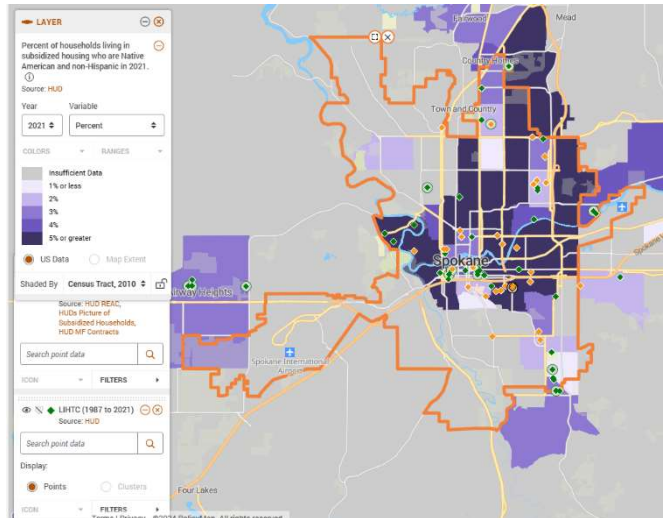
Percent of households participating in HUD subsidized housing programs who are **Asian or Pacific Islander** and non-Hispanic in 2021 with HUD Multifamily & LIHTC Sites

- Spokane: 4%
- Tracts:
- 53063003000: 15%
- 53063011400: 27%
- 53063001100: 9%

Source: <https://www.policymap.com/newmaps/>

Native Americans and Alaska Natives

Native Americans and Alaska Natives are 1.9% of the Spokane population. In 2021 they were 4% of all HUD subsidized housing program participants. They have been 4 to 5% of the households participating in HUD subsidized housing programs since at least 2014 (2014-2016: 5%, 2017-2021: 4%). Source: <https://www.policymap.com/newmaps#/>



MAP 24

Percent of households participating in HUD subsidized housing programs who are **Native American** and non-Hispanic in 2021

with HUD Multifamily & LIHTC Sites

Spokane: 4%

Tracts:

53063001400: 16%

53063000500: 20%

53063014500: 7%, 53063003100: 8%

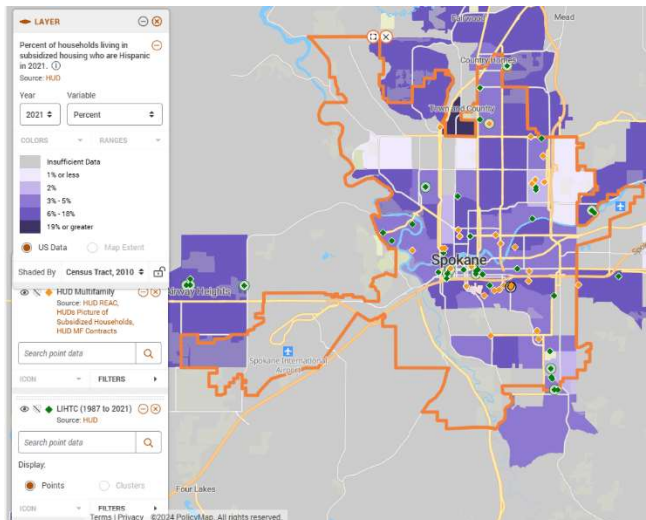
53063002300: 11%, 53063011201: 10%

Source: <https://www.policymap.com/newmaps#/>

Hispanic People

Hispanic people are 7% of the Spokane population. They have been 4% to 5% of all HUD subsidized housing program participants, including housing choice voucher holders, between 2014 to 2021: (4%: 2014-2017 and 2019-2020; 5%: 2021 and 2018).

Source: <https://www.policymap.com/newmaps#/>



MAP 25

Percent of households participating in HUD subsidized housing programs who are **Hispanic** in 2021 with HUD Multifamily & LIHTC Sites

Spokane: 5%

Tracts:

53063011000: 22%

53063000300: 10%

53063002100: 16%

53063002600: 9%

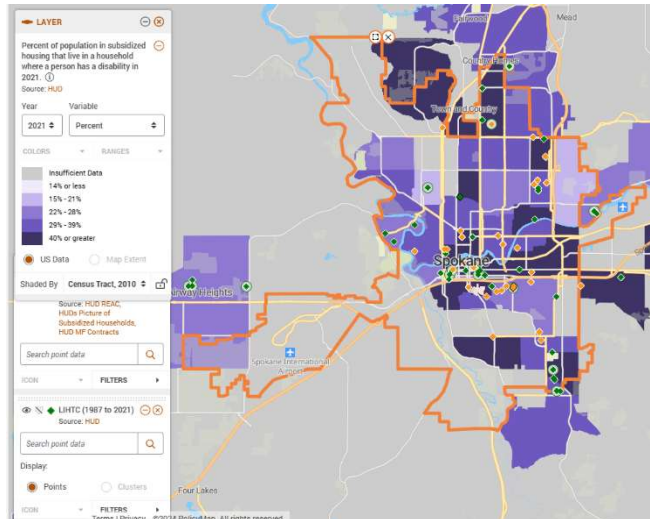
53063003000: 9%, 53063004400: 15%

Source: <https://www.policymap.com/newmaps#/>

People with Disabilities

- 16.6% of the non-institutionalized Spokane population have disabilities. Yet, in 2021, 40% of all people who lived in a household participating in a HUD subsidized housing program lived with a person with a disability.
- The percentage of people residing in HUD subsidized housing who live with a person with a disability has steadily increased from 31% in 2014 to 40% in 2021. (2014: 31%, 2015: 32%, 2016: 34%, 2017: 35%, 2018: 36%, 2019: 37%, 2020: 38%, 2021: 40%).

Source: <https://www.policymap.com/newmaps#/>



MAP 26

Percent of population in subsidized housing that lived in a household where a person had a **disability** in 2021 with

HUD Multifamily & LIHTC Sites

Spokane: 40%	Tracts:
	53063014500: 58%, 53063001800: 53%
	53063002400: 49%, 53063003500: 63%,
	53063003200: 61%, 53063004000: 61%
	53063004300: 64%, 53063004400: 71%,
	53063001300: 50%, 53063000200: 50%
	53063001101: 42%, 53063001102: 48%

Source: <https://www.policymap.com/newmaps#/>

Section 8 Tenant-Based Housing Choice Vouchers (HCV):

SHA administers 5,314 vouchers, made up of Housing Choice voucher (both-tenant based and project-based) and HUD VASH vouchers, Mainstream vouchers and SRO units.¹³ 737 vouchers are divided amongst Lincoln, Stevens, Pend Oreille, Whitman, and Ferry counties.¹⁴ The waiting list for tenant-based HCVs was last opened for three days in January 2016 and 4,500 were placed on the waiting list. As of 4/1/20, 950 applicants remained on the list.

- Black and Native American households were disproportionately represented in the HCV program as of 2021, compared to their percentages of the overall pop. Tables 18 and 19.
- People with disabilities are greatly overrepresented in the Spokane Housing Authority (SHA) HCV program. They were 68% of SHA HCV participants in 2021. Table 19
- In 2021, all non-white Spokane Housing Authority HCV holders were more likely to reside in 4, 5, 6, 7, and 8-person households than white HCV holders, while white HCV holders were more likely to reside in 1 person households. Table 20.
- SHA HVC participants in 2021 were more likely to be female (65.6%) than male (34.4%). Table 20.

¹³ Id.

¹⁴ Id.

	Spokane City	Spokane, County	WA	United States
Hispanic	5%	5%	7%	18%
Asian or Pacific Islander, non-Hispanic	3%	3%	7%	3%
White, non-Hispanic	79%	80%	57%	30%
Black, non-Hispanic	8%	8%	25%	48%
Native American	5%	4%	3%	1%

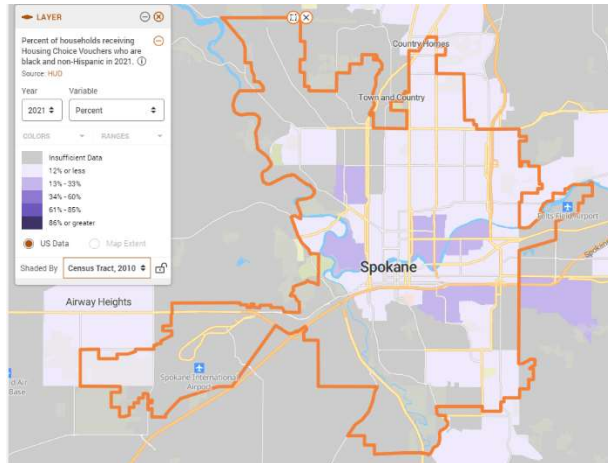
Source: <https://www.policymap.com>

Household Size	Count	Male	Female	Disability	Elderly	Ethnicity (Hispanic)	White	Black / African American	American Indian / Alaska Native	Asian	Native Hawaiian / Other Pacific Islander
1	3423	1447	1976	2866	916	147	3090	221	138	37	15
2	865	215	650	551	117	38	757	74	48	4	9
3	525	82	443	195	21	45	458	45	26	7	7
4	316	55	261	78	6	26	244	38	26	11	12
5	200	38	162	43	2	16	163	20	17	9	16
6	102	26	76	18	1	12	74	9	9	3	12
7	44	17	27	6	0	8	28	7	7	3	2
8	16	6	10	4	1	3	5	3	4	1	3
9	6	4	2	0	0	0	3	1	0	0	2
10	2	1	1	0	0	0	2	0	0	0	0
11	1	0	1	0	0	0	0	0	0	0	1
Total	5500	1891	3609	3762	1064	295	4814	418	275	75	79
% of Total	100%	34.4%	65.6%	68.4%	19.3%	5.4%	87.5%	7.6%	5%	1.4%	1.4%

Household Size	Count	Male	Female	Disability	Elderly	Hispanic	White	Black / African American	American Indian / Alaska Native	Asian	Native Hawaiian / Other Pacific Islander
1	62.2	76.5	54.8	76.2	86.1	49.8	64.2	52.9	50.2	49.3	19
2	15.7	11.4	18	14.6	11	12.9	15.7	17.7	17.5	5.3	11.4
3	9.5	4.3	12.3	5.2	2	15.3	9.5	10.8	9.5	9.3	8.9
4	5.7	2.9	7.2	2.1	0.6	8.8	5.1	9.1	9.5	14.7	15.2
5	3.6	2	4.5	1.1	0.2	5.4	3.4	4.8	6.2	12.0	20.3
6	1.9	1.4	2.1	0.5	0.1	4.1	1.5	2.2	3.3	4	15.2
7	0.8	0.9	0.7	0.2	0	2.7	0.6	1.7	2.5	4	2.5
8	0.3	0.3	0.3	0.1	0.1	1	0.1	0.7	1.5	1.3	3.8
9	0.1	0.2	0.1	0	0	0	0.1	0.2	0	0	2.5
10	0	0.1	0	0	0	0	0.0	0	0	0	0
11	0	0	0	0	0	0	0.0	0	0	0	1.3
Total	100	100	100	100	100	100	100	100	100	100	100

Black and African Americans

- Black people in Spokane are 2.7% of the population, but 8% of housing choice voucher holders. The percentage of black voucher holders remained steady, from 8 to 10% between 2012 and 2021 (8%: 2019-2021, 9%: 2012, 2014-2018; 10%: 2013). Source: <https://www.policymap.com/newmaps#/>
- Six census tracts have black non-Hispanic housing choice voucher holders greater than 13%. Map 27
- As of Oct. 2022, 7.6% of SHA HCV holders were Black or African American. Table 20.



MAP 27
Percent of households receiving Housing Choice Vouchers who are **Black** and non-Hispanic in 2021.

Spokane: 8%

Tracts:

53063003100: 20%

53063003000: 13%

53063002600: 14%

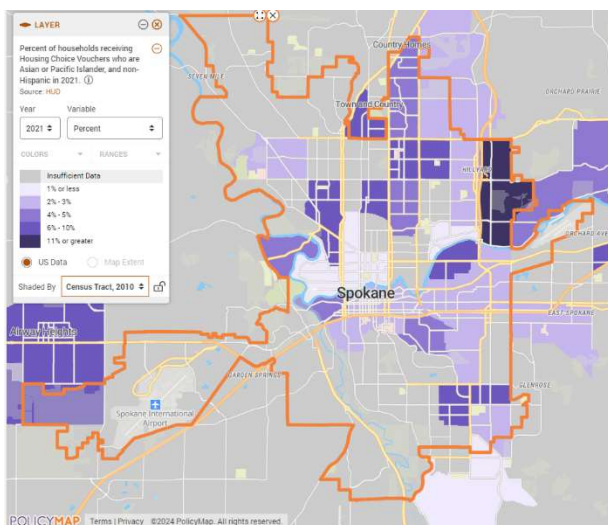
53063002500: 19%

53063002300: 13%, 53063001100: 17%

Source: <https://www.policymap.com/newmaps#/>

Asian and Pacific Islanders

- Asian and Pacific Islanders make up 3% of housing choice voucher holders. The percentage of Asian and Pacific Islander voucher holders ranged from 2 to 5% between 2012 and 2021 (2%: 2012, 3%: 2020-2021, 4%: 2013 & 2017-2019, 5%: 2014-2016). Source: <https://www.policymap.com/newmaps#/>
- Four census tracts have Asian and Pacific Islander non-Hispanic housing choice voucher holders populations greater than 7%. Map 28



MAP 28
Percent of households receiving Housing Choice Vouchers who are **Asian or Pacific Islander** and non-Hispanic in 2021.

Spokane: 3%

Tracts:

53063014400: 27%

53063001300: 7%

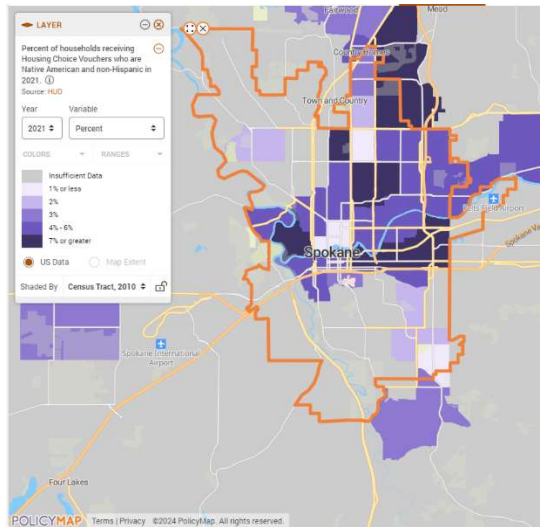
53063001100: 9%, 53063002100: 8%

Source:

<https://www.policymap.com/newmaps#/>

Native Americans and Alaska Natives

- Native Americans and Alaska Natives are 5% of housing choice voucher holders. The percentage of Native American holders was steady at 5% between 2014 and 2021, and 7% during 2012 – 2013. Source: <https://www.policymap.com/newmaps#/>
- Six census tracts have Native American non-Hispanic housing choice voucher holder populations greater than 7%. Map 29
- Native Americans were overrepresented among SHA HCV holders as of Oct. 2022 (5%). Tables 19 and 20.



MAP 29

Percent of households receiving Housing Choice Vouchers who are **Native American** and non-Hispanic in 2021, with HUD Multifamily & LIHTC Sites

Spokane: 5%

Tracts:

53063014500: 7%

53063001500: 8%

53063001400: 16%

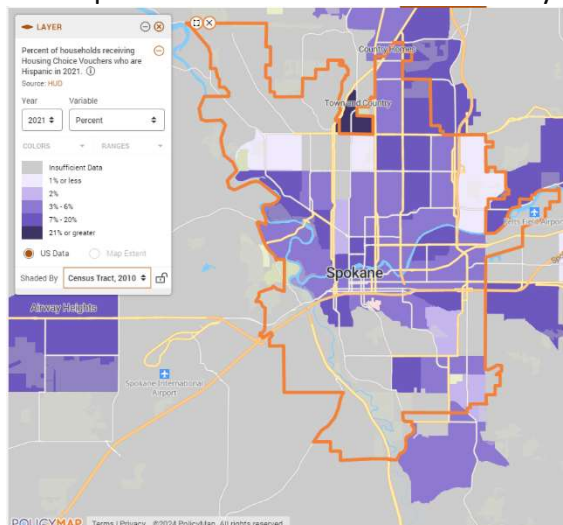
53063000500: 21%

53063002300: 11%, 53063011201: 10%

Source: <https://www.policymap.com/newmaps#/>

Hispanic People

- The percentage of Hispanic voucher holders was steady at 4-5% between 2012 and 2021 (4%: 2016, 5%: 2012-2015 and 2017-2021). Source: <https://www.policymap.com/newmaps#/>
- 7 census tracts have Hispanic housing choice voucher holder populations greater than 9%. Map 30
- Hispanic HCV holders were more likely to reside in a 3-person household.



MAP 30

Percent of households receiving Housing Choice Vouchers who are **Hispanic** in 2021.

Spokane: 5%

Tracts:

53063011000: 20%

53063000300: 10%

53063002600: 9%

53063002400: 9%

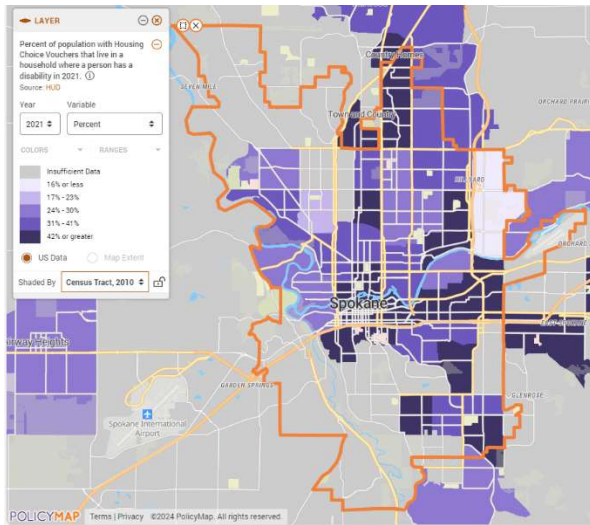
53063002100: 16%

53063003000: 13%, 53063004400: 15%

Source: <https://www.policymap.com/newmaps#/>

People with Disabilities

- In 2021 42% of people in a household with a housing choice voucher lived with a person with a disability. This percentage has steadily increased since 2012 (2012: 29%, 2013-2014: 30%, 2015: 31%, 2016: 34%, 2017: 35%, 2018: 37%, 2019: 38%, & 2020: 40%). Source: <https://www.policymap.com/newmaps#/>
- Seven census tracts have housing choice voucher holder populations with disabilities greater than 50%. Map 31
- As of Oct. 1, 2022, 68% of SHA HCV participants had a disability. The majority of these are single person households (76.2%). Table 21
- SHA HCV participants with disabilities were more likely to reside in a one-person household than with other people, as are elderly people. Table 21.
- Almost 300 of the 950 families on SHA waiting lists as of 4/1/20 indicated they had a head or co-head of household with a disability.



MAP 31

Percent of population with Housing Choice Vouchers that lived in a household where a person had a **disability** in 2021

Spokane: 42%

Tracts:

53063011101: 51%

53063001800: 53%, 53063004000: 61%

53063014500: 55%, 53063003200: 51%

53063004601: 59%, 53063004400: 71%

Source: <https://www.policymap.com/newmaps#/>

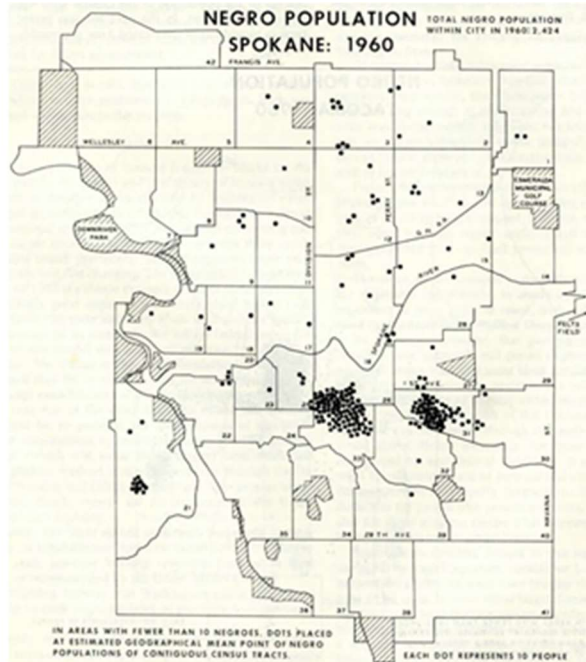
Table 21

Demographics for SHA Voucher Participants – 10/1/22 PIC Data			Demographics for SHA Voucher Participants – 10/1/22 PIC Data		
Household Size	Count	Disabled	Household Size	% of Total Participants	% of Total Disabled Participants
1	3423	2866	1	62.2%	76.2%
2	865	551	2	15.7%	14.6%
3	525	195	3	9.5%	5.2%
4	316	78	4	5.7%	2.1%
5	200	43	5	3.6%	1.1%
6	102	18	6	1.9%	0.5%
7	44	6	7	0.8%	0.2%
8	16	4	8	0.3%	0.1%
9	6	0	9	0.1%	0%
10	2	0	10	0%	0%
11	1	0	11	0%	0%
Total	5500	3762	Total	100%	100%
% of Total	100%	68.4%			

Segregation and Integration

Which areas within Spokane have **significant concentrations of particular protected class groups**?

In 1960, 63% of all black people lived in three census tracts. See Map 32. Today people of color are still concentrated in 99202, the zip code that includes the East Central neighborhood.



<http://thelocalhistory.com/digital-resource-feature/race-and-violence-in-washington-state/>

**MAP 32
BLACK POPULATION
1960**

Source:
Race and Violence in Washington State, Report of the Commission on the causes and prevention of civil disorder, 1968

<http://uindy.historyit.com/item.php?id=649833>

Non-white people in Spokane are most concentrated in 18 tracts, all which have over 25% non-white populations. Map 33 and Table 22.

**MAP 33
NON-WHITE POPULATION**
Estimated percent of the population that is people of color*, between 2018-2022.

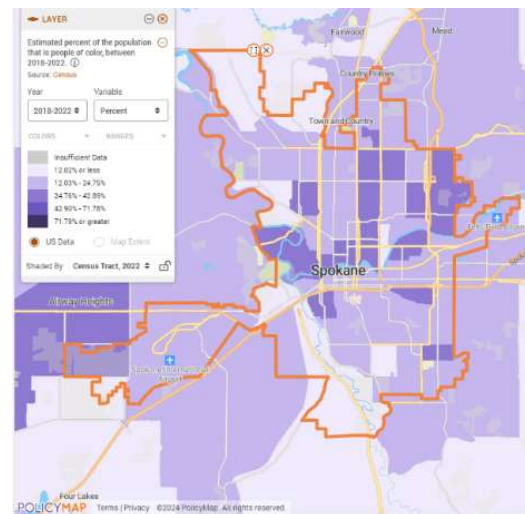
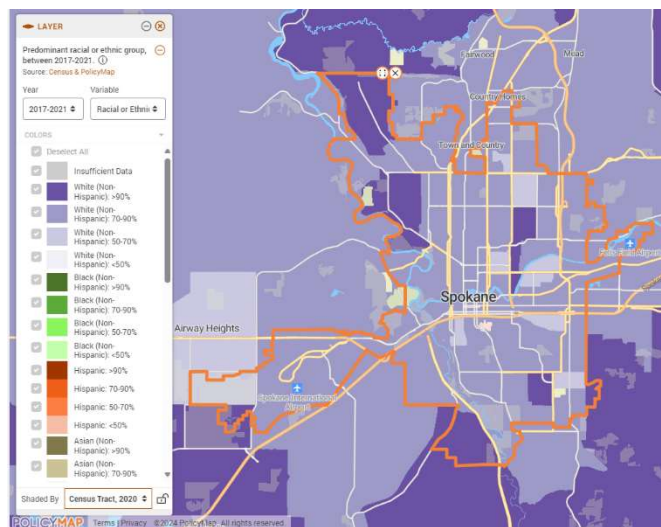


Table 22 - People of Color* By Census Tract			
Census Tract	%	Census Tract	%
53063000302	39.5	53063001100	28.4
53063004701	36.1	53063002300	27.9
53063002501	34.6	53063003601	27.7
53063000301	33.7	53063000400	27.6
53063003000	33.6	53063002400	27.4
53063011104	32.6	53063004001	26.9
53063002600	30.7	53063002503	25.8
53063001400	30	53063004002	25.3
53063001600	29.9	53063014400	25.2

*'People of color' is defined here as anyone who identifies as Hispanic or Latino, multiracial, or any race other than White. Source: <https://www.policymap.com/newmaps#/>

White non-Hispanic populations range 70-90% of the Spokane population depending on the census tract; they are over 90% in 7 tracts. Map 34



MAP 34 – PREDOMINANT RACIAL OR ETHNIC GROUP 2017-2021

Census Tracts:

- 53063010603: >90% white non-Hispanic
- 53063010604: >90% white non-Hispanic
- 53063000900: >90% white non-Hispanic
- 53063001000: >90% white non-Hispanic
- 53063001500: >90% white non-Hispanic
- 53063002502: >90% white non-Hispanic
- 53063004702: >90% white non-Hispanic

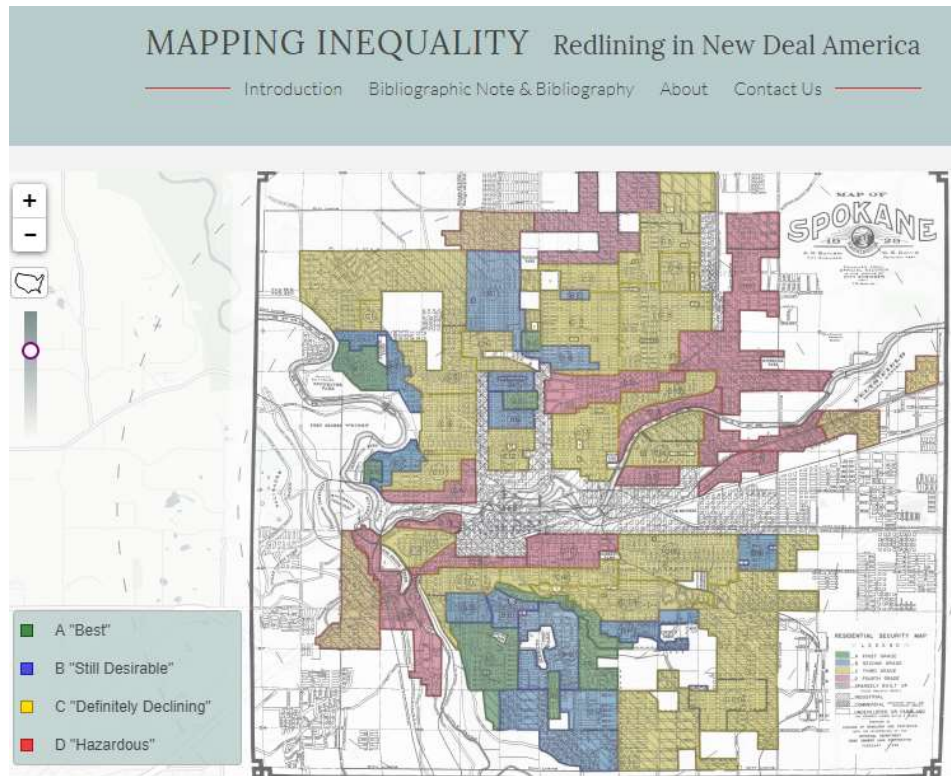
Source: <https://www.policymap.com/newmaps#/>

What public or private policies or practices, demographic shifts, economic trends, or other factors may have caused or contributed to the patterns described?

Past systemic, institutionalized, and individual racism determined where people of color could live in Spokane, and there is still evidence of the impacts of these policies and practices in housing patterns today.

Redlining: In the late 1930s, the Home Owners’ Loan Corporation (HOLC) graded neighborhoods into four categories, based in large part on racial makeup. Neighborhoods with minority occupants were marked in red — redlined — and considered high-risk for mortgage lenders. Spokane was not exempt from this government sponsored classification system. The HOLC Map for Spokane, see Map 9, dated 2/1/38, shows neighborhoods that were redlined. The HOLC 10/1/37 “Clarifying Remarks” for the Spokane, Liberty Park District, stated, for example:

Largely zoned for industry and business. Lot values are \$5 per front foot or less. The territory immediately adjacent to Liberty Park is slightly better grade but proximity to largest negro concentration of the city precludes higher grading. This is the “melting pot” of Spokane, and is extremely heterogeneous. The area is accorded a “low red” grade.”¹⁵



MAP 35

Steering by Real Estate Agents

Segregation in Spokane was also perpetuated by the institutionalized policies of real estate associations and the steering practices of individual real estate agents, away from or to certain neighborhoods based on race. The national and local real estate associations included in their bylaws and codes of ethics, prohibitions on introducing into a neighborhood people of a race whose presence was believed to negatively affect property values.

For example, the National Code of Ethics for Realtors stated: Part III, Article 34. A Realtor should never be instrumental in introducing into a neighborhood ... members of any race or nationality, or any persons whose presence will be detrimental to property values in that neighborhood.

Similarly, the former Spokane Realty Board’s bylaws stated: Article III. By-laws-Duty of Members to Public: It shall be unethical for any member to be instrumental in introducing into a neighborhood ..., occupancy or ownership of property, or individual whose presence will clearly be detrimental to property values in that neighborhood. ... Complaints for violations of this Article

¹⁵<https://dsl.richmond.edu/panorama/redlining/#loc=13/47.668/-117.441&city=spokane-wa&area=D10&text=downloads>

shall not be considered unless filed with the Spokane Realty Board within ninety (90) days after the introduction into a neighborhood of the character of property, use, occupancy, ownership of property, member of the race or nationality, or individuals to which objection is made. ...

Anecdotal accounts of past steering practices by real estate agents based on race in Spokane in the 1960s have been documented several times by the Spokesman-Review, the regional's largest newspaper.

Restrictive Residential Real Estate Covenants

Real estate developers also played a crucial role in ensuring that people of color could not live in certain neighborhoods in Spokane. Racially restrictive covenants were included in plats, subdivisions, and deeds, for homes in neighborhoods on the South Hill, the North Side, and neighboring Spokane Valley. Restrictive covenants used in Spokane included:

“No race or nationality other than the white race shall use or occupy any building on any lot, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality employed by an owner or tenant.”

“No person of any race other than white shall use or occupy any building upon these premises, except that this covenant shall not prevent occupancy by domestic servants of a different race domiciled with the owner or tenant.”

In 1948, in *Shelley v. Kraemer*, the United States Supreme Court unanimously ruled that restrictive covenants were unenforceable by state or federal courts. However, restrictive covenants continued to be included in Spokane property records into the 1950s.¹⁶

¹⁶The ability of County Auditors in Washington to remove void racially restrictive covenants from the public record pursuant to the Revised Code of Washington RCW 49.60.227 was the subject of recent litigation and legislation. In May 2019, a Superior Court Commissioner agreed with the Spokane County Auditor that she was not legally permitted to remove the covenants, and the Appeals Court agreed.¹⁶ While litigation was pending, the WA legislature enacted a non-judicial alternative for an owner to record a restrictive covenant modification document. Subsequently, while the case was on appeal to the WA Supreme Court, the 2021 WA legislature enacted amendments to RCW 49.60, clarifying, that if a judicial procedure is pursued,

the legislature intends that the court issue a declaratory judgment ordering the county auditor, or in charter counties the county official charged with the responsibility for recording instruments in the county records, to entirely strike the racist or otherwise discriminatory covenants from the chain of title. Striking the language does not prevent preservation of the original record, outside of the chain of title, for historical or archival purposes.

The WA Supreme Court then remanded the case to the trial court for relief consistent with the Legislature's 2021 amendments to RCW 49.60.227.¹⁶

RCW 49.60.227 now provides two means for a property owner to address a void provision in a written instrument. A judicial procedure to strike the void provisions, after which an image of each corrected document shall be placed in the public records with a cover page noting that the original was corrected. The original record is removed from the chain of title and shall be separately maintained in the county's records and, at the auditor's discretion, may also be transferred to the secretary of state archives division to be preserved for historical or archival purposes. As an alternative to the judicial procedure, the owner of the property may record a restrictive covenant modification document with the county auditor,

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD defines a racially or ethnically concentrated area of poverty (R/ECAP) as having a non-white population of 50% or more, where 40% or more of the population is at or below the poverty line (or the poverty rate is greater than 3 times the average poverty rate in the area). **Spokane does not have any R/ECAP designated tracts.** Accordingly, an **alternative analysis** has been used to **review disproportionate concentrations of non-white populations.**

Disproportionate Concentrations of Non-White Populations

Areas of disproportionate concentration are those in which there is a greater than 10% difference than the jurisdiction as a whole. Again, there are no areas in Spokane where one non-white race meets that definition for a disproportionate concentration. However, combining all non-white races with Hispanic ethnicity in Spokane, so that “racial and ethnic minority” is defined as Hispanic and/or a race other than white alone (single race), 23% of the population in Spokane is minority. Table 5. This definition was used in determining disproportionate concentrations of minority populations in the City. Therefore, any census tract with greater than 33% (23% + 10%) minority population is considered to have a disproportionate minority concentration. Spokane has five census tracts with non-white populations exceeding 33%. Table 23

Location	Percent Non-White
53063000302:	39.5%
53063000301:	33.7%
53063002501:	34.6%
53063004701:	36.1%
53063003000 in East Central, 99202	33.6%

Source: <https://www.policymap.com/newmaps#/>

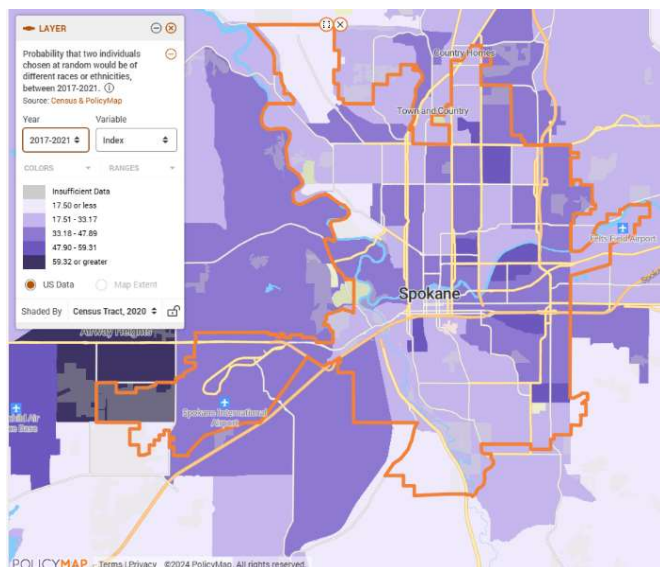
Diversity Index

The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities. Values between 0 and 20 suggest more homogeneity and values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas may sometimes represent concentrated poverty or wealth or indicate past or present discriminatory housing policies or barriers.

In Spokane, between 2017 and 2021, Spokane’s diversity index was 34.7. Eight tracts had index values of more than 49. In contrast, 11 tracts had values of 22 or less. Table 24. The darkest tracts on Map 36 have the highest diversity indexes while the lightest tracts have the lowest diversity.

which shall contain a statement, "The referenced original written instrument contains discriminatory provisions that are void and unenforceable under RCW [49.60.224](#) and federal law. This document strikes from the referenced original instrument all provisions that are void and unenforceable under law."

MAP 36: DIVERSITY INDEX

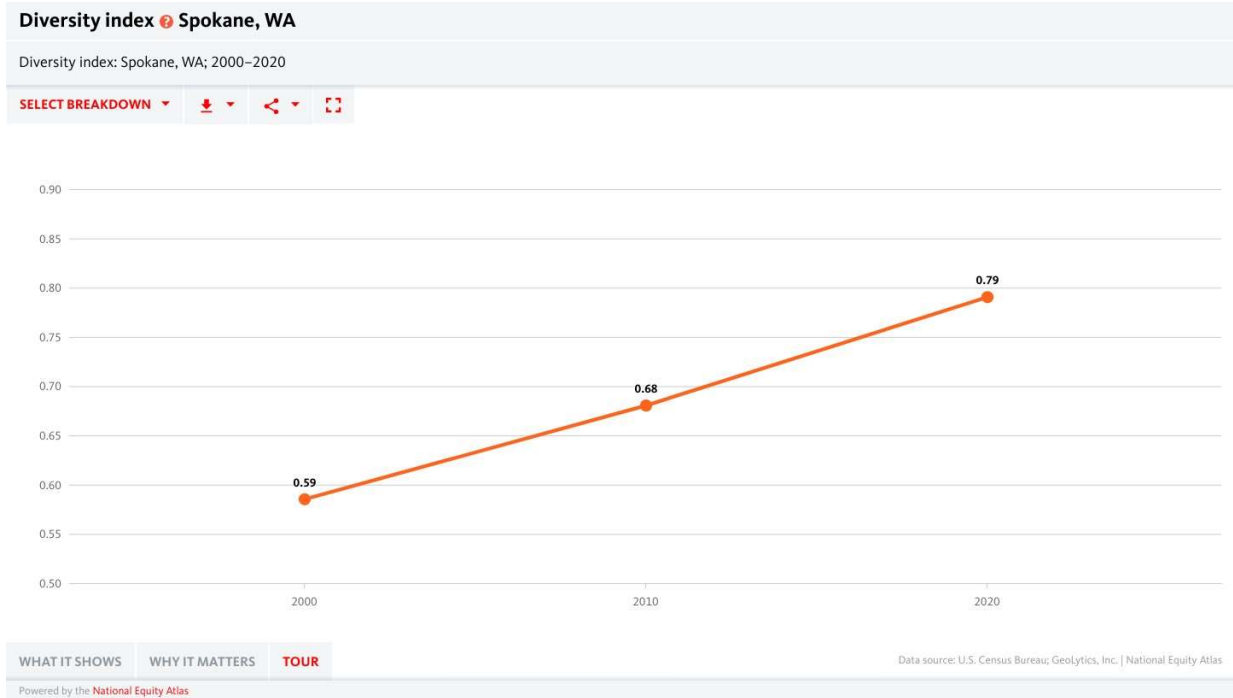


Source: <https://www.policymap.com/newmaps/> (ACS 2017-2021). Data were obtained from the Census' American Community Survey 2017-2021 estimates and calculated by PolicyMap.

Spokane County	30.2
Spokane	34.7
53063000302	54.8
53063002501	54.4
53063002600	53.9
53063000301	53.2
53063011104	52.6
53063004001	50.9
53063004701	50.9
53063003000	49
53063004400	22
53063004100	21.5
53063004500	20.4
53063003800	20.3
53063002502	18.7
53063001500	18.6
53063004702	18.6
53063000900	17.9
53063010604	16.7
53063010603	16.5
53063001000	15.1

The National Equity Atlas also calculates a diversity index, which is a measure of the racial/ethnic diversity of residents based on seven major racial/ethnic groups (Asian American, Black, Latinx, Pacific Islander, Mixed/other race, Native American, and white) identified by the census. The maximum diversity score (1.95) would occur if each group were evenly represented in the region. Data for 2010 and 2020 represent five-year averages (e.g., 2016-2020). Using this scale, Spokane's Diversity Index increased from 2000 to 2020 from .59 to .79. Graphic 5.

Graphic 5:



Source: [Demographics Indicators | National Equity Atlas](#).

https://nationalequityatlas.org/indicators/Diversity_index?geo=07000000005367000

Data Source(s): U.S. Census Bureau, 2010 and 2020 ACS 5-Year Summary Files; GeoLytics, Inc., 2000 Long Form in 2010 Boundaries.

Access to Community Assets

Protected Classes Experiencing Significant Disparities in Access to Assets:

Which protected class groups experience significant disparities in access to the following community assets:
<input type="radio"/> Education
<input type="radio"/> Employment
<input type="radio"/> Transportation
<input type="radio"/> Low-poverty neighborhoods
<input type="radio"/> Environmentally healthy neighborhoods
<input type="radio"/> Other community assets

Table 25 summarizes the results for Spokane for 7 opportunity indexes, based on data provided by HUD (most recent data is as of 2012 – 2018): Low Poverty Index, School Proficiency Index, Labor Market Index, Transit Index, Low Transportation Cost Index, Jobs Proximity Index, and Environmental Health Index. There were disparities based on race, in favor of white Spokane residents, in all indicators except Transit Index, Low Transportation Cost Index, and Jobs Proximity Index. Each of these is discussed in the sections that follow.

Table 25 (HUD AFFH Table 12) - Opportunity Indicators, by Race/Ethnicity							
(Spokane, WA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Pop.							
White, Non-Hispanic	42.6	39.7	45.6	66.8	49.1	59	7
Black, Non-Hispanic	31.1	35	36.2	72.8	54.7	68.5	5.9
Hispanic	35.8	35.2	38.3	69.2	52	62.7	6
Asian or Pacific Islander, Non-Hispanic	37.7	36.1	39.9	67.9	51.3	63.1	6.3
Native Amer., Non-Hispanic	30	31.3	33	71.3	55	66.9	5.2
Pop. below fed. poverty line							
White, Non-Hispanic	29.1	31.1	33.6	73.7	56.8	71	5
Black, Non-Hispanic	23.6	30.3	30	72.2	55.3	68.8	4.8
Hispanic	23	29.3	28.7	76.2	58.7	75	4.5
Asian or Pacific Islander, Non-Hispanic	28	36.9	28	72.9	55.4	65.5	6.2
Native Amer., Non-Hispanic	27.2	26.8	29.2	74.4	57.8	71.9	4.9
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).							

Education

Of the population 25 years and over in Spokane, white people have the highest high school graduation rate (94.3%), followed by two or more races, black or African Americans, Hispanic / Latinos, American Indian and Alaska native, Asian, and then Native Hawaiian and other Pacific Islanders (76.5%). Asian people less likely to graduate high school than all but Native Hawaiian and Pacific Islanders, but most likely to have a bachelor’s degree or more, followed by white populations. Native Hawaiian and Other Pacific Islanders are least likely to have a bachelor’s degree. Table 26.

Educational Attainment	White	Two or More Races	Black or African American	Hispanic / Latino	American Indian / Alaska Native	Asian	Native Hawaiian & Other Pacific Islander
Some High School – no diploma	5.7%	8.4%	10.5%	12.2%	17.8%	21.5%	24.5%
High School Diploma or More	94.3%	91.7%	89.5%	87.8%	82.2%	78.5%	75.5%
Bachelor’s degree or More	34.1%	25.8%	14.1%	22.3%	14.4%	42.6%	10.5%

Source: <https://www.policymap.com/newmaps#/>

School Proficiency Index – HUD Data

The HUD provided school proficiency index uses school-level data from 2016-2017 on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 3 miles of the block group centroid. Values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the school system in a neighborhood.¹⁷

For the total Spokane population, the school proficiency index for white, non-Hispanics, was 7.4 percentage points higher than for black, non-Hispanics, 10.6 higher than for Native Americans, and 4.3 than for Hispanics. The index was nearly the same for whites and Asians.

When only the population below the federal poverty line is examined, the disparities closed: 35.8 for white non-Hispanics, which was 2.3 percent higher than for black non-Hispanics (33.5), and less than the rates for Hispanics (36.2), Asian or Pacific Islanders (44.7), and Native Americans (38.9)

¹⁷See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation*, Data Version AFFHT0004a, March 5, 2019, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

Spokane School District Assessments

For more recent data, the WA Office of Superintendent of Public Instruction public data was reviewed, for the percent of students who met grade level standards based on results of the Smarter Balanced Assessments (SBA) for grades 3–8 and 10, and the Washington Comprehensive Assessment of Science (WCAS) for grades 5, 8, and 11 in 2022-2023.

Across the Spokane School District, children who are American Indian or Alaskan Native, Black or African American, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, or Two or More Races, performed less well on testing compared to the average scores for all students and Asian and white non-Hispanic students.¹⁸ Graphic 6. Also performing lower on standardized assessments were low-income students, students with disabilities, English language learners, migrant students, students in foster care, and students experiencing homelessness. Graphic 6.

¹⁸https://tableau.ospi.k12.wa.us/t/Public/views/ReportCard_Assessment_Suppressed/Assessment_Summary_Dashboard?iframeSizedToWindow=true&:embed=y&:showAppBanner=false&:display_count=no&:showVizHome=no&:toolbar=no&format=pdf&organizationid=100247&SchoolYear=2022-23

Graphic 6

Spokane School District

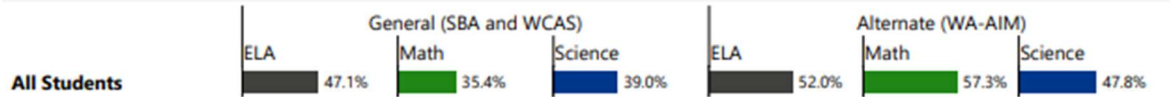
2022-23

Smarter Balanced Assessments (SBA): English Language Arts (ELA) and math for grades 3–8 and 10

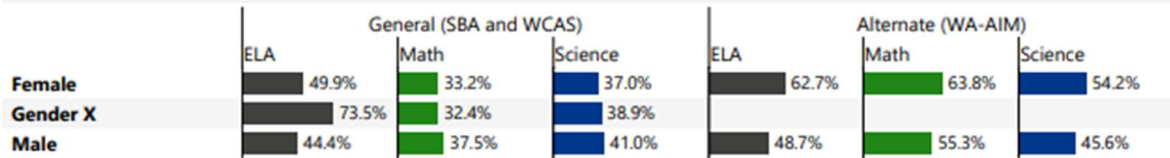
Washington Comprehensive Assessment of Science (WCAS): grades 5, 8, and 11

Washington - Access to Instruction and Measurement (WA-AIM): for students in grades 3–11 with significant cognitive disabilities

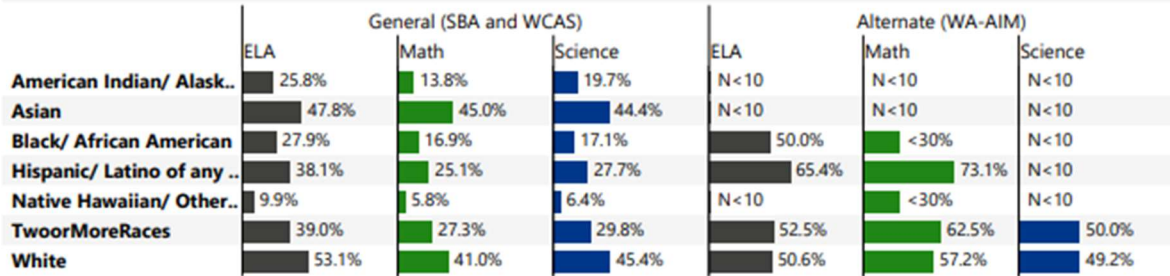
All Students



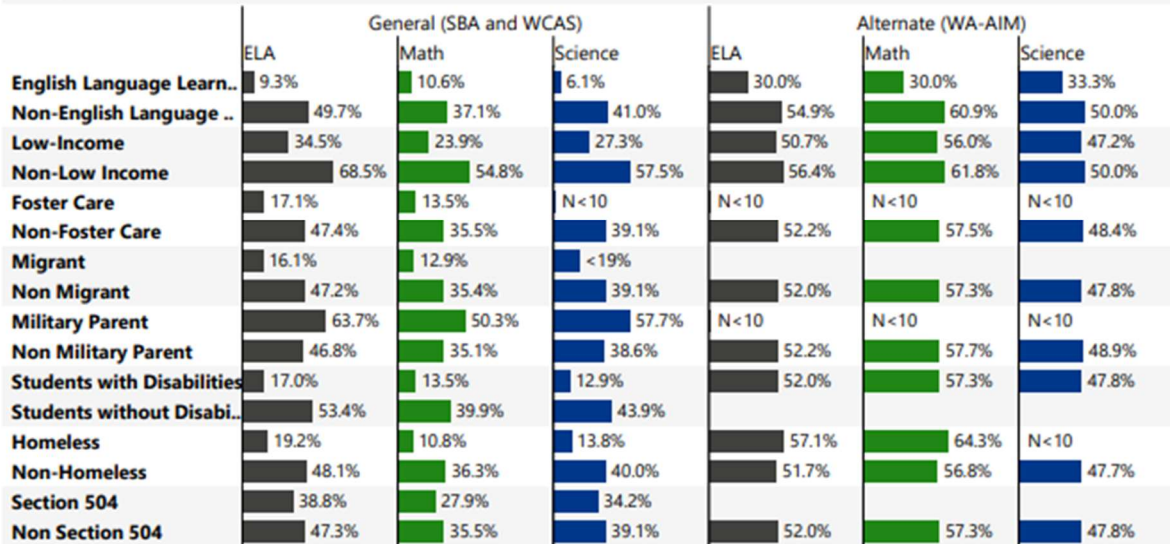
Gender



Ethnicity



Programs and Characteristics



Employment

Jobs Proximity Index

The HUD provided jobs proximity index quantifies the accessibility of a neighborhood as a function of its distance to all job locations within a core-based statistical area (CBSA), with larger employment centers weighted more heavily. A gravity model is used, where the accessibility of a residential block group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. Values are percentile ranked at the CBSA level with values ranging from 0 to 100. The higher the value, the better the access to employment opportunities for residents.¹⁹

The Jobs Proximity Index is one of the measures where people of color in most instances (except Asian/ Pacific Islanders below the poverty line) had higher or equivalent rates to white, non-Hispanics in Spokane. The HUD provided index used 2017 data²⁰, at which time the rate for white non-Hispanic people was 59 for the total white population and 71 for the white population below the poverty line. The corresponding rates for other races were: Black people (68.5 and 68.8); Hispanics (62.7 and 75); Asian and Pacific Islanders (63.1 and 65.5); and Native Americans (66.9 and 71.9). Non-white people in Spokane are more concentrated in central census tracts (East Central, etc.) rather than more remote tracts, which may explain the closer proximity to job locations. Notably, the index rates rose for all races when only measuring people under the poverty line, compared to the total population, possibly also explained by wealthier people able to live further from the City center.

(Spokane, WA CDBG) Jurisdiction	Jobs Proximity Index (2017)
Total Population	
White, Non-Hispanic	59
Black, Non-Hispanic	68.5
Hispanic	62.7
Asian or Pacific Islander, Non-Hispanic	63.1
Native American, Non-Hispanic	66.9
Pop. below fed. poverty line	
White, Non-Hispanic	71
Black, Non-Hispanic	68.8
Hispanic	75
Asian or Pacific Islander, Non-Hispanic	65.5
Native American, Non-Hispanic	71.9

¹⁹See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)* Data Documentation, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

²⁰HUD Map 8 – Race - AFFH Data and Mapping Tool, <https://egis.hud.gov/affht/> (Longitudinal Employer-Household Dynamics (LEHD) data, 2017).

Table 28 shows the estimated average travel time to work in WA, Spokane County, and City of Spokane. Across zip codes in Spokane, the average commute time ranged from 17 to 24 minutes, with 99208 having the longest commute time and 99202 the shortest.

Table 28 - Estimated average travel time to work in minutes, workers aged 16 yrs. or older (2018-2022)		
WA	Spokane County	Spokane City
27	22	21

Source: <https://www.policymap.com/newmaps#/>

Labor Market Engagement Index

While low income and BIPOC people may have close proximity to job centers, whether they are able to obtain those jobs is of concern, given the disparities in the Labor Market Engagement Index – see Table 29.

The HUD provided labor market engagement index describes the relative intensity of labor market engagement and human capital in a neighborhood, based on 2011-2015 ACS data. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The labor market index is a linear combination of three standardized vectors: unemployment rate, labor-force participation rate, and percent with a bachelor’s degree or higher. Values are percentile and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.²¹

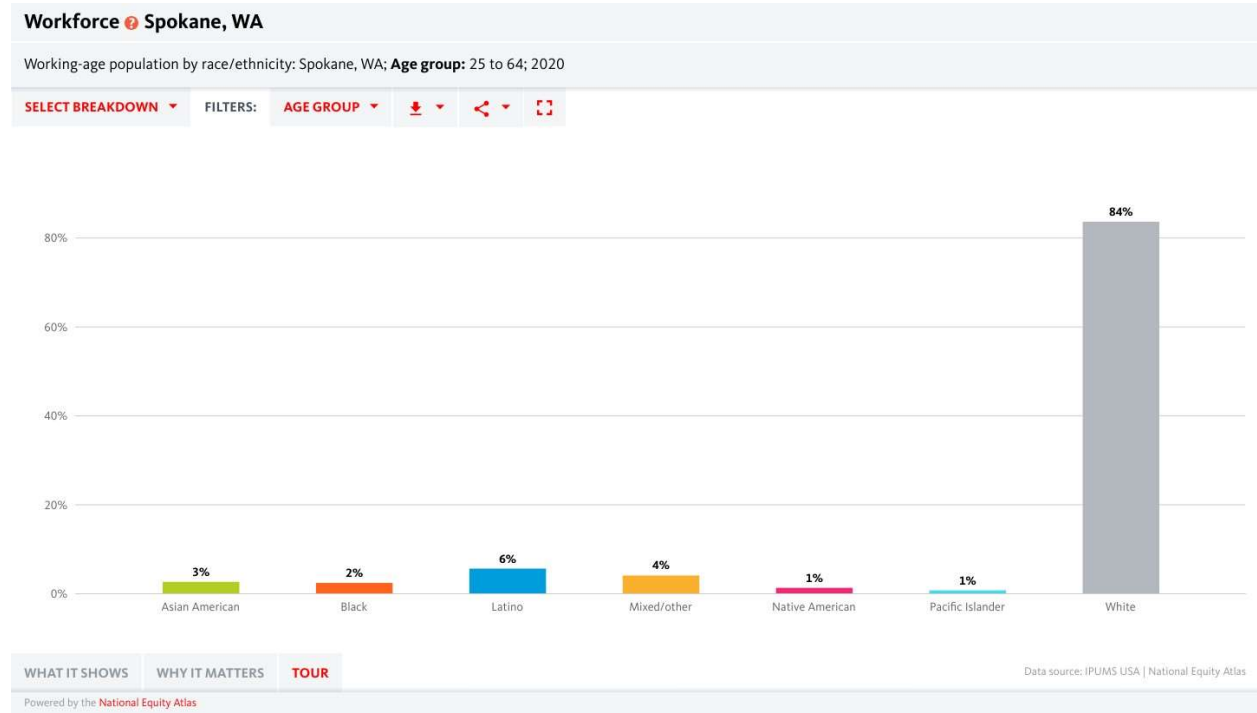
The labor market index for white, non-Hispanics, exceeded that for all other races, for both the total population (white, non-Hispanics: 45.6; blacks: 36.2; Hispanics: 38.3; Asian and Pacific Islanders: 39.9; and Native Americans: 33.1), and the population below the federal poverty line (white, non-Hispanics: 33.6; blacks: 30; Hispanics: 28.7, Asian and Pacific Islanders: 28; and Native Americans: 29.2).

Table 29	
(Spokane, WA CDBG) Jurisdiction	Labor Market Index (ACS 2011-2015)
Total Population	
White, Non-Hispanic	45.6
Black, Non-Hispanic	36.2
Hispanic	38.3
Asian or Pacific Islander, Non-Hispanic	39.9
Native American, Non-Hispanic	33.1
Pop. below fed. poverty line	
White, Non-Hispanic	33.6
Black, Non-Hispanic	30
Hispanic	28.7
Asian or Pacific Islander, Non-Hispanic	28
Native American, Non-Hispanic	29.2

²¹See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)* Data Documentation, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

In 2020 people of different races in Spokane were represented in the workforce population similar to their percentages in the general population. Graphic 7. However, the data does not indicate the types of employment obtained.

Graphic 7: Source: National Equity Atlas



Transportation

Several stakeholders who were interviewed identified the need to have affordable housing near public transportation. They cited transportation as a driving force for equity. Transportation centered housing, built along transit lines, is needed, so that renters don't have to travel great distances. One interviewee described having to walk ten blocks to the nearest bus line when they lived on the South Hill. Housing built away from transit is less affordable, centers on cars, is further from services, and causes sprawl.

Twenty-eight percent of survey responders selected "Public transportation – frequency or connections between housing and employment / education opportunities" in response to the question, "What are you most concerned about with respect to fair housing and access to housing opportunities in Spokane? Check your top concerns."

Transit Trips and Low Transportation Cost Indices

The HUD-provided Transit Trips Index is based on estimates of transit trips taken by a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI). The AFFH-T models annual transit trips for renters. Values are percentile ranked nationally, ranging from 0 to 100. The higher the value, the more likely residents in the neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.²²

The HUD-provided Low Transportation Cost Index is based on estimates of transportation costs for a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI). The AFFH-T models transportation costs as a percentage of income for renters. Neighborhoods are defined as census tracts. Values range from 0 to 100. The higher the value, the lower the cost of transportation in a neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.²³

Similar to the Job Proximity Index, people of color had higher Transit Trip Index rates than white non-Hispanics in Spokane (based on 2012-2016 HUD-provided data), and people below the federal poverty line have higher rates than the total population. The greater use of public transit by low income and people of color may again be explained by the greater frequency that they reside in centrally located neighborhoods near bus lines, and also have lower income and personal wealth with which to purchase and maintain a private vehicle.

²²See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation*, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

²³Id.

Like the Job Proximity and Transit Trip Indexes, people of color had higher Low Transportation Cost Indexes (again based on 2012-2016 data). When only people below the poverty line are considered black and Asian or Pacific Islander have lower transportation cost indexes than white non-Hispanic people.

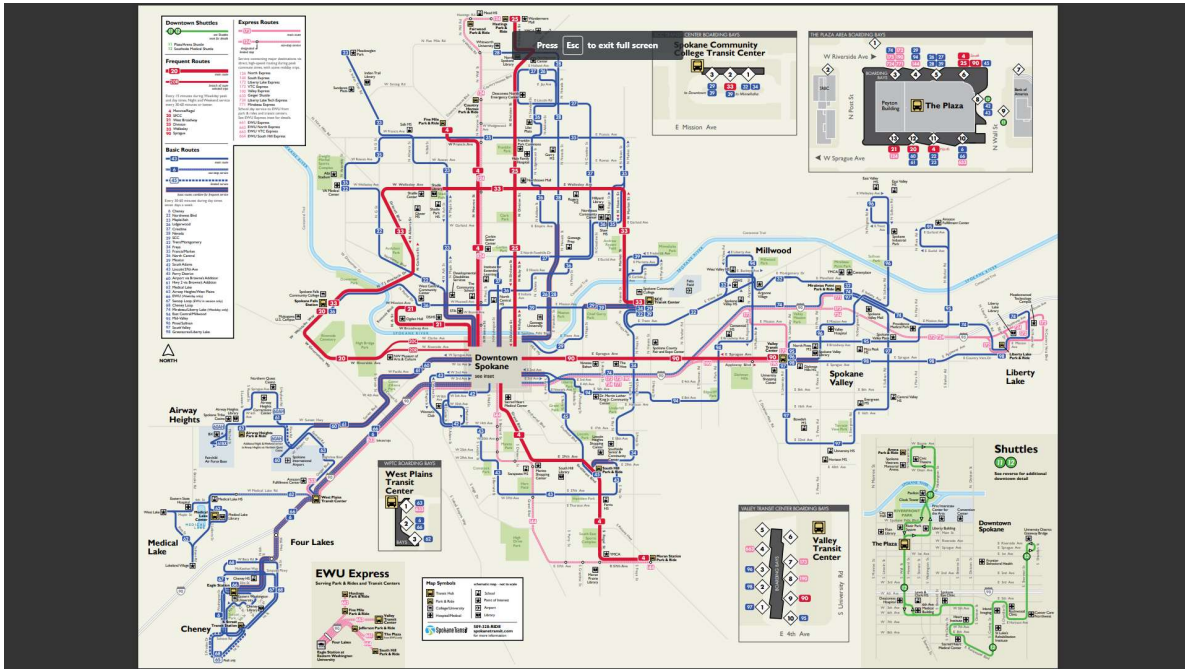
Table 30		
(Spokane, WA CDBG) Jurisdiction	Transit Trip Index	Low Transportation Cost Index
Total Population		
White, Non-Hispanic	66.8	49.1
Black, Non-Hispanic	72.8	54.7
Hispanic	69.2	52
Asian or Pacific Islander, Non-Hispanic	67.9	51.3
Native American, Non-Hispanic	71.3	55
Pop. below fed. poverty line		
White, Non-Hispanic	73.7	56.8
Black, Non-Hispanic	72.2	55.3
Hispanic	76.2	58.7
Asian or Pacific Islander, Non-Hispanic	72.9	55.4
Native American, Non-Hispanic	74.4	57.8
Location Affordability Index (LAI) data, 2012-2016		

Spokane Transit provides public transportation services through fixed route (bus) service, paratransit service and vanpool to the cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane and Spokane Valley and parts of the unincorporated County. Spokane Transit has 14 park and ride lots throughout the region.

All of Spokane Transit’s regular buses are fully accessible and equipped with ramps in order to board passengers who use wheelchairs.

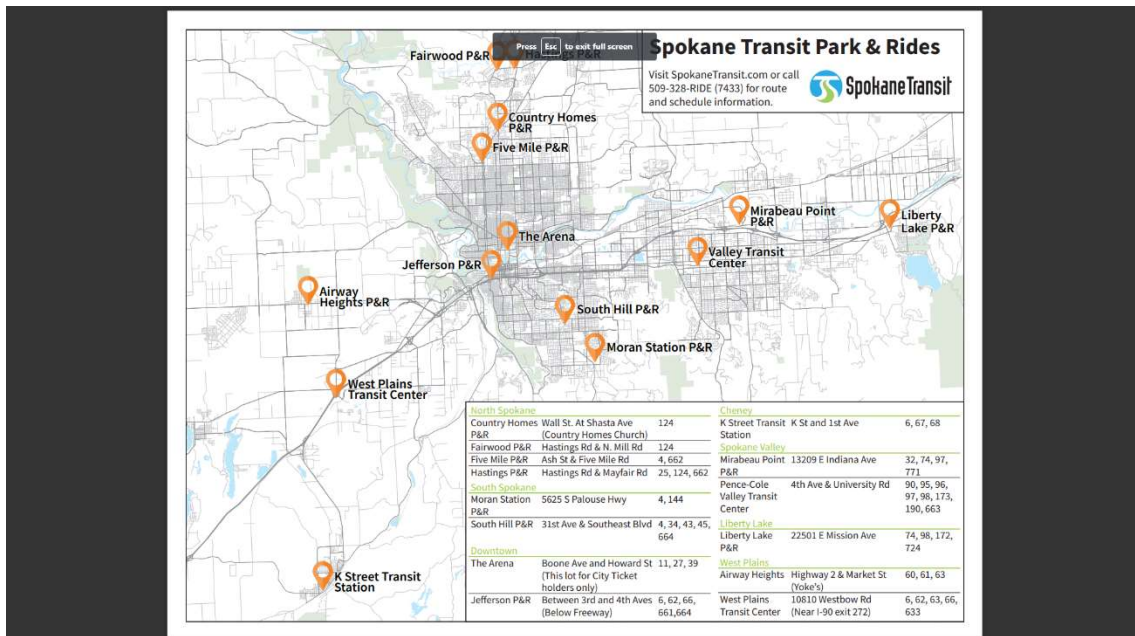
Paratransit is a wheelchair-accessible shared ride transportation service for individuals whose disability prevents them from using the regular fixed route buses. A person must be unable, because of a disability, to get to or from the bus stop, get on or off a lift or ramp equipped bus, or successfully travel by bus to or from the destination. An application for service is required. The application includes a section for verification of disability from a licensed medical or mental health professional.

Graphic 8 - STA System Map



Source: https://www.spokanetransit.com/wp-content/uploads/2022/08/SPO_MaG_system_2208_WEB.pdf

Map 37 – STA Transit Park & Rides



Source: <https://www.spokanetransit.com/wp-content/uploads/2022/09/20220912-Park-and-Ride-Map.pdf>

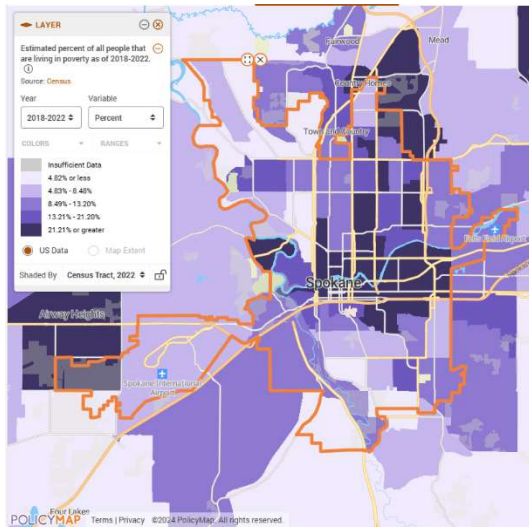
Access to Low Poverty Neighborhoods

Poverty Thresholds: The US Census Bureau uses income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically but are updated for inflation using the Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps). Income includes income of all related family members that live together.

As of 2022 the US Census data identified that 14.8% of Spokane residents live in poverty. Table 31. The rate of poverty varies considerably by census tract, with 53063010701 having a very low rate of less than 1%, and 53063002503 with a high of 50%. Table 31 and Map 40.

Table 31: Estimated percent of all people living in poverty - 2018-2022	
Spokane	14.8%
Selected Census Tracts	Percent
53063010701	1%
53063001100	3.2%
53063004900	4%
53063004300	4.3%
53063002100	4.4%
53063000000	4.5%
530630 04300	4.3%
53063002600	21.6%
53063000302	21.9%
53063001400	22%
53063011203	22.5%
53063003100	23.3%
53063003601	24.8%
53063003000	28.4%
53063000202	29.5%
53063011104	30.7%
53063002000	32.8%
53063001600	32.9%
53063002502	38%
53063014500	41.7%
53063002400	43.6%
53063003500	47.8%
53063002501	48.2%
53063002503	50.2%

Source: <https://www.policymap.com/newmaps#/>



Map 38
 Estimated percent of all people living in poverty
 2018-2022

Source: <https://www.policymap.com/newmaps/>

Non-white people are on average more likely to live in poverty throughout the City than white people. In Spokane, 21.8% of Black people, 36.7% of Native Americans / Alaska Natives, 29.1% of Hawaiian Native and Pacific Islanders, 17.9% Hispanics, 15.1% of Asians, and 13.6% of whites live below the poverty level. (Estimates for 2018-2022).

Table 32 - Estimated percent of people by race and ethnicity that are living in poverty 2018-2022							
All	White	Two or more races	Black or African American	Hispanic / Latino	American Indian / Alaska Native	Asian	Native Hawaiian & Other Pacific Islander
14.8%	13.6%	16.8%	21.8%	17.9%	36.7%	15.1%	29.1%

Source: <https://www.policymap.com/newmaps/>

Low Poverty Index

The low poverty index provided by HUD identifies poverty by census tract. Values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.²⁴

As of the most recent HUD-provided data (2011-2015 ACS) white non-Hispanics had a higher poverty index (less likely to live in low poverty neighborhoods) in Spokane compared to black, Hispanic, Asian, Pacific Islander, and Native American Spokane residents. These disparities persisted even when only measuring the population below the federal poverty line. Table 33. Black non-Hispanics and Native American were most likely to live in low poverty areas. When only people below the poverty line were considered Hispanic and black people were most likely to live in low poverty areas.

²⁴See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation*, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

Table 33	
(Spokane, WA CDBG) Jurisdiction	Low Poverty Index (2011 – 2015 ACS)
Total Population	
White, Non-Hispanic	42.6
Black, Non-Hispanic	31.1
Hispanic	35.8
Asian or Pacific Islander, Non-Hispanic	37.7
Native American, Non-Hispanic	30
Pop. below fed. poverty line	
White, Non-Hispanic	29.1
Black, Non-Hispanic	23.6
Hispanic	23
Asian or Pacific Islander, Non-Hispanic	28
Native American, Non-Hispanic	27.2

Source: HUD AFFH-T Map 12, Data from Census 2010, ACS 2011-2015

In Spokane, in 2022:

- 24% of female-headed family households (no spouse present) lived in poverty. Table 34.
- 26% of people with disabilities lived in poverty.
- 16% of children lived in poverty.

Table 34 – People In Poverty in Last 12 Months - 2022: ACS 5-Year Estimates	
Selected Characteristic	%
People in poverty	14.8%
Female	15.9%
Male	13.7%
Children under 18 years	16.1%
People 65 years old and over	10.9%
People 18 to 64 years below poverty	15.4%
With any Disability	26%
No Disability	12.6%
Living Arrangement: In Family Household, Female householder, No spouse present	24.1%

Access to Environmentally Healthy Neighborhoods

Environmental Health Index

The HUD-provided environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory, and neurological hazards with indexing census tracts. Values range from 0 to 100. The higher the value, the less exposure to toxins harmful to human health, and the better the environmental quality of a neighborhood.²⁵

The most recent Environmental Health Index available from HUD relied on 2014 National Air Toxics Assessment (NATA) data. The values for white non-Hispanics for the total population and those under the federal poverty line were slightly higher than all other races, except Asian and Pacific Islanders in the instance of those below the poverty line. Of concern, however, is that the Index rates for all races were only in the single digits, indicating high rates of exposure to unhealthy toxins in Spokane.

Table 35	
(Spokane, WA CDBG) Jurisdiction	Environmental Health Index
Total Population	
White, Non-Hispanic	7.1
Black, Non-Hispanic	5.9
Hispanic	6.1
Asian or Pacific Islander, Non-Hispanic	6.3
Native American, Non-Hispanic	5.2
Pop. below fed. poverty line	
White, Non-Hispanic	5.1
Black, Non-Hispanic	4.8
Hispanic	4.5
Asian or Pacific Islander, Non-Hispanic	6.2
Native American, Non-Hispanic	4.9

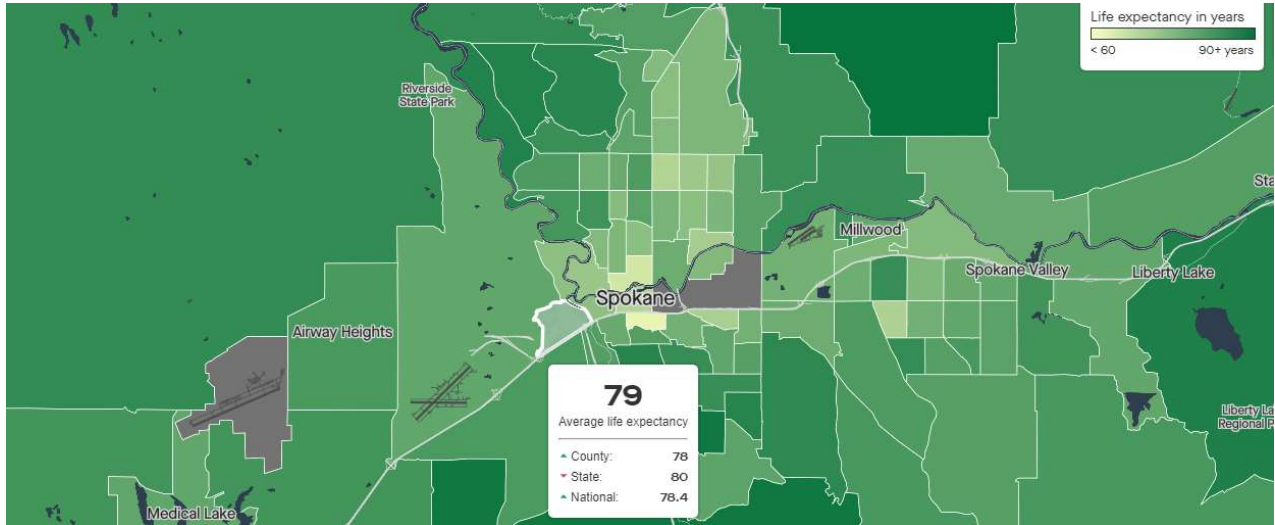
Life Expectancy

The 2020 life expectancy of a white person in Spokane County (78 yrs.) was more than 4 years longer than that of a Black person (73.7 yrs.) and more than 7 years longer than that of an American Indian / Alaska Native indigenous person (70.6) according to the Spokane Regional Health District (SRHD). Source: <https://countyhealthinsights.org/county/spokane/indicators/life-expectancy/>

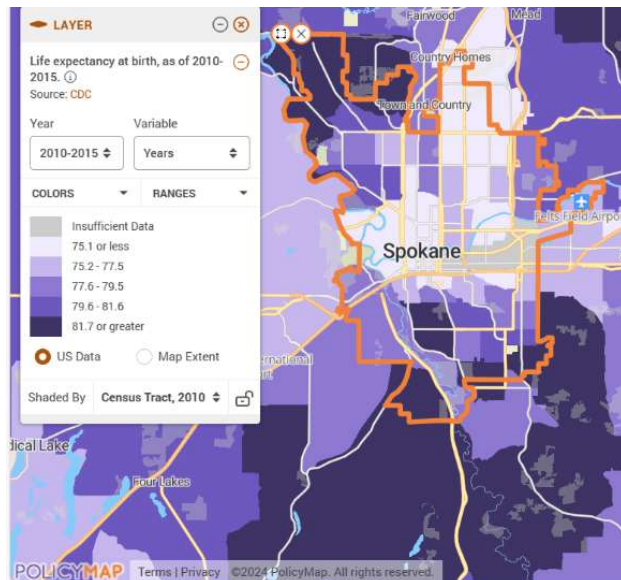
²⁵ See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)* Data Documentation, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

The zip code that one resides in makes a difference for quality and longevity of life. The Centers for Disease Control released detailed data on life expectancy for 90% of the census tracts in the United States. Map 39 was generated from a website that utilized the CDC data and allows searches on specific communities to determine neighborhood life expectancies. The overall Spokane County life expectancy for the reported period was 79 years. The darker a census tract is shaded, the greater the life expectancy. The lightest tracts on the map had life expectancies of 66 (Tract 300-3200), 68 (SE West Central), 71 (300-3400), and 72 (East Central and Bemiss) years, while the South Hill had a life expectancy of 81 years.

MAP 39 –AVERAGE LIFE EXPECTANCY



Source: Quartz: <https://qz.com/1462111/map-what-story-does-your-neighborhoods-life-expectancy-tell/>



MAP 40 Life Expectancy Spokane, WA 2010 – 2015

The darkest tracts have the highest life expectancy (81.7 years or more). The lightest tracts on the map have life expectancies of 75.1 or less.

Source: <https://www.policymap.com/maps>

Table 36 – Life Expectancy at Birth –Spokane – Selected Tracts (2010-2015)

Tract ID	Age	Tract ID	Age	Tract ID	Age
53063003000	71.5	53063003200	66	53063003500	70.8

Access to Other Assets

Access to Technology / Telecommunications

Community survey participants and organization interviewees expressed concerns about lack of technology access or knowledge being barriers to housing access for protected classes.

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Many landlords work with online systems to apply and screen tenants, many who are elderly, disabled, or homeless cannot access these systems. If they do access and apply, once moved in they struggle to pay through the online portals and run risks of getting late fee's due to inability to use technology.</i>
<i>online only applications</i>

Based on census data, most households in Spokane do have high access to household computers of any type (>94%), smartphones (>88%), and broadband internet access (90.5%). Table 37. Broadband internet subscription rates are similar for white non-Hispanics, black and African Americans, Asians, and Hispanic and Latinos (93.4% – 95.5%). American Indian and Alaska Native households have the lowest broadband subscription rate (88.4%), and Native Hawaiian and other Pacific Islander households have the highest broadband subscription rate (99.1%).

Data was not reported for income or disability, however, based on anecdotal accounts of stakeholder interviewees, and reports during intake conducted by NWFHA, it is likely that technology can be a barrier for people with certain disabilities, and perhaps also people with fewer financial resources.

Table 37 - Computer and Internet Use 2018 – 2022									
	WA	Spo. Co.	Spokane						
Race or Ethnicity:	All	All	All	White Non-Hispanic	Black or African Amer.	Asian	Amer. Indian or Alaska Native	Native Hawaiian or Pac. Islander	Hispanic or Latino
Households with any type of computer	96	95	94						
Households with a desktop or laptop	86	82.2	80						
Households with a smartphone	91	89.1	88						
Household Internet Access:									
Dial Up Only				.1	0	0	0	0	0
Broadband	92	90.7	91	93.4	94.8	93.4	88.4	99.1	95.5
No Internet Access	6	7	7	6.5	5.2	6.6	11.6	.9	4.5

Barriers that Deny Individuals with Disabilities Access to Opportunity

Describe the barriers that deny individuals with disabilities access to opportunity and community assets in the geographic area of analysis

The Fair Housing Act (FHA) was amended in 1988 to include protections for individuals with disabilities (“handicap is used in the FHA, but “disability” has come into usage as a preferred term). It is unlawful to discriminate in rental or to otherwise make unavailable or deny a dwelling to any renter because of a handicap of:

- that renter,
 - a person residing in or intending to reside in that dwelling after it is rented or made available, or
 - any person associated with that renter.
- “Handicapped” means:
- a physical or mental impairment which substantially limits one or more of such person’s major life activities;
 - a record of having such an impairment; or
 - being regarded as having such an impairment.

Discrimination based on disability includes:

- Refusing to make reasonable accommodations in rules, policies, practices or services
- Refusing to allow a person with a disability to make reasonable modifications
- Failing to meet disability design and construction access requirements

89% of all survey participants recognized disability as a protected class.

Accessible Housing

Fair Housing Act Design and Construction Requirements

Physically inaccessible properties limit the housing choices of individuals with disabilities. They may be discouraged from applying to rent a unit, may not have full use of their unit, or may have to endure minor to major inconveniences that other tenants do not. To address these concerns, the federal Fair Housing Act requires that multi-family dwelling complexes constructed for first occupancy on or after March 13, 1991 comply with 7 accessibility requirements. Buildings that meet the following criteria must comply with the FHA accessibility requirements:

- Have 4 or more dwelling units
- Have been built for first occupancy after March 13, 1991
- Have at least one dwelling unit actually occupied
- Have had a certificate of occupancy issued

If a building meets these criteria, then all dwelling units in buildings with one or more elevators, and all ground floor dwelling units in other buildings, must meet the seven accessibility requirements. Examples of covered buildings include: single-story townhouses, vacation timeshare units, college dormitories, apartments, and condominiums. Multistory dwelling units are not covered unless the building has an elevator, in which case the primary entry level is covered. The seven FHA accessibility requirements are:

1. Accessible Building Entrance on an Accessible Route, 2. Accessible and Usable Public and Common Areas, 3. Usable Doors, 4. Accessible Route Into and Through the Covered Dwelling Units, 5. Light Switches, Electrical Outlets, Thermostats and Other Environmental Controls in Accessible Locations, 6. Reinforced Walls for Grab Bars, and 7. Usable Kitchens and Bathrooms

To assist developers of multi-family housing comply with the FHA accessibility requirements, HUD issued a Fair Housing Act Design Manual (FHADM) in 1996. The FHADM includes:

- Fair Housing Accessibility Guidelines (March 6, 1991, 56 F.R. 9472-9515, 24 CFR Ch.I, Subch.A, App.II & III). Compliance with the Guidelines provides a safe harbor for compliance with the Fair Housing Act. The Guidelines reference the 1986 ANSI A117.1 American National Standard for Buildings and Facilities as an acceptable standard to meet; or an equivalent or stricter standard (e.g. 1992 CABO/ANSI).
- Supplement to Notice of Fair Housing Accessibility Guidelines: Q & As About the Guidelines (59 F.R. 33361-33363 (6/28/94), 24 CFR Ch. 1, SubCh. A, App. IV.

On April 30, 2013, US Depts. HUD and DOJ issued joint guidance, *Accessibility (Design and Construction) Requirements For Covered Multifamily Dwellings under the Fair Housing Act.*²⁶ The guidance includes a list HUD-recognized “safe harbors” for compliance with the Fair Housing Act’s design and construction requirements.

Additionally, affordable housing subject to Sec. 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with physical mobility impairments and units accessible for individuals with hearing or vision impairments.

Enforcement of Accessibility Design and Construction

The Fair Housing Act does not require local governments to ensure compliance with federal law. However, it is the policy of HUD to encourage States and units of general local government to include, in their existing procedures for the review and approval of newly constructed covered multifamily dwellings, determinations as to whether the design and construction of such dwellings are consistent with the FHA design and construction requirements. Determinations of compliance or noncompliance by a State or a unit of general local government are not conclusive in enforcement proceedings under the Fair Housing Act. 44 FR 9502 (March 6, 1991).

The State Building Code is to be enforced by Counties and Cities. RCW 19.27.050. Effective 7/1/20, WA adopted the 18th ed. of the IBC (WAC 51-50-003), which HUD has recognized as a safe harbor. In 2023 WA adopted the 21st ed. of the IBC, which HUD has not yet approved as a safe harbor. Any covered new multi-family housing built in Spokane should be in compliance with the Fair Housing Act to the extent it meets the requirements of the 18th ed. of the IBC. Despite the fact that the FHA design and construction requirements have been in existence for over 30 years, and significant litigation has occurred involving the Fair Housing Act accessibility requirements in Washington and the nation, multi-family complexes are still being built in non-conformance with the law in Spokane County.

²⁶<https://archives.hud.gov/news/2013/JOINTSTATEMENT.pdf>

Housing Accessibility in Spokane

Single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. Thus, people with physical disabilities are likely to have less opportunity to reside in single-family housing zones in Spokane. Since the Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards, multifamily housing built after this date, if built in compliance with federal law would meet a minimum level of accessibility. People with disabilities are therefore more likely to reside in zones that permit multi-family housing, in properties developed after 1991.

In July 2014, SHA completed a program review/ unit accessibility review, to assess compliance with Sec. 504 requirements. At the time of the report, SHA managed 25 substantially accessible units (3% of total units). SHA set a goal for all properties to provide at least 5% accessible units. Since the review SHA converted 139 units to meet section 504 standards, including 11 units at Valley 206 in Spokane Valley.

When asked, “What are you most concerned about with respect to fair housing and access to housing opportunities in Spokane? Check your top concerns”, 40% of all survey responders selected “Accessibility of rental properties for individuals with disabilities.”

When asked if survey responders were aware of any housing practices in Spokane that are barriers to equal and full access to housing, survey responder narrative comments included the following:

Survey Narrative Responses
<i>Accessible units for those that live with disabilities.</i>
<i>There are always issues with accessibility issues, and other barriers because we simply do not have sufficient housing to overcome the ability to use barriers when there are more people that units available.</i>

Stakeholder interviewees also shared concerns about the insufficient amount of accessible housing in Spokane. The need for more accessible units in new construction was commonly cited by interviewees.

Some stakeholder interviewees feel that Spokane should aspire to the goal of “universal design” in new construction, which means environments and amenities usable by all people, to the greatest extent possible, without requiring adaptation or specialized design.

The length of waitlists for accessible units in publicly supported housing and the lack of available accessible units in non-publicly supported housing available to HCV participants are major barriers to accessing housing for people with disabilities.

Similarly, while housing providers that are not federally subsidized must allow people with disabilities to make reasonable modifications to their units at the resident’s own cost, due to many people with disabilities having very low income, modifications often go unmade, even when permission is granted to make them.

Other Barriers to Opportunity for People with Disabilities

Housing Choice Voucher Acceptance

Sixty-eight percent of SHA HCV participants have a disability. The majority of these are single person households (76.2%). There is a shortage of available subsidized accessible units and private market units which will accept HCVs.

Zoning and Siting

Most accessible units will be in newly constructed multi-family housing, due to the requirements and exemptions in the Fair Housing Act for design and construction. People with disabilities are thus often limited to residing in rental units in zones which allow multi-family housing.

Transportation

People with disabilities are also often dependent upon public transportation, which further limits housing choice to regions of the County where they can access public transportation.

Reasonable Accommodations To Remove Barriers

A reasonable accommodation is a change, adaptation or modification to a policy, program or service, which will allow a person with a disability to use and enjoy a dwelling. An accommodation request must be granted when a person has a disability, there is a nexus between the disability and the accommodation requested, and the accommodation is reasonable. To prove that an accommodation is necessary, a person must show that, but for the accommodation, they likely will be denied an equal opportunity to enjoy the housing of their choice. *Giebeler v. M&B Assocs.*, 343 F.3d 1143, 1155 (9th Cir. 2003). An accommodation need not be granted if it would pose an undue financial and administrative burden on the housing provider (considering cost, financial resources of housing provider, benefits of the accommodation to tenant, and availability of alternative accommodations); or if it would fundamentally alter the nature of the housing provider's operations.

NWFHA assists households with 150-200 reasonable accommodation and modification requests per year, mostly in Spokane County. NWFHA's services are free to the public.

Spokane Housing Authority received 432 and 173 requests for accommodation from voucher program participants in 2021 and 2022 respectively. The majority were for extension of the time limit to find housing and place the voucher (69% in 2021 and 42% in 2022), and for additional bedrooms (22% in 2021 and 29% in 2022). Tables 38 and 39.

Spokane Housing Authority received 58 and 70 requests for accommodation from residents residing in properties it manages in 2021 and 2022 respectively. The majority were for assistance animals (52% in 2021 and 53% in 2022) and physical modifications (14% and 19%). Tables 40 and 41

Table 40 - Reasonable Accommodation Requests to SHA Property Management (2021)

	#	%
ADA Unit	1	1.7%
Additional Bedroom	1	1.7%
Assistance Animal	30	51.7%
Ground Level Unit	2	3.4%
Guests	1	1.7%
Hearing	1	1.7%
Keys	9	15.5%
Live in Aide	1	1.7%
Physical Modifications	8	13.8%
Reserved Parking	4	6.9%
Total	58	100%

Table 39 - SHA Reasonable Accommodation Requests for HAP Department – Voucher Program (2022)

	#	%
Additional Bedroom	50	28.9%
Exception to Payment Standard	10	5.8%
Informal Hearing / Regaining Assistance	8	4.6%
Live In Aide	11	6.4%
Modifications	1	0.6%
Placed on Waitlist	4	2.3%
Port	1	0.6%
Renting from Relative	7	4%
Shared Housing	4	2.3%
Shorter Lease	4	2.3%
Voucher Extension	73	42.2%
Total	173	100%

Table 38 - SHA Reasonable Accommodation Requests for HAP Department – Voucher Program (2021)

	#	%
Additional Bedroom	94	21.8%
Exception to Payment Standard	9	2.1%
Informal Hearing / Regaining Assistance	3	0.7%
Live In Aide	16	3.7%
Modifications	0	0%
Placed on Waitlist	0	0%
Port	1	0.2%
Renting from Relative	3	0.7%
Shared Housing	1	0.2%
Shorter Lease	3	0.7%
Voucher Extension	302	69.9%
Total	432	100%

Table 41 - Reasonable Accommodation Requests to SHA Property Management (2022)

	#	%
ADA Unit	2	2.9%
Additional Bedroom	1	1.4%
Assistance Animal	37	52.9%
Bed Removal	1	1.4%
Delay of Fees	2	2.9%
Ground Level Unit	2	2.9%
Guests	1	1.4%
Hearing	1	1.4%
Keys to Common Area	1	1.4%
Live in Aide	6	8.6%
Packing Assistance	1	1.4%
Physical Modifications	13	18.6%
Reserved Parking	2	2.9%
Total	70	100%

Forty-seven percent of housing provider survey responders have received a reasonable accommodation or modification request from a person with a disability.

Housing provider survey participants shared as narrative responses that they had received the following reasonable accommodation requests:

Survey Narrative Responses
Have you ever received a reasonable accommodation or modification request from a person with a disability?
<i>RA for section-8 housing subsidy to pay more for rent due to necessity of that housing location for the tenant</i>
<i>I am the president of the Tenant Union in the building. I have assisted in bringing requests from tenants to the attention of management.</i>
<i>N/a - but I have helped people request them</i>
<i>If one we could not help with is considered reasonable, WE have people ask to move in in wheelchairs. Our houses are not ADA compliant and include many stairs. We would like to help but just cannot</i>
<i>Accommodations - Change of rental payment dates due to fixed-income payments; assistance animals; moving a parking space; moving tenant from upper floor to ground floor when availability arises. Modifications - Wheelchair ramps; removal of shrubs to make access easier; grab bars in showers and around toilets.</i>
<i>One was reasonable, but the other two were so far unreasonable I would have rather sold my rental than accommodate.</i>
<i>I helped clients write and submit these to there landlords, property managers</i>
<i>To remove doors for wheelchair accessibility. Installation of grab bars in bathrooms, baths, and showers</i>
<i>Assistance animal, live in aid, Unit Transfer</i>

Assistance Animals

A prevalent type of reasonable accommodation request is for a person with a disability and disability-related need for an animal to have an animal as an exception to a no-pets, no-animals, policy. While housing providers can exclude or limit pets (animals not needed for disabilities), when “no pets” policies, or requirements for pet fees, pet rent, pet deposits, or pet insurance are unlawfully applied to people with disabilities who need an animal for their disability, this is a barrier for people with disabilities being able to use and enjoy their dwelling.

While it is unlawful to charge pet rent for an animal needed for a disability, one tenant advocate interviewee believes that pet rent (amounts typically charged monthly in addition to a deposit), should be eliminated as they are a huge barrier encountered by people with disabilities who need animals for their disabilities. Failed Senate Bill 6064, introduced during the 2024 WA legislature, would have capped pet deposits at \$150 and outlawed pet rent.

Discrimination Based on Disability

Community housing provider / advocate survey responders who believe they have witnessed illegal discrimination by someone in their industry against someone attempting to rent a dwelling unit made the following comments about disability discrimination as survey narrative responses:

Survey Narrative Responses
<i>Property management attempted to evict a person who was slightly behind rent during a mental health crisis. Other tenants in the building were significantly farther behind in rent and were not noticed. Management did not like the tenant's behaviors due to mental health crisis, although none were criminal or endangered the safety or security of the property.</i>
<i>My former neighbors were treated poorly by our then-landlord due to disability. The landlord didn't give me a key for the front door. Instead of procuring me a key, the building manager told the downstairs neighbors not to lock the front door (this is a neighborhood where everyone wants their doors locked). My neighbor had memory issues and kept locking the door. When I came home late one night and had to call for an emergency unlock from maintenance, the building manager billed my neighbor for it because she'd forgotten to leave the door unlocked.</i>

Community housing consumer / advocate survey responders included the following narrative comments about reported or experienced disability housing discrimination:

Selected Survey Narrative Responses
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
<i>Not accommodating to ADA laws</i>
<i>Discrimination based lack of accessible/reasonable accommodation units...</i>
<i>Landlords refusing deposit/first month rent payments from FCS TAP or other rental assistance programs for people with disabilities.</i>
<i>a tenant's disability status and refused to make the request reasonable accommodation.</i>
<i>Single mothers of disabled children.</i>
<i>Disability</i>
<i>Landlord appears to communicate about tenants they like, but not tenants they don't like. For example, a client that was on track for being evicted due to numerous lease violations was not at risk because landlord said "the unit is always clean when I go there". Another tenant with fewer lease violations was told they are being evicted, because "they used to have problems keeping the unit clean." We helped client get a caregiver and the unit was clean every time the housing specialist went there. Landlord appeared to be making a decision about which tenant to evict based on past mental health or disability issues that were currently resolved.</i>

I believe I have been illegally discriminated against while renting in Spokane (e.g., treated differently because of my protected class, harassed because of my protected class, etc.)

Having special needs children created a problem with another tenant. The property manager didn't attempt to accommodate us by giving us a ground floor unit. We had to move to another property. ...

If you believe that discrimination occurs in the rental of housing in Spokane, why do you believe it most often occurs?

Landlords sometimes says "I only rent to people with jobs", "I only rent to people who can take care of themselves (i.e. no one with an in-home caregiver or housing advocate), intentionally raising rent to be too high for Section 8 voucher budget every time HUD increases the budget, requiring income to be 3 or 4 times the rent even though the person has established excellent history of paying rent on less income before this became a common rule. May elderly have not encountered this rule before and are surprised when they try to move on SSI or SSD..

Residents of Publicly Supported Housing

In what ways do residents of publicly supported housing, by protected class group, experience disparities in access to opportunity and community assets?

People with disabilities, Black and African American, and Native American, Alaska Native, Indigenous people are disproportionately participating publicly supported housing programs. Barriers to accessing or utilizing these programs, such as housing choice voucher rates not keeping up with rising rental rates, or source of income discrimination against voucher holders, will be experienced disproportionately by these groups.

Housing Choice Vouchers

Too Few, Not Accepted, and Falling Behind Actual Rents

Multiple concerns about housing choice vouchers were shared by survey responders, stakeholder interviewees, and public meeting attendees.

- There are not enough to meet need and demand. The majority of those who would be eligible don't receive one.
- Even if someone is fortunate to have a voucher, the standard payment often does not cover the actual rent being charged for rental units. This makes it difficult to find housing that where the voucher can be used; and if an in-place tenant's rent is raised above the standard after the initial lease and SHA Housing Assistance Payment (HAP) contract ends, the tenant has to find new housing with rent that the voucher will cover.
- Finally, despite state and local source of income protections, refusal to accept housing vouchers is a prevalent complaint.

Survey participant narrative responses reported many concerns about vouchers, including not enough available, landlords refusing to accept them, and the amount of the voucher not being enough to cover rising rental rates:

Selected Survey Narrative Responses

What are you most concerned about with respect to fair housing opportunity in Spokane?

Discrimination include ... and landlords discriminating against vouchers

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

Most commonly the folks we're trying to help rent a place with a voucher hear that the place doesn't take Section 8 vouchers or will be discouraged from applying if they have a voucher because management / landlords tell them they won't be approved for the place when other folks don't have vouchers.

Landlords denying tenancy to someone with a Section 8 voucher unless they also have a co-signer. They indicated all tenants with low income are required to have a co-signer, but this person's rent voucher does not seem to have been included in their income calculation. They are not refusing the rent subsidy. They are claiming the person's income is not high enough.

I have specifically called on a private landlord's home to rent for a voucher holder and was told "I will not rent to anyone with a voucher." I reported this, but because my client (who was homeless and desperately seeking housing) didn't want to fight for the unit, there was nothing that could be done. Landlords are able to say these things and get away with it, especially private one's

I believe I have witnessed illegal discrimination by someone in my industry against someone attempting to rent a dwelling unit, because of their protected class.

A property manager telling tenants they would not take section-8

Income discrimination (we don't work with vouchers etc.)

I have been discriminated against because I am on housing.

I tried to help a friend find an apartment and he was openly told by landlords that they don't take vouchers.

the way potential tenants are spoken to by landlords/property management when looking for a place to rent with housing assistance

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

Lack of vouchers

Landlords not accepting vouchers

lack of vouchers for immigrant and justice involved populations

Not firsthand knowledge but have seen how difficult it is for people to find affordable housing for low income or section 8 housing

making apartment complexes required to take section 8 would help things be a little more equal.

Once vouchers increase in price, the average rent amounts also increase. There was a short amount of time with the Emergency Housing Vouchers (EHV's) where it was easy enough to find an apartment with a voucher but unfortunately rent is increasing too rapidly. Part of the issue of access to housing is how exceedingly difficult it is to obtain a Housing Voucher due to SHA being so far behind year round. Someone may have their voucher but then payments aren't being made by SHA in a reasonable amount of time. Let alone the inspection times which used to only be about a week but have since increased. The voucher renewal process usually results in "lost

paperwork" and extreme delays jeopardizing people maintaining their housing. It is astonishing how SHA remains unchecked so often when it comes to providing timely service to the community. I have seen many people lose housing opportunities and current housing due to their poor organization, paperwork, and processes. All of the above reasons cause landlords to not want to accept vouchers. Much of the time, they will say people are denied for credit even though they had already passed once they find out a voucher is involved. This is both due to SHA's poor practices and a bias landlords have towards voucher holders.

Landlords still regularly screen out potential tenants with housing vouchers, intentionally price units just outside of the voucher payment standard

I know certain apartments create loopholes to deny section 8 vouchers among many other tricks to discourage protected classes from applying and gaining housing.

Extreme shortage of vouchers. Denial of housing vouchers by landlords.

Even if they get a housing voucher, this does not assist with move in costs of deposit, first months, and last month's rent, plus fee's. I have also noticed that as SHA raises their budgets for the voucher, landlords raise their rents to above the budget, even if the unit is not "worth" that much. I feel this is to intentionally dodge Voucher Holder's leasing up their premises.

voucher, sources of income

Housing provider perceptions of and or negative experiences with voucher and public assistance subsidy programs or program participants may discourage housing providers from accepting subsidies.

Survey Narrative Responses

If you have accepted a voucher (section 8, VASH, etc.) or other subsidy (HEN, etc.) from a tenant, how would you describe the experience(s)?

Temporary programs that run out of funding for tenants can be difficult to navigate

I am currently waiting for 3 months for a HEN voucher. The person is lucky we haven't kicked him out because he would be homeless

Generally a negative experience from one of many angles: 1) Eventual non-payment issues from tenants; 2) More damage to the properties from subsidized tenants; 3) Regulatory and administrative burden; 4) Legal liability for not doing exactly what the agency, tenant or tenant advocate thinks we should be doing and getting lawyers involved. I have had some positive experiences as well, and had some high quality tenants use these programs, but the system in general is broken and getting worse, much like society in general.

Access to Affordable Housing Opportunities

Describe the availability of affordable housing opportunities that are **affordable** to families, by **protected class group**

Income

Measures of Income

Income directly affects whether someone is housing cost burdened or able to qualify for publicly supported housing with income restrictions.

Median Household Income

The median household income in Spokane in 2022 was \$63,316. Median household income includes all households, singles and families.

Median Income	Percentage of All Households
Less than \$10,000	5.1%
\$10,000 to \$14,999	5.5%
\$15,000 to \$24,999	7.7%
\$25,000 to \$34,999	8.5%
\$35,000 to \$49,999	12.8%
\$50,000 to \$74,999	18.6%
\$75,000 to \$99,999	13.3%
\$100,000 to \$149,999	16%
\$150,000 to \$199,999	6.1%
\$200,000 or more	6.4%

Median Earnings

The median earnings for full-time year-round workers in Spokane was \$53,874 (2018-2022). Median earnings for males working full-time, year-around was 16% higher than that for full-time working female workers. Table 43.

Median earnings workers full-time, year-round workers	\$53,874
Median earnings male	\$57,077
Median earnings female	\$49,268

Source: 2018—2022 ACS 5-Year Narrative Profile, Spokane

Median Family Income

Median family income includes only households defined by the census as families by relationships, marriage or the presence of children.

Median family income in Spokane was \$89,000, higher than median household income (\$63,316) (which may be due to more multiple incomes).

HUD publishes annual income thresholds, which are limits based on percentages of median family income. Median family income for FY2023 for the Spokane, WA HUD Metro FMR Area was \$89,000. The FY23 income thresholds for a family of 3 were: \$64,100 (Moderate Income (80% AMI), \$48,060 (“Low Income” (60% AMI)); \$40,050 (“Very Low (50% AMI)); and \$24,050 (“Extremely Low” (30% AMI)).

Table 44: HUD MEDIAN FAMILY INCOME (MFI) LIMITS 2023
(use for City HHAA, 1406/1590 AHTF, HOME, & CDBG)²⁷

(Effective 6/15/2023) Median Income for Spokane is \$89,000

HH Size	100% MFI		80% MFI (Moderate Income)		60% MFI (Low Income)		50% MFI (Very Low Income)		30% MFI (Extremely Low Income)	
	Annual	Hourly	Annual	Hourly	Annual	Hourly	Annual	Hourly	Annual	Hourly
1	\$62,300	\$29.95	\$49,850	\$23.97	\$37,380	\$17.97	\$31,150	\$14.98	\$18,700	\$8.99
2	\$71,200	\$34.23	\$57,000	\$27.40	\$42,720	\$20.54	\$35,600	\$17.12	\$21,400	\$10.29
3	\$80,100	\$38.51	\$64,100	\$30.82	\$48,060	\$23.11	\$40,050	\$19.25	\$24,050	\$11.56
4	\$89,000	\$42.79	\$71,200	\$34.23	\$53,400	\$25.67	\$44,500	\$21.39	\$26,700	\$12.84
5	\$96,200	\$46.25	\$76,900	\$36.97	\$57,720	\$27.75	\$48,100	\$23.13	\$28,850	\$13.87
6	\$103,300	\$49.66	\$82,600	\$39.71	\$61,980	\$29.80	\$51,650	\$24.83	\$31,000	\$14.90
7	\$110,400	\$53.08	\$88,300	\$42.45	\$66,240	\$31.85	\$55,200	\$26.54	\$33,150	\$15.94
8	\$117,500	\$56.49	\$94,000	\$45.19	\$70,500	\$33.89	\$58,750	\$28.25	\$35,250	\$16.95

Low-Moderate Income

HUD periodically identifies by block group the percent of the population living in households earning less than 80% of Area Median Income (AMI). Block groups in which 51% or more of the population live in households at or below 80% of AMI qualify as **Low-Mod areas**.

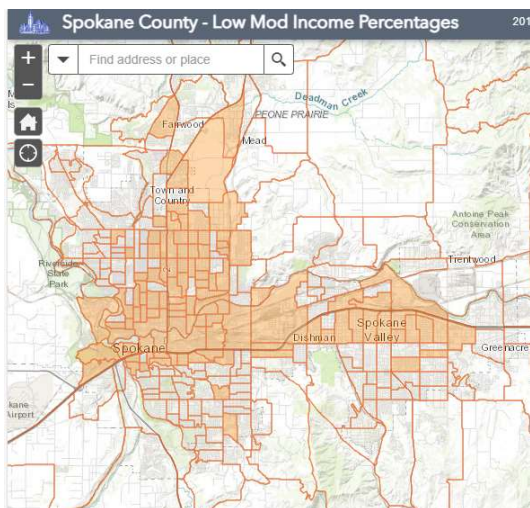
The Community Development Block Grant (CDBG) program requires each CDBG funded activity to principally benefit low- and moderate-income (LMI) persons, aid in the prevention or elimination of slums or blight, or meet a community development need having a particular urgency. Additionally, activities may qualify for CDBG assistance if the activity will benefit all the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income persons, i.e. area-benefit (LMA). The HUD Office of Community Planning and Development (CPD) provides estimates of the number of persons considered Low-, Low- to Moderate-, and Low-, Moderate-, and Medium-income persons based on special tabulations of

²⁷<https://static.spokanecity.org/documents/chhs/hmis/subrecipient-resources/hud-media-family-income-limits-2023.pdf>

data from ACS 5-Yr. Estimates (for FY23 CDBG, CPD used ACS 5 yr. 2011-2015 estimates). Estimates are provided at three income levels: Low Income (up to 50% of AMI); Moderate Income (greater than 50% AMI and up to 80% AMI), and Medium Income (greater than 80% AMI and up to 120%).²⁸

The latest HUD tabulations (2011-2015 ACS data) showed that 48% of the total Spokane population qualifies as Low-Mod income. 89 of 188 tracts in Spokane County had 51% or more Low -Mod income populations.²⁹

Table 45 - ACS 5-Year 2011-2015 Low- and Moderate-Income Individuals (LMISD) - Spokane					
	LOW	LOW MOD	LMMI	LOW MOD UNIV	LOW MOD %
Individuals	63,565	97,715	135,580	203,510	48%



MAP 41
Spokane County
Low-Mod Income Percentages

Source: <https://spokanecounty.maps.arcgis.com/apps/webappviewer/index.html?id=39a81144c9ec4907802e186fb06285b2>

Asset Limited, Income Constrained, and Employed (ALICE)

ALICE: “ALICE” is an acronym for Asset Limited, Income Constrained, and Employed, which are households with income above the Federal Poverty Level but below the basic cost of living. A household includes all people who occupy a housing unit but does not include group quarters such as a dorm, nursing home, or prison.

According to the United Way’s United For ALICE research, 36% of all households in Spokane County met the definition for ALICE in 2021.³⁰ From 2019 to 2021, the five largest counties in WA had increases in total households — between 2 and 7% (Spokane County

²⁸<https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

²⁹<https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-local-government/>

³⁰[23UFA Report Washington 4.11.23 Final \(1\).pdf](#)

increased by 3%). All but King County also had an increase in the number of households below the ALICE Threshold, with Spokane County having the largest increase (up 17% from 2019).

Source of Income

74.6% of households in Spokane received earnings. Of these, 32% of households received Social Security, 21.5% of households received retirement income other than Social Security, 6.3% of households received Supplemental Security Income (SSI), and 4.8% of households received cash public assistance income. Some households received income from more than one source therefore combined percentages exceed 100. 2018-2022 ACS 5-Year Narrative Profile, Spokane, WA. The average income from Social Security in Spokane was \$21,179.

Table 46: Sources of Household Income - 2018 -2022	
Earnings	74.6%
Social Security	32%
Retirement income	21.5%
Supplemental Security Income (SSI)	6.3%
Cash public assistance income	4.8%

Source: 2018—2022 ACS 5-Year Narrative Profile, Spokane, WA

Income by Race and Ethnicity

As of 2022, white median household income was 2% above overall median income, while Asian, Hispanic, Native Hawaiian / Other Pacific Islander, Black, Native American / Alaska Native, and Two or More Race median incomes were 93%, 97%, 83%, 74%, 55%, and 94% of median income respectively. Table 47.

Table 47: MEDIAN HOSHEOLD INCOME BY RACE OR ETHNICITY - Spokane				
Race / Ethnicity	2018-2022		2013-2017	
	Annual Income	% of All Median Income	Annual Income	% of All Median Income
All Households	\$63,316	100%	\$44,768	100%
Asian	\$59,173	93%	\$36,745	82%
White	\$64,853	102%	\$46,128	103%
Black or African American	\$46,598	74%	\$28,671	64%
Hispanic or Latino	\$61,118	97%	\$40,792	91%
Native Hawaiian or other Pacific Islander	\$52,321	83%	\$28,235	63%
Native American / Alaska Native	\$35,000	55%	\$38,093	85%
Two or More Races	\$59,612	94%	\$32,889	73%

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

Housing Costs

Homeowner Costs

Estimated housing costs in the City of Spokane and Spokane County are lower for both owner-occupants and renters than in Washington State as a whole.

The median value of owner-occupied units in Spokane in 2022 was just 65% of the estimated value in Washington State, and 875% of the value of the median Spokane County home. Table 48.

Table 48: Cost of Owner-Occupied Housing - 2022			
	Spokane	Spokane Co.	WA
Median value	\$368,500	\$415,500	\$569,500
Median monthly cost - with mortgage	\$1571	\$1688	\$2227
Median monthly owner cost - without mortgage	\$567	\$597	\$708

Source: American Community Survey

Forty-five percent of owner-occupied households with a mortgage in Spokane had housing costs less than \$1,500 per month, including utilities. In contrast, in overall Washington, 75% of owner-occupied households with a mortgage paid more than \$1,500 a month. Table 49.

Table 49: Range of Monthly Owner With a Mortgage Costs* - 2022			
Range	Spokane	Spokane Co.	WA
Less than \$1,000	14.4%	11.3%	5.1%
\$1,000-\$1,499	30.5%	27%	14.6%
\$1,500-\$1,999	28.8%	28.9%	21.3%
\$2,000 - \$2999	8.1%	8.6%	13.6%
\$3000 or more	5%	8.8%	25.5%

*Households with a mortgage; includes mortgage, taxes, insurance, condo fees and utilities

Source: 2022 American Community Survey

Renter Costs

The median gross rent during 2018-2022 was \$1060, less than the County or state, but a 24% increase over the 2013-2017 period.

Table 50: Range of Gross Rents*									
	Spokane			Spokane County			WA		
	2013-17	2018-22	% Change	2013-17	2018-22	% Change	2013-17	2018-22	% Change
Median gross rent	\$805	\$1,060	24%	\$842	\$1123	25%	\$1120	\$1592	30%
Range	Spokane			Spokane County			WA		
Less than \$500	13%	6.5%	-6.5%	10%	6%	-4%	7%	4.7%	-3.3%
\$500-\$749	30%	32.2%	-25.8%	27%	27.1%	-22%	13%	12.5%	-21.5%
\$750-\$999	28%			30%			21%		
\$1,000-\$1,499	22%	37.4%	15.4%	24%	38.5%	14.5%	33%	25.7%	-7.3%
\$1,500 or more	7%	22.6%:	15.6%	8%	28.4%:	20.4%	26%	57%:	31%
\$1,500 - \$1,999		16.8%			18.9%			27.1%	
\$2,000 - \$2,499		5.1%			6.8%			15.2%	
\$2,500 - \$2,999		.7%			1%			6.6%	
\$3,000 or more		-			1.7%			8.1%	

*Includes contract rent and utilities; excludes no cash payment

Source: ACS

Housing Cost Burdens

Housing is considered affordable when the cost of housing plus utilities equals no more than 30% of household income. During the 2016-2020 period, 33% of all households in Spokane were cost burdened. Table 51. 14% were severely cost burdened (paying more than 50% of household income for housing and utilities).

Table 51 - Housing Cost Burdens - Spokane, WA - 2016-2020 ACS						
Housing Cost Burden	Owner	% of Owners	Renter	% of Renters	Total	%
Cost Burden <=30%	40,580	78%	21,150	52%	61,730	66%
Cost Burden >30% to <=50%	7,480	14%	9,965	24%	17,445	19%
Cost Burden >50%	3,855	7%	9,250	23%	13,105	14%
Cost Burden not available	185	0%	610	1%	795	1%
Total	52,100	100%	40,975	100%	93,075	100%
Income by Cost Burden (Owners and Renters)	Cost burden > 30%	%	Cost burden > 50%	%	Total	%
Household Income <= 30% HAMFI	10,975	36%	9,380	72%	13,880	15%
Household Income >30% to <=50% HAMFI	8,805	29%	2,565	20%	11,980	13%
Household Income >50% to <=80% HAMFI	7,360	24%	900	7%	19,025	20%
Household Income >80% to <=100% HAMFI	1,550	5%	35	0%	10,235	11%
Household Income >100% HAMFI	1,855	6%	225	2%	37,955	41%
Total	30,545	100%	13,105	100%	93,075	100%

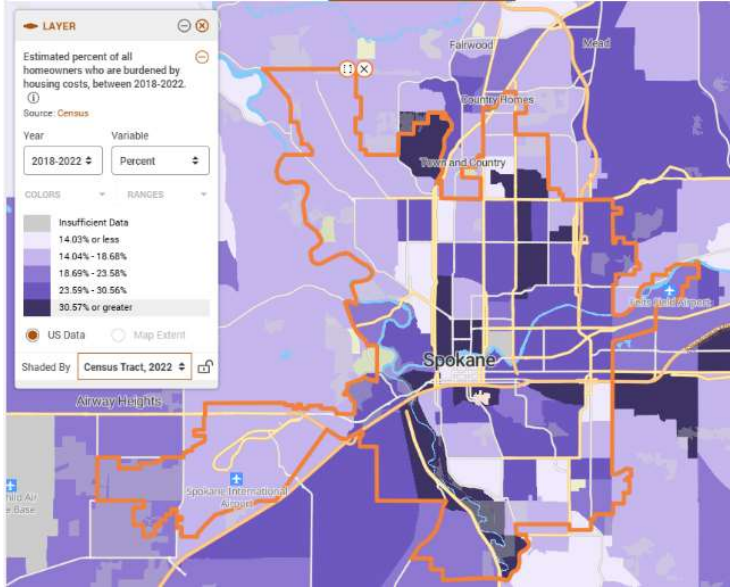
Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities). For owners- housing cost is "select monthly owner costs" which includes mortgage payment; utilities; association fees; insurance; and real estate taxes.
Source: CHAS Data (2016-2020) https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

Homeowners

- 22.7% of homeowner households were cost burdened in Spokane in 2022, with housing costs equal or greater to 30% of household income. Table 53. Again, the range varied greatly by census tract, from 4.7% to 51.7% being cost burdened. Map 42
- 7.9% of owner households were severely housing cost burdened (had housing costs equal to or greater than 50% of household income) (Table 54), ranging from 0 to 31.9% by tract (Map 43).

Table 52 – Owner Households Cost Burdened (paying 30% or more of income on housing costs)			
2013-2017		2018-2022	
Spokane Co.	Spokane	Spokane Co.	Spokane
23.5%	24.6%	21.3%	22.7%

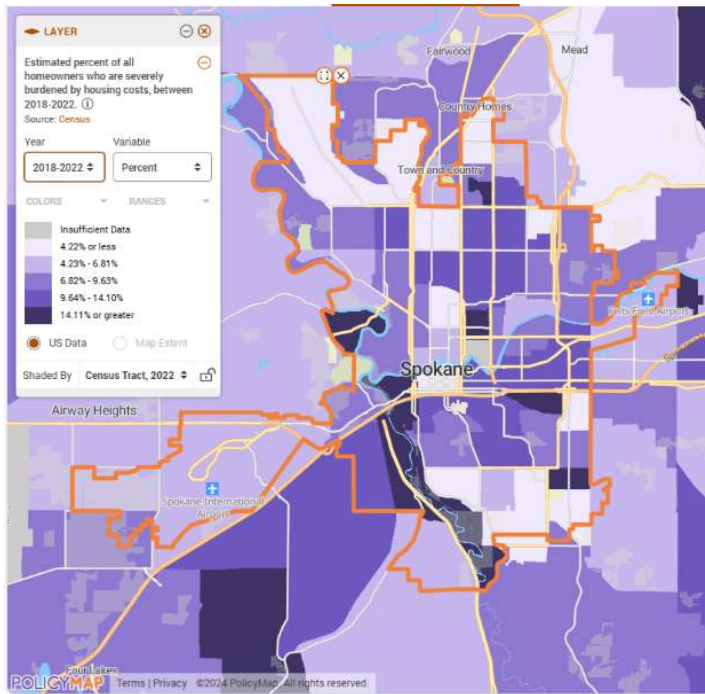
Source: ACS



MAP 42
 Owner Households with
 Cost Burden
 2018-2022

Source: <https://www.policymap.com/newmaps#/>

Table 53 – Percent of all homeowners who are severely cost burdened					
2013-2017			2018-2022		
Spokane Co.	Spokane City	WA	Spokane Co.	Spokane City	WA
8.5%	9.4%	9.3%	7.5%	7.9%	8.9%



MAP 43
 Owner Households with
 Severe Housing Cost Burden

Source: <https://www.policymap.com/newmaps#/>

Table 54 - Income by Housing Cost Burden - Owners - Spokane, WA - 2016-2020 ACS						
Income by Cost Burden (Owners only)	Cost burden > 30%	%	Cost burden > 50%	%	Total	%
Household Income <= 30% HAMFI	2,960	26%	2,335	61%	3,570	7%
Household Income >30% to <=50% HAMFI	2,590	23%	935	24%	4,355	8%
Household Income >50% to <=80% HAMFI	3,535	31%	475	12%	9,065	17%
Household Income >80% to <=100% HAMFI	1,055	9%	25	1%	6,110	12%
Household Income >100% HAMFI	1,195	11%	85	2%	29,000	56%
Total	11,335	100%	3,855	100%	52,100	100%

Cost burden is the ratio of housing costs to household income. For owners- housing cost is "select monthly owner costs" which includes mortgage payment; utilities; association fees; insurance; and real estate taxes.

Source: CHAS Data (2016-2020) https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

Renters

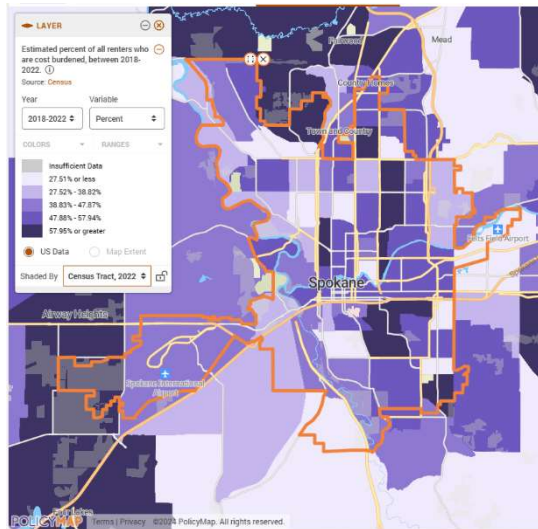
Renters are cost burdened when monthly housing costs including utilities exceed 30% of monthly income, and severely cost burdened when costs exceed 50% of monthly income.

- Half of all renters in Spokane are cost burdened (49.7%). Table 55
- Almost one quarter of all renter households in Spokane in 2022 were severely cost burdened, with gross rent equal to or greater than 50% of household income. Table 57. However, there is huge variation across census tracts, ranging from 0 to 44% of renters who are cost severely burdened. Map 45
- Spokane renter households were slightly more severely-cost burdened than in the County and State. Table 57

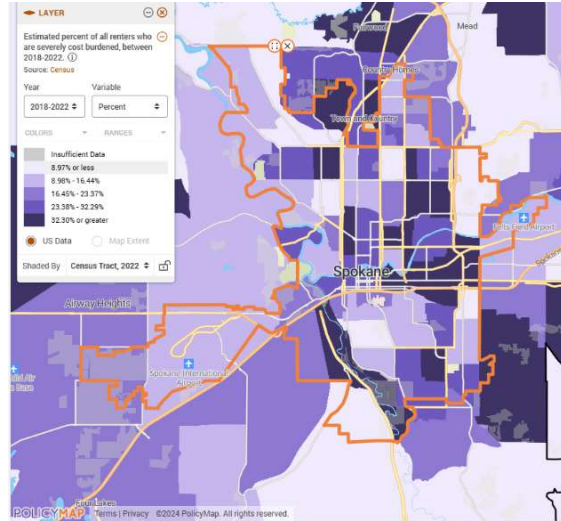
Table 55 - Percent of all renters who are cost burdened					
2013 -2017			2018-2022		
Spokane Co.	Spokane City	WA	Spokane Co.	Spokane City	WA
49.6%	51.4%	46.2%	48.9%	49.7%	46.3%

Table 56 – Percent of all renters who are severely cost burdened					
2013 -2017			2018-2022		
Spokane Co.	Spokane City	WA	Spokane Co.	Spokane City	WA
24.6%	25.8%	21.8%	22.95%	23.2%	21.7%

MAP 44
Renters who are cost burdened
2018-2022



MAP 45
Renters who are severely cost burdened
2018-2022



Source: <https://www.policymap.com/newmaps/>

Table 57 – Income by Housing Cost Burden – Renters - Spokane, WA - 2016-2020 ACS

Income by Cost Burden (Renters only)	Cost burden > 30%	%	Cost burden > 50%	%	Total	%
Household Income <= 30% HAMFI	8,020	42%	7,045	76%	10,310	25%
Household Income >30% to <=50% HAMFI	6,215	32%	1,630	18%	7,625	19%
Household Income >50% to <=80% HAMFI	3,825	20%	425	5%	9,960	24%
Household Income >80% to <=100% HAMFI	495	3%	10	0%	4,125	10%
Household Income >100% HAMFI	660	3%	140	2%	8,955	22%
Total	19,215	100%	9,250	100%	40,975	100%

Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities).

Source: CHAS Data (2016-2020)

https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

Household income is on average higher for homeowners than renters (Table 52), which contributes to renters having higher cost burden rates than owners (47% for tenants compared to 21% for owners in 2020). Table 58

Table 58 - Income of Owners and Renters - Spokane, WA 2016-2020 ACS						
Income Distribution Overview	Owner	%	Renter	%	Total	%
Household Income <= 30% HAMFI	3,570	7%	10,310	25%	13,880	15%
Household Income >30% to <=50% HAMFI	4,355	8%	7,625	19%	11,980	13%
Household Income >50% to <=80% HAMFI	9,065	17%	9,960	24%	19,025	20%
Household Income >80% to <=100% HAMFI	6,110	12%	4,125	10%	10,235	11%
Household Income >100% HAMFI	29,000	56%	8,955	22%	37,955	41%
Total	52,100	100%	40,975	100%	93,075	100%

Source: CHAS Data (2016-2020) https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

The National Low Income Housing Coalition provides an annual analysis of the cost of housing in relation to income. The 2023 *Out-of-Reach* data for the Spokane MSA are shown in Table 59. To afford rent for a 2- bedroom unit, a household would need to earn \$23.04 an hour – 146% of the 2023 Washington minimum wage. Table 59.

Table 59: Housing Costs, Income and Affordability Spokane MSA 2023					
Housing/Income Factor	Bedrooms				
	0	1	2	3	4
Fair Market Rent (FMR) 2023	\$812	\$926	\$1198	\$1703	\$1987
Annual income to afford			\$47,920		
Hourly wage necessary to afford* (Housing Wage)			\$23.04		
Minimum wage in Washington 2023	\$15.74	\$15.74	\$15.74	\$15.74	\$15.74
Housing wage compared to Minimum Wage			\$7.3		
Full-time jobs at Minimum Wage needed to afford			1.5		

Sources: American Community Survey; National Low Income Housing Coalition ([Out of Reach | National Low Income Housing Coalition \(nlihc.org\)](#)).

Table 60 - Spokane County								
Area Median Income (AMI)				Renters				
Fiscal Year 2023 AMI	Monthly rent affordable at AMI: (spending not more than 30% of gross income on gross housing)	30% of AMI	Monthly rent affordable at 30% of AMI	Renter households (2017-21)	% of total households (2017-21)	Estimated hourly mean renter wage (2023)	Monthly rent affordable at mean renter wage	Full-time jobs at mean renter wage needed to afford 2 BR FMR
\$92,100	\$2,303	\$27,630	\$691	76,355	36%	\$18.68	\$971	1.2

Source: National Low Income Housing Coalition ([Out of Reach | National Low Income Housing Coalition \(nlihc.org\)](#)).

Cost Burdens by Race

Describe the **housing cost burden** (e.g., more than 30% of monthly income) and **severe housing cost burden** (e.g., more than 50% of monthly income) experienced by **protected class** groups.

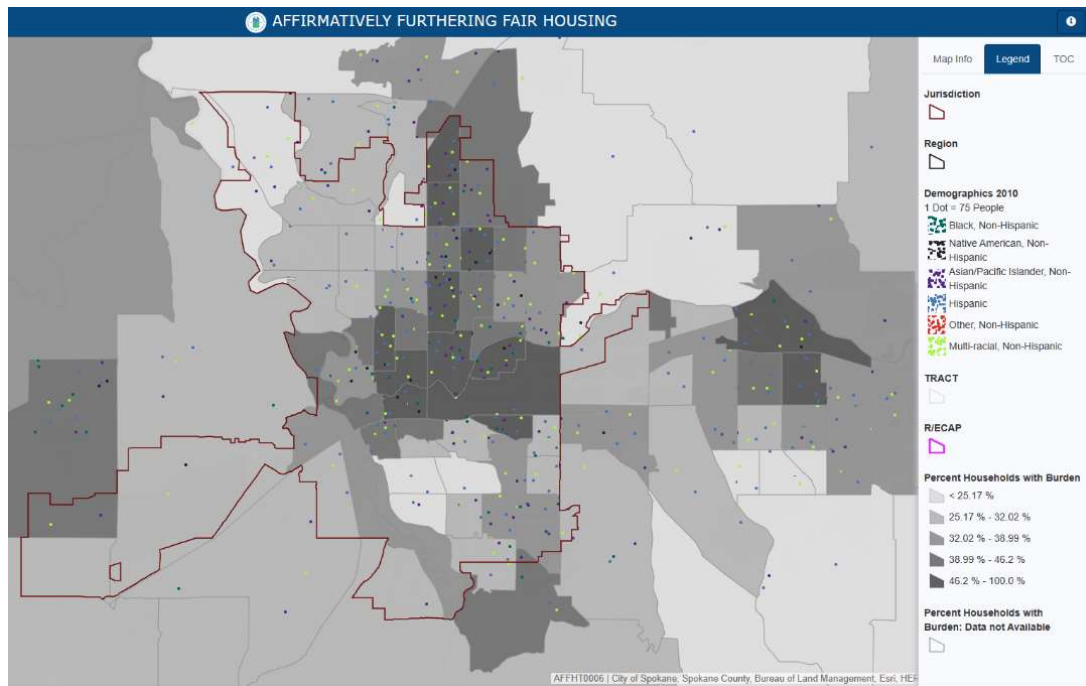
As of 2012-2016 HUD provided data, in Spokane, 16% of white non-Hispanic households had a severe housing cost burden, defined as paying more than 50% of their income for housing.

The rates of severe cost burdened households increased for people of color: 21.4% of Asians and Pacific Islander households, 20.6% of black households, 24.7% of Native American households, and 23% of Hispanic households had a severe cost burden. Table 61.

Overall, 17% of all households in Spokane had a severe rent burden. With rising rents, it is very likely that the percentage of households that have a severe housing cost burden has only increased.

Table 61 – HUD AFFH Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden	(Spokane, WA CDBG) Jurisdiction			(Spokane-Spokane Valley, WA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	12,300	76,135	16.2%	25,580	187,135	13.7%
Black, Non-Hispanic	385	1,873	20.6%	660	3,009	21.9%
Hispanic	780	3,384	23.1%	1,470	6,918	21.3%
Asian or Pacific Islander, Non-Hispanic	520	2,426	21.4%	829	4,219	19.7%
Native American, Non-Hispanic	305	1,235	24.7%	485	2,758	17.6%
Other, Non-Hispanic	520	2,193	23.7%	754	4,607	16.4%
Total	14,810	87,240	17%	29,778	208,660	14.3%
Household Type and Size						
Family households, <5 people	5,134	42,710	12%	10,978	114,854	9.6%
Family households, 5+ people	835	6,425	13%	1,792	17,495	10.2%
Non-family households	8,835	38,115	23.2%	17,029	76,315	22.3%
Note: Severe housing cost burden is defined as greater than 50% of income.						
Note: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note: Data Sources: CHAS (2012-2016)						
Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

MAP 46 HOUSEHOLDS WITH HOUSING COST BURDEN BY RACE (2012-2016)



Source: Map 6 – Race – AFFH Data and Mapping Tool, <https://egis.hud.gov/affht/>
(Data from Comprehensive Housing Affordability Strategy (CHAS), 2012-2016)

Disparities in Housing Quality

Describe disparities in housing quality (i.e., substandard housing conditions) by protected class group and indicate whether such disparities align with previously identified segregated or integrated areas.

Housing Problems

Table 62 provides data identifying instances where “housing problems” or “severe housing problems” exist. Information on housing problems is drawn from CHAS, which demonstrates the extent of housing problems and housing needs, particularly for low-income households. The U.S. Census Bureau produces the CHAS data via custom tabulations of ACS data.

The four housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30%.

“Severe” housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. “Severe” Cost Burden – monthly housing costs (including utilities) exceed 50% of monthly income.³¹

35% of all households, and half of all renter households in Spokane were experiencing at least one of four housing problems as of 2020. Table 62.

17% of all households in Spokane experienced at least one “severe” housing problem. Table 62. The rate was highest for renters at 27%.

Table 62 - Housing Problems - Spokane, WA - 2016-2020 ACS						
Housing Problems	# Owner Households	% of Total Owner households	# Renter Households	% of total Renter households	# Households	% of All Households
Household has at least 1 of 4 Housing Problems	11,675	22%	20,530	50%	32,205	35%
Household has none of 4 Housing Problems OR cost burden not available no other problems	40,430	78%	20,440	50%	60,870	65%
Total	52,100	100%	40,975	100%	93,075	100%
Severe Housing Problems	Owner	%	Renter		Total	
Household has at least 1 of 4 Severe Housing Problems	4,290	8%	11,180	27%	15,470	17%
Household has none of 4 Severe Housing Problems OR cost burden not available no other problems	47,810	92%	29,795	73%	77,605	83%

Source: CHAS Data (2016-2020) https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

³¹Id.

Table 63 – Income by Housing Problems - Spokane, WA - 2016-2020 ACS

Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	%	Household has none of 4 Housing Problems OR cost burden not available no other problems	%	Total	%
Household Income <= 30% HAMFI	11,105	34%	2,775	5%	13,880	15%
Household Income >30% to <=50% HAMFI	9,025	28%	2,955	5%	11,980	13%
Household Income >50% to <=80% HAMFI	7,945	25%	11,075	18%	19,025	20%
Household Income >80% to <=100% HAMFI	1,800	6%	8,435	14%	10,235	11%
Household Income >100% HAMFI	2,325	7%	35,635	59%	37,955	41%
Total	32,205	100%	60,870	100%	93,075	100%
Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	%	Household has none of 4 Housing Problems OR cost burden not available no other problems	%	Total	%
Household Income <= 30% HAMFI	8,135	40%	2,180	11%	10,310	25%
Household Income >30% to <=50% HAMFI	6,435	31%	1,190	6%	7,625	19%
Household Income >50% to <=80% HAMFI	4,340	21%	5,615	27%	9,960	24%
Household Income >80% to <=100% HAMFI	695	3%	3,430	17%	4,125	10%
Household Income >100% HAMFI	925	5%	8,030	39%	8,955	22%
Total	20,530	100%	20,440	100%	40,975	100%
Income by Housing Problems (Owners only)	Household has at least 1 of 4 Housing Problems	%	Household has none of 4 Housing Problems OR cost burden not available no other problems	%	Total	%
Household Income <= 30% HAMFI	2,970	25%	595	1%	3,570	7%
Household Income >30% to <=50% HAMFI	2,590	22%	1,765	4%	4,355	8%
Household Income >50% to <=80% HAMFI	3,605	31%	5,460	14%	9,065	17%
Household Income >80% to <=100% HAMFI	1,105	9%	5,005	12%	6,110	12%
Household Income >100% HAMFI	1,400	12%	27,605	68%	29,000	56%
Total	11,675	100%	40,430	100%	52,100	100%

Source: CHAS Data (2016-2020) https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020

Thirty-seven percent of all households in Spokane were experiencing at least one of four housing problems in 2016 (similar to 35% in 2020 – Table 62), per the most recent HUD provided data by race. Table 64. The percent of white non-Hispanic households experiencing at least 1 household problem was similar, at 36%. Black, Hispanic, Asian / Pacific Islander, and Native American households experienced at least one problem at the following higher rates: 50%, 39%, 48% and 42%. Nineteen percent of all households in Spokane experienced at least one severe housing problem. The rates for white non-Hispanic, Black, Hispanic, Asian / Pacific Islander, and Native American households were: 18%, 25%, 27%, 31%, and 28%. Table 64

Table 64 (HUD AFFH Table 9) ³²						
Demographics of Households with Disproportionate Housing Needs						
Disproportionate Housing Needs	(Spokane, WA CDBG) Jurisdiction			(Spokane-Spokane Valley, WA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	27,295	76,135	35.9%	61,025	187,135	32.6%
Black, Non-Hispanic	945	1,873	50.5%	1,600	3,009	53.2%
Hispanic	1,320	3,384	39%	2,754	6,918	39.8%
Asian or Pacific Islander, Non-Hispanic	1,163	2,426	47.9%	1,926	4,219	45.7%
Native American, Non-Hispanic	525	1,235	42.5%	1,063	2,758	38.5%
Other, Non-Hispanic	989	2,193	45.1%	1,684	4,607	36.6%
Total	32,235	87,240	37%	70,070	208,660	33.6%
Household Type and Size						
Family households, <5 people	12,375	42,710	29%	29,305	114,854	25.5%
Family households, 5+ people	2,755	6,425	42.9%	6,995	17,495	40%
Non-family households	17,115	38,115	44.9%	33,780	76,315	44.3%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	13,880	76,135	18.2%	29,525	187,135	15.8%
Black, Non-Hispanic	460	1,873	24.6%	765	3,009	25.4%
Hispanic	924	3,384	27.3%	1,840	6,918	26.6%
Asian or Pacific Islander, Non-Hispanic	754	2,426	31.1%	1,169	4,219	27.7%
Native American, Non-Hispanic	345	1,235	27.9%	633	2,758	23%
Other, Non-Hispanic	564	2,193	25.7%	882	4,607	19.1%
Total	16,920	87,240	19.4%	34,810	208,660	16.7%
Note: All % represent a share of the total pop. within the jurisdiction or region, except household type and size, which is out of total households.						
Note: Data Sources: CHAS 2012 -2016						

³²See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation*, Data Version AFFHT0004a, March 5, 2019, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research; AFFH Data and Mapping Tool, <https://egis.hud.gov/affht/>

Contributing Factors to High Housing Costs

What public or private policies or practices, demographic shifts, economic trends, or other factors may have **caused or contributed** to the patterns described?

Increasing Housing Demand

Spokane County has an increasing population which is fueling increased demand for housing. A report by The Counselors of Real Estate Consulting Corps® (CRECC), requested by the Spokane Association of REALTORS® (SAR), *Action Steps to Increase Spokane’s Housing Supply*, 12/20/21³³ reported that the County population has grown by over 56,000 people (nearly 12%) since 2010, an average annual rate of 1.09% per year (WA Office of Financial Management (OFM)). The population of the County is projected to increase by almost 50,000 over the next ten years, based on a “medium growth scenario”.

Insufficient Housing Supply

Although the exact shortage is debatable, there is broad consensus among stakeholder interviewees, survey participants, public meeting attendees, and industry³⁴ and City³⁵ reports, that there is insufficient housing supply of all types to meet demand.

Survey Narrative Responses
What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?
<i>More housing in Spokane.</i>
<i>more housing availability</i>
<i>more housing</i>
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Housing availability</i>
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>Not enough inventory</i>

Increasing Housing Costs

Increased demand and insufficient supply have resulted in increased housing costs, making unaffordable housing the primary concern of nearly everyone who provided input for this report.

³³[CRE-Consulting-Corps-Spokane-Housing-Recommendations.pdf \(spokanerealtor.com\)](#)

³⁴The CRECC forecasted that 28,552 more housing units will be needed in the County in the next ten years, an average of 2,855 units per year. However less than 2,300 units per year have been added in the County 2010 – 2021.

³⁵*Spokane Housing Action Plan*, 7/26/21 reported that City is projected to need at least 4,000 additional units through 2037 to support moderate and middle-income households (80-120% of AMI) as well as housing suitable for smaller households, and at least 2,700 additional units for households earning below 80% of AMI. <https://my.spokanecity.org/housing/spokane-housing-action-plan/>

Survey Narrative Responses

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

Affordable housing for the aging population.

find ways to keep housing affordable. It's not affordable now but don't let it double because then they can't afford it even if they can get it.

I'm not informed to answer, except that prices are very high

Nothing for the working poor

Middle class workers can't afford to buy house and barely afford rent. Yet you keep making housing for only low income.

We don't have enough low income housing

Not enough rental units at affordable prices.

Lack of units below market rate and at market rate.

I have been renting a house to a poor immigrant family for several years. I rent it for the cost of the mortgage, taxes and insurance, no profit, at about half market value. (3 bedroom, 2 bath home \$975 a month) At the time I first rented to them, they were on a waiting list for section 8 housing and had been told to expect 1 more years wait. I was very willing to be certified to be a section 8 landlord. But in all these years they have heard nothing and I have not been able to get information as to their status. I try to help people but I myself live on social security. I can no longer afford to keep this house so am having to evict them in order to sell it. The new owners, if they rent it out, will certainly charge close to double or more what I have been asking. So a family of 8 people is desperately looking for a new cheap rental or will soon become homeless.

Lack of qualified low income or affordable housing.

There are many barriers, ... and of course affordability.

If you believe that discrimination occurs in the rental of housing in Spokane, why do you believe it most often occurs?

Housing unaffordability is intrinsically discriminatory, as well.

What are you most concerned about with respect to fair housing opportunity in Spokane?

Prices. Nothing else

There are housing issues mainly caused by supply and demand issues. Also, new house construction regulations that increase the cost to build a home is counter to affordability. Your choices all deal with protected classes which is likely less than 1% of the issues with house people. Fix affordability which is the real issue with housing.

There is no affordable housing, for anyone!

Home Sales

The CRECC report, *Action Steps to Increase Spokane's Housing Supply*³⁶ noted:

- As a result of the housing shortage, home prices have been escalating.
- In the greater Spokane – Spokane Valley market area, housing prices rose 30% during Jul 2020 – Jul 2021. Spokane ranked in the top 20 cities in the nation in one year price growth.
- Housing demand is expected to increase, as the National Association of Home Builders identifies Spokane among the top 20 markets for home price growth, and the National Association of REALTORS® Economic forecast finds Spokane to be among the top 10 Post-Covid Real Estate Market

Table 65 - Housing Sales – September 2022						
	Ave. Sale Price	1 yr. change in Ave. Sale Price	Days on Market to Sell	Ave. Sale price per sqf.	1 yr. change in sale price per sqf.	Ave. offers received
Spokane Co.	\$424,000	+7.3%	20	\$216	+10.2%	

Data source: <https://www.redfin.com/city/3067/WA/Cheney/housing-market>

Survey Narrative Responses
I believe I have been illegally discriminated against while attempting to purchase a home in Spokane.
<i>We would love to be able to purchase a home, but the housing costs here are astronomical, even at our income level. Given that protected classes make considerably less than their white, straight, cis (especially male) counterparts, the lack of real action to make sure that safe, affordable places to live are available for all walks of life is absolutely discrimination against protected classes.</i>
Who can purchase anymore? NOT ME
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>Interest rates are too high for people to afford prices, that are driven up by false county values.</i>

In turn, increased real estate values lead to higher property tax and insurance rates.

Survey Narrative Responses
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>The increased tax rate in Spokane is making housing unaffordable</i>
I have had difficulty obtaining homeowner's insurance in Spokane because of my protected class (race, national origin, disability, etc.)
<i>Unable to obtain affordable home insurance. Something needs to be done about the outrageous cost of INSURANCE. And TAXES!! Who can afford to rent/own, buy food and pay utilities.</i>

³⁶[CRE-Consulting-Corps-Spokane-Housing-Recommendations.pdf \(spokanerealtor.com\)](https://www.crecc.com/CRE-Consulting-Corps-Spokane-Housing-Recommendations.pdf)

Rising Rents and Fees

As real estate values and costs increase, housing providers are increasing rents and rental fees, both of which are primary concerns for tenant advocates and tenants, shared through surveys, interviews, and public meetings. Interview and public meeting comments received included:

- People are being economically evicted. Where are they going to go?
- Seniors on fixed incomes are impacted more by rental increases. Minimum wage goes up every year, rents go up, but senior's income doesn't go up as much. Seniors are having to return to work as they can't make it on social security. There is now a foodbank at one senior housing complex in Spokane.
- Childcare is expensive. Childcare and rent can take up most of a person's income.
- The notice period to increase rents is too short for high rent increases.
- Huge rent increases are occurring at properties operated by non-profits,
- Rent increases are occurring even at senior and low-income tax credit properties.
- Rent increases are happening to people on fixed incomes that don't go up when rents go up – how can this continue?
- It is nearly impossible to come up with first and last month's rent, and a deposit.
- One public meeting attendee shared that their rent increased by \$500 and they are having to move.

Selected Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Landlords raising the cost of rent outside of what a tenant with disabilities can afford.</i>
<i>Rising rent amounts</i>
<i>Landlord rent hikes</i>

Increased Fees and Move-In Costs

Along with increasing rents, there is wide concern about high application, move-in, administrative, and other fees. Comments received included:

- Move-in fees are excessive
- Small non-profits can help people with rapid rehousing, but a \$500+ administrative fee, or \$6,000 deposit limits the number of people that can be served
- Excessive fees are being added because of efforts to pass rent stabilization legislation
- Move-in costs should be limited to one month's rent
- Garbage valet fees of \$100 are being charged to take tenant garbage to the dumpster, without an option to opt out of the fee and take garbage to the dumpster themselves
- Zillow has a \$35 one-time fee for an application good for 30 days. But not all housing providers advertising on Zillow accept it, so applicants then have to pay additional application fees.

Survey Narrative Responses

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

Requiring 3 months rent plus \$50 to \$75 credit report is a financial burden many find impossible to gather, especially when deposits are not returned by the previous landlord.

landlords will charge an administrative fee that is non-refundable as well as ask a prospective tenant for a larger deposit or ask for first month and last month's rent up front.

costly application fees causes low income individuals to not afford application process for affordable housing

Excessive application fees

Many landlords work with online systems to apply and screen tenants - Also - these programs seem to also charge additional "fees". Landlords are asking upwards of \$3000 or more for move in costs plus nonrefundable \$200+ fee's. This is incredibly burdensome to someone who is homeless and trying to survive on limited income.

Accepting application fees and declining an application d/t negative hx that was fully disclosed prior to application.

Landlords frequently hold one time for people to view the property and gather background applications and checks from everyone at that showing. No one gets their money returned and one applicant is chosen.

The utility shared cost that is never the same it is split between households. It changes every month and the companies are hiring a third party to do the billing and figure out the costs.

administrative fees

Some agencies tack on extra charges when you move out of a unit and never tell you. before you know it you have all these charges in collections without ever knowing what they are for or where they originated.

Requiring 3 months rent plus \$50 to \$75 credit report is a financial burden many find impossible to gather, especially when deposits are not returned by the previous landlord.

we allow Landlords the option to request large amounts of money upfront to even apply for housing. I don't see how requesting double security, or require 3x the income to rent is not income discrimination?

There are many barriers, application fees, first, last, deposit...

Investor and For-Profit Owned Rental Housing

Several people who provided input for this report attributed rising rents to investor and non-profit businesses operating rental housing for profit.

One interviewee cited for-profit entities operating tax credit properties, the most prevalent type of affordable housing in Spokane, as being subject to rent increases, not stable, and not affordable.

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Too many units are owned by investors. They can squeeze out individuals at every level of the market. Put a limit on how many rentals can be owned by the same person or group of investors in any corporate guise. There is no free market presently, it is dominated by a series of monopolies.</i>
<i>the lack of laws preventing large corporations from buying up houses for sale and turning them into high-priced rentals, is a huge problem</i>
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>monopolizing of rentals, cash buy-out of homes on the market by brokers or corporations</i>
<i>It's a lot of developers outbidding families and flipping houses to be extravagant rentals along with never-ending rental hikes and a seller's market that just keeps going up. We have a practice of just allowing people with money to do whatever they want at the expense of people with less. And that creates desperation so if someone finds a place they can kind of afford, they jump on it even though they may no longer be able to afford it in 6-12 months.</i>
<i>Housing costs are exorbitantly expensive due to people buying homes to make money off of and not live in. Wages haven't kept up with housing costs. By definition housing cannot be fair under those conditions</i>

Access to Homeownership and Economic Opportunity

Homeownership

- Which protected class groups experience significant **disparities in access to homeownership opportunities**?
- What are the **homeownership rates by protected class**?

There were more owner-occupants than renters in Spokane (57.5% owner-occupants and 42.5% renters) according to 2018-2022 ACS estimates. Table 66

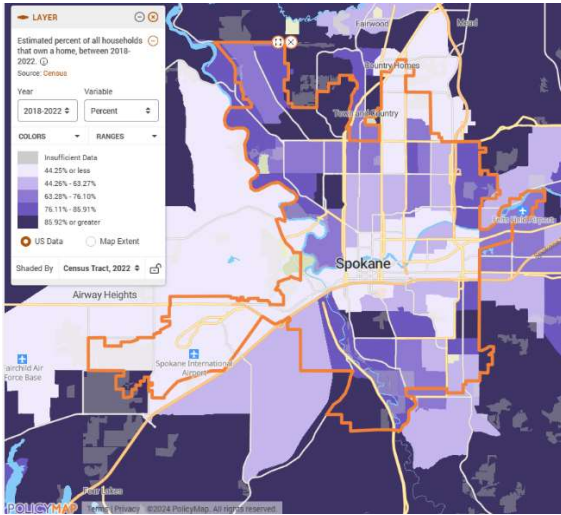
The numbers of rental or owner households vary significantly by neighborhood. Maps 47 & 48

Table 66: Tenure Occupied Units												
Prop Type	2013-2017						2018-2022					
	Spokane		Spokane Co.		WA		Spokane		Spokane Co.		WA	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent
All units	54.7%	45%	62%	37.6%	62.7%	37%	57.5%	42.5%	63.8%	36%	64.2%	35.8%
Sing. family*	80%	20%	74%	26%	81%	19%						
2-4 units	10%	90%	10%	90%	12.7%	87%						
5 or + units	4%	96%	4%	96%	11%	89%						
Mob Hm., other	76%	24%	88%	12%	75%	25%						

*Detached and attached

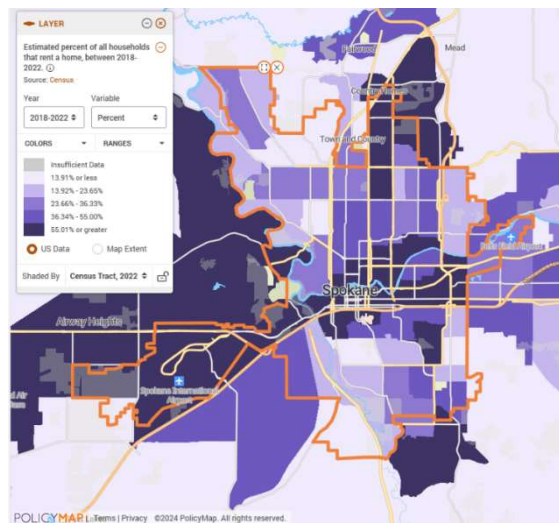
Source: U.S. Census Bureau, 2013-2017 & 2018-2022 AC Survey 5-Yr Estimates

MAP 47 – Owner Households Units



Source: PolicyMap, ACS 2018-2022

MAP 48 – Renter Occupied Housing Units



Owner Households	
53063000301	71%
53063000302	78%
53063000800	89%
53063001100	90.4%
53063001500	72.9%
53063004200	87.5%
53063004300	85%
53063004500	84.3%
53063004602	90.8%
53063004701	78%
53063010701	97.6%
53063011204	68%

% Renter Households:	
53063000400	55.8%
53063001800	56.3%
53063002400	86.9%
53063002501	76.7%
53063002502	70.4%
53063002503	100%
53063003200	72%
53063003500	95%
53063003602	86.3%
53063004001	59.6%
53063004002	68.3%
53063004601	63.4%
53063005000	55.7%
53063011102	69.7%
53063011103	77.2%
53063011104	73.7%
53063014500	70.4%
53063011203	75.4%

Homeownership / Rentals by Race

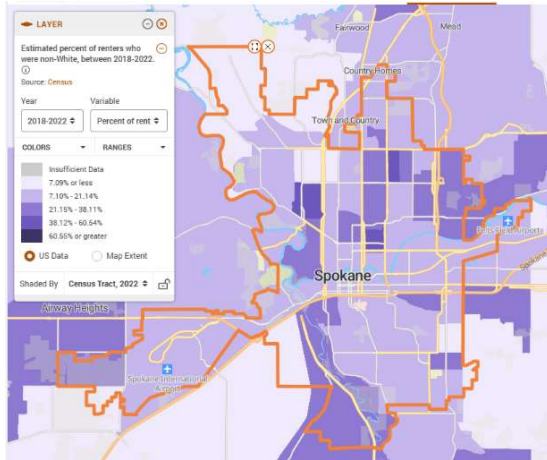
- Native Hawaiian and Other Pacific Islanders have the lowest homeownership rate in Spokane (20.8%). Table 67
- Black and African Americans have the second lowest homeownership rates in Spokane (30%), Spokane (31%), and WA (34%). Table 67
- Whites have the highest ownership rate (60%)

Table 67 - Estimated percent of all owner householders by Race						
	2013-2017			2018 – 2022		
	Spokane Co.	Spokane	WA	Spokane Co.	Spokane	WA
Race / Ethnicity	% own	% own	% own	% own	% own	% own
Hispanic or Latino	40.8	36.6	42.9	38.6	41.1	46.4
White alone	64.5	57	66	66	59.6	67.6
Black or African American alone	26.8	26.8	31.5	30	31.9	34
American Indian and Alaska Native alone	38.7	38.9	51.4	41.3	43	54.2
Asian alone	52	43.9	60.9	61.3	57.6	62.5
Native Hawaiian and Other Pacific Islander alone	13	6	33.8	17.3	20.8	34

Source: US Census: ACS Year Estimates

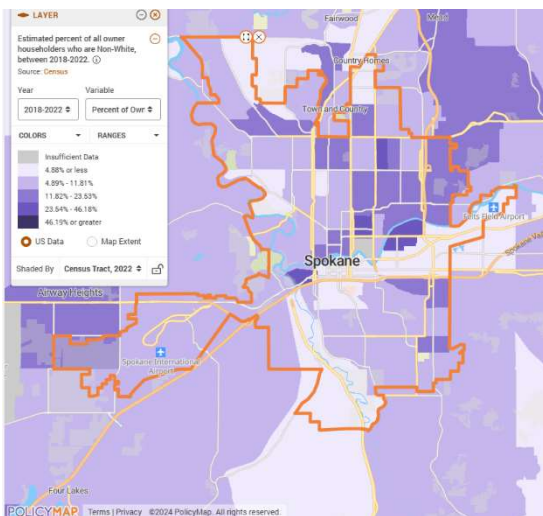
Conversely, non-white and Hispanic/Latino populations in Spokane have higher renter rates than whites. Table 68.

Table 68 - Estimated percent of renters by Race						
	2013-2017			2018 – 2022		
	Spokane Co.	Spokane	WA	Spokane Co.	Spokane	WA
Race / Ethnicity	% rent	% rent	% rent	% rent	% rent	% rent
Hispanic or Latino	59.2	63.5	57.1	58.9	61.8	53.6
White alone	35.5	42.9	34	34	40.45	32.4
Black or African American alone	73.2	73.2	68.5	70	68	66
American Indian and Alaska Native alone	61.4	61.1	48.6	58.7	56.9	45.8
Asian alone	48	56	39	38.7	42.4	37.5
Native Hawaiian and Other Pacific Islander alone	87	94	66.2	82.7	79.2	66



Map 49
Estimated percent of renters who were non-White, between 2018-2022.

Source: PolicyMap, 2018-2022 ACS



Map 50
Estimated percent of all owner households who are Non-White, between 2018-2022.

Source: PolicyMap, 2018-2022 ACS

Access to Home Mortgage Financing ***Home Mortgage Disclosure Act Data***

Home Mortgage Disclosure Act, or HMDA, data consists of information about mortgage loan applications for financial institutions, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data are available for home purchases, loan refinances, and home improvement loans. HMDA data can provide a picture of how different applicant types fare in the mortgage lending process. This data can be used to identify areas of potential concern that may warrant further investigations. For example, by comparing loan approval rates of minority applicants with non-minorities that have similar income and credit characteristics, areas of potential discrimination may be detected.

The Federal Reserve is the primary regulator of compliance with fair lending regulations. When federal regulators examine financial institutions, they use HMDA data to determine if applicants of a certain gender, race or ethnicity are rejected at statistically significant higher rates than applicants with other characteristics. The Federal Reserve uses a combination of sophisticated statistical modeling and loan file sampling and review to detect lending discrimination.

Financial institutions are required to report HMDA data if they have assets of more than \$32 million, have a branch office in a metropolitan area, and originated at least one home purchase or refinance loan in the reporting calendar year. Mortgage companies are required to report HMDA if they are for-profit institutions, had home purchase loan originations exceeding 10 percent of all loan obligations in the past year, are located in an MSA (or originated five or more home purchase loans in an MSA) and either had more than \$10 million in assets or made at least 100 home purchase or refinance loans in the calendar year.

Loan Origination and Denial Rates

Table B-2 (See Appendix B) shows the disposition of 48,413 aggregated applications made in 2021 for all types of home mortgage loans (including FHA, FSA/RHS, VA, conventional and refinance loans) in the Spokane – Spokane Valley MSA (includes City of Spokane). Information on race and ethnicity was collected for some applications but was not collected in the case of 9,611 applications. The number of applications with unreported race or ethnicity was much higher than any non-white race or ethnicity. Numbers of non-white and/or Hispanic applications were much smaller than white non-Hispanic applications.

Overall, white applicants made up 76.1% of all applications, and had loan origination and denial rates of 70.4% and 10.4%. Black and African American applicants made up 1.2% of applications and had the lowest origination rate (55.3%) and highest denial rate (18.1%). All other reported races also had lower origination and higher origination rates than whites: American Indian / Alaskan Native (63.5% and 13.5%); Asian (62.2% and 13.5%); Native Hawaiian / Pacific Islander (66.7% and 14.3%). Hispanic and Latino applications made up 2.3% of all applications and had origination and denial rates of 61.6% and 13.7%.

When applications are separated by income of applicant, racial disparities were still evident. See Appendix B, Tables B-3 – B-5.

Local and State Policies and Practices Impacting Fair Housing

How do local laws, policies, ordinances, and other practices impede or promote **the siting or location of affordable housing** in well-resourced neighborhoods? What is the relationship between those laws, policies, ordinances, and other practices and the segregated or integrated areas?

How do local laws, policies, ordinances, and other practices impede or **promote equitable access to homeownership and other asset building and economic opportunities** by protected class group?

How have existing **zoning and land use policies or ordinances, the presence or lack of source of income anti-discrimination laws, eviction policies and practices**, and other State and local policies or practices contributed to patterns of segregation and integration, as well as access to affordable housing opportunities in well-resourced areas throughout the geographic area of analysis for protected class groups?

Zoning and Land Use Policies

Zoning and land use issues were frequently raised by survey participants and stakeholder interviewees, with broad consensus that zoning changes are needed to allow for more housing choices.

Missing Middle

In July 2022 Spokane enacted an interim Building Opportunity and Choices for All (B.O.C.A.) ordinance to allow for immediate “Middle Housing” development while the City worked on making permanent Comprehensive Plan and Development Code changes. The purpose was to increase housing choice and diversity in the city by supporting middle housing development. Permanent code changes (Building Opportunity for Housing (B.O.H.)) were approved by the City Council in November 2023. B.O.H. allows design standards for single-unit detached homes and Middle Housing developments, does not require parking for residential uses within ½ mile of a transit stop, has no lot density maximums for lots less than 2 acres in size, reduced lot size minimums, expanded the Unit Lot Subdivision process to allow for greater site flexibility, implemented footprint and impervious surface maximums, and increased building height and reduced front and rear setbacks for some zones.

In 2023, over 35,000 building permits were approved in Spokane. The city has approved more building permits in the last three years than ever before, across the board. In the first three months of 2023, there was a 30% increase in permits for single-family homes and nearly 23 % increase in permits for multi-family housing projects. The increase in permits is in part attributed to “Building Opportunities for Housing” or B.O.H which expanded the types of allowed developments.

Stakeholder interviewees had varying opinions about the City’s recent efforts to expand Middle Housing. Some were very supportive, but believe it needs to be expanded to:

- Include an affordability requirement
- Allow and incentivize smaller developments, such as 6-plexes, which are harder to build cost-effectively than larger multi-family complexes

Some tenant advocates are concerned with displacement of tenants that can occur if affordable housing is demolished to make way for B.O.H. development. They believe that:

- affordable housing will be lost and replaced by higher rent units
- housing that typically has lower barrier background screening policies will be eliminated and replaced by developments that utilize more stringent screening criteria and check criminal history
- remodels, demolition, and building of ADUs allows tenants to be terminated with no cause notice and displaced.
- a right of first return should be required for displaced tenants
- there is a need to open zoning for more larger multi-family housing, not just B.O.H. type housing

Survey Narrative Response

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

...Allow more types of housing, the middle housing and other new code amendments are a good start. Allow tiny house courts, places for those in vehicles to park safely with services, allowing more than 6 unrelated persons to live in a home - provided there is adequate space, modular housing where separate residences share kitchens and bathrooms, allow temporary shelters in people's yards.

One survey participant said that permitting process, fees, and costs are a barrier to developing ADUs:

Survey Narrative Response

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

The process to get a building permit, etc. for new construction or remodeling to allow for additional units is ridiculous and expensive. The zoning was changed to allow for ADU's but the simplest one for just the fees to apply is expensive, not to mention to application forms are difficult to complete when you don't have a person who knows how to draw, the professionals who do it are expensive. The desire for the ADU's are noble, the process is cost prohibitive.

Mixed Use/Income/Space Housing

There is a desire and need for increased mixed use, mixed income, and mixed-use housing. Such housing would owners, renters, low- and high-income households, seniors, and families with children to interact, with walkable neighborhood development and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries. This “Community Model” of housing allows people “to thrive, not just survive” as one stakeholder said.

A barrier to developing housing in and near grocery stores is zoning laws which limit commercial development in residential only neighborhoods.

Another concern is that land which the City may have available to develop may be under long-term contracts, during which time it may be difficult to change to mixed-use.

“Social housing” was suggested by several interviewees and survey participants as a desirable mixed-income housing model, where everyone pays 30% of income, regardless of income.

Survey Narrative Response
What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?
<i>social/public housing</i>
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>Lack of social housing</i>

Siting of Affordable & Permanent Supportive Housing

Much of Spokane’s affordable housing and permanent supportive housing development has been concentrated downtown, in part due to zoning, available property to build, and central access to social services.

However, such “clustered housing” as described on one interviewee, can put people recovering from substance use disorder near those currently using and make it difficult to escape a cycle of relapse, a serious concern especially amidst the fentanyl epidemic.

Scattered Site Housing

Multiple stakeholders interviewed expressed the need for increased scattered site affordable housing. Scattered site housing allows people more options for neighborhood access and deconcentrates people with low incomes from only living near each other. Scattered site housing also enables people to have different housing experiences besides large apartment building living, access different neighborhoods, and also thereby increase equity in school systems.

Rent Stabilization / Rent Control

Public meeting attendees, stakeholder interviewees, and survey responders frequently identified concerns with the lack of laws to ensure rent stabilization or limit rent increases.

Rent control has been illegal under Washington State Law for 40 years:

No city or town of any class may enact, maintain, or enforce ordinances or other provisions which regulate the amount of rent to be charged for single-family or multiple-unit residential rental structures. RCW 35.21.830

Rent stabilization initiatives typically include establishing longer notice periods for housing providers to increase rents. In 2024 a bill was introduced in the WA Legislature that would have increased the notice time for rent increases; the bill passed the House but not the Senate. In April 2024 an ordinance was introduced in the Spokane City Council to increase the notice time for rent increases.

Some tenant advocates say that rent stabilization is needed to even the playing field, that providing rent stabilization is similar to a 30-year fixed rate mortgage available to homeowners,

as well as tax exemptions for homeowners. Landlords often oppose rent stabilization as they say they cannot accurately predict future expenses.

Survey responders shared the following narrative comments:

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Lack of rent control</i>
<i>No limit on the amount and frequency of rental increases.</i>
<i>Lack of stabilized rents</i>
<i>No limits to raising rent/ housing prices</i>
<i>No cap on rent amount increase.</i>
<i>The lack of a rent cap here</i>
<i>Unlimited Increases in rent.</i>
<i>no rent-cap</i>
<i>I'm not well read on rent control policy/practice, but everyone knows minimum wage and even middle-class earnings averages do not keep up with inflation, and specifically the artificial/extreme inflation in rent costs and home purchase prices. The market needs different regulation policies to put people's housing stability ahead of rent/mortgage profits.</i>
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>My concern is landlords raising prices on rent to unaffordable amounts without limits to inflation or other standards. Multiply the rate by number of units and you see the greed!! Subsidies should not try to keep up with greedy landlords either..</i>
What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?
<i>Control raises in rent by corporate owners.</i>

Source of Income Anti-Discrimination Laws

WA Residential Landlord Tenant Act – Source of Income Protection

Source of income discrimination was prohibited by a 2018 WA state legislative amendment to the WA Residential Landlord Tenant Act (RLTA)³⁷, which took effect on September 30, 2018. It applies to all landlords covered by the WA RLTA, and unlike the FHA and WLAD, does not have exemptions for small landlords.

“Source of income” includes benefits or subsidy programs including: housing assistance, public assistance, emergency rental assistance, veterans’ benefits, social security, supplemental security income or other retirement programs; and other programs administered by any federal, state, local, or nonprofit entity. Income derived in an illegal manner is not protected.

A landlord may not refuse to rent based on source of income of an otherwise eligible prospective or current tenant unless: the source of income is conditioned on the property passing inspection; a written estimate of the cost of improvements necessary to pass inspection is more than \$1,500; and the landlord has not received moneys from the landlord mitigation program

³⁷ RCW 59.18.255.

account (established by the WA Legislature in 2018 and administered by the WA Department of Commerce) to make the improvements. If a landlord requires a certain threshold level of income, any source of income in the form of a rent voucher or subsidy it must be subtracted from the total of the monthly rent prior to calculating if the income criteria have been met.

Like the FHA and WLAD prohibitions with respect to their protected classes, the RLTA prohibits the following practices, if based on source of income:

- Expel from real property;
- Make any distinction, discrimination, or restriction in price, terms, conditions, fees, or privileges relating to the rental, lease, or occupancy of real property or in the furnishing of any facilities or services in connection with the rental, lease, or occupancy of real property;
- Attempt to discourage the rental or lease of real property;
- Assist, induce, incite, or coerce another person to commit an act or engage in a practice that violates this section;
- Coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of having exercised or enjoyed or having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected under this section;
- Represent that a dwelling unit is not available for inspection or rental when the dwelling unit in fact is available for inspection or rental; or
- Otherwise make unavailable or deny a dwelling unit that, but for source of income, would be eligible to rent;
- Publish, circulate, issue, or display, or cause to be published, circulated, issued, or displayed, any communication, notice, advertisement, or sign of any kind relating to the rental or lease of real property that indicates a preference, limitation, or requirement based on any source of income.

There is no government agency that enforces the source of income protections the WA Residential Landlord Tenant Act (RLTA). A rental applicant or tenant with a claim for source of income discrimination must file a civil action in WA Superior Court. This will usually require that a complainant retain an attorney with the legal knowledge to do so. A person found by the Court to have violated RCW 59.18.255 shall be liable in a civil action for up to 4.5 times the monthly rent of the real property at issue, court costs and reasonable attorneys' fees.

Despite having state legal protection, source of income complaints were frequently reported by interviewees and survey participants. Survey participants made the following narrative comments related to source of income discrimination:

Survey Narrative Responses Re: Vouchers
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Landlords not accepting vouchers</i>
<i>Once vouchers increase in price, the average rent amounts also increase. There was a short amount of time with the Emergency Housing Vouchers (EHV's) where it was easy enough to find an apartment with a voucher but unfortunately rent is increasing too rapidly. Part of the issue of access to housing is how exceedingly difficult it is to obtain a Housing Voucher due to SHA being so far behind year round. Someone may have their voucher but then payments aren't being made by</i>

SHA in a reasonable amount of time. Let alone the inspection times which used to only be about a week but have since increased. The voucher renewal process usually results in "lost paperwork" and extreme delays jeopardizing people maintaining their housing. It is astonishing how SHA remains unchecked so often when it comes to providing timely service to the community. I have seen many people lose housing opportunities and current housing due to their poor organization, paperwork, and processes. All of the above reasons cause landlords to not want to accept vouchers. Much of the time, they will say people are denied for credit even though they had already passed once they find out a voucher is involved. This is both due to SHA's poor practices and a bias landlords have towards voucher holders.

Landlords still regularly screen out potential tenants with housing vouchers, intentionally price units just outside of the voucher payment standard

I know certain apartments create loopholes to deny section 8 vouchers among many other tricks to discourage protected classes from applying and gaining housing.

Denial of housing vouchers by landlords.

I have also noticed that as SHA raises their budgets for the voucher, landlords raise their rents to above the budget, even if the unit is not "worth" that much. I feel this is to intentionally dodge Voucher Holder's leasing up their premises.

voucher, sources of income

If you believe that discrimination occurs in the rental of housing in Spokane, on what bases do you believe that discrimination is most often based on?

Voucher

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

Most commonly the folks we're trying to help rent a place with a voucher hear that the place doesn't take Section 8 vouchers or will be discouraged from applying if they have a voucher because management / landlords tell them they won't be approved for the place when other folks don't have vouchers.

I believe I have witnessed illegal discrimination by someone in my industry against someone attempting to rent a dwelling unit, because of their protected class.

A property manager telling tenants they would not take section-8

Income discrimination (we don't work with vouchers etc)

I have been discriminated against because I am on housing.

I tried to help a friend find an apartment and he was openly told by landlords that they don't take vouchers.

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

Landlords denying tenancy to someone with a Section 8 voucher unless they also have a co-signer. They indicated all tenants with low income are required to have a co-signer, but this person's rent voucher does not seem to have been included in their income calculation. They are not refusing the rent subsidy. They are claiming the person's income is not high enough.

I have specifically called on a private landlord's home to rent for a voucher holder and was told "I will not rent to anyone with a voucher." I reported this, but because my client (who was homeless and desperately seeking housing) didn't want to fight for the unit, there was nothing that could be done. Landlords are able to say these things and get away with it, especially private one's

What are you most concerned about with respect to fair housing opportunity in Spokane?

Discrimination include ... and landlords discriminating against vouchers

Survey Narrative Responses – Source of Income – Not Specific to Vouchers

What are you most concerned about with respect to fair housing opportunity in Spokane?

Several landlords refuse payments from agencies paying deposits or first month rent. They know they are required to accept Section 8 vouchers, but they don't think the law protects source of income for move-in costs. If the agency pays via "promisory note" or "intent to pay letter" for a check to be mailed after lease signing, they will say payment was not received and block the person from signing the lease. Several of our clients had units approved but rented out from under them because landlord didn't think the promisory note counted as payment. Landlords used to accept these more readily. We think they are doing it on purpose as a way to avoid renting to homeless or disabled people who need rental assistance programs. Some of our clients were so desperate to get keys, they borrowed large sums of money from friends or family instead of waiting for the agency to address the problem with landlord. Landlord knew we were arranging payments but they chose to put high pressure on the applicant instead of calling us about the problem. Then they claimed they did nothing wrong because "client came up with the payment". They did, but it wasn't fair since they are on limited income with financial assistance available.

Discrimination include income, ...

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

income source discrimination

Usually based on source of income - refusal to accept assistance by the landlord.

Native American tenants who pay rent with tribal per capita payments.

I believe I have been illegally discriminated against while attempting to purchase a home in Spokane.

Source of income, self employed

I believe I have witnessed steering to a particular area of Spokane, neighborhood, or housing complex, by a person in my industry, because of protected class.

Yes, but source of income and parts of town that are more affordable

Application process where my clients have been discriminated on income

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

source of income such as SNAP, etc

income source

we have received complaints of discrimination based on ... income source ...

Refusal of Rental Assistance

For a time, rental assistance became widely available during the coronavirus pandemic. However, many survey participants and interviewees reported that landlords did not always accept it. While such payments would seemingly be covered by the WA source of income protections, it is believed by some that a housing provider does not have to accept rental assistance if a condition of acceptance is making changes to the rental agreement, such as agreeing to retain the tenant for a specified amount of additional time.

Stakeholders cited examples of landlords refusing rental assistance offered for seasonal workers during slower winter months, which impacts migrant populations.

Survey responders shared the following comments:

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>A refusal to accept rental assistance by landlord and a lack of enforcement from the Courts.</i>
<i>Landlords refusing to accept rental assistance for tenants</i>
<i>landlords refusing rental assistance</i>
<i>Landlords saying they will not accept promissory notes from housing service agencies. We have clients with deposit assistance who are not allowed to use it by certain landlords. They claim it is not income discrimination. They claim the applicant is welcome to go to the bank to get cash from whatever source of income they have. The problem is that most people on SSI or SSD don't have any savings, let alone \$2000-3000 savings for full month rent and deposit. We point out they qualified for rental assistance due to having a qualifying disability for the rental assistance program. Some landlords back down and accept payment when we write a formal accommodation request letter, but others have said "it is discrimination to treat the disabled person differently from other people that pay with cash." They claim it is not discrimination because some disabled people really are able to go to the bank to get the money. They think someone in a rental assistance program should be in the same financial situation as a disabled person that has a job or trust fund. The landlord sees this as a legal opportunity to avoid low-income renters that may be homeless, mentally ill or disabled.</i>
<i>Too many landlords refuse rental assistance</i>
What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?
<i>Agencies being able to pay by credit card or check immediately without waiting on a payment to be processed later would bypass landlord's concerns about waiting on payment. They claim to "not trust agencies" to honor payment. A centralized funding system for all rental assistance to be distributed by an entity that guarantees payment, instead of making individual housing specialists responsible for handling payments that landlords don't trust. And speeding up the time it takes for an agency to pay. Instead of mailing a check in 1-2 months, they should guarantee payment within 5-10 business days. This would help us out a lot.</i>

Eviction Laws and Practices

An eviction can keep people from being able to access housing again. Survey participants identified negative rental history and evictions as barriers to housing access:

Survey Narrative Responses
If you believe that discrimination occurs in the rental of housing in Spokane, on what bases do you believe that discrimination is most often based on?
<i>eviction history</i>
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>previous evictions</i>
<i>previous evictions are also a major barrier to moving people out of houselessness to housing.</i>
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
<i>I am a caseworker and many of my clients experience unfair rental practices through leases that are unregulated by law</i>
<i>i have clients that are illegally evicted daily.</i>

Eviction Filings

As of 2018, pre-coronavirus pandemic, Spokane County had 1440 eviction filings, with a rate of 3.95 per day, for a filing rate of 1.9%. This was a higher filing rate than the State of WA (1.5%), as well as a higher rate of households threatened (1.9%) compared to 1.4% for the State. Graphic 9. Spokane County has consistently had a higher eviction rate than the State, from 2000 to 2018. Table 69.

Graphic 9: Evictions Filed - Source: Eviction Lab

Washington		2018		Spokane County		2018	
44.36		1.52%¹		3.95		1.94%¹	
Filings per Day		Est. Filing Rate		Filings per Day		Est. Filing Rate	
Eviction Filings	16,190 ²			Eviction Filings	1,440 ²		
Households Threatened	15,381 ³			Households Threatened	1,408 ³		
Households Threatened Rate	1.44% ⁴			Households Threatened Rate	1.9% ⁴		

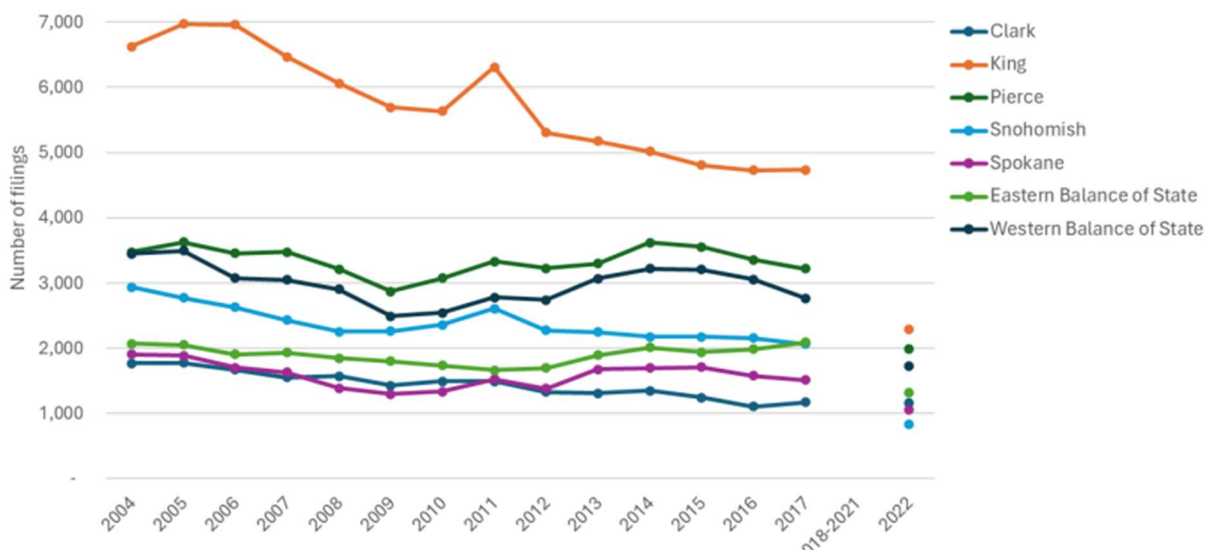
Table 69 - Evictions, 2000 – 2018						
Year	Geo	Filings-per-day	Eviction-filing-rate	Geographic	Filings-per-day	Eviction-filing-rate
2000	WA	48.23	2.19	Spokane Co.	3.84	2.49
2001	WA	52.15	2.33	Spokane Co.	4.16	2.64
2002	WA	51.55	2.26	Spokane Co.	3.72	2.32
2003	WA	54.67	2.36	Spokane Co.	3.72	2.29
2004	WA	61.36	2.61	Spokane Co.	5.23	3.17
2005	WA	62.42	2.6	Spokane Co.	5.18	3.08
2006	WA	59.14	2.43	Spokane Co.	4.68	2.74
2007	WA	56.73	2.29	Spokane Co.	4.49	2.58
2008	WA	53.09	2.12	Spokane Co.	3.82	2.17
2009	WA	49.56	1.94	Spokane Co.	3.56	1.99
2010	WA	50.33	1.94	Spokane Co.	3.65	2.01
2011	WA	54.43	2.07	Spokane Co.	4.19	2.27
2012	WA	49.34	1.85	Spokane Co.	3.78	2.02
2013	WA	51.58	1.9	Spokane Co.	4.61	2.42
2014	WA	55.42	2.01	Spokane Co.	4.65	2.42
2015	WA	55.53	1.99	Spokane Co.	4.7	2.41
2016	WA	50.85	1.8	Spokane Co.	4.35	2.2
2017	WA	49.84	1.73	Spokane Co.	4.15	2.07
2018	WA	44.36	1.52	Spokane Co.	3.95	1.94

Source: eviction-lab.pdf

Eviction filings in 2020 to 2021 were at a historic low due to a combination of federal rental assistance aid and temporary moratoriums on evictions and rent increases during the coronavirus pandemic, and legislative reforms in that changed the legal process landlords have to follow to evict a tenant, including a 2021 law guaranteeing counsel for low-income tenants facing eviction.

Eviction filings over time between 2004 and 2021 are depicted in Graphic 10.

Graphic 10: Eviction Filings



Source: [Final-Report-on-Implementation-of-Tenant-Appointment-Counsel-Program-10-2023.pdf \(wa.gov\)](https://www.wa.gov/tenant-appointment-counsel-program-10-2023)

Eviction filings began rising again in 2022 but remained low through the first half of 2023.

Eviction filings are now increasing, surpassing pre-coronavirus pandemic levels, attributable by tenant advocates to: rent increases being permitted again in late 2021, federal rental assistance ending in summer 2023, the expiration on 4/30/23 of the requirement that housing providers offer reasonable payment plans with any termination notice for debts between 3/1/20 and 4/30/23, and the expiration on 7/1/23 state Eviction Resolution Pilot Program that required landlords to notify a local dispute resolution center before filing for eviction.

In Washington, eviction filings more than doubled over the six months 4/1/23 to 10/31/23.³⁸ In Spokane, monthly filings reached 180 in October 2023, exceeding pre-pandemic rates (est. 118 per day, based on 3.95 per day).

Table 70: Unlawful Detainer Cases Filed between 4/1/2023 and 10/31/2023											
by Case Filed Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	
SPOKANE COUNTY SUPERIOR COURT	108	136	119	100	113	117	109	138	201	180	

Source: The Administrative Office of the Courts, the WA Courts, and the WA State County Clerks³⁹

While eviction filings by race of the defendant was not available for this report, demographic data included in the August 2023 report, Washington State’s Appointed Counsel Program: Baseline Report,⁴⁰ states that the statewide racial composition of clients served was 54.8% White, 10.4% Black, 6% Native American, and 4.1% Latino. This means that Black and Native American people disproportionately participated in the appointed counsel program, compared to their percentages in the overall population.

³⁸[Why have Washington eviction cases doubled in the past six months? | Crosscut – 11/28/23](#)

³⁹[evictions report AOC 2023.xlsx - Google Sheets](#)

⁴⁰[Final-Report-on-Implementation-of-Tenant-Appointment-Counsel-Program-10-2023.pdf \(wa.gov\)](https://www.wa.gov/tenant-appointment-counsel-program-10-2023)

Tenant advocates shared the following comments regarding evictions:

- If tenants are evicted from housing by largest low-income housing providers (such as SHA or Catholic Charities), it is difficult to get back into housing. It should be easier to reestablish tenancy with these providers.
- Spokane should adopt defenses to eviction such as Seattle did, including:
 - Evictions should be prohibited during winter months when seasonal workers, often immigrants, have less employment. Union workers can receive benefits, but if a person is an undocumented immigrant they are not eligible.
 - Seattle's Winter Eviction Protection: This protection applies to eligible tenants from Dec. 1 to Mar. 1. It creates a defense for tenant households whose income is at or below 80% of the area median income during this period. Exemptions to this eviction defense include:
 - Landlords with ownership interest in less than 4 properties
 - If the landlord or their immediate family needs to occupy the unit themselves, they can provide a 90-day notice
 - If the owner wishes to sell a single-family dwelling unit, they can give a 90-day notice
 - Households with school age children shouldn't be evicted during the school year.
 - Seattle's School Year Eviction Protection: This protection applies during the academic year, which runs Sept. to June. It creates a defense for tenant households with children attending school (from daycare to high school) and for tenants employed by schools. Exemptions for landlords include when specific just causes apply (e.g., landlord or their immediate family needing to occupy the unit, violation notices, etc.).
- There have been some improvements with eviction court. People can attend virtually. But sometimes they have a hard time logging in through Zoom.

Right to Counsel

In 2021 Washington State became the first state in the nation to establish a universal right to appointed counsel for indigent tenants in eviction cases. RCW 59.18.640. The responsibility for implementing and administering the Right to Counsel (RTC) program lies with the Office of Civil Legal Aid (OCLA). In March 2024, the Washington Legislature approved \$3 million in additional funding for the statewide tenant RTC program. This funding will allow the program to hire 10 more attorneys, bringing the total to 80 attorneys statewide. These attorneys will handle eviction cases across Washington, particularly in areas with high eviction rates, such as the Seattle area, Clark County, and Spokane County.

Tenant advocates shared the following concerns about the Right to Counsel program:

- Most attorneys who know landlord/tenant law usually defend landlords, so it seems like a conflict of interest when one is assigned to defend a tenant in an eviction.
- During the coronavirus pandemic, there seemed to be an absence of advertising for Right-to-Counsel to people with disabilities who are deaf or blind, or on public buses or television public service announcements. The law was in place, but how many were left out?

Mediation

During the coronavirus pandemic, landlords in Washington State were required to undertake efforts to engage tenants in resolution before filing an eviction case, pursuant to the Emergency COVID-19 Eviction Resolution Pilot Program (ERPP), a mandatory two-year pilot operating statewide from Nov. 1, 2021, to June 30, 2023. As of July 1, 2023, the ERPP ended by state statute. Landlords are no longer required to provide tenants with an ERPP Notice or offer them the option to participate in the ERPP before filing an unlawful detainer (eviction) case in court for unpaid rent.

Local Tenant Protections

Just Cause Eviction

The WA Residential Tenant Landlord Act was amended to require landlords to provide one of the enumerated good cause reasons for terminating month-to-month tenancies. The new law enumerates good cause reasons that a landlord can end the tenancy. Landlords can still end a tenancy at the end of a lease without cause if the initial rental term is between six months and one year and the tenant is given 60 days written notice.

Tenant advocates interviewed provided the following comments regarding need for local tenant protections:

- Spokane should enact a local ordinance to apply just cause to fixed term leases. Since just cause doesn't apply to fixed term leases, housing providers are incentivized to steer people into fixed term leases by offering sometimes significantly higher rental rates for month-to-month rental agreements.
- Rental relocation assistance just be provided for just cause terminations.

Tenant Screening Requirements

Common tenant screening requirements and processes are often impediments to accessing safe, affordable housing, including the following:

Screening Process Transparency

In Washington state, tenant screening requirements are outlined in RCW 59.18.257. Housing providers are required to have Screening Criteria and must provide prospective tenants with a written notice that outlines the qualifications required for approval. The minimum qualifying information listed in the screening criteria must include details such as income, rental history, and credit history.

Despite the requirement, it is not always clear how tenants are selected, especially when there are numerous applicants.

Additionally, many publicly subsidized housing programs have income limits and targeted population criteria (such as LIHTC properties), and units within the same complex may have different criteria, leaving people confused about why they didn't get accepted for a specific unit.

Criminal History

Lack of a “ban the box” law in Spokane is a major barrier to housing for justice involved people, who are disproportionately Black, Indigenous, and other people of color. Having a criminal history does not mean that someone won’t be a good tenant. Conducting an individualized assessment and considering mitigating factors can sometimes show that a specific criminal history has no bearing on whether a person will be a good tenant.

The US Dept. of Housing & Urban Development issued guidance on use of criminal history in housing screening in 2016 and 2022,⁴¹ including prohibiting blanket bans on criminal history, and advising housing providers to conduct an individualized assessment that considers relevant mitigating information beyond that contained in an individual’s criminal record. However, reports of housing denials based on criminal history are prevalent, and applicants and housing providers don’t often know about the right to provide mitigating information as part of an individualized assessment. A local ordinance specifically prohibiting automatic denials of criminal history without conducting an individualized assessment would likely open housing opportunities for people of protected classes with justice involved experiences.

⁴¹<https://www.hud.gov/sites/dfiles/FHEO/documents/Implementation%20of%20OGC%20Guidance%20on%20Application%20of%20FHA%20Standards%20to%20the%20Use%20of%20Criminal%20Records%20-%20June%202010%202022.pdf>;
https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

Survey Narrative Responses

Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?

Criminal background checks

Criminal history is a HUGE barrier for lots of people. People who want to get out of jail and change their lives. They can't because they can't find housing. Ban the box and stop asking people about their past mistakes. Stop making them relive their trauma.

Landlords refusing to rent to women or people with children due to criminal history of current renters.

The use of background checks that have no nexus in protecting/preserving housing creates a disparate impact on protected classes. For instance, misdemeanors should not limit someone from housing, and unhoused individuals are disproportionately impacted with misdemeanors for trespassing/panhandling, etc. We also know that the BIPOC population is overrepresented in homelessness, so it's a double whammy for those individuals.

The rules for housing that bar anyone with a manufacturing of drugs charge or intent to sell charge from gaining housing. Many of those experiencing homelessness have these charges along with sex registry. While I understand the sex registry is a bit more difficult, the drug charges should not ban someone if they are years in the past.

criminal history

... history of imprisonment are barriers to safe, well-maintained housing

Yes landlords often will utilize a background check ... to determine whether or not to rent a unit to an individual.

If you believe that discrimination occurs in the rental of housing in Spokane, on what bases do you believe that discrimination is most often based on?

Justice involvement (2 responses)

criminal backgrounds (2 responses)

criminal history (2 responses)

For Criminal history, many owner/agents immediately deny applicants with a felony. I feel there should be a time frame for not only forgiveness but for the applicant to explain their circumstances and what they have done since they were charged.

Background, past

If you believe that discrimination occurs in the sale of housing in Spokane, on what bases do you believe that discrimination is most often based on?

background check status

If you believe that discrimination occurs in mortgage lending in Spokane, on what bases do you believe that discrimination is most often based on?

background check status

What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?

Remove barriers to the justice involved with the exception of SO 2/3. It's a wonder Spokane has homeless issues and drugs on the streets. The laws cause this as well as the government

What are you most concerned about with respect to fair housing opportunity in Spokane?

Discrimination include ... criminal history, ...

Credit Score / History

Like criminal and eviction history, credit scores, or lack thereof, keep people from accessing housing. Comments received include:

- Credit score requirements have become outrageous – housing providers are requiring 700+ and 750+ scores
- During a housing search, 600 was the lowest allowable credit score found, but there was a \$5000 pet deposit
- An advertisement on Trulia required applicants to have no unpaid utilities on their credit record for past 5 years.
- Credit scores and checks also keep people from being qualified to purchase homes
- Credit score requirements have a bigger impact on BIPOC people who have historically been excluded from inter-generational wealth building, through homeownership, employment and education opportunities, and also people with disabilities on fixed incomes who may have experienced credit problems related to periods of medical treatments or health issues.

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>denying tenancy due to low credit score/no credit.</i>
<i>Low credit reports ... are barriers to safe, well-maintained housing</i>
<i>As a property manager, I am denying more people because I cannot qualify them with a credit score and having enough income to support them in the home. It takes months to get a bad tenant out so we no longer can accept those that are marginal. Making the rules harder for the owners and managers is having the opposite affect on housing the lower income classes. Where I used to take a chance, I no longer will. Its better to keep a house vacate them put in someone that wont pay and will destroy the property.</i>
<i>Yes landlords often will utilize ... a credit check to determine whether or not to rent a unit to an individual.</i>
<i>Access to get loan when working and no credit</i>
If you believe that discrimination occurs in the rental of housing in Spokane, on what bases do you believe that discrimination is most often based on?
<i>Barriers include credit</i>
<i>lack of credit, low credit scores that are not only medical or student debt, but perhaps the ex partner opened credit cards or took out loans in the applicants name. They are denied before they can explain the situation at times.</i>
If you believe that discrimination occurs in the mortgage lending in Spokane, why do you believe it most often occurs?
<i>Banks dont give loans to people that don't have good credit or work history.</i>
What are you most concerned about with respect to fair housing opportunity in Spokane?
<i>Use of racist structures like personal credit scores.</i>

Universal Background and Credit Check

In February 2023, the City Council passed Ordinance C-36366, which creates a portable background and credit check program to ensure landlords get the data they need to make an informed decision about a prospective tenant, while ensuring that prospective tenants are not unduly burdened by the need to pay multiple background and credit check fees. The City's Department of Code Enforcement is authorized by the ordinance to publish a request for qualifications from consumer reporting agencies that have the capability to provide certified portable background and credit checks. The content of the background and credit report must comply with state and federal laws and housing requirements, including guidance from the federal government on criminal background checks, and would be decided by the City Council upon the recommendation of an advisory group that must include representatives from landlord, tenant and social services housing organizations. The background and credit check would be paid for by the tenant and valid for 90 days. SMC 10.57.80.

A housing provider is not required to accept the universal background and credit check and can require a different one.

While the law was passed over a year ago, the City has yet to implement this program.

In addition to universal background check, tenant advocates say that there is need for a universal application process.

Lack of Rental History

Similar to not having a credit score, lack of rental history can be a bar to housing access:

Survey Narrative Responses
If you believe that discrimination occurs in the rental of housing in Spokane, on what bases do you believe that discrimination is most often based on?
<i>previous housing or lack thereof</i>
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Sometimes rental history is a barrier to trans people getting housing because we are unable to prove our housing due to receiving legal name changes, or simply being denied consistently and having to couch surf/live somewhere without a lease/landlord, and this makes us ineligible for housing according to many property management companies.</i>

Rental Regulation

Tenant advocates contend that regulation of rentals is needed to reduce harm, including ensuring compliance with state and local laws and the safety of tenants.

Rental Registry

In February 2023, the City Council passed Ordinance C-36330, unanimously, which established a residential rental registry and imposes a \$15 per unit per year fee, effective January 15, 2024. Thereafter, it is prohibited to make available for rent, or rent, lease, or let, to the public any residential housing unit without registering and maintaining registration of the residential rental property at which the unit is located. Landlords who offer below market rentals to low-income tenants may seek a waiver of the \$15 annual fee by registering with the City's affordable rental housing incentive program that CHHS will develop. Non-profits also receive waivers of the registration fees. While the rental registry requirement went into effective in January 2024, currently the City has been relying upon voluntary registrations and is not yet engaging in enforcement action against those who are not registered.

Business Licenses

Ordinance C-36330 also clarified that current Washington State Law and the Spokane Municipal Code require landlords to have a business license for a \$127 annual fee and make the licensing requirements more lenient for landlords who are renting out a room or two in the house they live in or are renting out an unattached accessory dwelling unit on their primary residential property since they would no longer be required to obtain a business license. Spokane's ordinance does not require landlords to have a business license before they can evict tenants, unlike other cities such as Tacoma.

Inspections

The housing stock in Spokane is on average older, from 1950, therefore there is a lot of substandard housing in Spokane. While other cities are conditioning rent increases on ability to pass rental inspections, there is no requirement for properties to be inspected by Code Enforcement prior to, or routinely, as a condition of renting them.

Ordinance C-36366, also passed in February 2023 requires landlords or property managers to self-inspect unit(s) before renting them out and, by engaging in a lease, certify that they have performed the inspections and that their property complies with all the building codes, habitability requirements, and other relevant codes preexisting the City and State codes; make all the necessary repairs to keep the unit in habitable condition as regulated by the City and State codes; and maintain all move-in and move-out inspection records for at least three years. SMS Sec. 10.57.110

The City's Code Enforcement Department may conduct periodic and cause-based inspections of residential rental property. Periodic inspections are conducted on properties selected from the registry. Code Enforcement prioritizes resources based on the level of safety sensitivity to be addressed by an inspection and available resources. SMC 10.57.040. If deficiencies are discovered and continue unremedied after a second inspection, Code Enforcement may schedule subsequent deficiency inspections and assess fees against the

residential rental unit's registrant for the additional safety inspections. Failure to pay assessed fees will bar renewal of a residential rental unit business registration. Code Enforcement may also issue notices of violation and infraction for residential rental units that do not comply with standards and may also issue a complaint to the residential rental unit's registrant to proceed through a building official hearing. Repeat offenders may be subject to a non-compliance fee of \$2,500 per violation.

Rental Assistance

An issue supported by all tenant and landlord advocates consulted for this the report is the need for rental assistance. While there were many reports of landlords who refused rental assistance, these refusals may be tied to strategies to get rid of perceived problem tenants. One landlord advocate interviewed couldn't understand why any landlord would refuse rental assistance from a good tenant.

The Shaping Spokane Together coalition is bringing together organizations that represent diverse and intersectional constituencies in Spokane who are all impacted by housing insecurity. Coalition members represent tenants, people with disabilities, elders, the Latine community, the Black community, indigenous people, and the AAPI community. Futurewise staffs the coalition, whose goals include providing proactive rental assistance (in addition to legalizing middle housing, increasing the number of disability-accessible and age-in-place units, and passing inclusionary zoning policies). The Coalition is promoting proactive rental assistance, similar to what cities like Tampa, FL have done.

Homelessness

Overrepresented Protected Classes

The January 2023 Point-in-Time Count identified a 36% increase in the Spokane County homeless population. People experiencing houselessness in Spokane belong to all races, but some protected classes continue to be disproportionately represented:

- Black and American Indian/Alaskan Native/Indigenous people were disproportionately represented in the 2023 Point-in-Time Count (7% and 8% respectively).
- Data collected under the WA State Dept. of Commerce Encampment Resolution Project (ERP), previously known as the State Right of Way (ROW) project in Spokane, WA, from agencies subcontracting under Empire Health Foundation on Spokane's ERP, reveals racial disparities among those served at Camp Hope and the Adams St Encampments. Like the PIT Count, Black and American Indian/Alaskan Native/Indigenous people were each more than 7% of total clients, double to triple their percentages in the overall Spokane population. Table 71
- 46% of clients served at the Adams St. and Camp Hope Encampments self-reported disabling disabilities, including one or more mental, physical, and/or substance abuse conditions.

Table 71 Race - Adams St. and Camp Hope Encampments						
	4 EHP ERP Agencies	4 EHP ERP Agencies	People Assessed at Adams St.	People Badged at Camp Hope	Total	% of Total
Race	Total	% of Total				
White	106	63.5%	47	312	359	67.9 %
American Indian/ Alaskan Native	12	7.2%	2	40	42	7.9%
Asian	2	1.2%	0	5	5	0.9%
Black/African American	15	9%	2	35	37	7%
Hispanic/Latino	1	0.6%	1	6	7	1.3%
Native Hawaiian/ Pacific Islander	4	2.4%	2	2	4	0.8%
Multi-racial	26	15.6%	8	62	70	13.2 %
Data not collected / did not answer	1	0.6%	0	5	5	0.9%
Total	167	100%	62	467	529	100%

Source: Spokane Low Income Housing, Coordinator of project referrals

Table 71 - Disabling Conditions - Adams St. and Camp Hope Encampments				
	Adams St.	Camp Hope	Total	% of All People
Clients reporting 1 or more disabling conditions			248	46.9%
Clients with Disabling Conditions*	41	202	243	45.9%
Physical	26	87	113	
Mental	35	175	210	
Substance Abuse	42	234	276	
*Clients may have multiple disabling conditions				

Homeless Trends and Needs

A Fentanyl Crisis

The fentanyl crisis is not doubt contributing to those who experience homelessness. Substance abuse was more frequently self-reported to be a disabling condition among clients of the Adams St. and Camp Hope Encampments, more than physical or mental conditions.

Both tenant and landlord advocates interviewed for this report relayed instances of people they had worked to house dying from fentanyl overdoses. With respect to fentanyl, interviewees said:

- We are losing people to fentanyl – resources are needed for treatment, detox, and housing stability
- There are not enough beds for treatment
- This is the last resource piece needed for the supportive housing

In a March 2024 letter addressed to Mayor Brown, Spokane City Council, Spokane County Commissioners, Spokane Regional Health Officer Dr. Velazquez, Spokane Tribal Chair Woman Tonasket and Governor Inslee, members of the Experience Matters Leadership Team say the impact of fentanyl-related incidents has "reached a critical level, necessitating, urgent and comprehensive intervention," adding the crisis has had a disproportionate impact on people of color and those who are homeless.

Permanent Supportive Housing

It is often a difficult adjustment to be in housing after experiencing homelessness. It is a huge challenge to get people into housing, but it is also a challenge to help people remain housed. Community advocates said there are not enough supportive services and too few case managers to meet the need, and that more permanent supportive housing is needed.

Disparities in Adverse Childhood Experiences (ACES)

BIPOC people are disproportionately removed from families and placed in foster care. In turn, youth who age out of foster care often become homeless. Community advocates, however, say that older adults experiencing homelessness are not often asked if they were in foster care as children. They suggest that using surveys or other polling methods could be a way to document the incidence of foster care and other ACES among the adult homeless, to develop social supports for children and youth today before they become homeless.

More Elderly Homeless

Community organization representatives interviewed report seeing more elderly people needing homeless and services. Northwest Fair Housing Alliance staff also report increased intakes from seniors who are on the verge of becoming homeless due to increased rents beyond their fixed incomes.

Regional Homeless Authority

The City Council voted to slow progress on a Regional Homeless Authority plan drafted by Spokane Unite, passing a resolution in August 2023, calling for more data and transparency, removing “detention” from the coalition’s priorities and allowing more time to make a decision. The Spokane Homeless Coalition, Spokane Regional Continuum of Care (COC) board, and other service providers had objected that the Authority’s leadership board did not include people with lived experience or service providers who work with the houseless population and included a focus on public safety and detention.

Homeless Planning

Community advocates working with houseless populations who were interviewed commented:

- There is a need for funding for a 5-year homeless plan
- COC needs to be supported and invested in. CMIS has resources but there is no COC support.
- The COC board has members who are unpaid from nonprofits
- The City should apply for a WA Dept. of Commerce planning grant

Racial Equity

Representation

BIPOC people, as well as people with disabilities and other lived experiences, need to be included in City and Regional Boards and Commissions. As discussed above, the draft Regional Homeless Authority plan did not have the support of key community organizations and coalitions, in part because of lack of representation of people with lived experience and homeless service providers on the Board. The plan’s included focus on detention and public safety did not reflect the perspectives of impacted persons and stakeholders.

Survey Narrative Responses
Are you aware of any housing practices in Spokane that are barriers to equal and full access to housing?
<i>Landlords are disproportionately white while renters are disproportionately Black and Brown. Imbalance of power between landlords and tenants.</i>
<i>No Native American advocates to sit on community board meetings or have a voice for concerns. Spokane has a significant Native American population.</i>

SMC [Sec 08.07C.040](#) created the Housing Action Subcommittee, an advisory Committee formed by City Council by resolution, to provide recommendations s to City Council concerning use of funds derived from a sales and use tax to be used for affordable housing (“1590” funds), and input on use of funds derived from any tax increment financing districts which provide or allow for the use of revenues for affordable housing. Appointments to the sub-comm shall be made to ensure a significant degree of participation by people who have been most negatively

impacted by the present housing crisis and historical patterns of discrimination in housing markets and housing policy, including families at risk of homelessness or with a lived experience of homelessness; Black, Indigenous, and other people of color; immigrants; seniors; people with disabilities; domestic violence survivors, unaccompanied homeless youth or young adults; and veterans. Similarly, SMC [Sec 08.07C.050](#) calls for applications for construction, rehab, or acquisition project funding and housing-related services funding to be reviewed by at least 1 individual that serves on the Housing Action Subcommittee, 1 individual that serves on the Equity Subcommittee, 1 individual who reps. impacted communities, and 1 individual who serves on the CHHS Board, with the assistance of appropriate Administration and Council staff. However, there seems to be some uncertainty about how the Housing Action Subcommittee and [Sec 08.07C.050](#) application review group interrelate with established City department permitting procedures and housing development granting processes.

Race Equity Framework

Structural racism is a significant barrier to racial equity.⁴² The United States has a long history of inequity in housing systems, including:

- Racially segregated neighborhoods,
- Large gap in homeownership rates between white households and households of color,
- Devaluation of housing in communities of color, and
- Policies that limit housing opportunities for formerly incarcerated individuals.⁴³

According to the National League of Cities, redlining, racialized zoning, segregation, predatory lending, urban renewal and exclusions in the New Deal and the G.I. Bill are examples of public policies that have produced racial disparities that permeate housing policy today.⁴⁴

The result of these discriminatory housing practices among Black people and people of color are a main driver for the country's housing affordability crisis.⁴⁵ Nationally,

- Homes in black neighborhoods undervalued by \$48k per home on average, amounting to \$156 billion in cumulative losses.
- Black, Native American, and Latinx households more likely than white households to be extremely low-income renters – with incomes at or below poverty level or 30% of AMI.
- Low-income women of color particularly cost-burdened and face higher rates of eviction.
- 63% of American Indian or Alaskan Native households extremely low-income renters are severely housing cost-burdened
- Black people make up 13% of the general pop., but more than 40% of the homeless pop.

To rectify these disparities, race conscious decisions by government are usually prohibited. Federal, state, and local government entities generally cannot use race as a classification when choosing target populations in the design of equitable programs or policies.

⁴²[FHEO Table Talks Learning Brief: Advancing Racial Equity and Fair Housing \(hudexchange.info\)](#)

⁴³Id.

⁴⁴[Embedding Racial Equity in Housing - National League of Cities \(nlc.org\)](#)

⁴⁵Id.

The US Constitution equal protection clause as applied to states and localities, limit abilities to confer benefits or impose burdens based on race.⁴⁶ Federal statutes prohibiting discrimination on the basis of race, such as the Fair Housing Act, may also restrict the use of racial classifications.⁴⁷

Addressing these housing disparities will require such efforts as producing more affordable housing, preserving existing affordable housing, and preventing displacement.

While there is a demonstrated need to prioritize racial equity within government programs and policies, federal law, and in some instances state law, restricts localities' ability to factor race expressly into their decision making, thereby limiting the ability of local governments to create policy solutions that remedy historical harms rooted in racism and necessitating the use of equitable, race-neutral metrics.⁴⁸

A racial equity analysis does not inherently violate fair housing laws. While promoting racial equity, it is essential to strike a balance with fair housing principles. Policies and practices should not discriminate against any group but should create opportunities for historically marginalized communities. A racial equity analysis can enhance fair housing by identifying and rectifying disparities.

A racial equity analysis examines policies, programs, and practices to identify and address racial disparities, and helps uncover systemic biases and ensures that decisions do not perpetuate inequality. For example, a 2021 federal Executive Order directed each federal agency to assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.⁴⁹

While race-conscious policies are subject to strict scrutiny judicial review, race-neutral policies are subject to the more lenient rational basis standard. Use of set-asides, quotas, or percentages based on race in government policies is impermissible, but governments can generally use race-neutral metrics to indirectly address racial disparities. Race-neutral categories can be used to design legally defensible, equitable programs, considering such race-neutral metrics such as federal poverty line based on household income or percentages of area median income.

Governments must be able to articulate a nondiscriminatory reason for the race-neutral category of choice. For example, income-based eligibility for programs that provide financial assistance (e.g., down payment assistance or emergency rental assistance) has a nondiscriminatory basis: they target financial assistance at people most likely to need it, those with the least financial resources.

⁴⁶[Policy Primer: Incorporating Racial Equity into Housing Policy \(changelabsolutions.org\)](https://www.changelabsolutions.org/policy-primer/5/23) – 5/23.

⁴⁷The Fair Housing Act prohibits discrimination based on race, color, religion, sex, disability, national origin, or familial status in housing-related activities. It aims to ensure equal access to housing opportunities for all.

⁴⁸[Policy Primer: Incorporating Racial Equity into Housing Policy \(changelabsolutions.org\)](https://www.changelabsolutions.org/policy-primer/5/23) – 5/23.

⁴⁹[Exec. Order On Advancing Racial Equity & Support for Underserved Communities Through the Federal Government](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/), 1/20/21, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

Specific to housing, Spokane Municipal Code Sec 08.07C.030(C) requires that recommendations on the use of sales and use revenues collected for housing and housing-related supportive services (“1590 funds”) employ a racial equity framework that promotes equity, works to reduce disparities in housing, and achieve equitable outcomes for marginalized populations and populations that have been subject to historical or present discrimination in housing markets and/or housing policy.

In employing a racial equity framework, the City should look at whether racial groups are excluded from participation in projects or services, explicitly or disproportionately, and if so, try to discern the reasons (location, design, systems, marketing, etc.). Then, deploy strategies to address the causes, using race neutral policies that will increase participation of people historically or currently marginalized in housing. Such strategies could include but are not limited to:

- Marketing of funding opportunities and program services in diverse community news media that reach a variety of populations
- Transparency in funding awards and processes
- Provision of and referral to technical assistance resources for funding applications
- Creating incentives for partnerships between experienced housing developers and community organizations that serve marginalized and impacted communities and neighborhoods
- Advancing homeownership for BIPOC people who have disproportionately low homeownership rates, using Special Purpose Credit Programs (homeownership assistance programs specifically targeted to economically disadvantaged protected classes who would otherwise be left out of lending opportunities is specifically authorized by the Equal Credit Opportunity Act – (see, e.g., the WA Covenant Homeownership Act homebuyer assistance programs to be offered by the WSHFC in July 2024).

Finally, data should be collected and reviewed to determine whether public contracts or public benefits are awarded in an inclusive, nondiscriminatory manner.⁵⁰

Other cities and public institutions in Washington have adopted race equity toolkits and analysis tools.⁵¹ It is recommended that Spokane adopt such a tool, including procedures on how, when, and who within City government is to utilize it.

⁵⁰Ex: Prior to 2019, King County and the City of Seattle used Coordinated Entry for All, a housing referral program for people experiencing homelessness which used a prioritizing “vulnerability index” screening tool. After collecting and analyzing program data, it was discovered that families with a white head of household were significantly more likely to be referred for housing than households of other races. New race-neutral criteria were selected, to reduce the weight of the vulnerability index score and increase the weight of chronic homelessness, history of foster care, and presence of children or pregnant people in the household. [Policy Primer: Incorporating Racial Equity into Housing Policy \(changelabsolutions.org\)](https://www.changelabsolutions.org/policy-primer/incorporating-racial-equity-into-housing-policy)

⁵¹E.g., The Race and Social Justice Initiative (RSJI) is a division of the Seattle Office for Civil Rights, codified by ordinance ([CB 120525](https://www.seattle.gov/legislation/codified-by-ordinance/cb-120525)). The goal of RSJI is to end institutional racism within City government, working toward a vision where racial disparities will be eliminated and racial equity achieved. [https://www.cityoftacoma.org/government/city-departments/equity and human rights/equity and e](https://www.cityoftacoma.org/government/city-departments/equity-and-human-rights/equity-and-e)

Discrimination or Violations of Civil Rights Law Related to Housing or Access to Community Assets Based on Protected Class

State and Local Fair Housing Laws

Washington Law Against Discrimination (WLAD)

The Washington Law Against Discrimination (WLAD)⁵², like the FHAct, prohibits discrimination in housing on the basis of race, color, national origin, sex, disability, and familial status, and additionally on the basis of creed, sexual orientation (including gender expression / identity), marital status, honorably discharged veteran or military status, the presence of any sensory, mental, or physical disability (unlike the FHA, the WLAD protects temporary and mitigated disabilities), the use of a trained dog guide or service animal by a person with a disability, and retaliation for opposing an unfair practice.

The WLAD is substantially equivalent to the federal Fair Housing Act. Amendments were made to the WLDA in 1993 to reflect major amendments to the federal fair housing law made in 1988. These changes added prohibitions against discrimination on the basis of disability and the status of being a family with children. There are, however, a few significant differences between the federal FHA and the WLAD. The WLAD includes four additional protected classes: creed (rather than religion), marital status, sexual orientation, and honorably discharged veteran or military status. Similarly, even if a dwelling is exempt under one of the FHA exemptions, the WLAD only exempts such dwellings from the requirements to make reasonable accommodations and modifications for people with disabilities. The WLAD was amended most recently by the Washington Legislature in 2018 to clarify that its narrow definition of “service animal” (a dog or miniature horse, individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability), a definition similar to that in the Americans with Disabilities Act (ADA) regulations, applies only in Washington employment and public accommodation settings, not to housing accommodations or real estate transactions.

Spokane Human Rights Ordinance – Title 18

The Spokane Human Rights Ordinance does not provide a cause of action under state law or form a basis for relief in the state courts. The commission of an act of discrimination as defined in Title 18 is punishable as a Class 1 civil infraction. All causes of action for violations of the ordinance lie with the City of Spokane’s Hearing Examiner, Municipal Court, or appellate review in the Superior Court. Aggrieved persons may also institute any action or pursue any civil or

empowerment framework. The City utilizes the RSJI Racial Equity Toolkit which lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

RacialEquityToolkit_FINAL_August2012.pdf (seattle.gov). See also, Tacoma’s Equity and Empowerment Framework goals, at

https://www.cityoftacoma.org/government/city_departments/equity_and_human_rights/equity_and_empowerment_framework, and the Seattle Public Schools Racial Equity Analysis Tool, at

https://www.seattleschools.org/wp-content/uploads/2021/07/racial_equity_analysis_tool.pdf.

⁵² RCW 49.60.

criminal remedy for the violation of such person's civil rights, as nothing in Title 18 limits or expands any causes of action available under federal or state law.

An individual claiming to be aggrieved by a practice prohibited by the Ordinance may, within six months from the date of the occurrence of the alleged unlawful practice, file a complaint on forms available from the Spokane Human Rights Commission (SHRC). The SHRC is to prioritize resources to focus on resolving complaints that are not within the jurisdiction of government or non-profit agencies other than the commission. Complaints that claim a violation of state or federal law are to be referred to the appropriate state or federal agency. Complaints that are only jurisdictional under Title 18 are forwarded by the SHRC for review by the City or an agency or organization with which the City maintains a contractual relationship for the purpose of reviewing such complaints ("reviewing agency"), to determine whether the allegations stated on the face of the complaint, if true, would be a prohibited practice as stated in SMC 18.01.040 or chapter 18.03 SMC. Northwest Fair Housing Alliance has been the contracted reviewing agency since January 1, 2018.

Upon receipt of a complaint, the reviewing agency reviews the factual allegations of the complaint, interviews the complainant, takes a statement from the complainant, interviews the person accused of discrimination and documents that interview in a writing, and if applicable, interviews all participants and witnesses having relevant information regarding the allegation of discrimination, and documents those interviews in writing. If, as the result of the interviews, the reviewing agency determines that the complaint states a violation of the ordinance, the reviewing agency communicates that determination in writing to the complainant and the city attorney's office, with a copy to the SHRC. If the reviewing agency determines that the complaint does not state a violation of the ordinance, it is dismissed. Complaints that claim a violation of a prohibited practice established only in Title 18 shall be referred to a WA State Dispute Resolution Center established under ch. 7.75, RCW, or by a mediator agreed upon by all parties, within thirty days of the filing of the complaint. Mediation sessions are not open to the public. If the mediation resolves the complaint, the mediator will notify the City of the resolution and the complaint file will be closed. Complaints that are not resolved through mediation shall be submitted to the City Prosecutor for a determination as to the filing of a civil infraction pursuant to chapter 1.05 SMC. Any person whose complaint has been dismissed may appeal the dismissal to the hearing examiner, who shall review the complaint and the decision to dismiss the complaint under an abuse of discretion standard of review. The hearing examiner may affirm the dismissal, reverse the dismissal, or remand the complaint to be processed according to the ordinance's investigation procedure. Any person who is aggrieved by the decision of the hearing examiner on administrative appeal may institute an action for judicial review in the Superior Court.

In 2018, two complaints were referred by the City of Spokane to NWFHA for investigation of alleged violations of the source of income prohibitions of Title 18. One alleged the denial of a section 8 voucher, the other alleged termination of tenancy for use of a section 8 voucher. There was insufficient evidence to prove that discrimination based on source of income in these cases occurred, due the need to relocate tenants for renovation and asbestos abatement in one instance, and the policy of not entering into 12-month leases with tenants, usually required for the first 12 months of voucher placement by the Housing Authority.

Due to the enactment of source of income protections in the WA Residential Landlord Tenant Act effective January 2019, most complainants of source of income discrimination file

complaints in Court under the WA RLTA, rather than with the City under Title 18, due to the possibility of recovering damages under the RLTA. Title 18 only makes housing discrimination an infraction, with no damages available for a complainant. However, to avail themselves of the possible damages under RLTA for source of income discrimination, a complainant will usually need to retain the services of an attorney. Although attorney fees are awardable by the Court pursuant to the RLTA, some complainants may find that finding and retaining an attorney is a barrier to pursuing relief in the Courts.

Community Reports / Perceptions of Discrimination Based on Protected Classes

Over twenty percent of housing consumer responders identified that they work for an organization on behalf of tenants or homebuyers and that their organization has received housing discrimination complaints from clients/constituents/members that occurred in Spokane.

Perceptions and Reports of Housing Discrimination - Rental

Fifty-seven percent of housing consumer / advocate responders believe rental discrimination occurs commonly, while 38% of housing provider / advocate responders believe it is common. 34% of all survey participants believe it occurs occasionally. Very few responders in both survey groups believe it rarely or never occurs (1.7% of total responders).

Both survey groups believe rental discrimination most often occurs because of source of income (66.4%) and race (65.5%), followed by immigration/citizenship status (49%), disability (48%), color (41.6%), sexual orientation (40.7%), familial status (36.7%), national origin (33%), and sex/gender (25.7%). Marital status, veteran status, and religion were all selected least often.

18% of housing consumer survey responders believe they have been discriminated against while attempting to obtain rental housing in Spokane.

40% of housing provider survey responders believe they have witnessed illegal discrimination by someone in their industry against someone attempting to rent a dwelling unit, because of their protected class.

18% of housing consumer survey responders believe they have been illegally discriminated against while renting in Spokane (e.g., treated differently because of protected class, harassed because of my protected class, etc.). 35% of housing provider responders believe they have witnessed illegal discrimination by someone in their industry against someone during their tenancy (treated differently because of protected class, harassed because of protected class, etc.).

8% of housing consumer survey responders believe they have been illegally discriminated against and terminated from rental housing in Spokane because of protected class.

Perceptions and Reports of Housing Discrimination - Sales

Fewer survey participants believe that discrimination commonly occurs in the sale of housing than rental discrimination (33% of all responders). Fewer responders believe it occurs rarely (19%) or never (4%). More responders believe it occurs occasionally (46%)

Most housing survey respondents believe discrimination in sales occurs because of race (65% of all responders) and source of income (63%), followed by immigration/citizenship (49.3%),

color (42.3%), sexual orientation (39.6%), national origin (38%), and disability (34%). Less than 30% selected marital status, sex/gender, familial status, veteran/military status, or religion.

7% of housing consumer responders believe they have been illegally discriminated against while attempting to purchase a home in Spokane.

5% of housing provider responders believe they have witnessed illegal discrimination by someone in their industry against a person attempting to purchase a home in Spokane, based on their protected class.

Perceptions and Reports of Housing Discrimination - Lending

34% of all survey participants believe that discrimination commonly occurs in mortgage lending. Fewer responders believe it occurs rarely (17.7%) or never (8%). 41.6% believe it occurs occasionally.

Most survey respondents believe discrimination in lending occurs because of source of income (68.8%) or race (59%), followed by immigration/citizenship status (46%), disability (40%), color (37.6%), national origin (34%), and marital status (31%). Less than 30% selected sexual orientation, sex/gender, familial status, veteran/military status, or religion.

5.6% of housing consumer survey responders reported being denied a mortgage loan due to protected class.

10% of housing provider responders believe they have witnessed lending discrimination by someone in their industry against a person attempting to obtain a mortgage based on protected class.

Survey Narrative Response - Lending
I have been denied a home mortgage loan in Spokane because of my protected class (race, disability, sex, national origin, etc.)
I haven't bothered to try because as a brown, single mother, it feels impossible.

Perceptions and Reports of Housing Discrimination - Insurance

2% housing consumer responder has had difficulty obtaining homeowner's insurance in Spokane because of protected class.

19% of housing provider responders have had difficulty obtaining, or have had to pay higher premiums, for property insurance in Spokane because the occupants of dwelling units they manage, own or serve have disabilities, are unrelated, or have assistance animals or children.

Perceptions and Reports of Housing Discrimination - Steering

14% of housing consumer responders believe they have been steered to a particular area of Spokane, neighborhood, or housing complex because of race, national origin, disability, or presence of a child. 30% of housing provider responders believe they have witnessed steering to a particular area of Spokane, neighborhood, or housing complex, by a person in their industry, because of protected class. Survey participants reported the following instances of discrimination:

Survey Narrative Responses – Discrimination Against Protected Classes
I believe I have witnessed illegal discrimination by someone in my industry against someone during their tenancy (treated differently because of protected class, harassed because of protected class, etc.)
<i>Witnessed a rep from large property manager company ins Spokane treat protected class awful all the time for seemingly no reason</i>
Survey Narrative Responses – Steering
I believe I have been illegally discriminated against while attempting to purchase a home in Spokane.
<i>but I was told about certain neighborhood demographics and not wanting to live in certain neighborhoods by my real-estate agent.</i>

Perceptions and Reports of Housing Discrimination – By Protected Class

Survey Narrative Responses - Race Discrimination
I believe I have been illegally discriminated against while attempting to obtain rental housing in Spokane?
<i>My last name could be seen as a racial name and we applied to so many rental agencies and not one would even call us back.</i>
<i>As a black man, I was searching for housing and found a unit that I wanted and applied for the unit. When my application was approved I was charged a larger security deposit than what was advertised for the unit that I had applied for.</i>
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
<i>A client feels she is not getting treated the same as others based upon her race and color. She has not had the same help as others in regards to referrals, programs etc. by (redacted)</i>
I believe I have witnessed illegal discrimination by someone in my industry against someone during their tenancy (treated differently because of protected class, harassed because of protected class, etc.)
<i>Many of my clients have reported that they felt like a landlord was issuing them notices or similar because of their race.</i>
I believe I have witnessed steering to a particular area of Spokane, neighborhood, or housing complex, by a person in my industry, because of protected class.
<i>I have been steered towards “nicer” neighborhoods than I could afford by leasing agents and real estate agents and I think this was in part because of race. I’m certain the opposite happens too.</i>
If you believe that discrimination occurs in the sale of housing in Spokane, why do you believe it most often occurs?
<i>similar to systemic racism in areas like hillyard</i>
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
<i>Discrimination based on race...</i>
<i>we have received complaints of discrimination based on: race, ...</i>

I have received complaints of racism and ...from constituents which I cannot do much about in my job so I have to direct them to other resources.

Survey Narrative Responses – Sex Discrimination

I believe I have been illegally discriminated against while renting in Spokane (e.g., treated differently because of my protected class, harassed because of my protected class, etc.)

As a woman my landlord had little respect for me and would not announce when he was coming to work on the unit ahead of time. Multiple times I thought someone was breaking in.

Being a single Asian woman I have experienced sexual harassment by landlords.

I have been denied a home mortgage loan in Spokane because of my protected class (race, disability, sex, national origin, etc.)

They didn't say they wouldn't give me a loan because I am a woman, but I believe it.

What are you most concerned about with respect to fair housing opportunity in Spokane?

Domestic violence causes 85% of homelessness among women.

Survey Narrative Responses – National Origin Discrimination

I believe I have witnessed illegal discrimination by someone in my industry against someone attempting to rent a dwelling unit, because of their protected class.

National Origin ("why can't they call me themselves"), "that's not really the kind of place we are" etc.

Survey Narrative Responses – Familial Status

I believe I have been illegally discriminated against while attempting to obtain rental housing in Spokane?

I attempted to look at housing for my grandchildren. Being a grandparent, they were happy to show the units. The second kids were mentioned, suddenly there were pending applications.

If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?

We've had one participant be told that if she has any children they won't renew her lease as well.

Single mothers of children under the age of 18.

I believe I have been illegally discriminated against while renting in Spokane (e.g., treated differently because of my protected class, harassed because of my protected class, etc.)

In 2019 I had a one bedroom apartment that my 2 children stayed with my part time. We converted the 'dining room' into a bedroom since it had an egress window. My youngest was under 1 year old and my oldest was 5. I wanted to add an adult household member to the lease and was told I could not. This household member was necessary to help me cover bills and care for my children. When I pointed out the 2 heartbeats per room HUD rule, and that living rooms count as sleeping space, they claimed that my children were heartbeats and they denied my request to add a household member. They refused to even screen the member to be added.

Survey Narrative Responses - Sexual Orientation / Gender Identity Discrimination

I believe I have been illegally discriminated against while attempting to obtain rental housing in Spokane?

My partner and I were about to get approved to rent a house, but then we met the owners and they saw we are queer and transgender. They made up some excuse about us having bad rental

<i>history (but I have never had any problems with previous rentals and always left everything in immaculate condition).</i>
If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?
<i>landlords' discrimination due to sexual orientation</i>
<i>we have received complaints of discrimination based on ... sexuality/gender/transgender</i>
<i>I have received complaints of ...and homophobia from constituents which I cannot do much about in my job so I have to direct them to other resources.</i>
I believe I have been illegally discriminated against while renting in Spokane (e.g., treated differently because of my protected class, harassed because of my protected class, etc.)
<i>Under one of our property managers, we went for several months without a refrigerator despite that being part of our rental agreement. We made multiple attempts to get this situation resolved, but as a queer person, you know that you can't push issues like "not having a place to store food" too hard without risking getting kicked out.</i>
Survey Narrative Responses – Marital Status Discrimination
I believe I have been illegally discriminated against while attempting to obtain rental housing in Spokane?
<i>I was previously turned down for a rental property because the property owner refused to rent to unmarried couples on the basis of discriminatory religious beliefs he held.</i>
Survey Narrative Responses – Immigration Status Discrimination
If you believe that discrimination occurs in the sale of housing in Spokane, why do you believe it most often occurs?
<i>Illegal statis</i>

Federal and State Agencies that Provide Fair Housing Enforcement

The following entities provide fair housing enforcement in Spokane:

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD)

FHEO HUB Office, 909 1st Ave., Ste. 205, OAE, Seattle, WA 98104
 (800) 877-0246 or (206) 220-5170, TDD: (206) 220-5185, FAX: (206) 220-5447

Nationally, the HUD Office of Fair Housing and Equal Opportunity administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Particular activities carried out by the Office of Fair Housing and Equal Opportunity include implementing and enforcing the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968. In addition, FHEO

- manages the Fair Housing Assistance Program (FHAP) (WSHRC is a FHAP)
- administer the award and management of Fair Housing Initiatives Program (FHIP) grants (NWFHA is a FHIP grantee);
- proposes fair housing legislation;

- works with other government agencies on fair housing issues;
- reviews and comments on Department clearances of proposed rules, handbooks, legislation, draft reports, and notices of funding availability for fair housing considerations;
- interprets policy, process complaints, perform compliance reviews and offer technical assistance to local housing authorities and community development agencies regarding Section 3 of the Housing and Urban Development Act of 1968;
- ensures the enforcement of federal laws relating to the elimination of all forms of discrimination in HUD's employment practices;
- conducts oversight of the Government-Sponsored Enterprises, Fannie Mae and Freddie Mac, to ensure consistency with the Fair Housing Act and the fair housing provisions of the Federal Housing Enterprises Financial Safety and Soundness Act; and
- works with private industry, fair housing and community advocates on the promotion of voluntary fair housing compliance.

WASHINGTON STATE HUMAN RIGHTS COMMISSION (WSHRC)

711 S. Capitol Way, Suite 402, Olympia, WA 98504-2490

Tel: (360) 753-6770, Fax: (360) 586-2282, TDD: 1 (800) 233-3247

The WSHRC administers the State law prohibiting discrimination in employment, credit, and insurance transactions, public accommodations, and real property transactions against the federally protected classes and based on creed, marital status, sexual orientation, veteran status, and citizenship/ immigration status. The duties of WSHRC include processing complaints, establishing regulations, conducting studies, and providing educational and consulting services. WSHRC has five members appointed by the Governor and operates district offices in Olympia, Vancouver, Spokane, Yakima, and East Wenatchee. The WSHRC has a cooperative agreement with HUD to process and investigate dual-filed housing complaints for which the Commission receives federal funding under the Fair Housing Assistance Program (FHAP). The Commission is a FHAP agency because Washington's law is substantially equivalent to the federal Fair Housing Act. Most of the Commission's housing cases are dual filed with HUD; however, in some instances, the state fair housing law is more expansive than the federal fair housing law and the Commission will prepare a complaint with Commission jurisdiction only.

The Complaint Process - HUD / WSHRC

The Fair Housing Act (FHA) allows all aggrieved persons to file fair housing complaints with HUD. An aggrieved person includes any person who (1) claims to have been injured by a discriminatory housing practice; or (2) believes that such person will be injured by a discriminatory housing practice that is about to occur. Administrative complaints must be filed with HUD within one year of the alleged discriminatory practice. 24 CFR § 103. In Washington, HUD refers almost all complaints to a HUD recognized Fair Housing Administration Program (FHAP) (a state or local enforcement agency with a substantially equivalent fair housing law or ordinance) for investigation and enforcement. Complainants can also file complaints directly with the Washington State Human Rights Commission (WSHRC).

After a complaint is filed with HUD and/or the WSHRC, a Respondent receives notification and a copy of the complaint, and then has ten days in which to file an answer. The Assistant

General Counsel has authority to authorize the U.S. Department of Justice (DOJ) to seek preliminary relief in appropriate matters. HUD can also issue subpoenas in aid of its investigation. The FHA and its regulations require that HUD investigators attempt to resolve a complaint through conciliation prior to the issuance of a determination. If conciliation attempts are unsuccessful, the investigation will continue, with two possible outcome determinations: “no reasonable cause”, or “reasonable cause”, accompanied by the issuance of a charge of discrimination. Upon issuance of a charge, any party may elect to have the matter heard in federal district court. If elected, the matter is referred to the DOJ to file a civil action (or WA Attorney General if the WSHRC investigates). Otherwise, an Administrative Law Judge (ALJ) hears the matter. However, a complainant is not required to file a HUD administrative complaint or exhaust administrative remedies before filing an action in federal district or state court. A complaint must be filed in Court within two years of the last act of discrimination. If a complainant is successful in either an ALJ hearing or in Federal District Court, he or she can be awarded compensatory damages (tangible out-of-pocket actual damages, and intangible damages (for emotional distress, loss of housing opportunity, and violation of civil rights)), equitable relief (injunctive and declaratory), and attorney fees. 42 U.S.C. §3613. Respondents can also be ordered to pay civil penalties, monetary sums that are payable to the federal or state government. If a complaint is filed in federal district court, a plaintiff can also receive punitive damages, as well as a jury trial.

Administrative Fair Housing Complaints Filed with HUD and/or WSHRC

Complaint data for Spokane was obtained from HUD and the WSRHC. The Complaint Tables below detail the number and type of complaints from Spokane as reported by HUD and the WSHRC. The number of complaints filed with these agencies exceeds the number of complaints NWFHA filed with HUD and the WSHRC, as complainants can file complaints directly with HUD and the WSHRC and need not enlist NWFHA’s assistance. Between 7/1/19 and 3/31/24 at least 62 complaints filed with HUD and / or the WSHRC originated in Spokane.⁵³

Most, but not all, complaints filed with HUD are referred to the WSHRC for investigation pursuant to WSHRC’s status as a HUD recognized Fair Housing Administrative Program (FHAP). Until 2019, when the WA Law Against Discrimination amended provisions regarding service animals went into effect, HUD retained and investigated housing discrimination complaints involving assistance animals. HUD also typically retains and investigates complaints based on allegations of design and construction provisions of the Fair Housing Act.

⁵³Complaints referred by HUD to WSHRC are “dual filed” and assigned both HUD and WSHRC complaint numbers. Therefore, separate complaint data provided by HUD and WSHRC for Spokane included complaints that should only be counted as one complaint for purposes of calculating the number of discrimination complaints originating in the City. Complaint lists provided by HUD and WSHRC included different data fields that had to be reconciled to identify the same complaints on both lists (e.g., WSHRC data included case numbers and zip codes, while HUD data provided the city of violation, but no case numbers). Where address of violation was not provided it was not always possible to determine whether the complaint originated in City of Spokane as some zip codes overlap City boundaries – therefore these complaints were not included in this report. Thus, the total number of complaints originating in the City is likely under reported. NWFHA complaint data was used to provide additional details for complaints that NWFHA referred to HUD and served as advocate for complainants.

The WSHRC has jurisdiction over additional protected classes not included in the Fair Housing Act (marital status, veteran/military status, creed, sexual orientation, and immigration/citizenship status), therefore complaints based on these protected classes are only filed with the WSHRC, not HUD.

No Unresolved Charges Against the City

What is the **status of any unresolved findings, lawsuits, enforcement actions, settlements, or judgments** in which the City of Spokane has been a party related to fair housing or other civil rights laws in the jurisdiction?

There are no unresolved charges or letter of findings from HUD concerning any violations of civil rights-related laws pending against the City of Spokane, including:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

Fair Housing Act Complaints By Protected Class Filed In Spokane

See Appendix B, Tables B-6 through B-11.

Disability-based housing discrimination complaints were the most common basis for filing a complaint (71%).

- Between 7/2019 and 3/2024, 33 complaints based on disability alone were filed with HUD and/or the WSHRC. An additional 11 complaints alleged disability as the primary basis of discrimination, with one or more secondary protected classes (race, sex, familial status, or retaliation).
- Issues in disability-based complaints included (1 complaint may have multiple issues):
 - Discrimination in terms, conditions or privileges (42)
 - Failure to make a reasonable accommodation (34)
 - At least (8) involved assistance animals
 - Discriminatory refusal to rent (15)
 - Discriminatory advertising, statements, and notices (6)
 - Discriminatory acts under Section 818 (intimidation, harassment, coercion, etc.) (3)
 - Otherwise deny or make housing unavailable (2)
 - Non-compliance with design and construction requirements (2)

Two National Origin complaints made up 3% of housing discrimination complaints filed with HUD and or the WSHRC in Spokane.

- Issues in national origin-based complaints included:
 - Discrimination in terms, conditions or privileges (2)
 - Discriminatory refusal to rent (1)
 - Otherwise deny or make housing unavailable
 - Intimidation (1)

Familial Status complaints were 12% of housing discrimination complaints filed with HUD and or the WSHRC in Spokane.

- Issues in familial status-based complaints included (1 complaint may have multiple issues):
 - Discrimination in terms, conditions or privileges relating to rental (2)
 - Discriminatory refusal to rent (5)
 - Discriminatory Advertising/ Statements/ Notices (6)
 - Steering
 - Deny or Make Housing Available (2)

Race based complaints were 5% of housing discrimination complaints filed with HUD and or the WSHRC in Spokane.

- Issues in race-based complaints included (1 complaint may have multiple issues):
 - Discrimination in terms, conditions or privileges (3)
 - Discriminatory acts under Section 818 (intimidation) (1)

Sex and Sexual Orientation & Gender Identity complaints: (11.3%) of all complaints

- Issues in sex-based complaints included (1 complaint may have multiple issues):
 - Discrimination in terms, conditions or privileges relating to rental (3)
 - Discriminatory refusal to rent (1)
 - Deny or Make Housing Unavailable, (1)
 - Discriminatory acts under Section 818 (intimidation, harassment, etc.) (4)

Washington Law Against Discrimination Protected Class Complaints

- **Marital status complaints:** 1 complaint
 - Issues in the marital status-based complaint:
 - Discrimination in terms, conditions or privileges relating to rental (1)

Administrative Fair Housing Complaint Outcomes:

Of the 62 complaints filed with HUD and the WSHRC originating from Spokane, at least 39% (24) were resolved through conciliation, a mediation process required to be attempted by investigators pursuant to regulations. These resolved agreements are characterized in the Complaint Tables in Appendix C by HUD and WSHRC as “conciliation”, “settlement successful”, or “PFS (pre-finding settlement) Agreement”.

One complaint resulted in a private settlement between the parties and the withdrawal of the complaint. Three complaints were closed as administrative closures for failure to cooperate.

26 complaints (16%) were dismissed after investigation led to a “no reasonable cause” finding. The complainant bears the burden to prove discrimination occurred, and often there are no corroborating witnesses or documentary or other evidence of violations frequently alleged to occur verbally without other people present.

15 (24%) complaints had unknown resolutions or were still pending as no closure or outcome data was provided for these complaints in the data provided by HUD and WSHRC.

Three (5%) complaints resulted in the issuance of a charge of discrimination following a “reasonable cause” finding. This is in accord with national statistics. In recent years, HUD has issued reasonable cause findings in only 1% of complaints. Most complaints filed nationally are resolved through conciliation. Reasons for the large number of conciliated complaints and the miniscule number of charged complaints may include 1) the emphasis placed on conciliation by regulatory mandate; 2) limited federal and state resources to conduct fair housing hearings or engage in litigation, and, 3) the burden a complainant must meet to prevail against a respondent when there is often only conflicting oral testimony in the absence of corroborating witnesses or documentation.

Organizations That Provide Fair Housing Counseling and Advocacy

NORTHWEST FAIR HOUSING ALLIANCE (NWFHA): NWFHA is a 501(c) (3) non-profit tax-exempt fair housing education and advocacy organization based in Spokane, Washington. The mission of the Northwest Fair Housing Alliance is to eliminate housing discrimination and to ensure equal housing opportunity for the people of Washington State through education, counseling and advocacy. NWFHA is the only fair housing advocacy agency serving 17 counties in Eastern and Central Washington. Since 1994 NWFHA has provided comprehensive fair housing services, including complaint intake, investigation, rental, sales, and lending testing, advocacy, education, and outreach.

Intakes, Allegations, and Reasonable Accommodations Requested

NWFHA does not have binding authority to adjudicate fair housing disputes or enforce penalties for violations of the FHA. Instead, NWFHA receives its primary grant funding from HUD’s Fair Housing Initiatives Program (FHIP) to provide outreach, advocacy, and fair housing counseling to people who experience housing discrimination. Such activities include assisting complainants with filing administrative fair housing complaints with HUD and the WA State Human Rights Commission (WSHRC) and serving as an advocate for the complainant through the investigation and fact-finding process and conciliation discussions. NWFHA also has legal standing to file complaints on its own behalf for violations of fair housing laws, and to seek compensation for diversion of resources and frustration of its mission.

Intakes

NWFHA receives 1500-2000 intakes from the public each year. Most initial inquiries to NWFHA are made via phone, with additional in-person walk-in and website inquiry submissions. Of these, about 80% do not concern fair housing but instead involve issues of landlord-tenant law (repairs, security deposits, tenancy terminations, etc.) or requests for resources (housing, financial assistance, public subsidies, etc.). People seeking non-fair housing assistance are referred to appropriate resources in the community (legal aid, Housing Authorities, etc.).

Fair Housing Allegations

From the intakes NWFHA receives, allegations of fair housing are opened as in-house cases for further review and investigation. An intake is only considered a fair housing allegation if a violation of the FHA based on a protected class is alleged. Fair housing allegations are reviewed to determine if evidence exists to substantiate the filing of a fair housing complaint with HUD and/or the WSHRC.

By far, the greatest number of fair housing allegations involved alleged discrimination based on disability. This is in accord with national trends. In 2005, the number of disability-based complaints filed with HUD nationally overtook race-based complaints as the most common basis of filed complaints. The large number of disability-related allegations may stem from a combination of an aging baby-boomer population with increasing disabilities, greater awareness by housing consumers of the FHA protections for individuals with disabilities (added to the FHA in 1988), and the greater number of potential violations in the FHA regarding individuals with disabilities (failure to grant reasonable accommodations or modifications; failure to design and construct in accordance with FHA accessibility requirements), as compared to possible violations involving the other protected classes.

Most fair housing allegations received by NWFHA involved rental transactions (%). The majority of allegations involved requests for assistance to obtain reasonable accommodations (%), most of which were resolved through communications with housing providers. The remainder of allegations were based on other violations of the Fair Housing Act, and were resolved through informal negotiations with housing providers, closure due to failure of complainant to cooperate (lack of communication, failure to locate, etc.), closure due to lack of allegations or evidence sufficient to meet the requirements for a prima facie case of housing discrimination, or the filing of complaints with HUD and the WSHRC.

Testing

Fair housing audit testing is a controlled method for measuring and documenting variations in the quality, quantity and content of information and services offered or given to various home seekers by housing service providers. Testing is a legitimate method of uncovering and detecting discrimination. In 1982, the U.S. Supreme Court confirmed the importance and validity of fair housing testing, in a unanimous decision, by reaffirming the role of the tester. *Havens Realty Corp. v. Coleman*, 455 U.S. 363 (1982) Testing refers to the use of individuals who, without a bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective renters or purchasers to obtain information for the purpose of evaluating the compliance of housing providers with fair housing laws. Fair housing testing utilizes rigorous protocols to ensure that any discrepancies identified in the course of testing can be attributed to differential treatment. The aggregate results of testing conducted in Spokane provide an objective opportunity to identify trends critical to the identification of impediments to fair housing choice.

Testing has taken place throughout the State of Washington since the mid-1990s as evidence for complaints and for audit testing, the latter of which is to gain perspective on housing practices in a given area. In general, Northwest Fair Housing Alliance is the only agency that conducts testing in E. Washington, pursuant to HUD FHIP grant awards.

Other Offices, Departments, Agencies, or Entities that Aim to Advance Equity
Spokane Human Rights Commission

The City of Spokane Human Rights Commission (SHRC) was established in 1992, as authorized by the City Council in Title 4 of the Spokane Municipal Code. The SHRC actively participates in community events, facilitates public forums and conducts public outreach to drive awareness, education, and advocacy around human rights issues affecting our community.⁵⁴

The Commission's Mission is to advise and make recommendations to the City Council regarding issues related to human rights and unjust discrimination and the implementation of programs consistent with the needs of all residents of the City of Spokane.

The commission has power and duty to:

- hold regular public meetings;
- serve as a complaint channel to which human rights grievances of all types can be reported;
- maintain statistical data on incidents of human rights violations and make appropriate recommendations for correction;
- conduct public hearings to receive citizen concerns about issues relating to human rights;
- conduct and arrange for surveys, studies, and polls to factually determine problem areas and perceptions;
- provide conflict management and dispute resolution services such as conciliation and mediation;
- provide and arrange for victim assistance and support groups;
- convene and develop work groups such as sub-committees, ad hoc committees, task forces, and coalitions consisting of concerned organizations, agencies, and individuals to achieve coordinated focus on priority problem areas;
- provide and develop community education projects such as conferences, forums, and workshops in collaboration and co-sponsorship with organizations and other agencies; conduct diversity training programs for public and private employers, citizen groups and agencies;
- create a speaker's bureau to address cultural diversity issues;
- publish a periodic newsletter on current events and special reports on studies and related findings and recommendations;
- develop a mass media program consisting of the appropriate use of press releases, press conferences, public service announcements, and production;
- make recommendations for public policy relating to human rights;
- issue quarterly reports to the City Council concerning the numbers and dispositions of complaints received
- issue an annual report to the mayor and city council on the health of human rights along with achievements for the past year and goals for the coming year; and

⁵⁴<https://static.spokanecity.org/documents/bcc/commissions/spokane-human-rights-commission/documents/shrc-brochure-final-2021-01-12.pdf>

- provide guidance for the city’s anti-discrimination efforts without limitation, including federal Title VI compliance efforts.

Spokane Office of Civil Rights, Equity and Inclusion

In 2021 the City Council unanimously approved Ordinance C35159, establishing the City’s first Office of Civil Rights, Equity, and Inclusion (OCREI). City Council had previously budgeted funding for an Office of Civil Rights, but a formal department that not been created.

The Office of Civil Rights, Equity, and Inclusion will provide city-wide leadership and guidance in the areas of civil rights, equity, and inclusion. It shall promote the removal of historical and existing barriers to access to services within the boundaries of the City of Spokane and work to eliminate discrimination in housing, employment, and public accommodations for all people. In addition to creating the new department, Council also approved funding for a Director and two support staff for the office as part of the 2022 Budget adoption.

In February 2023, the City Council passed Ordinance C-36330, which, “Allows the Community, Housing and Human Services department to coordinate with the Office of Civil Rights, Equity, and Inclusion to establish a public-facing website, the digital link of which will be provided by landlords to their tenants, that identifies a variety of online resources for landlords and tenants, including tenant rights and responsibilities, a change of address form, and a voter registration form.”

Spokane City Council Equity Subcommittee

The Equity Subcommittee was adopted by Spokane City Council, November 29th, 2021, to serve as an advisory body for council through the Finance and Administration Committee. The purpose of the Equity Subcommittee is to:

- Collaborate with the City Council and city departments on policy and budget initiatives
- To build relationships between the City and impacted community members
- To recommend any necessary changes to the Spokane Municipal Code and other necessary policy actions to advance equity and inclusion, including the diversity, equity and inclusion policy goals established by the City's Comprehensive Plan
- To collaborate and consult with any other City council subcommittees, technical advisory group(s), City departments, and City's boards and commissions established by the City Administration in developing the framework and guidance for implementation

City Council Staff

- Manager of Equity and Inclusion – this position is a member of the Council’s policy and budget staff, and proposes and implements legislation regarding diversity, equity and inclusion.
- Manager of Housing and Homelessness Initiatives – This position addresses critical issues related to housing and homelessness within the community and plays a vital role in managing initiatives aimed at providing affordable housing options and supporting those experiencing homelessness.

Spokane County Human Rights Task Force

<http://www.spokanecountyhumanrightstaskforce.org/>

PO Box 4552, Spokane, WA 99220

The Spokane County Human Rights Task Force (SCHRTF) was founded in 2016 as a volunteer organization of community members whose purpose is to guard and advance human rights in order to create a region where all people feel welcomed, safe, and valued. Its top 3 priorities are:

- Support for people victimized by prejudice and bigotry
- Support education promoting positive human relations
- Monitor and document hate activity, crimes and incident

SCHRTF launched the Hate Documentation Project on April 2, 2019. The project has four core objectives: 1. Create a community record of hate crimes and incidents 2. Develop reports of crimes and incidents to share with the public 3. Use collected information to support and coordinate educational, programmatic, and awareness activities along with improving response and prevention efforts to hate in our community 4. Provide resources to individuals who choose to be contacted by a trained responder. To document hate crimes and incidents, the Spokane County Hate Reporting Tool was developed and made available at www.ReportHateBias.org and www.schrtf.org. The Tool has been translated into Spanish and Russian. Reports may be filed anonymously. Trained responders communicate with individuals who have requested to be contacted and can provide referrals to other agencies for assistance. These reports are not connected to law enforcement, though people who have experienced a hate crime are encouraged to submit a report to police.

In December 2020 the SCHRTF and the Pacific Northwest Anti-Defamation League developed a partnership to share hate incident data originating from Spokane County. The SCHRTF also partners with the City of Spokane Police Department, Cheney Police Department, E. WA University Police Department, and the Spokane County Sheriff's Office.

Description of Fair Housing Issues

Fair Housing Issues:

Fair housing issues were identified during the analysis conducted for each fair housing goal category.

Fair Housing Goal Category: Overcoming Segregation and Achieving Integration		
Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected
1. Disproportionate protected class concentrations in neighborhoods		
<ul style="list-style-type: none"> White non-Hispanic populations are over 90% in 7 tracts Non-white people in Spokane are most concentrated in 18 tracts, all which have over 25%-40% non-white populations 	<ul style="list-style-type: none"> Redlining, Steering, & Restrictive Covenants Highway displacement Zoning and siting of affordable housing Private discrimination due implicit bias and overt prejudice 	Race National Origin
<ul style="list-style-type: none"> People with disabilities (16.6% of total pop.) reside at higher percentages in central zip codes 99201 (25.4%) and 99202 (20.8%), and least in 99203 (12.4%) 	<ul style="list-style-type: none"> Zoning and siting of affordable and multi-family housing Lack of accessibility in older houses in single-family zoning Private discrimination due implicit bias and overt prejudice 	People with Disabilities
<ul style="list-style-type: none"> People with disabilities, Black and African American, and Native American, Alaska Native, and Indigenous people are disproportionately participating publicly supported housing programs. 	<ul style="list-style-type: none"> Housing choice voucher rent standards do not meet rental rates in higher income neighborhoods. Source of income discrimination against voucher holders is prevalent Publicly supported housing is concentrated in zip codes which allow large multi-family housing 	People with Disabilities Race National Origin
Fair Housing Goal Category: Reducing Disparities in Access to Community Assets		
Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected

<p>1. Access to Low Poverty Neighborhoods</p> <ul style="list-style-type: none"> Black, Native American / Alaska Natives, Hawaiian Native and Pacific Islanders, Hispanics, female-headed family households, and people with disabilities live in poverty at higher rates than the general population. 		<p>Race National Origin People with disabilities Families with Children Sex</p>
<p>2. Access to Transportation</p> <ul style="list-style-type: none"> Affordable housing is needed near public transportation. Transportation is a driving force for equitable access to schools and low-poverty neighborhoods. 	<ul style="list-style-type: none"> Availability and frequency of public transportation 	<p>People with disabilities Race National origin</p>
<p>3. Access to Education</p> <ul style="list-style-type: none"> Spokane School District children who are American Indian or Alaskan Native, Black or African American, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, or Two or More Races, performed less well on Smarter Balanced Assessments and the Comprehensive Assessment of Science compared to the average scores for all students and Asian and white non-Hispanic students. Low-income students, students with disabilities, English language learners, migrant students, students in foster care, and students experiencing homelessness also perform lower on standardized assessments. 		<p>Race National Origin Disability Families with Children</p>
<p>4. Access to Environmentally Healthy Neighborhoods</p> <ul style="list-style-type: none"> Life Expectancy: Black and American Indian/ Alaska Native / Indigenous people have life expectancies 4 and 7 years less than white people in Spokane county. Census tracts have wide variations, from 66 to 81 years. 	<ul style="list-style-type: none"> Redlining, Steering, & Restrictive Covenants Highway displacement Zoning and siting of affordable housing Private discrimination due implicit bias and overt prejudice 	<p>Race</p>
<p>5. Barriers that Deny Individuals with Disabilities Access to Opportunity</p> <ul style="list-style-type: none"> There is insufficient accessible housing in Spokane. 	<ul style="list-style-type: none"> Zoning and Siting: Most accessible units are in newly constructed multi-family housing 	<p>Disability</p>

<ul style="list-style-type: none"> • People with disabilities are often dependent upon public transportation, which further limits housing choice • Denial of reasonable accommodations, including assistance animals 	<ul style="list-style-type: none"> • Insufficient supply of subsidized accessible units and private market units which HCV rent standards will cover. • Long waitlists for accessible units in publicly supported housing a • Lack of available accessible units in non-publicly supported housing available to HCV participants • Residents in non-federally subsidized housing must pay for their own reasonable modifications • Availability and frequency of public transportation • Refusal of assistance animals, or high fee charged by housing providers who are afraid of or who have experienced damage by assistance animals 	
<p>6. Barriers to Housing for Residents of Publicly Supported Housing</p> <ul style="list-style-type: none"> • Source of income discrimination against voucher holders • There are not enough to meet need and demand. • Housing choice voucher rent standards do not meet rental rates in higher income neighborhoods. • Publicly supported housing is concentrated in zip codes which allow large multi-family housing 	<ul style="list-style-type: none"> • Refusal of vouchers and subsidies by housing providers who are afraid of or who have experienced damage by publicly assisted housing participants • Insufficient government funding • Rising rents • Zoning and siting • Available land • Access to existing transportation and services 	<p>People with disabilities Race</p>
<p>Fair Housing Goal Category: Increase Access to Affordable Housing Opportunities</p>		

Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected
<ul style="list-style-type: none"> • Income Disparities: BIPOC and people with disabilities have lower median incomes than the overall Spokane median income. • Housing Cost Burdens: Half of all renters in Spokane are cost burdened, and almost one quarter of all renter households are severely cost burdened. Cost burdens are greater for BIPOC households and people with disabilities on low fixed incomes. • Disparities in Housing Quality: <p>Housing Problems: Half of all renter households in Spokane experience at least one of four housing “problems.” 27% of renters experience at least one “severe” housing problem. Non-white households experience household problems at higher rates.</p>	<ul style="list-style-type: none"> • Insufficient Housing Supply • Increasing Housing Costs • Rising Rents and Fees 	Race National Origin People with Disabilities
Fair Housing Goal Category: Increase Access to Homeownership		
Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected
<ul style="list-style-type: none"> • There is a racial homeownership gap between BIPOC and white homeownership rates • Low mortgage origination and high denial rates for BIPOC <ul style="list-style-type: none"> • People with disabilities on disability income have difficulty qualifying for a home mortgage 	<ul style="list-style-type: none"> • Insufficient or unverifiable income • Low or no credit history • Lack of down payment and closing costs • Lack of inter-generational wealth and home equity, caused by redlining, restrictive covenants, and other discriminatory barriers to home inter-generational home ownership • Need for homebuyer and financial education • Low fixed incomes 	Race People with disabilities
Fair Housing Goal Category: Remove Local and State Policies and Practices that Are Barriers to Fair Housing		

Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected
<p>Zoning and Siting Policy changes are needed to allow for more housing choice:</p> <ul style="list-style-type: none"> • Mixed Use/Income/Space Housing There is a desire and need for increased mixed-use and mixed-income housing. Such housing would include owners, renters, low- and high-income households, seniors, and families with children, with walkable neighborhood development, and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries. • Siting of Affordable & Permanent Supportive Housing Much of Spokane’s affordable housing and permanent supportive housing development is concentrated downtown. Clustered housing makes it difficult for people to escape substance use relapse and continues segregation patterns for BIPOC and people with disabilities who are more often renters in publicly subsidized multi-family housing. • Scattered Site Housing There is need for increased scattered site affordable housing to allow more options for neighborhood access and deconcentrate people with low incomes from only living near each other. 	<ul style="list-style-type: none"> • Zoning laws limit commercial development in residential-only neighborhoods • Available property to build • Central access to transportation and social services 	<p>People with disabilities Race National Origin Families with Children</p>
<p>Rent Stabilization</p> <ul style="list-style-type: none"> • Rent stabilization is needed to provide longer notice periods for rent increases. 	<ul style="list-style-type: none"> • Landlords often oppose rent stabilization as they say they cannot accurately predict future expenses. 	<p>People with disabilities Race National Origin Families with Children</p>
<p>Source of Income Discrimination</p> <ul style="list-style-type: none"> • Housing providers frequently refuse to accept housing vouchers and other subsidies even though state and local law prohibit it 		<p>People with disabilities Race</p>

<ul style="list-style-type: none"> • Landlords do not always accept rental assistance 	<ul style="list-style-type: none"> • Lack of clarity about whether rental assistance is covered by source of protection laws if acceptance requires changing terms of the rental agreement. 	
<p>Eviction Laws and Practices</p> <ul style="list-style-type: none"> • Statewide demographic data indicates that Black and Indigenous people statewide disproportionately participate in appointed counsel programs. 	<ul style="list-style-type: none"> • BIPOC people are more often renters than homeowners, more likely to live in poverty, have lower median incomes, and be housing cost burdened. 	Race
<p>Just Cause Eviction Protection is needed for fixed term leases.</p> <ul style="list-style-type: none"> • Fixed leases can generally be terminated with a 60-day notice. Tenants are often steered into fixed term leases by being offered significantly higher rental rates for month-to-month rental agreements. 	<ul style="list-style-type: none"> • WA RLTA just cause eviction protections do not generally apply to fixed leases 	Race Disability
<p>Tenant Screening Requirements Commonly used tenant screening qualifications and processes are often impediments to accessing safe, affordable housing, including:</p> <ul style="list-style-type: none"> • Lack of screening process Transparency <ul style="list-style-type: none"> • Criminal History: Lack of a “ban the box” law in Spokane is a major barrier to housing for justice involved people, who are disproportionately Black, Indigenous, and other people of color. 	<ul style="list-style-type: none"> • In WA, housing providers must provide prospective tenants with a written notice that outlines the qualifications required for approval. However, applicants do not know how actual selections are made among multiple applicants. • Most publicly subsidized housing programs have income limits and targeted population criteria, varying by property and even within units in the same complex. • Applicants and housing providers don’t always know about the right to provide mitigating information as part of an individualized assessment. 	Race Disability

<ul style="list-style-type: none"> • Credit Score / History • Need for Universal Background and Credit Check 	<ul style="list-style-type: none"> • Credit score requirements have a bigger impact on BIPOC people who have historically been excluded from inter-generational wealth building, through homeownership, employment and education opportunities, and also people with disabilities on fixed incomes. • The City passed an ordinance to create a portable background and credit check program. The City has yet to implement this program. • A housing provider is not required to accept the universal background and credit check. 	
<p>Language Access</p> <ul style="list-style-type: none"> • Translation and interpreting of vital housing-related documents is needed in at least Spanish, Ukrainian, Russian, Marshallese, & Arabic, Vietnamese. 	<ul style="list-style-type: none"> • Housing providers that do not receive government funds are not required to provide translation or interpreting. 	National Origin
<p>Rental Regulation</p> <ul style="list-style-type: none"> • A full and complete rental registry is needed to know the quantity and location of rental units and have them available for selection for random audit by City Code Enforcement inspections. 	<ul style="list-style-type: none"> • The average housing stock in Spokane older. • There are numerous complaints about mold and substandard housing conditions • The rental registry requirement went into effect in January 2024, but currently the City is relying upon voluntary registrations and not yet engaging in enforcement action against those who are not registered. • A 2023 ordinance requires landlords or property managers to self-inspect units before renting them and certify that their property complies with all building codes, habitability requirements, and other relevant codes. However, there is no requirement for properties to be inspected by Code Enforcement prior to, or routinely, as a condition of renting them. The City's Code Enforcement Department 	Race Disability Families with Children

	may conduct periodic and cause-based inspections of residential rental property.	
<p>Rental Assistance</p> <ul style="list-style-type: none"> • There is broad consensus among housing consumers and providers for the need for rental assistance to stabilize people in housing and ensure housing providers are compensated. 	<ul style="list-style-type: none"> • Funding needs to be identified and allocated in the City budget 	<p>Race Disability Families Children</p> <p style="text-align: right;">with</p>
<p>Houselessness</p> <ul style="list-style-type: none"> • Black and American Indian / Alaskan Native / Indigenous people were disproportionately overrepresented in the Point-in-Time Count and as clients served at houseless encampments. • 46% of clients served at the Adams St. and Camp Hope Encampments self-reported disabling disabilities, including one or more mental, physical, and/or substance abuse conditions. • It is often a difficult adjustment to be in housing after experiencing houselessness. There are not enough supportive services and too few case managers to help people stay housed, and more permanent supportive housing is needed. • The fentanyl crisis has a disproportionate impact on people of color and those who are houseless. Substance abuse was more frequently self-reported as a disabling condition among clients of houseless encampments than physical or mental conditions. 		<p>Race Disability</p>
<p>Equity In City Institutions and Programs</p> <ul style="list-style-type: none"> • Representation: BIPOC, people with disabilities, and impacted people with lived experiences need to be included in City and Regional Boards and Commissions. • Race Equity Framework: A racial equity analysis is needed to examine City policies, programs, and practices to identify racial disparities and uncover systemic biases, and then use race-neutral metrics to design equitable 	<ul style="list-style-type: none"> • Public and private policies and practices (including redlining, racialized zoning, segregation, predatory lending, urban renewal, disinvestment in BIPOC neighborhoods, and exclusions in the New Deal and 	

programs. The City should adopt a race equity toolkit and provide clarity about how, when, and who within City government should utilize it.	the G.I. Bill) have resulted in racial disparities which still impact equitable housing access today.	
Fair Housing Goal Category: Increase Fair housing Enforcement		
Fair Housing Issues:	Contributing Factors	Protected Class Groups Adversely Affected
Discrimination or Violations of Civil Rights Laws Related to Housing Discrimination in housing is occurring based on Protected Classes: <ul style="list-style-type: none"> • Disability-based housing discrimination complaints are the most common basis for filing a complaint (71%), followed by: • Familial Status complaints (12%) • Sex and Sexual Orientation & Gender Identity (11%) • Race (5%) • National Origin (3%) & • Marital status (1.6%) 		All
The Spokane Human Rights Ordinance – Title 18 Few complaints are filed under the Spokane Human Rights Ordinance.	Title 18 does not provide a private cause of action. The commission of an act of discrimination as defined in Title 18 is punishable as a Class 1 civil infraction. Due to the enactment of source of income protections in the WA RLTA in 2019, most complainants of source of income discrimination file complaints in Court under the WA RLTA due to the ability to recover damages.	
Lack of resources for fair housing agencies and organizations to provide enforcement and education		All

Fair Housing Goals

Fair housing goals must be designed to overcome prioritized fair housing issues in each fair housing goal category. While HUD expects to see progress toward the achievement of each goal by the time of the program participant’s next Equity Plan, HUD recognizes that all goals may not be fully achieved during a single five-year cycle. Goals may consist of short-term goals such that material positive change is readily achieved, and long-term goals such that material positive change occurs within the jurisdiction over a prolonged but reasonable period of time.

To address the fair housing issues and contributing factors that have been identified, the following goals, strategies, and actions for consideration have been selected, including several previously identified in the Spokane Housing Action Plan and City Council Implementation Plan:

Goal #1: Increase affordable housing and neighborhood access
Strategies:
(A) Reduce land use and zoning restrictions that limit housing type to ensure that members of historically underserved communities and protected class groups have equitable access to affordable housing opportunities in well-resourced areas throughout the jurisdiction.
(B) Increase and preserve the housing supply in a range of affordable and accessible housing unit types, sizes and rates.
(C) Preserve housing affordability and quality to help people thrive where they live. <i>Spokane Housing Action Plan, Priority B.</i>
(D) Provide priority for housing programs to households that would be eligible for a free or reduced lunch program. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.9.</i>
(E) Contract with nonprofit community groups that serve people negatively impacted by historical redlining and its current consequences to provide culturally competent navigators to members of those communities to assist them in expanding their housing and neighborhood choices. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.12</i>
(F) Support land use and development code regulations that allow diverse housing types and support mixed-income communities, consistent with Comprehensive Plan Policy H 2.2. <i>Spokane Housing Action Plan, Strategy C-1, Action for Consideration.</i>
(G) Prioritize investment and incentives that support housing affordability and stability for low-income residents and people of color in historically underserved neighborhoods, while also increasing access to high-resource neighborhoods. <i>Spokane Housing Action Plan, Strategy C-1, Action for Consideration.</i>
(H) Incentivize developers to build affordable housing.
(I) Prioritize the sale of City parcels to public housing authority and not-for-profit affordable housing developers and require inclusion of rent-restricted units.
(J) Develop mixed-use, mixed-income housing, to include owners, renters, low- and high-income households, seniors, and families with children, walkable neighborhood development, and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries.

(K) Diversify the siting of affordable and permanent supportive housing.

Fair housing issue(s) the goal is designed to address:

Disproportionate protected class concentrations in neighborhoods

- White non-Hispanic populations are over 90% in 7 tracts
- Non-white people in Spokane are most concentrated in 18 tracts, all which have over 25%-40% non-white populations
- People with disabilities (16.6% of total pop.) reside at higher percentages in central zip codes 99201 (25.4%) and 99202 (20.8%), and least in 99203 (12.4%)

- Access to Low Poverty Neighborhoods: Black, Native American / Alaska Natives, Hawaiian Native and Pacific Islanders, Hispanics, female-headed family households, and people with disabilities live in poverty at higher rates than the general population.

- Publicly supported housing is concentrated in neighborhoods which are zoned for large multi-family housing, which has disproportionate participation by protected classes (including BIPOC and people with disabilities)

- Affordable housing is needed near public transportation, a driving force for equitable access to schools and low-poverty neighborhoods.

- Access to Environmentally Healthy Neighborhoods. Black and American Indian/ Alaska Native / Indigenous people have life expectancies 4 and 7 years less than white people in Spokane county. Census tracts have wide variations, from 66 to 81 years.

- Zoning and Siting Policy changes are needed to allow for more housing choice

Actions for consideration:

- Use sales and use tax “1590” funds to develop affordable housing

- Raise the minimum wage

- Increase scattered site affordable housing to allow more options for neighborhood access

- Consider reducing open space requirements, increasing residential density, providing density bouses, and decreasing minimum lot sizes

- Create a database and mapping system to monitor future rent-restricted housing property affordability expirations

- Identify properties at risk for displacement

- Establish a purchase or loan fund program to prevent properties from becoming market rate

Goal #2: Overcome the fair housing issues of segregation and disparities in access to opportunity for individuals with disabilities due to a lack of accessible, affordable housing

Strategies:

(A) Incorporate the provision of enhanced accessibility features (e.g., features that provide greater accessibility than the minimum features required by accessibility standards) in new construction and rehabilitation of affordable housing to create greater access to integrated housing opportunities for individuals with disabilities.

(B) Promote universal design in residential development to support all people regardless of their age, size, and ability in accessing housing to the greatest extent possible, without the need for adaptation or specialization. *Spokane Housing Action Plan, Strategy C1, Actions for Consideration.*

(C) Expand public transportation routes and ride frequency to provide access to more neighborhoods

Fair housing issue(s) the goal is designed to address:

<ul style="list-style-type: none"> • There is insufficient accessible housing in Spokane.
<ul style="list-style-type: none"> • People with disabilities are often dependent upon public transportation, and frequency and location of routes, which limits housing choice
<ul style="list-style-type: none"> • Older housing, especially single-family houses, is often inaccessible
<ul style="list-style-type: none"> • Residents in non-federally subsidized housing must pay for their own reasonable modifications
<ul style="list-style-type: none"> • Reasonable accommodations are often denied, including denial or fees charged for assistance animals
<ul style="list-style-type: none"> • Zoning and Siting: Most accessible units are in newly constructed multi-family housing
<ul style="list-style-type: none"> • Insufficient supply of subsidized accessible units and private market units which HCV rent standards cover.
<p>Actions for Consideration:</p>
<ul style="list-style-type: none"> • Review new multi-family development plans and conduct site audits for compliance with the Fair Housing Act’s design and construction requirements.
<ul style="list-style-type: none"> • Provide Fair Housing Act design and construction compliance training for City staff and developers, architects, engineers, and builders involved in the development of multi-family housing.
<ul style="list-style-type: none"> • Establish a fund for people with disabilities with low-income tenants to make reasonable modifications in housing that is not subsidized, and for low-income homeowners to make home modifications needed for disabilities.
<ul style="list-style-type: none"> • Provide training for housing providers and consumers about reasonable accommodations (including assistance animals) and reasonable modification requirements
<p>Goal #3: Stabilize people in safe and affordable housing</p>
<p>(A) Provide proactive rental assistance for low-income people before they become houseless, and rapid rehousing and rental assistance for low-income people who have been displaced or are houseless</p>
<p>(C) Ensure habitability and accessibility in housing</p>
<p>(D) Provide permanent supportive housing and services for houseless people and treatment facilities and services in a variety of neighborhoods and housing types</p>
<p>(E) Provide seed funding for a three-year pilot program for attorneys and upfront relocation funds for tenants attempting to enforce clear violations of existing state and local rental and housing standards to be replenished by landlords found responsible for violating law. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy II.15</i></p>
<p>(F) Preserve and stabilize the viability of existing homeownership for low-income homeowners. <i>Spokane Housing Action Plan, Strategy C-3.</i></p>
<p>Fair housing issue(s) the goal is designed to address:</p>
<ul style="list-style-type: none"> • Need for rental assistance to stabilize people in housing and ensure housing providers are compensated.
<ul style="list-style-type: none"> • Rent stabilization is needed to provide longer notice periods for rent increases.
<ul style="list-style-type: none"> • Just Cause Eviction Protection is needed for fixed term leases.
<ul style="list-style-type: none"> • Eviction Laws and Practices: Black and Indigenous people statewide disproportionately participate in appointed counsel programs.

- Half of all renter households in Spokane experience at least one of four housing “problems,” including incomplete kitchen and plumbing facilities. 27% of renters experience at least one “severe” housing problem. Non-white households experience household problems at higher rates.
- A full and complete rental registry is needed to know the quantity and location of rental units and have them available for selection for random audit by City Code Enforcement inspections.
- Black and American Indian / Alaskan Native / Indigenous people were disproportionately overrepresented in the Point-in-Time Count and as clients served at houseless encampments.
- 46% of clients served at the Adams St. and Camp Hope Encampments self-reported disabling disabilities, including one or more mental, physical, and/or substance abuse conditions.
- There are not enough supportive services and too few case managers to help people stay housed, and more permanent supportive housing is needed.
- The fentanyl crisis has a disproportionate impact on people of color and those who are houseless.

Actions for Consideration:

- Identify and allocate additional resources for rehabilitation and maintain viable affordable housing that goes beyond regular upkeep. *Spokane Housing Action Plan, Strategy C3, Action for Consideration.*
- Encourage proactive counseling and education for homeowners on maintenance and upkeep of their homes. *Spokane Housing Action Plan, Strategy C3, Action for Consideration.*
- Support programs that reduce tax burdens to help homeowners with costs and stay in their neighborhoods, targeting but not limiting such programs to lower and moderate income, elderly, disabled, and veteran homeowners. *Spokane Housing Action Plan, Strategy C3, Action for Consideration.*
- Investigate expanding City resources, programming, and partnerships to support home safety modification projects for lower income, disabled, and elderly homeowners. *Spokane Housing Action Plan, Strategy C3, Actions for Consideration.*
- Fund proactive and rapid rehousing rental assistance
- Fund permanent supportive housing and services and treatment facilities and services
- Adopt a rent stabilization ordinance to provide additional notice for rent increases over a specific percentage
- Adopt Just Cause Eviction Protection for fixed term leases.
- Support and fund 5-year homeless planning and Continuum of Care

Goal #4: Enhance Equitable Access to Homeownership

Strategies:

- (A) Eliminate barriers and expand homeownership for lower income households, first-time homebuyers, and protected class groups that have historically been denied an equal opportunity to become homeowners, including people of color and people with disabilities.

(B) Expand attainable home ownership programs, especially using shared equity and land trust models, by utilizing new funding streams authorized by 1406, 1590 and 2497. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.3</i>
(C) Give housing purchase and other City-funded programs priority to people who live in, formerly lived in, or their parents lived in, the neighborhood where the new housing is located in order to mitigate past or future displacement. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.8</i>
(D) Support partner organizations' efforts to expand homeownership education, outreach, and financial assistance to reach more potential homebuyers, including expanding homebuyer financial assistance (to include downpayments, earnest money, real estate broker fees, inspection fees, and closing costs) and education opportunities for first-time homebuyers, and providing financial literacy, credit repair, and credit building education. <i>Spokane Housing Action Plan, Strategy C-1, Action for Consideration</i>
(E) Support community-based organizations with a commitment to increasing Black, Indigenous, Latinx and People of Color homeownership and reducing the racial homeownership gap. <i>Spokane Housing Action Plan, Strategy C-1, Action for Consideration</i>
(F) Work with the community and partner organizations to explore shared equity models to provide home ownership opportunities to low- and moderate-income families, including shared equity cooperatives, limited-equity resident-owned communities, cooperatives, community land trusts, and deed-restricted/ below market-rate programs. <i>Spokane Housing Action Plan, Strategy C-1, Action for Consideration</i>
Fair housing issue(s) the goal is designed to address:
<ul style="list-style-type: none"> • There is a racial homeownership gap between BIPOC and white homeownership rates • Low mortgage origination and high denial rates for BIPOC people
Actions for Consideration:
<ul style="list-style-type: none"> • Establish Special Purpose Credit Programs for first-generation and historically and economically disadvantaged populations, to increase homeownership opportunities for underserved groups, specifically authorized by the Equal Credit Protection Act. • Provide financial assistance for homeowners to make needed modifications post-purchase
Goal #5: Advance Equity In City Institutions, Programs, and Services
Strategies:
<ul style="list-style-type: none"> • The City should use its Office of Historic Preservation to promptly create a report that explains the historical actions of government and institutions in Spokane to expressly and indirectly redline housing based on race and other factors. All housing policies and programs going forward should take those illegal actions and their impacts into account and attempt, within the bounds of current state and federal law, to redress them and avoid further inequity. Current and former residents of neighborhoods with a history of redlining along with households who are eligible for free and reduced lunch programs in public schools should be given preference in qualifying for City-sponsored housing programs. Regardless of preference, the City should spend money to reduce barriers to accessing housing programs by liberally using language translation services, proactive reasonable accommodations and contracting with trusted ambassadors to communities in need of and at risk of not accessing housing services. These equity efforts should be informed by community members with lived experience relevant to the housing programs at issue and the challenges of accessing them. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy F.</i>

<ul style="list-style-type: none"> • Create a historical housing equity report on racial and other redlining in Spokane neighborhoods. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.14</i>
<ul style="list-style-type: none"> • Create a housing equity toolkit to analyze potential equity impacts of current and proposed land use and housing program practices. <i>Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.15</i>
<ul style="list-style-type: none"> • Address racial inequities and disparities in housing. <i>Spokane Housing Action Plan, Strategy C-2</i>
<p>Fair housing issue(s) the goal is designed to address:</p>
<ul style="list-style-type: none"> • Representation: BIPOC, people with disabilities, and impacted people with lived experiences need to be included in City and Regional Boards and Commissions. • Race Equity Framework: A racial equity analysis is needed to examine City policies, programs, and practices to identify racial disparities and uncover systemic biases, and then use race-neutral metrics to design equitable programs.
<p>Actions for Consideration:</p>
<ul style="list-style-type: none"> • Develop a racial equity framework and expand analysis of equity indicators to inform housing and land use policy, code regulations, and to mitigate displacement. <i>Spokane Housing Action Plan, Strategy C-2, Action for Consideration</i>
<ul style="list-style-type: none"> • Continue work to eliminate fair housing barriers identified in the City’s Fair Housing Plan, and affirmatively further fair housing practices in City government. <i>Spokane Housing Action Plan, Strategy C2, Action for Consideration.</i>
<ul style="list-style-type: none"> • Work with community partners to encourage actions that address unfair/discriminatory housing, lending and appraisal practices and increase access to credit. <i>Spokane Housing Action Plan, Strategy C2, Action for Consideration.</i>
<ul style="list-style-type: none"> • Equitably engage and empower all community members to participate in shaping housing policies, particularly those most impacted including but not limited to people of color, people with disabilities, lower income households, renters, refugees, immigrants, women and LGBTQIA+ and other under-represented groups. <i>Spokane Housing Action Plan, Strategy C2, Action for Consideration.</i>
<ul style="list-style-type: none"> • Partner with local organizations to provide fair housing education for housing providers, and fair housing design and construction training for developers, contractors, architects, engineers, and city planning and development personnel. <i>Spokane Housing Action Plan, Strategy C2, Action for Consideration.</i>
<ul style="list-style-type: none"> • Conduct an equity review and update the Comprehensive Plan Housing Chapter if needed to comply with 2021 WA legislation (HB 1220). <i>Spokane Housing Action Plan, Strategy C2, Action for Consideration.</i> In 2021, the WA Legislature, with House Bill 1220 (HB 1220), amended the Growth Management Act to require local governments to “plan for and accommodate” housing affordable to all income levels. HB 1220 added new requirements for housing elements of jurisdiction’s comprehensive plans. Local governments must review and identify housing policies and regulations that have resulted in racially disparate impacts, displacement and exclusion, and identify and implement policies to begin to undo these impacts. Fully planning jurisdictions must also identify areas that may be at a higher risk of displacement and develop anti-displacement policies to avoid these effects. Each fully planning jurisdiction must comply with RCW 36.70A.070(e-h). The City should implement the WA Dept. of Commerce Racially Disparate Impacts Guidance for local governments on how to integrate new requirements related to racially disparate impacts, displacement, exclusion and displacement risk in housing into their housing element updates.

- Expand research and application of equity and anti-displacement practices to deepen place-based analysis and reflect in policy development. *Spokane Housing Action Plan, Strategy C2, Action for Consideration.*

Goal #6: Reduce Barriers to Housing Entry

Strategies:

- (A) Support partner organizations’ efforts to provide financial literacy, credit repair, and credit building education
- (B) Reduce overly restrictive screening criteria for housing access for people with criminal justice system involvement that do not predict success as a tenant and are not justified by legitimate safety concerns
- (C) Expand information provided in Spanish, Russian, Marshallese, Vietnamese, Arabic, and other languages to help increase access to housing and community development programs and resources.
- (D) Increase language translation and technology options for sharing opportunities with potential beneficiaries of housing programs to overcome obstacles related to language, culture, education, transportation and/or disability. *Spokane Housing Action Plan, City Council Implementation Plan, App. A, Strategy I.13*

Fair housing issue(s) the goal is designed to address:

- Criminal history screening and tenant qualification policies are a major barrier to housing for justice involved people, who are disproportionately Black, Indigenous, and other people of color.
- Tenants are denied housing due to insufficient credit scores or history
- Need for a universal background and credit check
- Translation and interpreting of vital housing-related documents is needed in at least Spanish, Ukrainian, Russian, Marshallese, Arabic, and Vietnamese.

Actions for Consideration:

- Implement the City universal background and credit program.
- Enact a “ban the box” ordinance in Spokane

Goal #7: Increase fair housing outreach, education, and enforcement

- (A) Ensure the public has information about fair housing protections and compliance
- (B) Support community organization efforts to provide fair housing advocacy, identify non-compliance with fair housing laws, and bring enforcement actions under fair housing laws

Fair housing issue(s) the goal is designed to address:

- Discrimination or Violations of Civil Rights Laws Related to Housing Discrimination in housing is occurring based on Protected Classes
- Housing providers frequently refuse to accept housing vouchers and other subsidies even though state and local law prohibit it.
- Lack of resources for fair housing agencies and organizations to provide enforcement and education
- The Spokane Human Rights Ordinance, Title 18 does not provide a private cause of action.

Actions for Consideration:

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Conduct audit testing for compliance with source of income laws |
| • Provide fair housing education for everyone involved in housing transactions or policy development and implementation. |
| • Provide fair housing and landlord and tenant information in commonly used non-English languages and accessible formats to increase housing access for immigrant and refugee communities and persons with disabilities. |
| • Amend the Spokane Human Rights Ordinance in Title 18 to include a private cause of action |

Certification and Submission

APPENDIX A - Requirement to Affirmatively Further Fair Housing

Title VIII of the Civil Rights Act of 1968, “the Fair Housing Act”, requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. <https://www.hud.gov/AFFH>

For decades, HUD has required recipients of federal financial assistance such as States, local governments, insular areas, and PHAs to engage in fair housing planning. Such planning has previously consisted of the Analysis of Impediments to Fair Housing Choice and the Assessment of Fair Housing and was done in connection with other types of planning required by program requirements, such as the consolidated plan, annual action plan, and PHA plan. <https://www.hud.gov/AFFH>

On July 16, 2015, HUD published the final AFFH rule that created a process for local jurisdictions and public housing authorities to analyze the local fair housing landscape and set fair housing priorities and goals through an Assessment of Fair Housing (AFH). The AFFH rule was designed to improve community planning in order to overcome fair housing issues and have inclusive community participation, to result in establishing fair housing goals in order to increase fair housing choices and provide equal access to opportunity for all community members.

HUD terminated the 2015 AFFH Rule, and replaced it with a new rule, the Preserving Communities and Neighborhood Choice rule, which went into effect on September 8, 2020.

On January 25, 2021, the White House issued a number of Executive Orders that implicate HUD’s responsibility for implementing the AFFH mandate, including Executive Order 13895, “Advancing Racial Equity for Underserved Communities Through the Federal Government” and Executive Order 13988, “Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation.” <https://www.hud.gov/AFFH>

On January 26, 2021, the White House issued a Memorandum to the Secretary of Housing and Urban Development, which declared that the affirmatively furthering fair housing provision in the Fair Housing Act, “...is not only a mandate to refrain from discrimination but a mandate to take actions that undo historic patterns of segregation and other types of discrimination and that afford access to long-denied opportunities.” <https://www.hud.gov/AFFH>

HUD published an Interim Final Rule (IFR), effective July 31, 2021, “Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,” which:

- Rescinded the 2020 Preserving Communities and Neighborhood Choice rule, which caused funding recipients to certify “compliance” with a regulatory definition that was not a reasonable construction of the Fair Housing Act’s mandate to AFFH. <https://www.hud.gov/AFFH>.
- Reinstated several of the 2015 AFFH rule definitions and certifications incorporating those definitions at 24 CFR 5.151, including “Affirmatively Furthering Fair Housing,” “Disability,” “Fair Housing Choice,” “Housing Programs Serving Specified Populations,” “Integration,” “Meaningful Actions,” “Racially or Ethnically Concentrated Areas of Poverty,” “Segregation,” and “Significant Disparities in Opportunity.” These definitions correspond with the AFFH statutory mandates, HUD’s long-standing interpretations, and judicial precedent.
- Requires program participants to submit certifications that they will AFFH in connection with their consolidated plans, annual action plans, and PHA plans.
 - The IFR amended the certifications in the program regulations at 24 CFR 91.225, 91.325, 91.425, 570.487, 903.7, and related record keeping requirements to restore meaningful AFFH certifications

that incorporate appropriate definitions. Amendments to 24 CFR parts 92, 570, 574, and 576 include updated cross-references and clarification of program participants in the HOME, CDBG, Housing Opportunities for Persons With AIDS (HOPWA), and Emergency Solutions Grants programs regarding recordkeeping requirements. The IFR also amends 24 CFR 903.7(o), 903.15, and 24 CFR 903.23(f) to update cross-references to the amended definitions and certification provisions in 24 CFR 5.151 and 5.152 .

- HUD may review recipients' records and documents to confirm the validity of certifications submitted to HUD in connection with the receipt of Federal funds.
- To support these certifications, the IFR creates a voluntary fair housing planning process. The IFR does not require program participants to undertake any specific type of fair housing planning to support their certifications, but **HUD anticipates the continued use of the AI or AFH process as ways program participants may choose to support AFFH certifications.**

On February 9, 2023, HUD published a new proposed Affirmatively Further Fair Housing (AFFH) rule, with a 60-day comment period.

- HUD proposes to implement the obligation to affirmatively further the purposes and policies of the Fair Housing Act with respect to certain recipients of HUD funds. The Fair Housing Act not only prohibits discrimination, but also directs HUD to ensure that the agency and its program participants will proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in housing-related opportunities, and foster inclusive communities that are free from discrimination. This proposed rule builds on the steps previously taken in HUD's 2015 Affirmatively Furthering Fair Housing (AFFH) final rule to implement the AFFH obligation and ensure that Federal funding is used in a systematic way to further the policies and goals of the Fair Housing Act. **This rule proposes to retain much of the 2015 AFFH Rule's core planning process, with certain improvements such as a more robust community engagement requirement, a streamlined required analysis, greater transparency, and an increased emphasis on goal setting and measuring progress.** It also includes mechanisms to hold program participants accountable for achieving positive fair housing outcomes and complying with their obligation to affirmatively further fair housing, modeled after those processes under other Federal civil rights statutes that apply to recipients of Federal financial assistance.
- If adopted, the new Plan to be submitted is named an Equity Plan. Program participants would be required to submit an Equity Plan to HUD every 5 years for review and acceptance. Participants may submit individual or joint Equity Plans. Housing Authorities would also be required to submit Equity Plans.
- For each program participant that receives a total of **\$1-29 million in formula grant funds for the program year that begins on or after January 1, 2026, the first Equity Plan shall be submitted no later than 365 calendar days prior to the date for which a new consolidated plan is due.**
- *How to comply with AFFH planning and certification requirements until first Equity Plan submission* - until such time as a program participant submits or is required to submit an Equity Plan, **the program participant shall engage in fair housing planning** (e.g., prepare an Analysis of Impediments to Fair Housing Choice, Assessment of Fair Housing, or other fair housing plan).
 - Program participants that have not conducted or updated their fair housing plans for more than three years prior to [effective date of final rule], and who are not required to submit an Equity Plan pursuant to paragraph (b) or (c) of this section within twenty-four months of [effective date of final rule], shall either conduct or update their fair housing plans (i.e., Analysis of Impediments to Fair Housing Choice, Assessment of Fair Housing, or other fair housing plan) and submit such plan to HUD for publication and potential review no later than 365 days from [effective date of final rule].

- **Program participants that have conducted or updated their fair housing plans during the three years prior to [effective date of final rule], are not required to undertake additional updates, but must submit their existing fair housing plan to the Department for publication and potential review no later than 120 days from [effective date of final rule].**
- Program participants may, alternatively, conduct an Equity Plan in advance of when such plan would otherwise be due for submission to HUD.
- **Program participants shall continue to update their fair housing plans at least every five years and submit updated plans to HUD** for publication and potential review until such time as the program participant is required to begin preparing its Equity Plan for submission to HUD.
- The public comment period ended on April 24, 2023. HUD will take the upcoming months to review public comments before making revisions and finalizing the rule.
- **The AFFH Interim Final Rule remains in effect during proposed rulemaking.**

APPENDIX B – SUPPLEMENTAL TABLES

Table B-1: Place of Birth for the Foreign-Born Population in Spokane –2022: ACS 5-Year Estimates			
	Estimate	Margin of Error	% of Foreign-Born Pop.
Total:	13,198	±1,378	100%
Europe:	3,219	±532	24%
Northern Europe:	428	±151	3%
United Kingdom	315	±143	2%
England	174	±102	1%
Scotland	83	±80	1%
Western Europe:	485	±182	4%
Germany	392	±167	3%
Southern Europe:	163	±100	1%
Italy	88	±67	1%
Spain	67	±69	1%
Eastern Europe:	2,143	±525	16%
Albania	105	±127	1%
Belarus	98	±70	1%
Bosnia and Herzegovina	80	±88	1%
Latvia	82	±98	1%
Moldova	239	±207	2%
Russia	590	±267	4%
Ukraine	693	±262	5%
Other Eastern Europe	152	±126	1%
Asia:	5,889	±944	45%
Eastern Asia:	923	±223	7%
China:	535	±176	4%
Excluding Hong Kong and Taiwan	423	±152	3%
Taiwan	89	±66	1%
Japan	145	±73	1%
Korea	238	±107	2%
South Central Asia:	1,054	±367	8%
Afghanistan	229	±156	2%
India	326	±156	2%
Kazakhstan	122	±118	1%
Nepal	75	±60	1%
Other South Central Asia	205	±181	2%
South Eastern Asia:	2,262	±502	17%
Burma (Myanmar)	267	±180	2%
Cambodia	80	±93	1%
Laos	97	±102	1%
Malaysia	80	±88	1%
Philippines	611	±209	5%
Thailand	362	±217	3%
Vietnam	754	±259	6%
Western Asia:	1,650	±802	13%
Iraq	1,060	±584	8%
Saudi Arabia	174	±179	1%
Syria	314	±386	2%
Africa:	868	±376	7%
Eastern Africa:	677	±307	5%
Ethiopia	275	±144	2%
Tanzania	130	±162	1%
Uganda	140	±173	1%
Middle Africa:	85	±91	1%
Western Africa:	66	±59	1%
Oceania:	911	±237	7%
Marshall Islands	561	±229	4%
Micronesia	189	±156	1%
Oceania, n.e.c.	151	±99	1%
Americas:	2,311	±448	18%
Latin America:	1,589	±354	12%

Caribbean:	174	±140	1%
Cuba	124	±128	1%
Central America:	1,165	±315	9%
Mexico	1,005	±312	8%
South America:	250	±104	2%
Venezuela	73	±78	1%
Northern America:	722	±211	5%
Canada	722	±211	5%

Table B-2

Disposition of applications by income, race, and ethnicity of applicant, 2021														
MSA/MD: 44060 - Spokane-Spokane Valley, WA														
INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	No.	% of Total	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
ALL INCOMES														
Race														
American Indian or Alaska Native	364	0.8%	231	63.5%	11	3.0%	49	13.5%	46	12.6%	27	7.4%	3	7.4%
Asian	875	1.8%	544	62.2%	19	2.2%	118	13.5%	138	15.8%	56	6.4%	25	1.6%
Black or African American	575	1.2%	318	55.3%	17	3.0%	104	18.1%	101	17.6%	35	6.1%	25	1.6%
Native Hawaiian or Other Pacific Islander	96	0.2%	64	66.7%	3	3.1%	11	11.5%	14	14.6%	4	4.2%	2	0.1%
White	36829	76.1%	25915	70.4%	663	1.8%	3841	10.4%	5028	13.7%	1382	3.8%	1114	73.5%
2 or more minority races	63	0.1%	42	66.7%	0	0.0%	9	14.3%	8	12.7%	4	6.3%	2	0.1%
Joint	1452	3.0%	998	68.7%	22	1.5%	160	11.0%	226	15.6%	46	3.2%	48	3.2%
Free Form Text Only	4	0.0%	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Race Not Available	8155	16.8%	5088	62.4%	166	2.0%	928	11.4%	1369	16.8%	604	7.4%	297	19.6%
Total	48413		33204		901		5220		6930		2158		1516	
Ethnicity														
Hispanic or Latino	1100	2.3%	678	61.6%	21	1.9%	158	14.4%	188	17.1%	55	5.0%	49	4.5%
Not Hispanic or Latino	37634	77.7%	26342	70.0%	677	1.8%	3991	10.6%	5156	13.7%	1468	3.9%	1114	3.0%
Joint	1061	2.2%	732	69.0%	19	1.8%	99	9.3%	167	15.7%	44	4.1%	34	3.2%
Free Form Text Only	11	0.0%	8	72.7%	0	0.0%	2	18.2%	1	9.1%	0	0.0%	1	9.1%
Ethnicity Not Available	8607	17.8%	5444	63.3%	184	2.1%	970	11.3%	1418	16.5%	591	6.9%	318	3.7%
Total	48413	100.0%	33204		901		5220		6930		2158		1516	

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2021/WA/44060/5>

Table B-3

Disposition of applications by income, race, and ethnicity of applicant, 2021														
MSA/MD: 44060 - Spokane-Spokane Valley, WA														
INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total
LESS THAN 50% OF MSA/MD MEDIAN														
Race														
American Indian or Alaska Native	56	1.30%	26	46.43%	3	5.36%	13	23.21%	7	12.50%	7	12.50%	2	3.57%
Asian	95	2.20%	40	42.11%	0	0.00%	29	30.53%	18	18.95%	8	8.42%	2	2.11%
Black or African American	46	1.10%	16	34.78%	3	6.52%	16	34.78%	9	19.57%	2	4.35%	11	23.91%
Native Hawaiian or Other Pacific Islander	10	0.20%	4	40.00%	1	10.00%	3	30.00%	1	10.00%	1	10.00%	0	0.00%
White	3276	76.50%	1715	52.35%	98	2.99%	828	25.27%	447	13.64%	188	5.74%	251	7.66%
2 or more minority races	4	0.10%	1	25.00%	0	0.00%	1	25.00%	1	25.00%	1	25.00%	0	0.00%
Joint	64	1.50%	28	43.75%	2	3.13%	21	32.81%	9	14.06%	4	6.25%	11	17.19%
Free Form Text Only	0	0.00%	0		0		0		0		0		0	
Race Not Available	734	17.10%	277	37.74%	26	3.54%	219	29.84%	123	16.76%	89	12.13%	47	6.40%
Total	4285	100.00%	2107	49.17%	133	3.10%	1130	26.37%	615	14.35%	300	7.00%	324	7.56%
Ethnicity														
Hispanic or Latino	128	3.00%	51	39.84%	5	3.91%	35	27.34%	26	20.31%	11	8.59%	17	13.28%
Not Hispanic or Latino	3363	78.50%	1758	52.27%	102	3.03%	857	25.48%	450	13.38%	196	5.83%	239	7.11%
Joint	36	0.80%	15	41.67%	2	5.56%	11	30.56%	6	16.67%	2	5.56%	10	27.78%
Free Form Text Only	2	0.00%	0	0.00%	0	0.00%	2	100.00%	0	0.00%	0	0.00%	0	0.00%
Ethnicity Not Available	756	17.60%	283	37.43%	24	3.17%	225	29.76%	133	17.59%	91	12.04%	58	7.67%
Total	4285	99.90%	2107		133		1130		615		300		324	
50-79% OF MSA/MD MEDIAN														
Race														
American Indian or Alaska Native	134	1.40%	89	66.42%	3	2.24%	18	13.43%	13	9.70%	11	8.21%	0	0.00%
Asian	175	1.90%	104	59.43%	5	2.86%	28	16.00%	25	14.29%	13	7.43%	5	2.86%
Black or African American	142	1.50%	83	58.45%	1	0.70%	28	19.72%	22	15.49%	8	5.63%	2	1.41%
Native Hawaiian or Other Pacific Islander	16	0.20%	11	68.75%	0	0.00%	3	18.75%	1	6.25%	1	6.25%	2	12.50%
White	7312	78.10%	4975	68.04%	138	1.89%	888	12.14%	1024	14.00%	287	3.93%	183	2.50%
2 or more minority races	18	0.20%	14	77.78%	0	0.00%	0	0.00%	2	11.11%	2	11.11%	1	5.56%
Joint	171	1.80%	108	63.16%	7	4.09%	30	17.54%	22	12.87%	4	2.34%	4	2.34%
Free Form Text Only	2	0.00%	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race Not Available	1387	14.80%	840	60.56%	21	1.51%	194	13.99%	219	15.79%	113	8.15%	56	4.04%
Total	9357	100.00%	6226	66.54%	175	1.87%	1189	12.71%	1328	14.19%	439	4.69%	253	2.70%
Ethnicity														
Hispanic or Latino	287	3.07%	189	65.85%	2	0.70%	49	17.07%	33	11.50%	14	4.88%	10	3.48%
Not Hispanic or Latino	7451	79.63%	5029	67.49%	141	1.89%	920	12.35%	1048	14.07%	313	4.20%	184	2.47%
Joint	138	1.47%	90	65.22%	3	2.17%	19	13.77%	19	13.77%	7	5.07%	1	0.72%
Free Form Text Only	2	0.02%	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Ethnicity Not Available	1479	15.81%	916	61.93%	29	1.96%	201	13.59%	228	15.42%	105	7.10%	58	3.92%
Total	9357	100.00%	6226	66.54%	175	1.87%	1189	12.71%	1328	14.19%	439	4.69%	253	2.70%

Table B-4

Disposition of applications by income, race, and ethnicity of applicant, 2021														
MSA/MD: 44060 - Spokane-Spokane Valley, WA														
INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total
80-99% OF MSA/MD MEDIAN														
Race														
American Indian or Alaska Native	28	0.80%	18	64.29%	0	0.00%	5	17.86%	5	17.86%	0	0.00%	0	0.00%
Asian	60	1.80%	41	68.33%	0	0.00%	5	8.33%	9	15.00%	5	8.33%	2	3.33%
Black or African American	49	1.50%	32	65.31%	0	0.00%	9	18.37%	4	8.16%	4	8.16%	1	2.04%
Native Hawaiian or Other Pacific Islander	9	0.30%	7	77.78%	0	0.00%	2	22.22%	0	0.00%	0	0.00%	0	0.00%
White	2605	77.70%	1833	70.36%	45	1.73%	285	10.94%	350	13.44%	92	3.53%	70	2.69%
2 or more minority races	8	0.20%	4	50.00%	0	0.00%	3	37.50%	1	12.50%	0	0.00%	0	0.00%
Joint	91	2.70%	60	65.93%	2	2.20%	9	9.89%	17	18.68%	3	3.30%	7	7.69%
Free Form Text Only	0	0.00%	0		0		0		0		0		0	
Race Not Available	504	15.00%	319	63.29%	6	1.19%	62	12.30%	79	15.67%	38	7.54%	21	4.17%
Total	3354	100.00%	2314	68.99%	53	1.58%	380	11.33%	465	13.86%	142	4.23%	101	3.01%
Ethnicity														
Hispanic or Latino	92	2.70%	60	65.22%	3	3.26%	14	15.22%	10	10.87%	5	5.43%	4	4.35%
Not Hispanic or Latino	2650	79.00%	1871	70.60%	40	1.51%	286	10.79%	357	13.47%	96	3.62%	74	2.79%
Joint	63	1.90%	46	73.02%	1	1.59%	5	7.94%	9	14.29%	2	3.17%	1	1.59%
Free Form Text Only	2	0.10%	1	50.00%	0	0.00%	0	0.00%	1	50.00%	0	0.00%	0	0.00%
Ethnicity Not Available	547	16.30%	336	61.43%	9	1.65%	75	13.71%	88	16.09%	39	7.13%	22	4.02%
Total	3354	100.00%	2314	68.99%	53	1.58%	380	11.33%	465	13.86%	142	4.23%	101	3.01%
100-119% OF MSA/MD MEDIAN														
Race														
American Indian or Alaska Native	54	0.60%	43	79.63%	1	1.85%	1	1.85%	2	3.70%	7	12.96%	1	1.85%
Asian	158	1.70%	105	66.46%	5	3.16%	16	10.13%	23	14.56%	9	5.70%	5	3.16%
Black or African American	136	1.50%	79	58.09%	4	2.94%	21	15.44%	23	16.91%	9	6.62%	6	4.41%
Native Hawaiian or Other Pacific Islander	23	0.20%	17	73.91%	1	4.35%	0	0.00%	5	21.74%	0	0.00%	0	0.00%
White	7113	77.00%	5212	73.27%	110	1.55%	626	8.80%	907	12.75%	258	3.63%	204	2.87%
2 or more minority races	12	0.10%	8	66.67%	0	0.00%	2	16.67%	2	16.67%	0	0.00%	0	0.00%
Joint	296	3.20%	218	73.65%	3	1.01%	25	8.45%	41	13.85%	9	3.04%	9	3.04%
Free Form Text Only	0	0.00%	0		0		0		0		0		0	
Race Not Available	1449	15.70%	937	64.67%	23	1.59%	132	9.11%	249	17.18%	108	7.45%	48	3.31%
Total	9241	100.00%	6619	71.63%	147	1.59%	823	8.91%	1252	13.55%	400	4.33%	273	2.95%
Ethnicity														
Hispanic or Latino	216	2.30%	139	64.35%	1	0.46%	27	12.50%	38	17.60%	11	5.10%	9	4.17%
Not Hispanic or Latino	7276	78.70%	5309	72.84%	116	1.59%	641	8.80%	933	12.75%	277	3.81%	208	2.87%
Joint	204	2.20%	147	72.06%	6	2.94%	17	8.33%	26	12.74%	8	3.92%	9	4.41%
Free Form Text Only	1	0.00%	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	1	100.00%
Ethnicity Not Available	1544	16.70%	1023	66.25%	24	1.55%	138	8.94%	255	16.51%	104	6.74%	46	2.98%
Total	9241	100.00%	6619	100.00%	147	100.00%	823	100.00%	1252	100%	400	100%	273	100%

Table B-5

Disposition of applications by income, race, and ethnicity of applicant, 2021														
MSA/MD: 44060 - Spokane-Spokane Valley, WA														
INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total
120% OR MORE OF MSA/MD MEDIAN														
Race														
American Indian or Alaska Native	92	0.40%	55	59.78%	4	4.35%	12	13.04%	19	20.65%	2	2.17%	0	0.00%
Asian	387	1.70%	254	65.63%	9	2.33%	40	10.34%	63	16.28%	21	5.43%	11	2.84%
Black or African American	202	0.90%	108	53.47%	9	4.46%	30	14.85%	43	21.29%	12	5.94%	5	2.48%
Native Hawaiian or Other Pacific Islander	38	0.20%	25	65.79%	1	2.63%	3	7.89%	7	18.42%	2	5.26%	0	0.00%
White	16523	74.50%	12180	73.72%	272	1.65%	1214	7.35%	2300	13.92%	557	3.37%	406	2.46%
2 or more minority races	21	0.10%	15	71.43%	0	0.00%	3	14.29%	2	9.52%	1	4.76%	1	4.76%
Joint	830	3.70%	584	70.36%	8	0.96%	75	9.04%	137	16.51%	26	3.13%	17	2.05%
Free Form Text Only	2	0.00%	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race Not Available	4081	18.40%	2715	66.53%	90	2.21%	321	7.87%	699	17.13%	256	6.27%	125	3.06%
Total	22176	100.00%	15938	71.87%	393	1.77%	1698	7.66%	3270	14.75%	877	3.95%	565	2.55%
Ethnicity														
Hispanic or Latino	377	1.70%	239	63.40%	10	2.65%	33	8.75%	81	21.49%	14	3.71%	9	2.39%
Not Hispanic or Latino	16894	76.20%	12375	73.25%	278	1.65%	1287	7.62%	2368	14.02%	586	3.47%	409	2.42%
Joint	620	2.80%	434	70.00%	7	1.13%	47	7.58%	107	17.26%	25	4.03%	13	2.10%
Free Form Text Only	4	0.00%	4	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Ethnicity Not Available	4281	19.30%	2886	67.41%	98	2.29%	331	7.73%	714	16.68%	252	5.89%	134	3.13%
Total	22176	100.00%	15938	71.87%	393	1.77%	1698	7.66%	3270	14.75%	877	3.95%	565	2.55%

Table B-6 Issues Alleged in Disability Complaints Filed with HUD and WSHRC 7/2019 - 3/2024

Table B-6 Issues Alleged in Disability Complaints Filed with HUD and WSHRC 7/2019 - 3/2024											
	#	% of All	Filed w/ HUD & WSHRC	Type	Issue(s)	Zip code	Finding	Conciliation			
								Monetary	Training	Policy Req.	Add'l Terms
DISABILITY ALONE											
			yes	Rental	Terms & Conditions, Harassment, Reasonable Accommodation	99208	Pre-finding Settlement	\$3,240	Yes		
			yes	Rental	Terms & Conditions, Reasonable Accommodation	99202	Closed: Failure to Cooperate				
			HUD only	Rental	Design & Construction	99204	Pre-finding Settlement	\$8,750			Mods.
			HUD only	Design & Const.	Terms & Conditions, Design & Construction	99202	No Reas. Cause / Pending Recon.				
			yes	Rental	Refusal to Rent, Terms & Conditions	99223	No Reasonable Cause				
			yes	HOA	Terms & Conditions, Reasonable Accommodation	99201	No Reasonable Cause				
			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions	99207	Pre-finding Settlement	\$500	Yes	RA Policy	distribute RA & AA policy to new apps. & current: post notices in rental offices
			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions	99207	Pre-finding Settlement	\$350	Yes	RA Policy	w/ AA policy distribute RA policy to new apps. & current tenants
			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions	99207		\$350	Yes	RA Policy	distribute RA & AA to new apps. & current tenants; post notices in rental offices

			yes	Rental	Terms & Conditions, Reasonable Accommodation	99201	No Reasonable Cause				
			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions	99204	Pre-finding Settlement	\$1,000	Yes	RA Policy	RA: Service & Assist. Animal
			yes	Rental	Reasonable Accommodation, Terms & Conditions	99203	Pre-finding Settlement	\$2,868.75	Yes	Policy revisions	Affirm. Ads.
			HUD only	Rental	Reasonable Accommodation	99223	Pre-finding Settlement	\$4,000	Yes	RA & AA Policies	Self-audit for pet fees charged
			HUD	Rental	Refusal to Rent, Terms & Conditions, Reasonable Accommodation	99201	Pre-finding Settlement	\$2,200	Yes	Policy revisions	
					Terms & Conditions, Reasonable Accommodation	99216	No Reasonable Cause				
			Yes	Rental	Reasonable Accommodation, Terms & Conditions	99203	Pre-finding Settlement	\$4,000	Yes	Policy revisions	Post Notices
			Yes		Terms & Conditions	99203	No Reasonable Cause				
			Yes	Rental	Refusal to Rent, Terms & Conditions, Reasonable Accommodation		No Reasonable Cause				
			HUD	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions	99204	No Reasonable Cause				
			yes		Terms & Conditions, Reasonable Accommodation		No Reasonable Cause				
			yes	Rental	Discriminatory Advertising/State statements/Notices, Terms & Conditions, Reasonable Accommodation	99202	Pre-finding Settlement	\$5,750	Yes	FH Policy	Add language to ads: "Assistance animals welcome" Review tenant files & return SA fees for last 5 yrs., revisit any SA RA previously denied

			HUD	Rental	Refusal to Rent, Terms & Conditions, Reasonable Accommodation		Failure to Cooperate				
			HUD		Terms & Conditions, Reasonable Accommodation	99208	Withdrawal with Benefits				
			HUD		Terms & Conditions, Reasonable Accommodation	99223	Pre-finding Settlement				
			HUD		Terms & Conditions, Reasonable Accommodation						
					Terms & Conditions, Reasonable Accommodation						
			HUD	Rental	Terms & Conditions, Intimidation, Reasonable Accommodation	99201					
			yes		Terms & Conditions, Reasonable Accommodation	99208					
			yes		Terms & Conditions, Reasonable Accommodation						
			yes		Terms & Conditions, Reasonable Accommodation						
			yes	Rental	Terms & Conditions	99201					
			yes		Terms & Conditions, Reasonable Accommodation	99207					
				Rental	Refusal to Rent, Terms & Conditions, Discriminatory Advertising/Statements/Notices						
DISABILITY & 1 OR MORE OTHER PROTECT. CLASSES											
Disability, Retaliation			yes	Rental	Terms & Conditions, Reasonable Accommodation, Harassment	99202	Pre-finding Settlement	\$200	Yes	RA / AA Policy	

Disability, Retaliation					Terms & Conditions, Reasonable Accommodation						
Disability, Familial Status			yes	Rental	Refusal to Rent, Deny or Make Housing Available, Terms & Conditions, Reasonable Accommodation, Discriminatory Advertising/State ments/Notices	99223	Pre-finding Settlement	\$2,000	Yes	RA Policy	
Disability, Familial Status			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions, Discriminatory Advertising/State ments/Notices	99201	Pre-finding Settlement	\$2,500	Yes	RA & AA Policies	Include "Children welcome" in future ads. Verify any ads. comply with WLAD. FH posters.
Disability, Race			yes	Rental	Terms & Conditions	99207	No Reasonable Cause				
Disability, Familial Status			yes	Rental	Refusal to Rent, Deny or Make Housing Available, Terms & Conditions, Reasonable Accommodation, Discriminatory Advertising/State ments/Notices	99223	Pre-finding Settlement	\$2,000	Yes	RA Policy	
Disability, Familial Status			yes	Rental	Refusal to Rent, Reasonable Accommodation, Terms & Conditions, Discriminatory Advertising/State ments/Notices	99201	Pre-finding Settlement	\$2,500	Yes	RA & AA Policies	
Disability, Race			yes	Rental	Terms & Conditions	99207	No Reasonable Cause				
Disability, Race			yes		Terms & Conditions, Reasonable Accommodation	99207	Pre-finding Settlement	\$1,500	Yes	RA Policy	Provide reserve parking space
Disability, Sex			yes	Rental	Terms & Conditions, Reasonable Accommodation	99205	No Reasonable Cause				
Disability, Sex			yes	Rental	Terms & Conditions, Refusal to Rent						
Total	47	75.8%									

Table B-7: National Origin Complaints Filed with HUD and WSHRC 7/2019 - 3/2024

	#	% of All Complaints	Filed w/ HUD	Filed w/ WSRHC	Type	Zip code	Issues	Reasonable Cause or No RC	Conciliation	
									Monetary	Training Reqt.
			yes	yes	Rental	99216	Refusal to Rent, Terms & Conditions, Deny or Make Housing Available		\$3,000	Fair Housing
						99208	Terms & Conditions, Intimidation	NRC		
Total	2	3.2%								

Table B-8-: Issues Alleged in Familial Status Complaints Filed with HUD and WSHRC 7/2019 - 3/2024

Conciliation											
	#	% of All	Filed w/ HUD & WSHRC	Type	Issue(s)	Zip code	Finding:	Monetary	Training Req.	Policy Req.	Add 'l Terms
Familial Status Alone	7										
			yes	rental	Discriminatory Advertising/ Statements/ Notices, Refusal to Rent, Terms & Conditions, Deny or Make Housing Available	99204	Pre-finding Settlement	\$1,500	Yes		Affirm. Ads.
			yes	rental	Advertising, Steering	99207	Pre-finding Settlement	\$1,000	Yes	Policy revise	Post Notices
			yes	rental	Refusal to Rent	99204	Pre-finding Settlement	\$7,500	Yes		Affirm. Ads.
			yes	rental	Refusal to Rent, Discriminatory Advertising/ Statements/ Notices	99204	No Reasonable Cause				
			yes	rental	Refusal to Rent, Discriminatory Advertising/ Statements/ Notices	99204	Failure to Cooperate				
			yes	rental	Refusal to Rent, Discriminatory Advertising/ Statements/ Notices	99207	Pre-finding Settlement	\$2,500	Yes	Policy revise	Verify ads. comply with WLAD. Post FH notices
			yes	rental	Deny Access to Services / orgs/ real estate, Discriminatory Advertisements / Notices / Statements	99201					
FAM. STATUS & SEX	1		yes	rental	Terms & Conditions, Intimidation	99224	Pre-finding Settlement	\$3,500	Yes		Affirm. Ads.
Total	8	12.9%									

Table B-9: Issues Alleged in Race Complaints Filed with HUD and WSHRC 7/2019 - 3/2024

Race Alone	#	% of All Complaints	Filed w/ HUD & WSHRC	Type	Issue(s)	Zip code	Finding:	Conciliation	
								Monetary	Training Reqt.
				Rental	Terms & Conditions, Intimidation	99223	Pre-finding Settlement	\$4,824	Yes
			Yes	Rental	Terms & Conditions	99205	No Reasonable Cause		
			Yes		Terms & Conditions	99223	No Reasonable Cause		
Total	3	4.8%							

Table B-10: Issues Alleged in Sex Complaints Filed with HUD and WSHRC 7/2019 - 3/2024

	#	% of All	Filed w/ HUD & WSHRC	Type	Issue(s)	Zip code	Finding:
Sex			yes	rental	Terms & Conditions	99202	Reasonable Cause; Conciliation Failure; Finding against CP after Trial
Sex			yes	rental	Harassment	99202	Reasonable Cause; Conciliation Failure; Finding against CP after Trial
Sex			yes	rental	Harassment	99202	Reasonable Cause; Conciliation Failure; Finding against CP after Trial
Sex			yes		Terms & Conditions, Deny or Make Housing Available, Intimidation		
Sex			yes		Terms & Conditions		
Sex			yes		Intimidation		
Sexual Orientation / Gender Identity			yes	rental	Refusal to Rent		No Reasonable Cause
Total	7	11.3%					

Table B-11: Issues Alleged in Marital Status Complaints Filed with WSHRC 7/2019 - 3/2024

Marital Status	#	% of All Complaints	Type	Issue(s)	Zip code	Finding:
			Rental	Terms & Conditions	99224	Pre-finding Settlement
Total	1	1.6%				

APPENDIX C – SURVEY RESPONSE SUMMARIES

City of Spokane 2024 Housing Survey for Housing Providers and Their Advocates - Please respond by 4/7/24		
Q1. Where do you live? (*The first questions ask about your demographic information, to provide information on whether survey responders are representative of all protected classes, geographies and roles in housing transactions in Spokane)		
Answer Choices	Responses	
City of Spokane	76.2%	16
Other town or city within the County of Spokane	19.1%	4
Unincorporated Spokane County	4.8%	1
Other town or city in WA outside Spokane County	4.8%	1
Outside of WA State	4.8%	1
Other (please specify)	9.5%	2
	Answered	21
	Skipped	0
Other (please specify)		
Cle elum		
Idaho, Coeur D'Alene		
Q5. What is your race?		
Answer Choices	Responses	
Black or African American	4.76%	1
Hawaiian or Other Pacific Islander	0.00%	0
Asian	0.00%	0
Native American, Alaskan Native or Indigenous	4.76%	1
White non-Hispanic	85.71%	18
Hispanic or Latino	4.76%	1
2 or more Races	4.76%	1
Other Race	0.00%	0
Other (please specify)	4.76%	1
	Answered	21
	Skipped	0
Other (please specify)		
nunya		
Q6. Are you Hispanic, Latino or Latinx?		
Answer Choices	Responses	
Yes	9.5%	2
No	90.5%	19
	Answered	21
	Skipped	0
Q7. Do you or does someone in your household have a disability?		
Answer Choices	Responses	
Yes	23.8%	5
No	61.9%	13
If yes, is it a mental or physical disability?	14.3%	3
	Answered	21
	Skipped	0
If yes, is it a mental or physical disability?		
	1	both
	1	physical
	1	Developpmental
Q8. What is your sexual orientation?		
Answer Choices	Responses	
Heterosexual	76.2%	16
Gay or Lesbian	4.8%	1

City of Spokane 2024 Fair Housing Survey for Housing Consumers & Advocates - Please Respond by 4/7/2024				All	
Q1. Where do you live? (*The first questions ask about your demographic information, to provide information on whether survey responders are representative of all protected classes, geographies and roles in housing transactions in the City of Spokane)					
Answer Choices	Responses		Responses		
City of Spokane	74.7%	159	175	74.79%	
Other town or city within Spokane County	18.3%	39	43	18.38%	
Unincorporated Spokane County	5.2%	11	12	5.13%	
Other town or city in WA outside of Spokane County	1.4%	3	4	1.71%	
Outside of WA State	0.9%	2	3	1.28%	
Other (please specify)	0.5%	1	3	1.28%	
	Answered	213	234	100.00%	
	Skipped	0			
Other (please specify)					
I own in Spokane city limits but live in Idaho					
Q2. What is your race?					
Answer Choices	Responses		Responses		
Black or African American	3.3%	7	8	3.4%	
Hawaiian or Other Pacific Islander	0.5%	1	1	0.4%	
Asian	1.4%	3	3	1.3%	
Native American /Alaska Native/ Indigenous	3.8%	8	9	3.9%	
White Non-Hispanic	78.8%	167	185	79.4%	
Hispanic or Latino	8.0%	17	18	7.7%	
2 or more Races	7.1%	15	16	6.9%	
Other Race	2.4%	5	5	2.1%	
If you selected Other Race, please specify)		5	6	2.6%	
	Answered	212	233	100.0%	
	Skipped	1			
If you selected Other Race, please specify)					
99% Eurrepan 1% African					
Human					
White					
White / Latina					
nunya					
Q3. Are you Hispanic, Latino, or Latinx?					
Answer Choices	Responses		Responses		
Yes	9.5%	20	22	9.5%	
No	90.5%	190	209	90.5%	
	Answered	210	231	100.0%	
	Skipped	3	3		
Q4. Do you or does someone in your household have a disability?					
Answer Choices	Responses		Responses		
Yes	35.1%	74	79	34.1%	
No	64.9%	137	150	64.7%	
If yes, is it a mental or physical disability?		70	73	31.5%	
	Answered	211	232	100.0%	
	Skipped	2	2		
If yes, is it a mental or physical disability?					
	16	Both	17		
	24	Mental	24		
	25	Physical	26		
	3	Developmental	4		
		Intellectual and/or Developmental disability should be added to this list			
		yes			
Q5. What is your sexual orientation?					
Answer Choices	Responses		Responses		
Heterosexual	67.9%	142	158	68.7%	
Gay or Lesbian	8.1%	17	18	7.8%	

	Skipped	0		
Q12. Which best describes your annual income?				
Answer Choices	Responses			
No income	0.0%	0		
\$12,000 or less	4.8%	1		
\$18,000 or less	0.0%	0		
\$22,500 or less	4.8%	1		
\$26,215 or less	0.0%	0		
\$29,960 or less	0.0%	0		
\$33,705 or less	0.0%	0		
\$37,450 or less	0.0%	0		
\$44,940 or less	14.3%	3		
\$56,200 or less	9.5%	2		
\$75,000 or less	14.3%	3		
\$103,400 or less	19.1%	4		
\$103,401 or more	33.3%	7		
	Answered	21		
	Skipped	0		
Q32. Have you ever accepted a voucher (section 8, VASH, etc.) or other subsidy (HEN, etc.) from a tenant?				
Answer Choices	Responses			
Yes	42.9%	9		
No	23.8%	5		
N/A	33.3%	7		
If Yes, what type?	23.8%	5		
	Answered	21		
	Skipped	0		
If Yes, what type?				
Rapid Rehousing, Section-8, HUD-VASH				
I accept DOC Voucher, HEN, Section 8 and others				
Sec 8				
All Section 8 vouchers				
bias in housing is so exceedingly rare as to be non-existent				
Q33. If you have accepted a voucher (section 8, VASH, etc.) or other subsidy (HEN, etc.) from a tenant, how would you describe the experience(s)?				
Answer Choices	Responses			
Negative	10.0%	2		
Neutral	0.0%	0		
Positive	0.0%	0		
Mixed - positive and negative experiences	35.0%	7		
N/A	55.0%	11		
Additional information:	25.0%	5		
	Answered	20		
	Skipped	1		
Additional information:				
Temporary programs that run out of funding for tenants can be difficult to navigate				
I am currently waiting for 3 months for a HEN voucher. The person is lucky we haven't kicked him out because he would be homeless				
Generally a negative experience from one of many angles: 1) Eventual non-payment issues from tenants; 2) More damage to the properties from subsidized tenants; 3) Regulatory and administrative burden; 4) Legal liability for not				
I help clients get these vouchers.				
bias in housing is so exceedingly rare as to be non-existent				
Q2. Which best describes your role as a housing provider?				
Answer Choices	Responses			
Provider / employee of a homeless shelter	15.0%	3		
Property manager	15.0%	3		
Leasing Agent	0.0%	0		
Landlord	30.0%	6		

	Skipped	4		4	
Other (please specify)					
3 and son part-time					
Pass					
Q9. Which best describes your annual income?					
Answer Choices	Responses			Responses	
No income	0.0%	0	0	0.0%	
\$12,000 or less	2.4%	5	6	2.6%	
\$18,000 or less	2.4%	5	5	2.2%	
\$22,500 or less	2.9%	6	7	3.0%	
\$26,215 or less	3.3%	7	7	3.0%	
\$29,960 or less	1.0%	2	2	0.9%	
\$33,705 or less	4.8%	10	10	4.3%	
\$37,450 or less	3.3%	7	7	3.0%	
\$44,940 or less	6.7%	14	17	7.4%	
\$56,200 or less	14.3%	30	32	13.9%	
\$75,000 or less	19.5%	41	44	19.0%	
\$103,400 or less	18.1%	38	42	18.2%	
\$103,401 or more	22.4%	47	54	23.4%	
	Answered	210	231	100.0%	
	Skipped	3	3		
Q10. Do you use a voucher (section 8, VASH, etc.) or other subsidy (HEN, etc.) to pay some or all of your housing costs?					
Answer Choices	Responses			Responses	
Yes	0.0%	0	9	4.2%	
No	100.0%	211	216	100.0%	
If Yes, what type?	0.0%	0	7	3.2%	
	Answered	211	216	100.0%	
	Skipped	2	23		
Q11. Which best describes your current living situation?					
Answer Choices	Responses			Responses	
Homeless shelter	0.0%	0			
Houseless, no shelter	0.0%	0			
Renting a dwelling unit on a month to month basis	10.4%	22			
Leasing a dwelling unit for a fixed term (12 mos. etc.)	19.8%	42			

lack of credit, low credit scores that are not only medical or student debt, but perhaps the ex partner opened credit cards or took out loans in the applicants name. They are denied before they can explain the situation at times. For Criminal history, many owner/agents immediately deny applicants with a felony. I feel there should be a time frame for not only forgiveness but for the applicant to explain their circumstances and what they have done since they were charged.

Barriers include credit, and income in which I have seen discrimination regarding my clients.
I'm not involved with property management and don't possess sufficient knowledge.

Justice involvement
bias in housing is so exceedingly rare as to be non-existent

Q17. If you believe that discrimination occurs in the rental of housing in Spokane, why do you believe it most often occurs?

Answer Choices	Responses	
Unconscious or immediate thought process	30.0%	6
Intentional bias	25.0%	5
Laws and written or unwritten policies within institutions and across systems	15.0%	3
Deeply embedded beliefs and company culture within institutions and across systems	40.0%	8
All of the Above	30.0%	6
Other (please specify)	20.0%	4
	Answered	20
	Skipped	1

Other (please specify)
I believe that most of the people that are discriminated also fall into groups that are less preferred tenants based on historical truths. It may not reflect that person, but generally reflects a lot of people of the same age, income, and background.

Lack of knowledge of the myriad of laws, change in the applications of the laws and laws that change often. Also, please stop with the "institutional racism" trope

Please own a rental house, and you will see why we are biased against people who cause us landlords the most bias in housing is so exceedingly rare as to be non-existent

It does not occur

PETS
I don't believe discrimination occurs regularly but "bad actors" in certain areas deserve to be denied housing because of behavior.

Justice involvement

Political affiliation
those with criminal backgrounds
Background, past, physical appearance
Speculation isn't data
Income aka socioeconomic status as well as criminal history
Basis is different from bases
Pets
pets and service animals
Not good tenants
Likely across the board; unknowingly.
previous housing or lack thereof
Criminal Background
Pets, criminal history, eviction history, sex offender status, voucher
usually a misunderstanding between landlord & tenant or tenant gets advise to sue from greedy attorney
All the above
none-bias is exceedingly rare in housing

Q17. If you believe that discrimination occurs in the rental of housing, why do you believe it most often occurs?

Answer Choices	Responses	
Unconscious or immediate thought process	32.4%	68
Intentional bias	26.7%	56
Laws and written or unwritten policies within institutions and across systems	17.6%	37
Deeply embedded beliefs and company culture within institutions and across systems	30.5%	64
All of the Above	53.3%	112
Other (please specify)	9.1%	19
	Answered	210
	Skipped	3

Other (please specify)
It does not occur

Landlords deserve to limit tenants that destroy their investments...example pet owners.

Fear of renter unable to meet rent obligation
Lack of sufficient legal protections for both renters and landlords
Income level
Ensure payment is going to be paid and on time and whether the proposed tenant seems like they are in a stable situation so the landlord's property will be occupied for a lengthy period
Concerns about the ability of tenants to pay full rent on time and take good care of the property
Housing unaffordability is intrinsically discriminatory, as well.
Homeless population statistics, personal experience reported to me.
demographics are used to make many decisions. It's human nature. Rental listings always have some demographic restrictions such as "adults only", "no pets", "stair access only" etc
Nope
No enforcement that is easy without having the money for an attorney
55 and older restrictions
Having property destroyed by renters
Zero anonymous reporting or funds for enforcement

Responses	
74	32.2%
61	26.5%
40	17.4%
72	31.3%
118	51.3%
23	10.0%
230	100.0%
4	

Accessibility of rental properties for individuals with disabilities	33.3%	7	Accessibility of rental properties for individuals with disabilities	41.0%	86	93	40.3%
Habitability (quality/condition) of rental properties and impact on protected classes	38.1%	8	Habitability (quality/condition) of rental properties and impact on protected classes	54.3%	114	122	52.8%
Representation of people of different protected classes on City Boards and Commissions	4.8%	1	Representation of people of different protected classes on City Boards and Commissions	34.3%	72	73	31.6%
Zoning and siting of housing that impacts protected classes	9.5%	2	Zoning and siting of housing and impact on protected classes	29.5%	62	64	27.7%
Ability to provide input on decisions and policies affecting funding, siting, zoning and development of housing and housing services that impact protected classes	19.1%	4	Ability to provide input on decisions and policies affecting funding, siting, zoning and development of housing and housing services that impact protected classes	30.5%	64	68	29.4%
Use of criminal records for rental applicants and impact on protected classes	28.6%	6	Use of criminal records for rental applicants and impact on protected classes	37.6%	79	85	36.8%
Technology requirements to access housing – searching, submitting applications, screening, paying rent, etc.	9.52%	2	Technology requirements to access housing – searching, submitting applications, screening, paying rent, etc. and impact on protected classes	27.6%	58	60	26.0%
Acceptance of vouchers, subsidies, or alternative sources of income by housing providers	38.1%	8	Acceptance of vouchers, subsidies, or alternative sources of income by housing providers	43.3%	91	99	42.9%
			Acceptance of rental assistance by housing providers	38.6%	81	81	35.1%
Discrimination in mortgage lending because of protected class	0.0%	0	Discrimination in mortgage lending because of protected class	23.3%	49	49	21.2%
Discrimination in home sales because of protected class	0.0%	0	Discrimination in home sales because of protected class	22.4%	47	47	20.3%
Discrimination in rental housing because of protected class	14.3%	3	Discrimination in rental housing because of protected class	32.4%	68	71	30.7%
Steering of home buyers to neighborhoods by real estate agents because of protected class	0.0%	0	Steering of home buyers to neighborhoods by real estate agents based on protected class	21.0%	44	44	19.0%
Steering of tenants to housing complexes by property managers because of protected class	9.5%	2	Steering of tenants to housing complexes by property managers based on protected class	23.3%	49	51	22.1%
			Discriminatory advertising of housing rentals, sales, or mortgage lending because of protected class	15.7%	33	33	14.3%
			Discrimination in housing counseling because of protected class	13.3%	28	28	12.1%
			Failure to grant reasonable accommodations and modifications in housing for people with disabilities	35.2%	74	74	32.0%
Discrimination in appraisals because of protected class	4.8%	1	Discrimination in appraisals because of protected class	17.6%	37	38	16.5%
Discrimination in property or home owner insurance because of protected class	4.8%	1	Discrimination in homeowner or renter insurance because of protected class	14.3%	30	31	13.4%
Other (please specify)	23.8%	5	Other (please specify)	11.0%	23	28	12.1%
	Answered	21		Answered	210	231	100.0%
	Skipped	0		Skipped	3	3	
Other (please specify)			Other (please specify)				
Get off the protected classes already. I serve many of your protected classes. They do not need more laws and programs. They need you to quit adding more and more laws and regulations that make housing unaffordable or obtainable for anybody but the rich.			Compliance with MFTE Affordability Requirements and impact on protected class				
1) Proliferation of laws and policies, by well-meaning but economically ignorant renter advocates and legislators, meant to protect renters but in fact reduce availability of housing and raise the cost of housing.			Zoning changes that reduce the value of homes, lack of police response to home crimes, lack of concern by government and agencies for taxpayers who fund government				
Interest rates are too high for people to afford prices, that are driven up by false county values.			The elderly are being priced out of owning/living in their long term homes to subsidize those that destroy property!				
Discrimination include income, criminal history, and landlords discriminating against vouchers			Government regulations adding to the cost burden of construction and renting, adding to affordability issues that housing is treated as a commodity and not a human right				
bias in housing is so exceedingly rare as to be non-existent			Use of racist structures like personal credit scores.				
			Prices. Nothing else				
			Excessive process, fees, legal requirements, etc. for landlords. More protected classes that have nothing to do with responsibly renting a home and more about hampering a landlords ability to find qualified tenants who demonstrate a high probability of paying rent on time and taking care of the property.				
			squatters should not have rights				

There are housing issues mainly caused by supply and demand issues. Also, new house construction regulations that increase the cost to build a home is counter to affordability. Your choices all deal with protected classes which is likely less than 1% of the issues with house people. Fix affordability which is the real issue with housing.

Recent trend of landlords not being able to deny "emotional support animals" and not being able to require pet damage deposits. It means I must assume damage and raise my rents to cover

There is no affordable housing, for anyone!

Radical city council and mayor

Not enough inventory

The increased tax rate in Spokane is making housing unaffordable

My concern would be for everyone, not just protected classes.

Lack of social housing

I don't know what PROTECTED CLASSES ARE) My concern is landlords raising prices on rent to unaffordable amounts without limits to inflation or other standards. Multiply the rate by number of units and you see the greed!! Subsidies should not try to keep up with greedy landlords either.

I am most worried about all this focus on discrimination is forcing prices up

Domestic violence causes 85% of homelessness among women.

Several landlords refuse payments from agencies paying deposits or first month rent. They know they are required to accept Section 8 vouchers, but they don't think the law protects source of income for move-in costs. If the agency pays via "promisory note" or "intent to pay letter" for a check to be mailed after lease signing, they will say payment was not received and block the person from signing the lease. Several of our clients had units approved but rented out from under them because landlord didn't think the promisory note counted as payment. Landlords used to accept these more readily. We think they are doing it on purpose as a way to avoid renting to homeless or disabled people who need rental assistance programs. Some of our clients were so desperate to get keys, they borrowed large sums of money from friends or family instead of waiting for the agency to address the problem with landlord. Landlord knew we were arranging payments but they chose to put high pressure on the applicant instead of calling us about the problem. Then they claimed they did nothing wrong because "client came up with the payment". They did, but it wasn't fair since they are on limited income with financial assistance available.

No being able to adapt our own homes to provide housing

I am most concerned that ALL of these options assume prejudicial bias in housing in Spokane, when the reality is bias in renting, owning, and financing housing is exceedingly rare almost to the point of non-existence

Q26. Who is in need of increased fair housing education?

Answer Choices	Responses	
Tenants	60.00%	12
Landlords	75.00%	15
Property managers	70.00%	14
Real estate brokers	45.00%	9
Mortgage lenders, originators, and brokers	45.00%	9
Healthcare providers	25.00%	5
Social service providers	45.00%	9
Homebuyers	35.00%	7
Other (please specify)	20.00%	4
	Answered	20
	Skipped	1

Other (please specify)

The person who wrote this survey, and anybody that approved it

No sure at this point. I have attended multiple fair housing conferences and trainings over multiple years and would advocate for others to do the same. We are inundated with requirements for fair housing and DEI policies that at this point are doing more harm than good for society.

Nobody

bias in housing is so exceedingly rare as to be non-existent

Q26. Who is in need of increased fair housing education?

Answer Choices	Responses	
Tenants	77.9%	162
Landlords	81.3%	169
Property managers	74.5%	155
Real estate brokers	51.4%	107
Mortgage lenders, originators, and brokers	51.9%	108
Healthcare providers	30.3%	63
Social service providers	47.1%	98
Homebuyers	51.4%	107
Other (please specify)	11.5%	24
	Answered	208
	Skipped	5

Other (please specify)

All

Everyone needs to learn about what is going on here

Politicians

Justice system

The General Public

Everyone and also, housing needs to be decommmodified and our general outlook on humanity has to shift away from capitalism for any change to really happen.

everyone

the governing people need to look at this issue from the side of the building owner

government entities

not sure

People who are discriminating and being discriminated against. There isn't a group to single out.

Responses	
174	76.3%
184	80.7%
169	74.1%
116	50.9%
117	51.3%
68	29.8%
107	46.9%
114	50.0%
28	12.3%
228	100.0%
6	

Q30. What fair housing topics would you like more training about?

Answer Choices	Responses	
Assistance animals	23.8%	5
Reasonable accommodations	38.1%	8
Reasonable modifications	33.3%	7
Source of income discrimination	28.6%	6
Use of criminal history records in screening applicants	42.9%	9
Design and construction requirements	28.6%	6
Fair housing basics	38.1%	8
Immigration, citizenship, and national origin protected class issues	38.1%	8
Sexual orientation and gender identity protected class issues	23.8%	5
Disability protected class issues	38.1%	8
Familial status protected class issues	19.1%	4
Fair lending	9.5%	2
Fair housing for real estate brokers	9.5%	2
Race and color protected class issues	14.3%	3
Sex harassment and domestic violence protected class issues	19.1%	4
Other (please specify)	14.3%	3
	Answered	21
	Skipped	0

Other (please specify)

How about job training, how to secure better paying jobs, financial education, investing, striving for excellence. Teach people how to achieve that American Dream, not wait for it to be handed to them.

We need more training on all of the above due to the fact they are continually moving targets and landlords need to know how fair housing advocates and hustlers are going to be trying to attack them. The ones I marked specifically are generally the most detailed and cause problems for landlords I know.

bias in housing is so exceedingly rare as to be non-existent

Q27. What is the most effective way to provide fair housing information to housing providers in Spokane?

Answer Choices	Responses	
Television public service announcements	4.8%	1
Radio public service announcements	0.0%	0
Newspaper public service announcements	4.8%	1
Brochures	14.3%	3
Information tables at community events	33.3%	7
In-person training	71.4%	15
Live webinars	52.4%	11
Online pre-recorded training	52.4%	11

Social media (Facebook, Instagram, etc.)	33.3%	7
------------------------------------------	-------	---

Other (please specify)	9.5%	2
-------------------------------	------	---

Legislators
Maybe Tenants and Homebuyers.
City council
Young adult first time renters and homebuyers
Nobody
All
I've not come across any "group" that seems uneducated.
Specifically independent landlords, people with a second home as surplus income
Nobody
The legislature and superior court.
Sellers
All
apparently the creator of this survey, who obviously is biased with the preconception that bias in housing exists

Q27. What is the most effective way to provide fair housing information to tenants and homebuyers in Spokane?

Answer Choices	Responses	
Television public service announcements	37.1%	76
Radio public service announcements	26.8%	55
Newspaper public service announcements	18.1%	37
Brochures	27.3%	56
Information tables at community events	40.0%	82
In-person training	48.8%	100
Live webinars	34.2%	70
Online pre-recorded training	42.0%	86
Provide training for those who work with tenants and homebuyers (tenant advocates, housing counselors, social service providers, healthcare providers, and tenant attorneys)	68.8%	141
Social media (Facebook, Instagram, etc.)	55.6%	114
Posters	16.6%	34
Other (please specify)	8.3%	17

Control raises in rent by corporate owners.
 For people to realize the agendas behind the falsity of supposed barriers
 Why did bill 5858 not pass? How can superior court take women and children out of their homes, and provide no solutions except taxpayer dollars.
 Agencies being able to pay by credit card or check immediately without waiting on a payment to be processed later would bypass landlord's concerns about waiting on payment. They claim to "not trust agencies" to honor payment. A centralized funding system for all rental assistance to be distributed by an entity that guarantees payment, instead of making individual housing specialists responsible for handling payments that landlords don't trust. And speeding up the time it takes for an agency to pay. Instead of mailing a check in 1-2 months, they should guarantee payment within 5-10 business days. This would help us out a lot.
 all of the above
 more housing availability
 more housing
 Law - You can only own a house if you live in it. I have heard that is a real law in Scandinavia. Housing for all!
 bias in housing is so exceedingly rare as to be essentially nonexistent

Q31. Are you aware of any housing policies or practices in Spokane that are barriers fair housing and equal access to housing opportunities?

Answer Choices	Responses	
Yes	16.7%	3
No	83.3%	15
If yes, please explain		5
	Answered	18
	Skipped	3

If yes, please explain
 Lack of rent control
 Requiring 3 months rent plus \$50 to \$75 credit report is a financial burden many find impossible to gather, especially when deposits are not returned by the previous landlord.
 Yes, laws and policies that make WA state, and the City of Spokane in particular, places landlords are divesting of their real estate holdings and/or causing them to seek housing investments elsewhere. Landlord competition cures many ills.
 Lack of required education for landlords and a sense of impunity when it comes to treating tenants poorly, unfairly or in a discriminatory manner
 bias in housing is so exceedingly rare as to be non-existent

Control raises in rent by corporate owners.
 For people to realize the agendas behind the falsity of supposed barriers
 Why did bill 5858 not pass? How can superior court take women and children out of their homes, and provide no solutions except taxpayer dollars.
 Agencies being able to pay by credit card or check immediately without waiting on a payment to be processed later would bypass landlord's concerns about waiting on payment. They claim to "not trust agencies" to honor payment. A centralized funding system for all rental assistance to be distributed by an entity that guarantees payment, instead of making individual housing specialists responsible for handling payments that landlords don't trust. And speeding up the time it takes for an agency to pay. Instead of mailing a check in 1-2 months, they should guarantee payment within 5-10 business days. This would help us out a lot.
 all of the above
 more housing availability
 more housing
 Law - You can only own a house if you live in it. I have heard that is a real law in Scandinavia. Housing for all!
 bias in housing is so exceedingly rare as to be essentially nonexistent

Q30. Are you aware of any housing practices in Spokane that are barriers to fair housing and equal opportunity access to housing?

Answer Choices	Responses	
Yes	44.4%	88
No	56.6%	112
If yes, please explain		85
	Answered	198
	Skipped	15

If yes, please explain
 You can do research.
 Catholic charities has said they have a tenant screening policy that they do not disclose which has led to several denials of those in protected classes. This is a common problem.
 The lack of a rent cap here, as well as the lack of laws preventing large corporations from buying up houses for sale and turning them into high-priced rentals, is a huge problem.
 Landlord rent hikes, monopolizing of rentals, cash buy-out of homes on the market by brokers or corporations
 I am renting a house to a family receiving aid from the SHA and they are the worst people I have ever had to deal with. Deliberate ignorance of how utilities are billed in Spokane, deliberately misunderstanding simple English, and deliberately NOT explaining what is needed for their unknowable rules.
 HOA Covenants
 No limit on the amount and frequency of rental increases. Rental units with inhabitable conditions such as mold and malfunctioning appliances.
 My family has had experiences with Rockwood Property Management as tenants which to the best of my knowledge did not comply with Fair Housing practices and regulations.
 Accepting application fees and declining an application d/t negative hx that was fully disclosed prior to application.
 online only applications
 Landlords not accepting vouchers
 Access to get loan when working and no credit
 Housing costs are exorbitantly expensive due to people buying homes to make money off of and not live in. Wages haven't kept up with housing costs. By definition housing cannot be fair under those conditions
 The homeless and unemployed are given special treatment over the working poor.
 Middle class workers can't afford to buy house and barely afford rent. Yet you keep making housing for only low income.
 Too many units are owned by investors. They can squeeze out individuals at every level of the market. Put a limit on how
 Discrimination from landlords, mortgage brokers, and realtors
 Lack of vouchers
 Accessible units for those that live with disabilities. Affordable housing for the aging population.

Responses	
91	42.1%
127	58.8%
90	41.7%
216	100.0%
18	

we allow for shadow inventory, which creates a manufactured shortage. WE allow landlords to not maintain a business, Linces. WE have no way to assure quality of our housing. We allow untrained people to evaluate income, criminal history, and eligibility. We don't cap what a landlord can charge and allow property owners to utilize laws and regulations that do nothing but cover up possible discrimination. We let anyone who happens to own a home the right operates without any testing, licensing, or training. Plus, we allow Landlords the option to request large amounts of money upfront to even apply for housing. I don't see how requesting double security, or require 3x the income to rent is not income discrimination?

Parking issues in and around housing complexes

Criminal background checks

Income

Lack of stabilized rents

Sometimes rental history is a barrier to trans people getting housing because we are unable to prove our housing due to receiving legal name changes, or simply being denied consistently and having to couch surf/live somewhere without a lease/landlord, and this makes us ineligible for housing according to many property management companies.

all the -isms that realtors, developers, landlords etc have implicit and/or explicit bias toward. we are all brainwashed in this capitalist system

No tenant protections beyond the state RLTA in the city of Spokane or Spokane County. Low pay for rental housing residential managers and nonprofit housing service providers. Landlords are disproportionately white while renters are disproportionately Black and Brown. Imbalance of power between landlords and tenants.

The whole system is broken

Neglected home maintenance.

Too many landlords refuse rental assistance.

Criminal history is a HUGE barrier for lots of people. People who want to get out of jail and change their lives. They can't because they can't find housing. Ban the box and stop asking people about their past mistakes. Stop making them relive their trauma. However when doing this find ways to keep housing affordable. It's not affordable now but don't let it double because then they can't afford it even if they can get it. Also making apartment complexes required to take section 8 would help things be a little more equal.

Greenstone and developers a like. Real estate agents and property management companies owned and operated by the above.

Landlords frequently hold one time for people to view the property and gather background applications and checks from everyone at that showing. No one gets their money returned and one applicant is chosen.

Once vouchers increase in price, the average rent amounts also increase. There was a short amount of time with the Emergency Housing Vouchers (EHV's) where it was easy enough to find an apartment with a voucher but unfortunately rent is increasing too rapidly. Part of the issue of access to housing is how exceedingly difficult it is to obtain a Housing Voucher due to SHA being so far behind year round. Someone may have their voucher but then payments aren't being made by SHA in a reasonable amount of time. Let alone the inspection times which used to only be about a week but have since increased. The voucher renewal process usually results in "lost paperwork" and extreme delays jeopardizing people maintaining their housing. It is astonishing how SHA remains unchecked so often when it comes to providing timely service to the community. I have seen many people lose housing opportunities and current housing due to their poor organization, paperwork, and processes. All of the above reasons cause landlords to not want to accept vouchers. Much of the time, they will say people are denied for credit even though they had already passed once they find out a voucher is involved. This is both due to SHA's poor practices and a bias landlords have towards voucher holders.

Not firsthand knowledge but have seen how difficult it is for people to find affordable housing for low income or section 8

I'm not informed to answer, except that prices are very high

I know certain apartments create loopholes to deny section 8 vouchers among many other tricks to discourage protected

We don't have enough low income housing

Lack of qualified low income or affordable housing. Also, income rates that approve vouchers. But that doesn't matter until we can get more available housing units. Gap services like SNAP provides. More of those.

12

Landlords raising the cost of rent outside of what a tenant with disabilities can afford. Landlords and or Maintenance workers not fixing broken items in the home the CLT with disabilities live. These individuals struggle to advocate for themselves at times and end up living with the broken items or housing condition as a result.

There are always issues with accessibility issues, and other barriers because we simply do not have sufficient housing to overcome the ability to use barriers when there are more people that units available.

<p>As a property manager, I am denying more people because I cannot qualify them with a credit score and having enough income to support them in the home. It takes months to get a bad tenant out so we no longer can accept those that are marginal. Making the rules harder for the owners and managers is having the opposite affect on housing the lower income classes. Where I used to take a chance, I no longer will. Its better to keep a house vacate them put in someone that wont pay and will destroy the property.</p>
<p>Issues with Zoning for single family structures, acreage limits, and lack of preservation of critical farmland and wetlands</p>
<p>No cap on rent amount increase. Discrimination is normal here no oversight .No Native American advocates to sit on community board meetings or have a voice for concerns. Spokane has a signifigant Native American population.</p>
<p>I have been renting a house to a poor immigrant family for several years. I rent it for the cost of the mortgage, taxes and insurance, no profit, at about half market value. (3 bedroom, 2 bath home \$975 a month) At the time I first rented to them, they were on a waiting list for section 8 housing and had been told to expect 1 more years wait. I was very willing to be certified to be a section 8 landlord. But in all these years they have heard nothing and I have not been able to get information as to their status. I try to help people but I myself live on social security. I can no longer afford to keep this house so am having to evict them in order to sell it. The new owners, if they rent it out, will certainly charge close to double or more what I have been asking. So a family of 8 people is desperately looking for a new cheap rental or will soon become homeless.</p>
<p>Not enough rental units at affordable prices.</p>
<p>City council meddling</p>
<p>All are based on income and credit.</p>
<p>I can't speak to it in detail, but I've heard and read that zoning/regulations have limited higher density and affordable income.</p>
<p>The process to get a building permit, etc. for new construction or remodeling to allow for additional units is ridiculous and expensive. The zoning was changed to allow for ADU's but the simplest one for just the fees to apply is expensive, not to mention to application forms are difficult to complete when you don't have a person who knows how to draw, the professionals who do it are expensive. The desire for the ADU's are noble, the process is cost prohibitive.</p>
<p>costly application fees causes low income individuals to not afford application process for affordable housing</p>
<p>A refusal to accept rental assistance by landlord and a lack of enforcement from the Courts.</p>
<p>Lack of accountability with quality of residences due to lack of ombudsman(s), redlining and it's generational effects, no rent-cap</p>
<p>The utility shared cost that is never the same it is split between households. It changes every month and the companies are hiring a third party to do the billing and figure out the costs.</p>
<p>Mobile home parks rcw 59.18 is if you rent the Mobile home from landlord, RCW 59.20 is if you own the Mobile home and rent the lot space. Mobile home parks are allowing rv's, campers and people living in storage sheds propped up on bricks with no inspections for water, septic, skirting, and no zoning changes from mobile homes to anything goes. North Vista Mobile Court north of Deer Park is a perfect example. Homeowners properties lose value when the owners will allow everything other than Mobile homes. The building dept does not care and won't come out to look.</p>
<p>The use of background checks that have no nexus in protecting/preserving housing creates a disparate impact on protected classes. For instance, misdemeanors should not limit someone from housing, and unhoused individuals are disproportionately impacted with misdemeanors for trespassing/panhandling, etc. We also know that the BIPOC population is overrepresented in homelessness, so it's a double whammy for those individuals.</p>
<p>The rules for housing that bar anyone with a manufacturing of drugs charge or intent to sell charge from gaining housing. Many of those experiencing homelessness have these charges along with sex registry. While I understand the sex registry is a bit more difficult, the drug charges should not ban someone if they are years in the past. Also, previous evictions are also a major barrier to moving people out of houselessness to housing.</p>
<p>Landlords refusing to accept rental assistance for tenants</p>
<p>Rising rent amounts, failed HQS inspections where landlords do not make needed repairs, administrative fees, denying tenancy due to low credit score/no credit.</p>
<p>Extreme shortage of vouchers. Denial of housing vouchers by landlords. Lack of housing types. Lack of units below market rate and at market rate. Wages not high enough.</p>
<p>Some agencies tack on extra charges when you move out of a unit and never tell you. before you know it you have all these charges in collections without ever knowing what they are for or where they originated.</p>
<p>Unlimited Increases in rent.</p>

Not specifically.
landlords refusing rental assistance
Overuse of single-family zoning, lack of funding for renters and homeowners, lack of enforcement
Pets, voucher, sources of income, criminal history
Low credit reports, previous evictions, history of imprisonment are barriers to safe, well-maintained housing
As stated in previous answers. Priority Spokane has some great statistics. Spokane has a drug use problem. It was rated by the community as second to the DV problem. It IS a gendered issue, and while men can be victims; it is most often women and children- mothers- who are exploited.
Landlords saying they will not accept promisory notes from housing service agencies. We have clients with deposit assistance who are not allowed to use it by certain landlords. They claim it is not income discrimination. They claim the applicant is welcome to go to the bank to get cash from whatever source of income they have. The problem is that most people on SSI or SSD don't have any savings, let alone \$2000-3000 savings for full month rent and deposit. We point out they qualified for rental assistance due to having a qualifying disability for the rental assistance program. Some landlords back down and accept payment when we write a formal accommodation request letter, but others have said "it is discrimination to treat the disabled person differently from other people that pay with cash." They claim it is not discrimination because some disabled people really are able to go to the bank to get the money. They think someone in a rental assistance program should be in the same financial situation as a disabled person that has a job or trust fund. The landlord sees this as a legal opportunity to avoid low-income renters that may be homeless, mentally ill or disabled.
There are a number of social service providers who attempt at providing housing and have a number of barriers with landlords keeping their properties in tact and maintaining safety practices, choosing not provide affordable housing due to concerns and stigma in the population. From a home buyers perspective there realtors on a whole that need implicit bias and anti-racism training as a requirement to their licensure, as well as appraisers who are known in the community for under-appraising properties that they know are owned by same sex couples.
Landlords refusing to rent to women or people with children due to criminal history of current renters.
Excessive application fees
It's a lot of developers outbidding families and flipping houses to be extravagant rentals along with never-ending rental hikes and a seller's market that just keeps going up. We have a practice of just allowing people with money to do whatever they want at the expense of people with less. And that creates desperation so if someone finds a place they can kind of afford, they jump on it even though they may no longer be able to afford it in 6-12 months.
Yes landlords often will utilize a background check as well as a credit check to determine whether or not to rent a unit to an individual. Also, landlords will charge an administrative fee that is non-refundable as well as ask a prospective tenant for a larger deposit or ask for first month and last month's rent up front.
Red lining - south Hill
Many landlords work with online systems to apply and screen tenants, many who are elderly, disabled, or homeless cannot access these systems. If they do access and apply, once moved in they struggle to pay through the online portals and run risks of getting late fee's due to inability to use technology. Also - these programs seem to also charge additional "fees". Landlords are asking upwards of \$3000 or more for move in costs plus nonrefundable \$200+ fee's. This is incredibly burdensome to someone who is homeless and trying to survive on limited income. Even if they get a housing voucher, this does not assist with move in costs of deposit, first months, and last month's rent, plus fee's. I have also noticed that as SHA raises their budgets for the voucher, landlords raise their rents to above the budget, even if the unit is not "worth" that much. I feel this is to intentionally dodge Voucher Holder's leasing up their premises.
Housing availability
Lack of interpreting and translation services, lack of vouchers for immigrant and justice involved populations,
to many to mention
Landlords still regularly screen out potential tenants with housing vouchers, intentionally price units just outside of the voucher payment standard
-not having rental applications in other languages
The lack of enforcement in agencies and in the courts allows landlords to commit various acts of discrimination without much fear of consequences. Without advocates or a system of accountability for landlords, it's easier for them to get away with unfair housing practices, especially tenants. The development of the Office of Equity and Inclusion at the City was supposed to be part of helping with creating more systems of accountability, but they have been slow to get off the ground.
There are many barriers, application fees, first, last, deposit... lack of access to search for housing and of course affordability.

There are many empty houses and apartment complexes and the city should peruse the owners to rent them, and/or bring them up to code or sell them.		
bias in renting, selling, and financing is so exceedingly rare as to be nonexistent		
Q31. If you work for an organization on behalf of tenants or homebuyers, has your organization received housing discrimination complaints from your clients/constituents/members that occurred in Spokane?		
Answer Choices	Responses	
Yes	20.5%	35
No	74.9%	128
If yes, please explain	22.2%	38
	Answered	171
	Skipped	42
If yes, please explain		
Not accommodating to ADA laws		
See above		
NA (6)		
I am a caseworker and many of my clients experience unfair rental practices through leases that are unregulated by law		
Said they cannot get a hold of their LL, calls being ignored.		
i have clients that are illegally evicted daily.		
maintenance requests not being completed, black mold issues, landlords that won't take/make repayment plans, the way		
I		
I dont work for any of them		
Do not work for such an organization.		
Had multiple different scenarios. Most commonly the folks we're trying to help rent a place with a voucher hear that the place doesn't take Section 8 vouchers or will be discouraged from applying if they have a voucher because management/landlords tell them they won't be approved for the place when other folks don't have vouchers.		
Rental housing complaints by white neighbors to white property managers. Native American tenants who pay rent with tribal per capita payments. No language translation for Marshallese and other tenants whose first language is not English. Single mothers of children under the age of 18. Single mothers of disabled children.		
I work for the arc of spokane and get calls all the time about losing their housing for things that are not legal. Housing		
Most of my clients have landlords (slumlords) who treat their issues, whether it be a language barrier, SES, or disability as being inconsequential. Many property managers count on the tenants being uneducated and not understanding any leverage or rights they may have.		
Umm... there is no box for I don't work for these organizations. Didn't anyone proof read this survey?		
Not directly. I am on the Peer Spokane advisory board that works with a lot of homeless or mental heath clients.		
A CLT not being the correct age to be a tenant. Landlords not making updates to housing community and or apt and or apt building. Landlords not fixing the broken items or equipment in apts. or homes they are renting out, despite being notified of the need. Landlords taking advantage of the tenants vulnerability.		
landlords' discrimination due to sexual orientation		
income source discrimination		
homeless status		
Usually based on source of income - refusal to accept assistance by the landlord. OR a tenant's disability status and refused		
Discrimination based on race, lack of accessible/reasonable accommodation units, source of income such as SNAP, etc.		
We occasionally receive complaints, which are always taken seriously and investigated. None have been found to have merit, but we take every opportunity to educate staff and ensure our housing practices remain solid and legally compliant.		
I don't know.		
we have received complaints of discrimination based on: race, income source, and sexuality/gender/transgender clients are being denied housing due to not meeting landlord requirements..		
Age, income source, disability		
An explanation would compromise client confidentiality		
Landlords refusing deposit/first month rent payments from FCS TAP or other rental assistance programs for people with disabilities.		
does not apply		
I have received complaints of racism and homophobia from constituents which I cannot do much about in my job so I have to direct them to other resources.		
We hear from clients that we serve quite often that a landlord wants a double deposit because of the prospective tenants background.		

Q36. I believe I have witnessed illegal discrimination by someone in my industry against someone attempting to rent a dwelling unit, because of their protected class.

Answer Choices	Responses	
True	40.0%	8
False	60.0%	12
If true, please explain	30.0%	6
	Answered	20
	Skipped	1

If true, please explain

A property manager telling tenants they would not take section-8
Income discrimination (we don't work with vouchers etc), National Origin ("why can't they call me themselves"), "that's not really the kind of place we are" etc.

I have been discriminated against because I am on housing.

Cedar Springs apartment complex dilybertly dicriminated against clients.

All the companies that use a third party applications to do there back ground checks the ones that use a California companies, they aren't up to date with Washington-Spokane laws.

I tried to help a friend find an apartment and he was openly told by landlords that they don't take vouchers.

bias in housing is so exceedingly rare as to be non-existent

Q37. I believe I have witnessed illegal discrimination by someone in my industry against someone during their tenancy (treated differently because of protected class, harassed because of protected class, etc.)

Answer Choices	Responses	
True	35.0%	7
False	65.0%	13
If true, please explain	30.0%	6
	Answered	20

I have specifically called on a private landlord's home to rent for a voucher holder and was told "I will not rent to anyone with a voucher." I reported this, but because my client (who was homeless and desperately seeking housing) didn't want to fight for the unit, there was nothing that could be done. Landlords are able to say these things and get away with it, especially private one's. Another landlord (not private, with a company) told a client of mine their application was denied for a 2 year old DUI. They had a good landlord review from their current property and had a voucher to subsidize the unit, they had always paid their rent on time, and had 0 lease violations. A DUI has nothing to do with housing and should not have been used as grounds for denial. I have also worked with landlords who weren't so "clear" with their denials, they just did not respond to requests and were generally difficult to work with, making the client move on to a more amenable landlord.

A client feels she is not getting treated the same as others based upon her race and color. She has not had the same help as others in regards to referrals, programs ect by Catholic Charities

are any complaints required to include a specific format and evidence submission? if a narrative without evidence is provided, how can you not assume the complaint is someone grinding a grudge?

Q32. I believe I have been illegally discriminated against while attempting to obtain rental housing in Spokane?

Answer Choices	Responses	
True	18.5%	36
False	82.1%	160
If true, you may provide additional details if you feel comfortable doing so	7.7%	15
	Answered	195
	Skipped	18

If true, you may provide additional details if you feel comfortable doing so

I am not.

My partner and I were about to get approved to rent a house, but then we met the owners and they saw we are queer and transgender. They made up some excuse about us having bad rental history (but I have never had any problems with previous rentals and always left everything in immaculate condition).

I lost an apartment because I am white and I was told they wanted to give it to Hispanic instead because they struggle more, it's racial bias because landlord was Hispanic.

Disability

I was previously turned down for a rental property because the property owner refused to rent to unmarried couples on the basis of discriminatory religious beliefs he held.

My last name could be seen as a racial name and we applied to so many rental agencies and not one would even call us back.

Was denied rental due to my young age, veteran status, and income type

This is really an awkward survey. It doesn't allow you to correct an answer

My child has been

I attempted to look at housing for my grandchildren. Being a grandparent, they were happy to show the units. The second kids were mentioned, suddenly there were pending applications.

35 years ago

Turned the case over to Human Rights and won

I had money coming in from the military and the landlord was grilling me on why I was getting that money. I walked away from that.

As a black man, I was searching for housing and found a unit that I wanted and applied for the unit. When my application was approved I was charged a larger security deposit than what was advertised for the unit that I had applied for.

bias in housing is exceedingly rare, to the point of being non-existent

Q33. I believe I have been illegally discriminated against while renting in Spokane (e.g., treated differently because of my protected class, harassed because of my protected class, etc.)

Answer Choices	Responses	
True	18.0%	35
False	82.1%	160
If true, you may provide additional details if you feel comfortable doing so	8.2%	16
	Answered	195

		Skipped	1
If true, please explain			
Witnessed a rep from large property manager company ins Spokane treat protected class awful all the time for seemingly no reason			
Complicated situations that arose due to a property owner and property manager not communicating about the tenants			
Many of my clients have reported that they felt like a landlord was issuing them notices or similar because of their race.			
Property management attempted to evict a person who was slightly behind rent during a mental health crisis. Other tenants in the building were significantly farther behind in rent and were not noticed. Management did not like the tenant's behaviors due to mental health crisis, although none were criminal or endangered the safety or security of the property.			
My former neighbors were treated poorly by our then-landlord due to disability. The landlord didn't give me a key for the front door. Instead of procuring me a key, the building manager told the downstairs neighbors not to lock the front door (this is a neighborhood where everyone wants their doors locked). My neighbor had memory issues and kept locking the door. When I came home late one night and had to call for an emergency unlock from maintenance, the building manager billed my neighbor for it because she'd forgotten to leave the door unlocked.			
bias in housing is so exceedingly rare as to be non-existent			

		Skipped	18
If true, you may provide additional details if you feel comfortable doing so			
I am not.			
As a woman my landlord had little respect for me and would not announce when he was coming to work on the unit ahead of time. Multiple times I thought someone was breaking in.			
Under one of our property managers, we went for several months without a refrigerator despite that being part of our rental agreement. We made multiple attempts to get this situation resolved, but as a queer person, you know that you can't push issues like "not having a place to store food" too hard without risking getting kicked out.			
Na			
Same as above.			
I'm not allowed to rent most of the new complexes because I'm middle class			
Disability			
Being a single Asian woman I have experienced sexual harassment by landlords.			
I was charged excessive cleaning fees and my deposit not returned by a management company in Spokane. As a landlord, I had to fire a management company for lying to and threatening my tenants. (Giving them 3 day notice for an eviction) I think the first was because I was a young single mother. The management company thought they could get away with bullying because I was female and my tenant was young and poor. He did need to be evicted but that management company regularly illegally bullied their clients, I learned. A big company in Spokane			
Turned the case over to Human Rights and won			
I had a hostile landlord who refused to fix anything and put off fixing things like our HVAC. I think it was because we were college students and "could handle it". I also detected some hostility whenever I mentioned my disability.			
I was told by a landlord that I was a scammer, when I left an abusive relationship I thought I was moving into a safe home with my children... Boy was I wrong. He and his wife acted as if they were helpful people when in turn, he was verbally abusive disrespectful. His wife just would talk to me and they own businesses in Spokane. What trauma			
Having special needs children created a problem with another tenant. The property manager didn't attempt to accommodate us by giving us a ground floor unit. We had to move to another property. The tenant downstairs was a nasty person. She only cared about herself and was apparently the favored, as she complained constantly.			
I had a landlord charge me extra so not being able to move out at the end of the month even though the building was being sold and remodeled. I also had to pay for new carpet even though the building was sold and being remodeled. I know it was being sold because that was why I was needing to move and I know it was being remodeled because they also had someone taking measurements outside my bathroom window without warning or notice and he scared the crap out of me. Again, I can't help but wonder if it was because I was the only single parent in the building or because I have mental health problems or both. But it certainly wasn't normal.			
In 2019 I had a one bedroom apartment that my 2 children stayed with my part time. We converted the 'dining room' into a bedroom since it had an egress window. My youngest was under 1 year old and my oldest was 5. I wanted to add an adult household member to the lease and was told I could not. This household member was necessary to help me cover bills and care for my children. When I pointed out the 2 heartbeats per room HUD rule, and that living rooms count as sleeping space, they claimed that my children were heartbeats and they denied my request to add a household member. They refused to even screen the member to be added.			
bias in housing is so exceedingly rare as to be non-existent			
Q34. I believe I have been illegally discriminated against and terminated from rental housing in Spokane because of my protected class.			
Answer Choices		Responses	
True		7.9%	15
False		91.6%	175
If true, you may provide additional details if you feel comfortable doing so		2.6%	5

Q38. I believe I have witnessed illegal discrimination by someone in my industry against a person attempting to purchase a home in Spokane, based on their protected class.

Answer Choices	Responses	
True	5.0%	1
False	95.0%	19
If true, please explain	10.0%	2
	Answered	20
	Skipped	1

If true, please explain
 Accidentally picked and it will not allow me to unpick and is forcing me to respond
 bias in housing is so exceedingly rare as to be non-existent

Q39. I believe I have witnessed steering to a particular area of Spokane, neighborhood, or housing complex, by a person in my industry, because of protected class.

Answer Choices	Responses	
True	30.0%	6
False	70.0%	14
If true, please explain	25.0%	5
	Answered	20
	Skipped	1

If true, please explain
 Yes, but source of income and parts of town that are more affordable
 DOc will only let up open recovery homes in certain locations.
 Application process where my clients have been discriminated on income
 I have been steered towards "nicer" neighborhoods than I could afford by leasing agents and real estate agents and I think this was in part because of race. I'm certain the opposite happens too.
 bias in housing is so exceedingly rare as to be non-existent

	Answered	191
	Skipped	22

If true, you may provide additional details if you feel comfortable doing so
 NA
 Na
 Disability
 Turned the case over to Human Rights and won
 bias in housing is so exceedingly rare as to be non-existent

Answer Choices	Responses	
True	6.8%	13
False	92.6%	176
If true, please explain	5.8%	11
	Answered	190
	Skipped	23

If true, please explain
 I am not comfortable.
 We would love to be able to purchase a home, but the housing costs here are astronomical, even at our income level. Given that protected classes make considerably less than their white, straight, cis (especially male) counterparts, the lack of real action to make sure that safe, affordable places to live are available for all walks of life is absolutely discrimination against protected classes.
 Na (2)
 I offered more money but a Californian offered cash and \$50,000 less so they took the Californian's offer. This happened 7 times.
 but I was told about certain neighborhood demographics and not wanting to live in certain neighborhoods by my real-estate agent.
 Our credit score went down because of a glitch
 Source of income, self employed
 The listing agent tried to tank the purchase because we were not Russian. She lied to the seller, then called the appraiser and lied saying our financing fell through. She knew our lender had a deadline and she was trying to push it past it. We found out in time though so she failed, but definitely illegal discrimination.
 Who can purchase anymore? NOT ME
 bias in housing is so exceedingly rare as to be non-existent

Answer Choices	Responses	
True	13.8%	27
False	85.7%	168
If true, you may provide additional details if you feel comfortable doing so	6.1%	12
	Answered	196
	Skipped	17

If true, you may provide additional details if you feel comfortable doing so
 I am not comfortable
 when i was trying to purchase a home they only showed me dumpy houses on the west side and market street area.
 Na
 To sell my long term home to live in assisted living against my will.
 Very run down areas due to lack of income because of disability
 I had to demand to see certain homes and was told I would not like them or the area they are in.
 ive been steered to a certain area because of the choices i have made in my life & the result of those choices
 Happened to us by the owener
 Redlining is still occurring in Spokane, WA. As a white woman I can acknowledge that I grew up with more opportunity in some ways, less discrimination, and have been able to afford to live in an area of Spokane with less criminal activity and that I chose. There are others that are not able to do so due to the systematic barriers that are still in place.
 I'm a white woman and I live on the south hill
 Forced to live in mobile home can't afford rent and living on 1 income as single parent will not pay the mortgage

Q40. I have had difficulty obtaining, or have had to pay higher premiums, for property insurance in Spokane, because the occupants of dwelling units I manage, own or serve have disabilities, are unrelated, or have assistance animals or children.

Answer Choices	Responses	
True	19.1%	4
False	28.6%	6
N/A	52.4%	11
If true, please explain	9.5%	2
	Answered	21
	Skipped	0

If true, please explain
I have heard this being the case. Higher insurance premiums for landlords who accept higher barrier tenants

bias in housing is so exceedingly rare as to be non-existent

Q41. I have witnessed lending discrimination by someone in my industry because of a mortgage applicant's protected class (race, disability, sex, national origin, etc.)

Answer Choices	Responses	
True	10.00%	2
False	90.00%	18
If true, please explain	5.00%	1
	Answered	20
	Skipped	1

bias in housing is so exceedingly rare as to be non-existent

Q34. Have you ever received a reasonable accommodation or modification request from a person with a disability?

Answer Choices	Responses	
Yes	45.0%	9
No	40.0%	8
If yes, please describe	50.0%	10
	Answered	20
	Skipped	1

If yes, please describe
RA for section-8 housing subsidy to pay more for rent due to necessity of that housing location for the tenant

I am the president of the Tenant Union in the building. I have assisted in bringing requests from tenants to the attention of management.

N/a - but I have helped people request them

If one we could not help with is considered reasonable, WE have people ask to move in in wheel chairs. Our houses are not ADA compliant and include many stairs. We wold like to help but just cannot

Accommodations - Change of rental payment dates due to fixed-income payments; assistance animals; moving a parking space; moving tenant from upper floor to ground floor when availability arises. Modifications - Wheelchair ramps; removal of shrubs to make access easier; grab bars in showers and around toilets.

One was reasonable, but the other two were so far unreasonable I would have rather sold my rental than accomodate.

I helped clients write and submit these to there landlords, property managers

To remove doors for wheelchair accessibility. Installation of grab bars in bathrooms, baths, and showers

Assistance animal, live in aid, Unit Transfer

bias in housing is so exceedingly rare as to be non-existent

Q35. Has a fair housing complaint ever been filed against you or your company?

bias in housing is so exceedingly rare as to be non-existent

Q37. I have had difficulty obtaining homeowner's insurance in Spokane because of my protected class (race, national origin, disability, etc.)

Answer Choices	Responses	
True	2.1%	4
False	96.9%	185
If true, you may provide additional details if you feel comfortable doing so	2.6%	5
	Answered	191
	Skipped	22

If true, you may provide additional details if you feel comfortable doing so
NA (2)
Unable to obtain affordable home insurance.
Something needs to be done about the outrageous cost of INSURANCE. And TAXES!!
Who can afford to rent/own, buy food and pay utilities.
Age of mobile home or living in a fire area
bias in housing is so exceedingly rare as to be non-existent

Q38. I have been denied a home mortgage loan in Spokane because of my protected class (race, disability, sex, national origin, etc.)

Answer Choices	Responses	
True	5.6%	11
False	93.9%	183
If true, you may provide additional details if you feel comfortable doing so	3.6%	7
	Answered	195
	Skipped	18

If true, you may provide additional details if you feel comfortable doing so
I am not comfortable.
NA
They didn't say they wouldn't give me a loan because I am a woman, but I believe it.
But I insisted and wrote a letter
I haven't bothered to try because as a brown, single mother, it feels impossible.

Answer Choices	Responses	
Yes	10.0%	2
No	80.0%	16
If yes, on what basis and how did it resolve?	25.0%	5
	Answered	20
	Skipped	1
If yes, on what basis and how did it resolve?		
<p>A tenant complained about being denied a rental due to their service animal when in fact they were denied due to lack of proof of income. Instead of the tenant advocate inquiring with me for the complete set of facts, the complaint was sent to HUD. I paid their extortion because it was clearly a "guilty until proven innocent" situation and they told me a lawsuit was not only hard to win but could bankrupt me. It was a business decision to pay instead of fight, even though the claim was bogus. Again, the system is broken and landlords are becoming increasingly aware they are viewed as "the enemy" instead of partners in housing that provide a needed and valuable service. Until that changes, we will continue to have a rental housing shortage and lack of affordability.</p>		
<p>he had two huge dogs, never said they were support animals. The apartment is 400 sf. After 3 years of getting bounced around to different HUD investigators agreed to settle with the the guy for \$1000 buck. THere comes a <u>point when common sense has to kick in.</u></p>		
<p>All the complaints regarding the landlords we deal with are submitted to the attorney general. We are not landlords or property managers.</p>		
<p><u>I'm not involved with property management and don't possess sufficient knowledge.</u></p>		
<p><u>bias in housing is so exceedingly rare as to be non-existent</u></p>		