



Agenda Sheet for City Council:

Committee: Urban Experience **Date:** 08/12/2024

Committee Agenda type: Discussion

Date Rec'd

8/1/2024

Clerk's File #

RES 2024-0080

Cross Ref #

Project #

Council Meeting Date: 08/26/2024

Submitting Dept

COMMUNITY, HOUSING & HUMAN

Bid #

Contact Name/Phone

KIMBERLY 6048

Requisition #

Contact E-Mail

KBABB@SPOKANECITY.ORG

Agenda Item Type

Resolutions

Council Sponsor(s)

ZZAPPONE KKLITZKE

Agenda Item Name

1680- 2024-2027 FAIR HOUSING PLAN

Agenda Wording

The Community Housing and Human Services Department contracted with Northwest Fair Housing Alliance 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.

Summary (Background)

As a participant in Community Planning and Development programs, the City of 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 through the Community Development Block Grant, Home Investment Partnership), and Emergency Solutions CPD programs. quirem

Lease? NO

Grant related? NO

Public Works? NO

Fiscal Impact

Approved in Current Year Budget? N/A

Total Cost

\$

Current Year Cost

\$

Subsequent Year(s) Cost

\$

Narrative

Amount

Budget Account

Select

\$

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Select

\$

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Adopted by Spokane City Council on: 8/26/2024

Select

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Laurie Farnsworth
Acting Clerk



Continuation of Wording, Summary, Approvals, and Distribution

Agenda Wording

Summary (Background)

Approvals

<u>Dept Head</u>	ANDERSON, ARIELLE M.
<u>Division Director</u>	KINDER, DAWN
<u>Accounting Manager</u>	MURRAY, MICHELLE
<u>Legal</u>	SCHOEDEL, ELIZABETH
<u>For the Mayor</u>	PICCOLO, MIKE

Additional Approvals

Distribution List

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arielleanderson@spokanecity.org	dkinder@spokanecity.org
dnorman@spokanecity.org	

Committee Agenda Sheet

Urban Experience Committee

Committee Date	August 12, 2024
Submitting Department	Community, Housing, and Human Services
Contact Name	Kimberly Babb
Contact Email & Phone	kbabb@spokanecity.org , 509-625-6048
Council Sponsor(s)	<u>Zappone, Bingle, Klitze</u>
Select Agenda Item Type	<input type="checkbox"/> Consent <input checked="" type="checkbox"/> Discussion Time Requested: 10 min
Agenda Item Name	2024-2027 Fair Housing Plan
Proposed Council Action	<input checked="" type="checkbox"/> Approval to proceed to Legislative Agenda <input type="checkbox"/> Information Only
Summary (Background) *use the Fiscal Impact box below for relevant financial information	<p>As a participant in Community Planning and Development (CPD) programs, the City of 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).</p> <p>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. 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.</p>
Fiscal Impact Approved in current year budget? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Total Cost: Click or tap here to enter text. Current year cost: Subsequent year(s) cost:	
Narrative: Please provide financial due diligence review, as applicable, such as number and type of positions, grant match requirements, summary type details (personnel, maintenance and supplies, capital, revenue), impact on rates, fees, or future shared revenue	
Funding Source <input type="checkbox"/> One-time <input type="checkbox"/> Recurring <input checked="" type="checkbox"/> N/A Specify funding source: Select Funding Source* Is this funding source sustainable for future years, months, etc? Click or tap here to enter text.	
Expense Occurrence <input type="checkbox"/> One-time <input type="checkbox"/> Recurring <input checked="" type="checkbox"/> N/A	

Other budget impacts: (revenue generating, match requirements, etc.)
Operations Impacts (If N/A, please give a brief description as to why)
<p>What impacts would the proposal have on historically excluded communities?</p> <p>This Plan will provide data showing how protected classes are affected by fair housing choice. Data on fair housing will impact future planning to determine how to best serve historically excluded communities. These are the community members most often affected by fair housing laws and supports.</p>
<p>How will data be collected, analyzed, and reported concerning the effect of the program/policy by racial, ethnic, gender identity, national origin, income level, disability, sexual orientation, or other existing disparities?</p> <p>Organizations receiving HUD entitlement grants report demographic data for their programs on a monthly and quarterly basis.</p>
<p>How will data be collected regarding the effectiveness of this program, policy or product to ensure it is the right solution?</p> <p>Organizations that received HUD entitlement funds are required to report program data and accomplishments monthly and quarterly. This program data is compiled and reported to HUD in the annual CAPER (Consolidated Annual Performance and Evaluation Report).</p>
<p>Describe how this proposal aligns with current City Policies, including the Comprehensive Plan, Sustainability Action Plan, Capital Improvement Program, Neighborhood Master Plans, Council Resolutions, and others?</p> <p>This proposal aligns with the 2020-2024 Consolidated Plan and will provide needed data for the 2025-2029 Consolidated Plan. As a HUD requirement this proposal will keep the City of Spokane in compliance with HUD regulations to Affirmatively Further Fair Housing.</p>

RESOLUTION NO. 2024-0080

A Resolution in support of the City of Spokane's 2024 Fair Housing Plan and affirmatively furthering fair housing.

WHEREAS, the City of Spokane is a participant in Community Planning and Development (CPD) programs under the U.S. Department of Housing and Urban Development (HUD) and therefore subject to the affirmatively furthering fair housing requirements of the Fair Housing Act; and

WHEREAS, the City of Spokane receives annual funding from HUD through the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions (ESG) CPD programs; and

WHEREAS, the City of Spokane 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 in compliance with HUD's Affirmatively Furthering Fair Housing (AFFH) rule; and

WHEREAS, The City of Spokane's Community Housing and Human Services (CHHS) 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; and

WHEREAS, NWFHA is a HUD designated Qualified Fair Housing Organization and has provided nonprofit fair housing services since 1994; and

WHEREAS, 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; and

WHEREAS, 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; and

WHEREAS, the City of Spokane's 2024 Fair Housing Plan summarizes data and public input received during the fair housing assessment and 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;

NOW, THEREFORE, BE IT RESOLVED that the Spokane City Council is committed to affirmatively furthering fair housing and supporting the City of Spokane's submittal of the 2024 Fair Housing Plan to the U.S. Department of Housing and Urban Development.

Adopted by the City Council this 26th day of August, 2024.

Laurie Farnsworth
City Clerk (Acting)

Approved as to form:

Elizabeth Schoedel
Assistant City Attorney



Certificate Of Completion

Envelope Id: 9BCD919A495549EB9C682E1C13BD7073	Status: Completed
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	808 W. Spokane Falls Blvd.
	Spokane, WA 99201
	drose@spokanecity.org
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Elizabeth Schoedel eschoedel@spokanecity.org Assistant City Attorney - approved as to form only Security Level: Email, Account Authentication (None)	<i>Elizabeth Schoedel</i> Signature Adoption: Pre-selected Style Using IP Address: 97.118.34.62 Signed using mobile	Sent: 8/29/2024 9:19:22 AM Viewed: 8/29/2024 3:35:59 PM Signed: 8/29/2024 3:36:06 PM
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2024 FAIR HOUSING PLAN

**Adopted by Resolution No. 2024-0080
August 26, 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>

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 Resolution No. 2024-0080 on August 25, 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.

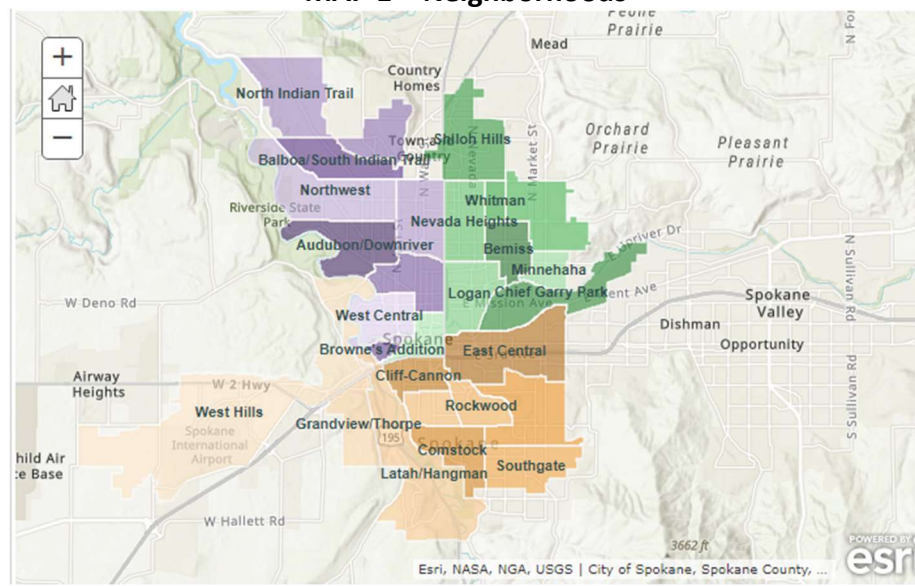
Spokane has an estimated population of 230,160 (US Census Bureau, Est., July 1, 2022). Spokane is the second largest city in Washington State, and the largest city between Seattle, Washington and Minneapolis-St. Paul, Minnesota. Spokane is a major metropolitan center for the Inland Northwest. Spokane 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

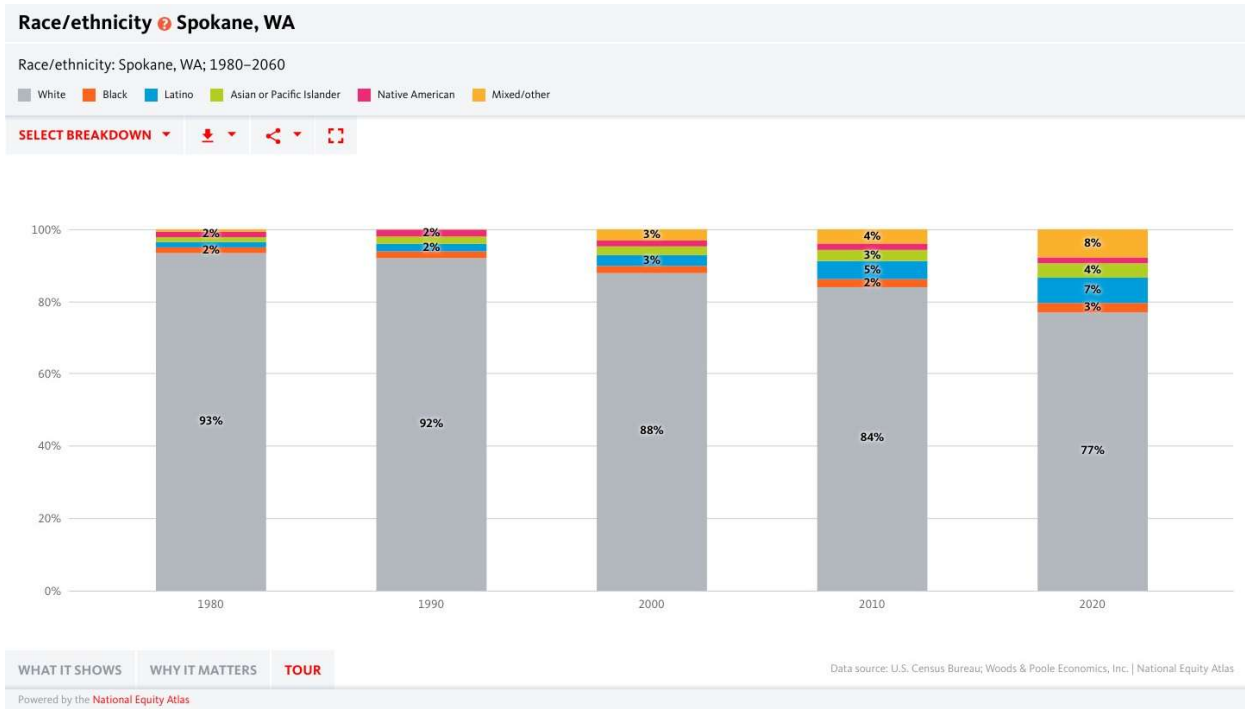
The population of Spokane is predominantly white, non-Hispanic; however, it is slightly more diverse than the rest of the county. Out of the total City population, 79.3% are white, 7% are Hispanic, 2.8% are Asian, 2.7% are black or African American, 1.9% are American Indian or Alaskan Native, 1.2% are 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

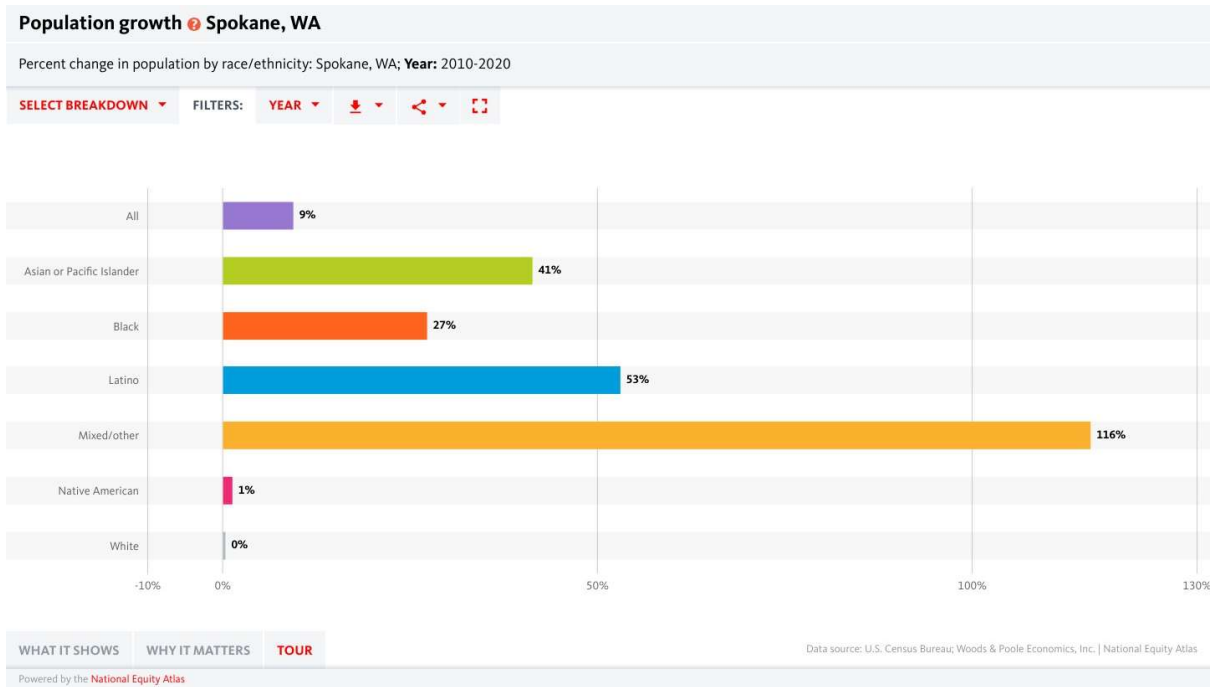
*Hispanic and/or race other than white alone non-Hispanic. Source: US Census

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

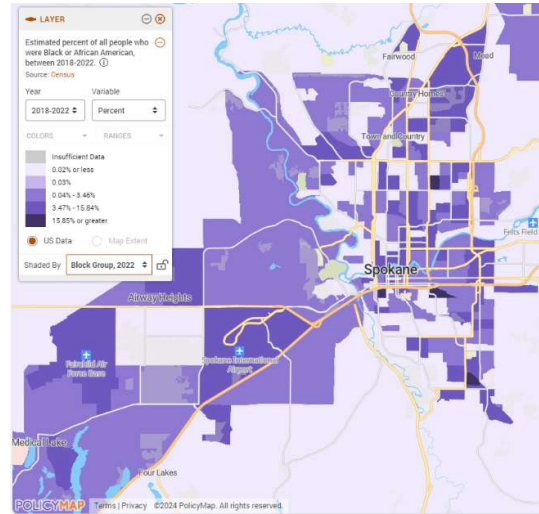
People who are Black and African American alone (without another race) are 2.7% of the Spokane population, a slightly higher percentage than the County of Spokane (2%). Table 2.

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#/>



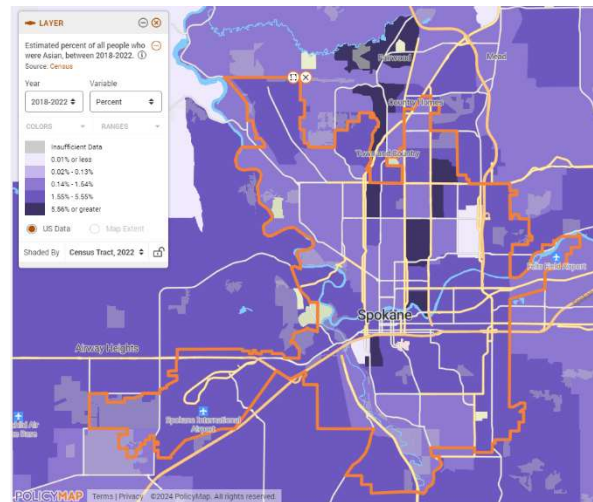
Asian Populations

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#/>



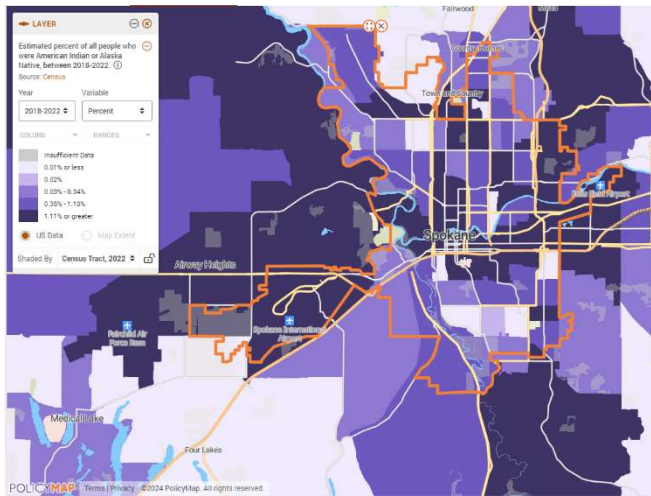
American Indian and Alaska Native – Indigenous Populations

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:

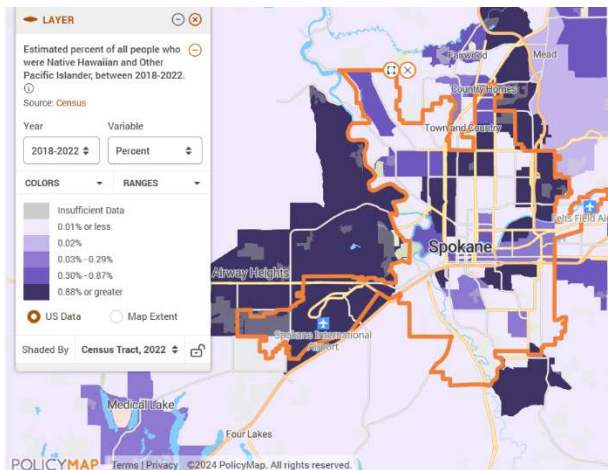


- 53063011103 (4%)
- 53063000400 (3%)
- 53063000202 (2.7%)
- 53063001900 (2.7%)
- 53063002000 (4.3%)
- 53063002400 (4.3%)
- 53063014500 (5.3%)
- 53063004701 (8.5%)
- 53063002300 (5%)
- 53063003601 (3.75%)

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

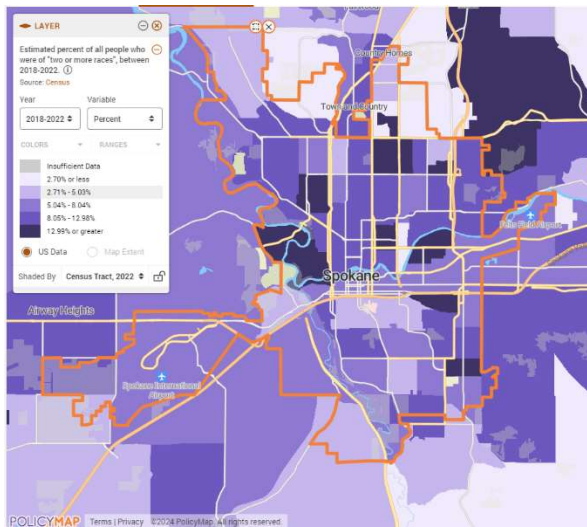
Source: <https://www.policymap.com/newmaps#/>

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/>

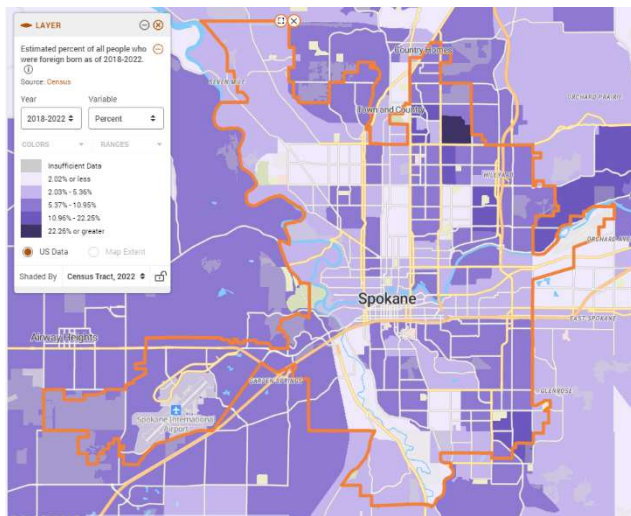
National Origin

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

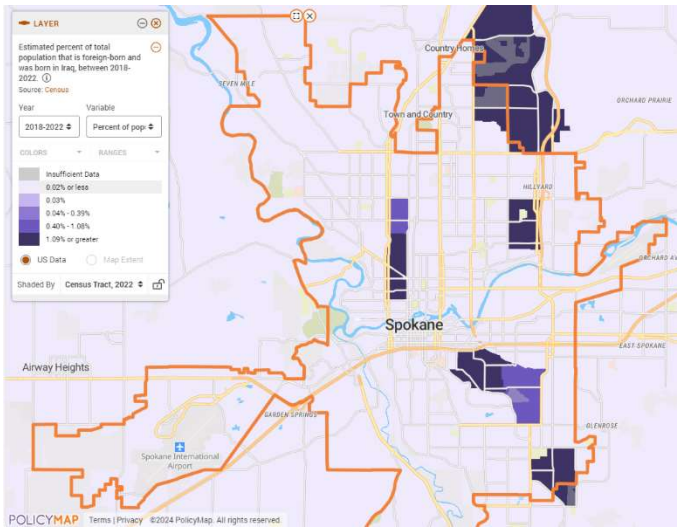
Foreign Born Population 2018 - 2022

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/ACSDT5Y2022.B05006?t=Place%20of%20Birth&g=160XX00US5367000&tid=ACSDT5Y2021.B05006>

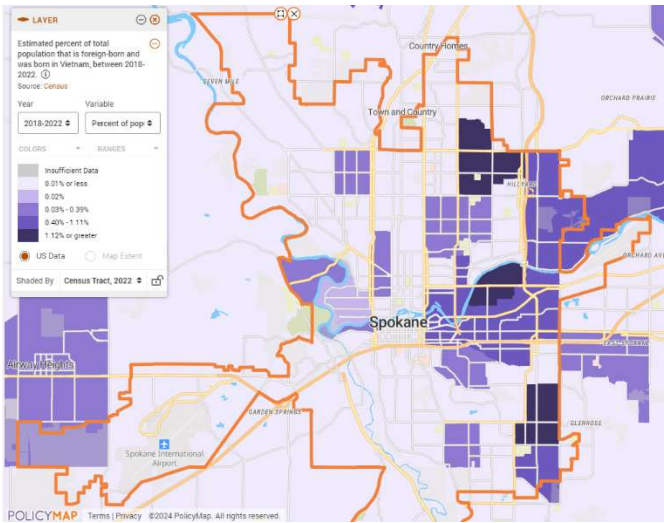


MAP 8
 Estimated percent total pop. that is
 foreign-born and born in
Iraq
 2018-2022

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/>

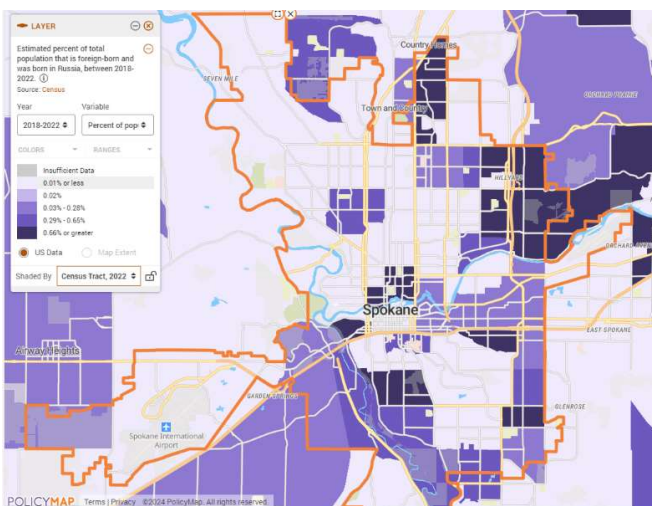


MAP 9
 Estimated percent total pop. that is
 foreign-born and born in
Vietnam (2018-2022)

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/>

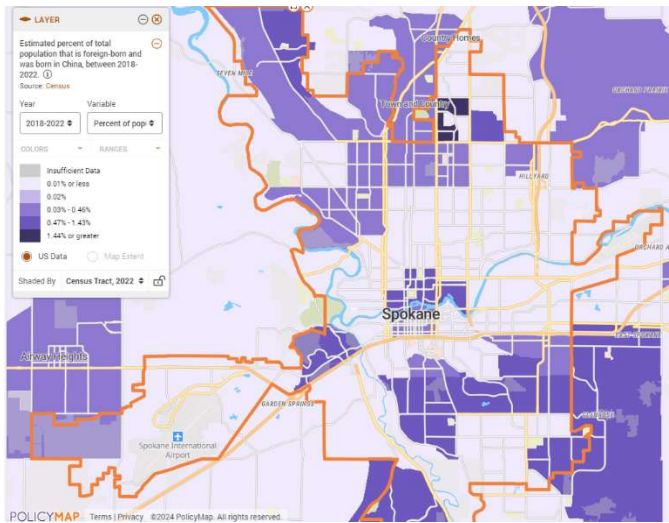


MAP 10
 Estimated percent total pop. that is
 foreign-born and born in **Russia**
 2018-2022

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/>



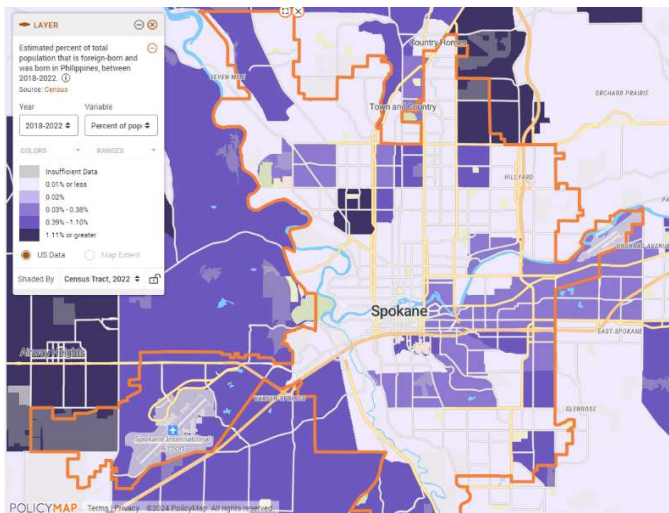
MAP 11

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/>



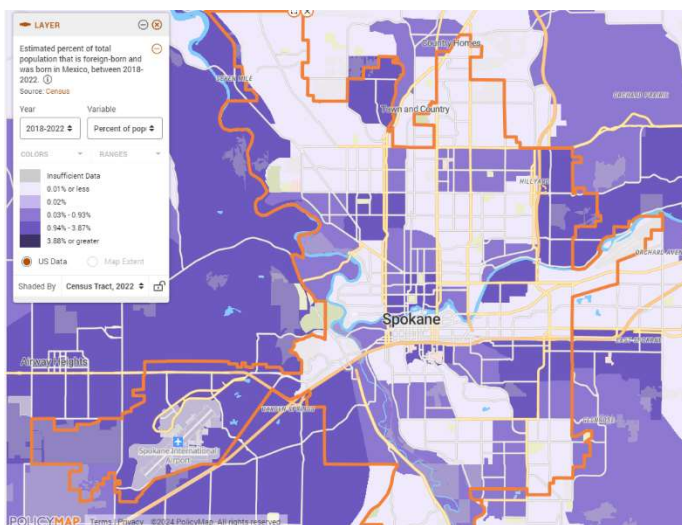
MAP 12

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/>



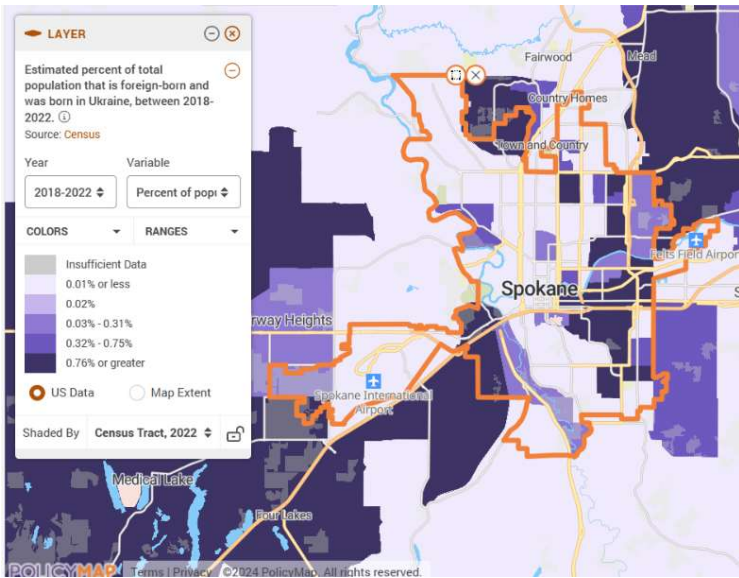
MAP 13

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/>



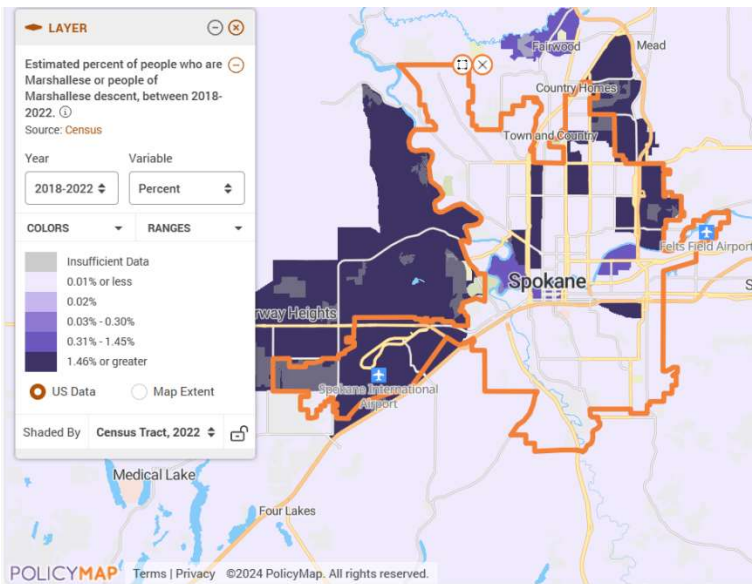
Source: <https://www.policymap.com/newmaps/>

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%)

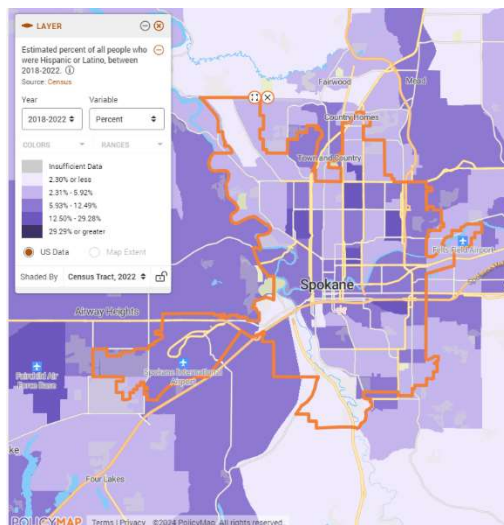
Hispanic / Latino Population

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.

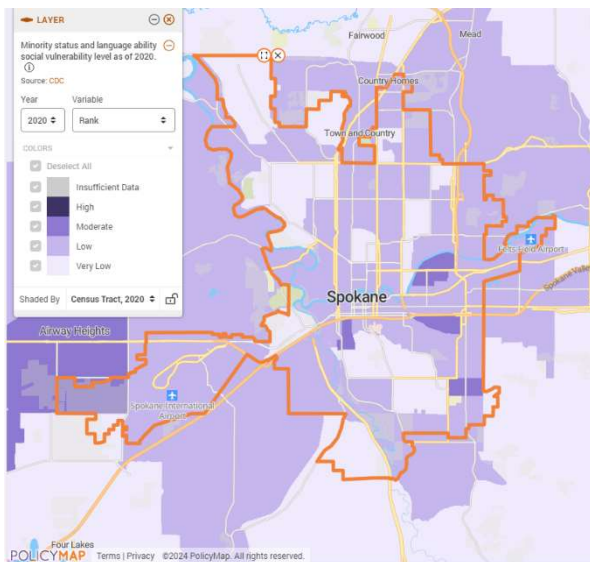
Tenant advocates shared anecdotes of translating for lease signing for a Spanish-speaking person who would otherwise not understand the rules regarding maintenance of the property, and a person who spoke Marshallese not understanding an Unlawful Detainer Summons in English and subsequent Writ of Execution 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

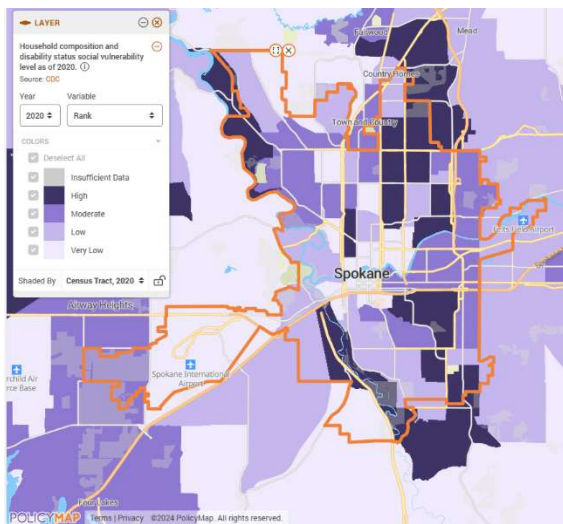
Household composition and disability status social vulnerability level

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

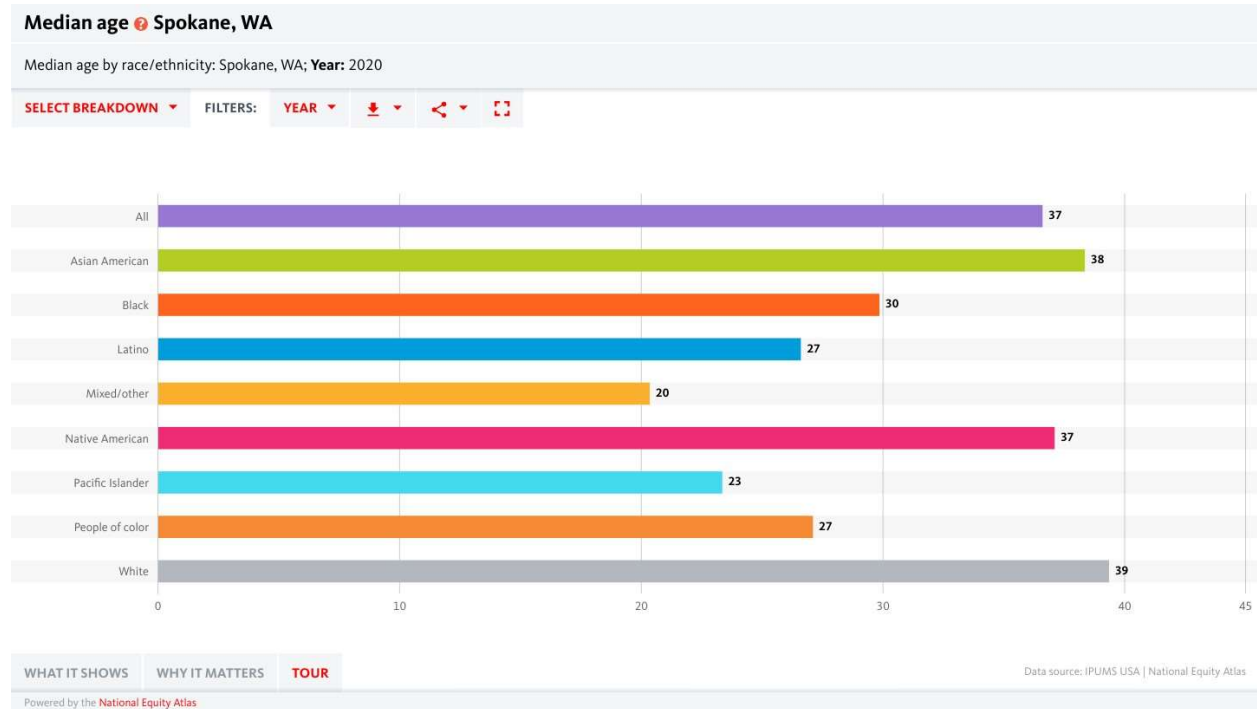
The median age in Spokane is 36.3 years, younger than the County, State, and USA. The median age in Spokane increased by 2.8 years since 1990, following regional and national trends of aging populations. Table 13.

Table 13: Median Age 1990-2020				
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

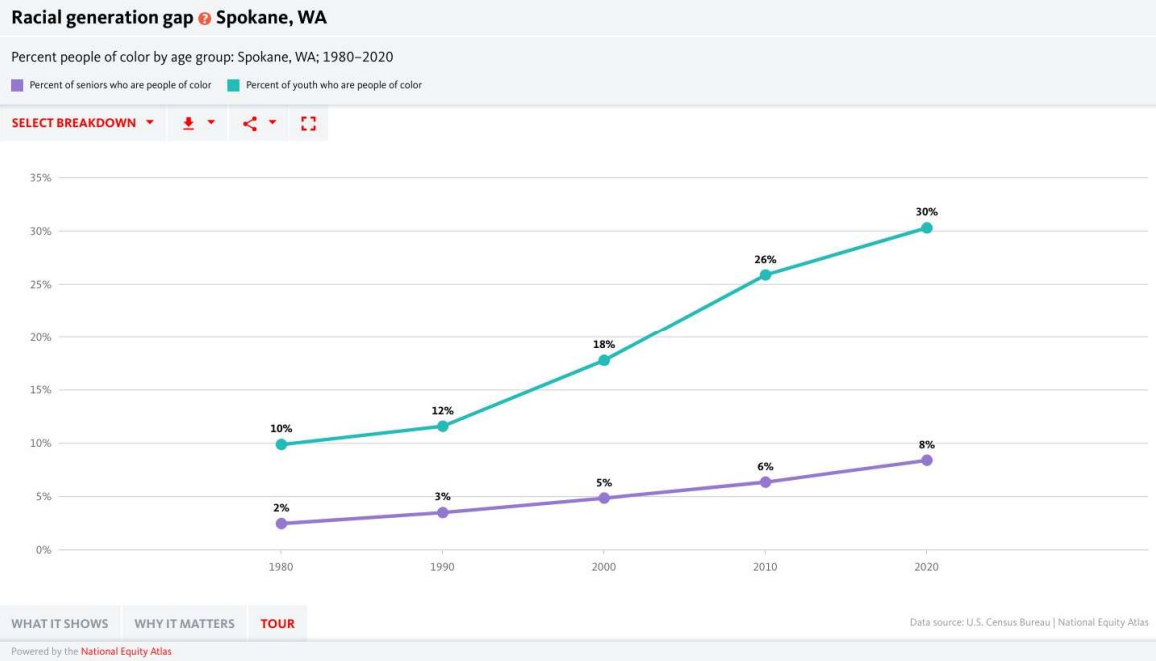
The median ages of Black (30), Latino (27), Pacific Islander (23), and multi-racial (20) people in Spokane are significantly lower than for white (39), Asian (38), and Native American (37) people.

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%

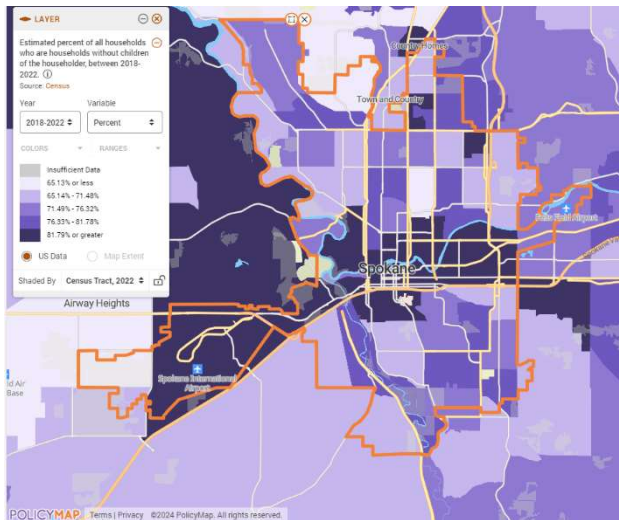
Source: US Census

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)

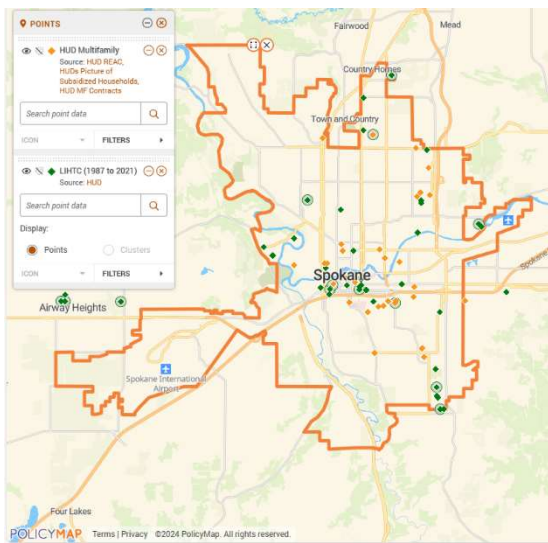
Source: <https://www.policymap.com/newmaps#/>

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)

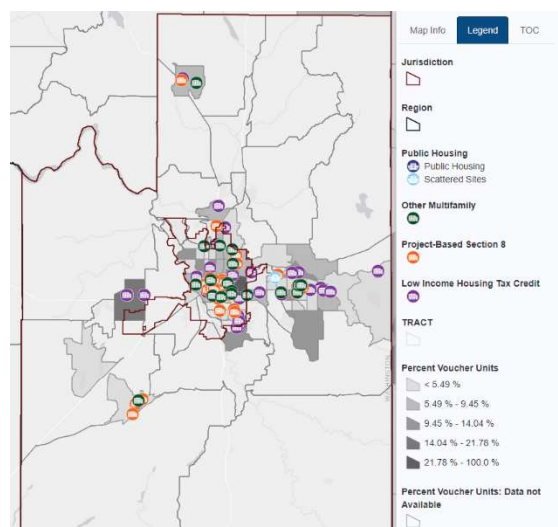
MAP 21

(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%

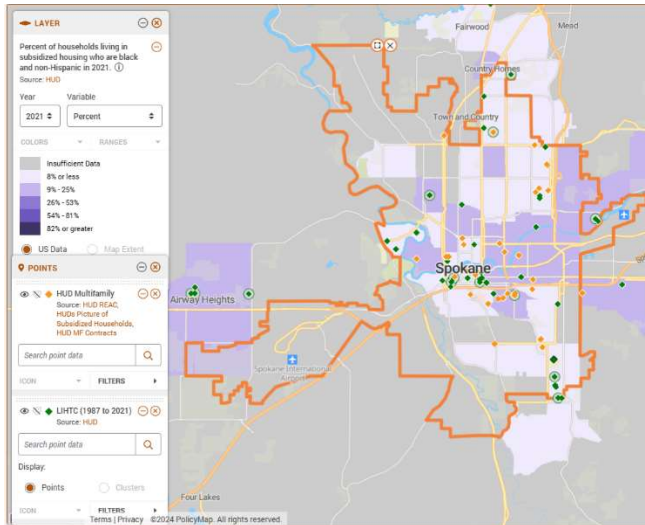
*Subsidized households include only programs from the U.S. Dept. of HUD, including Public Housing, HCVs, Moderate Rehabilitation, Project Based Sec. 8, Rent Supplement/ Rental Assistance Payment, Sec. 236 / Below Market Interest Rate, Sec. 202 /Project Rental Assistance Contract, & Sec. 811 / Project 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

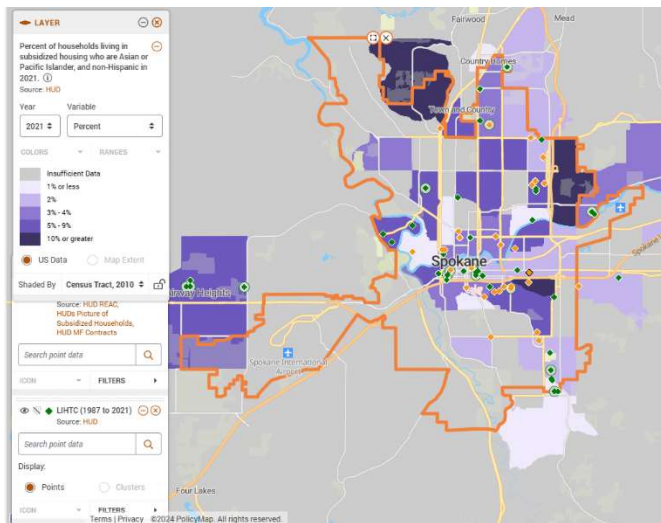
Percent of households participating in HUD subsidized housing programs who are **Black** and non-Hispanic in 2021 / with HUD Multifamily & LIHTC Sites

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

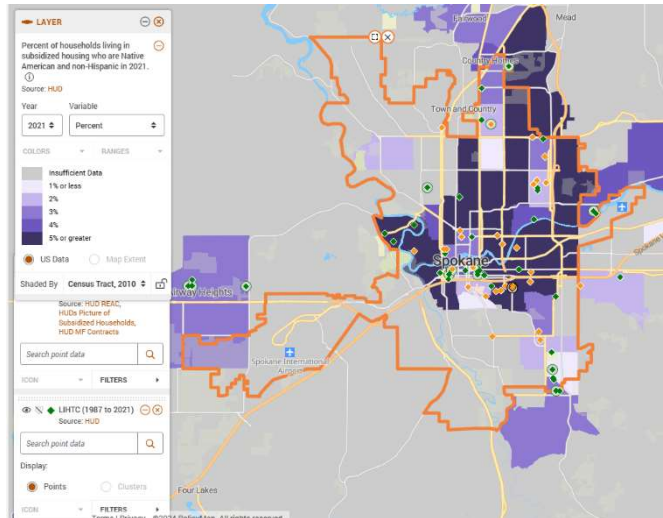
Percent of households participating in HUD subsidized housing programs who are **Asian or Pacific Islander** and non-Hispanic in 2021 with HUD Multifamily & LIHTC Sites

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%

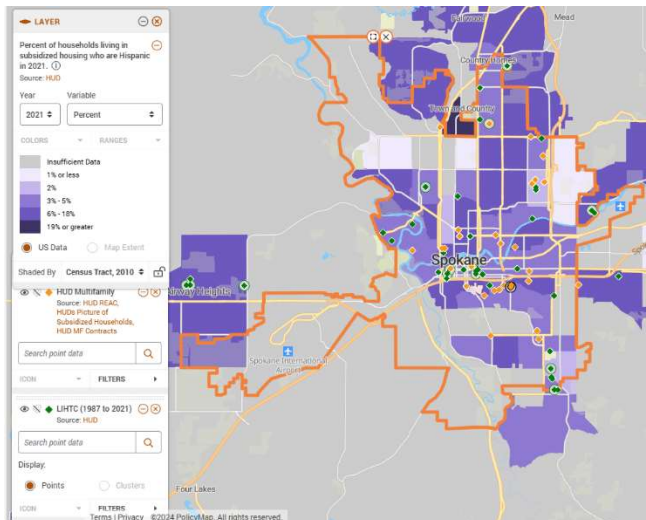
53063002300: 11%, 53063011201: 10%

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%

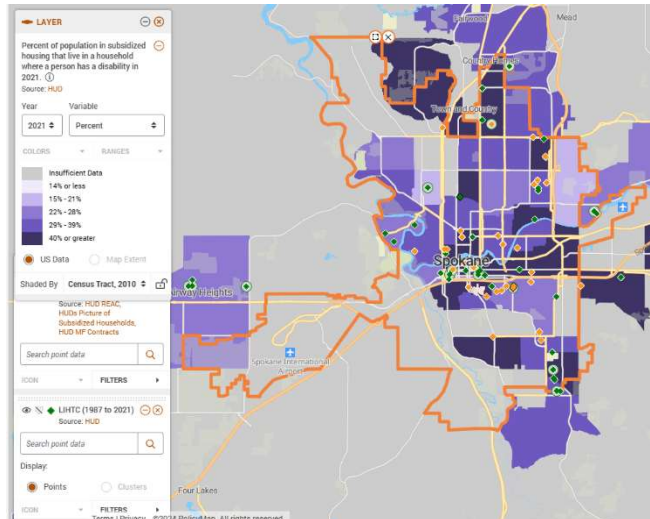
53063003000: 9%, 53063004400: 15%

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 HCV participants in 2021 were more likely to be female (65.6%) than male (34.4%). Table 20.

¹³ Id.

¹⁴ Id.

Table 18 - Percent of households by Race Receiving Housing Choice Vouchers – 2021				
	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%

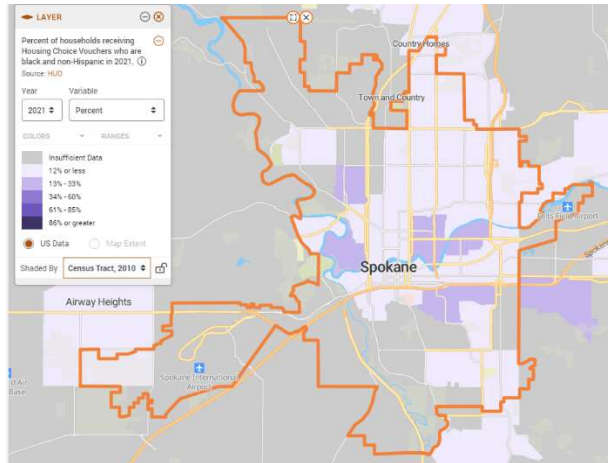
Source: <https://www.policymap.com>

Table 19 - Demographics for SHA Voucher Participants – 10/1/22 PIC Data											
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%

Table 20 - Demographics for SHA Voucher Participants by Percent – 10/1/22 PIC Data											
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%

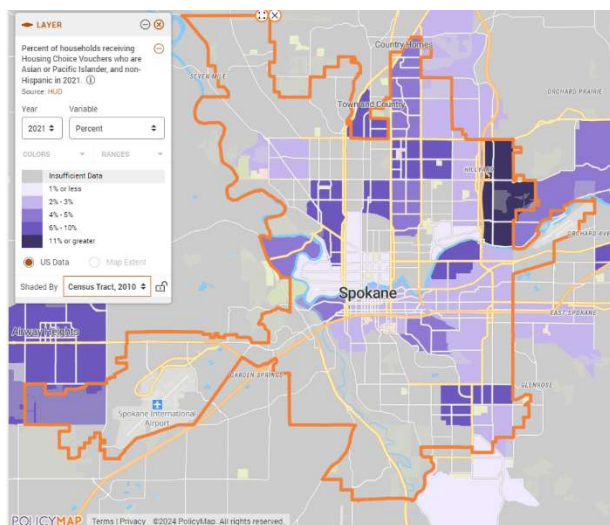
53063002500: 19%

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%

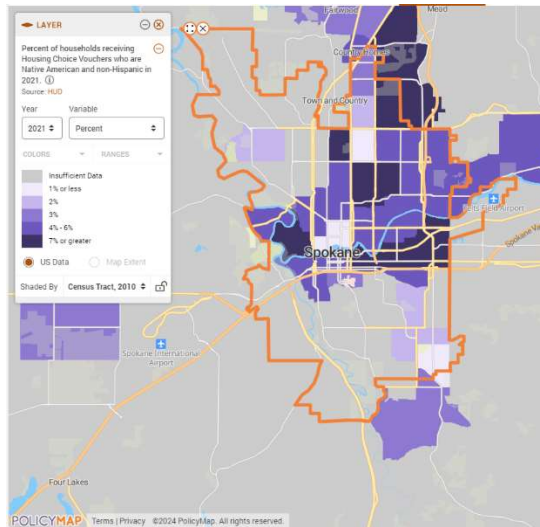
53063001100: 9%, 53063002100: 8%

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%

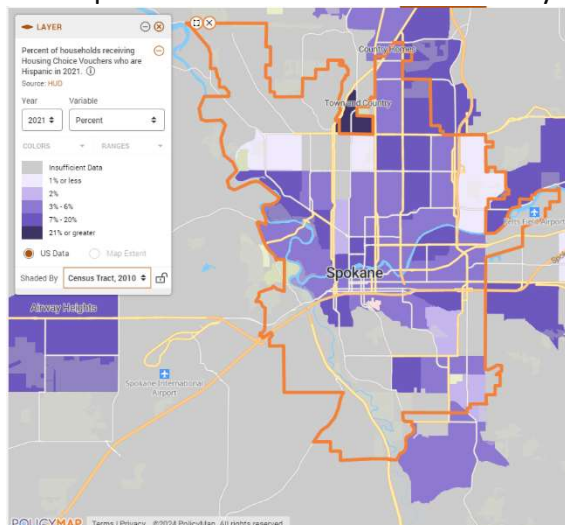
53063000500: 21%

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%

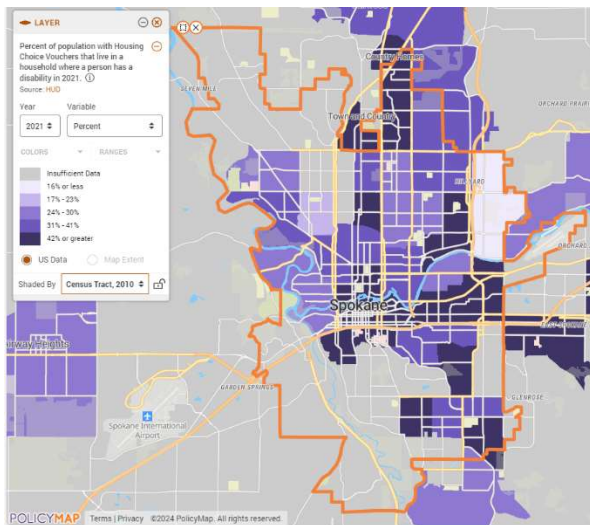
53063002100: 16%

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#/>

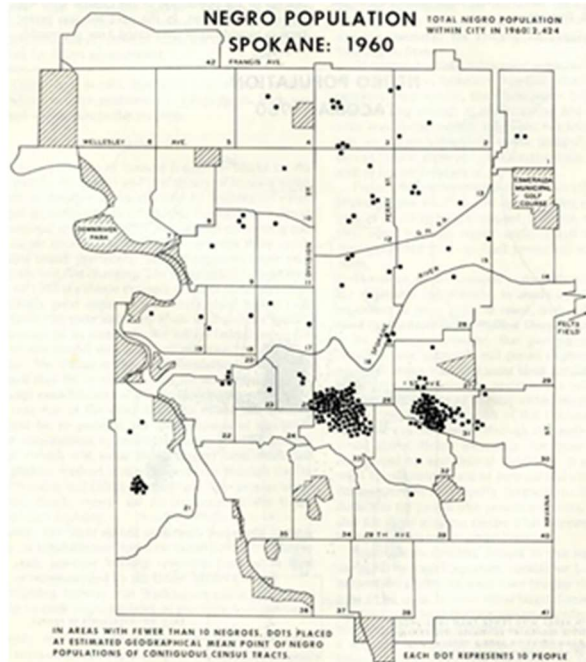
Table 21

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.

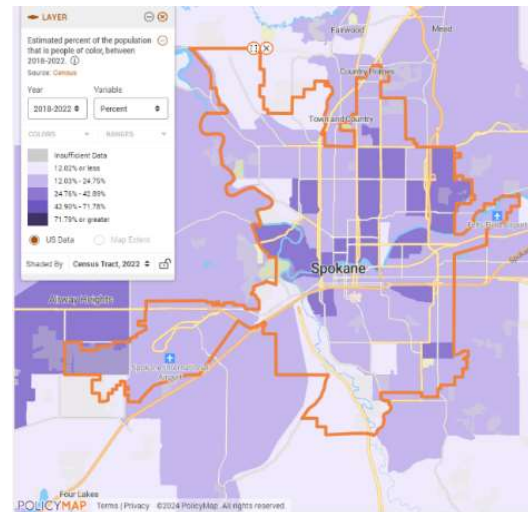
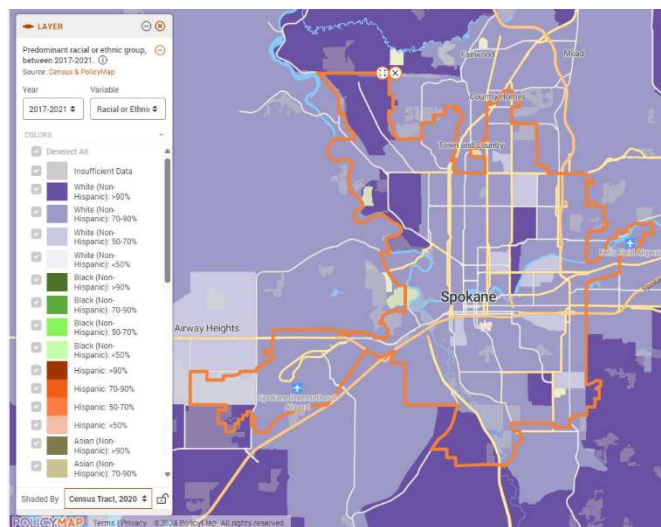


Table 22 - People of Color* By Census Tract			
Census Tract	%	Census Tract	%
53063000302	39.5	53063001100	28.4
53063004701	36.1	53063002300	27.9
53063002501	34.6	53063003601	27.7
53063000301	33.7	53063000400	27.6
53063003000	33.6	53063002400	27.4
53063011104	32.6	53063004001	26.9
53063002600	30.7	53063002503	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

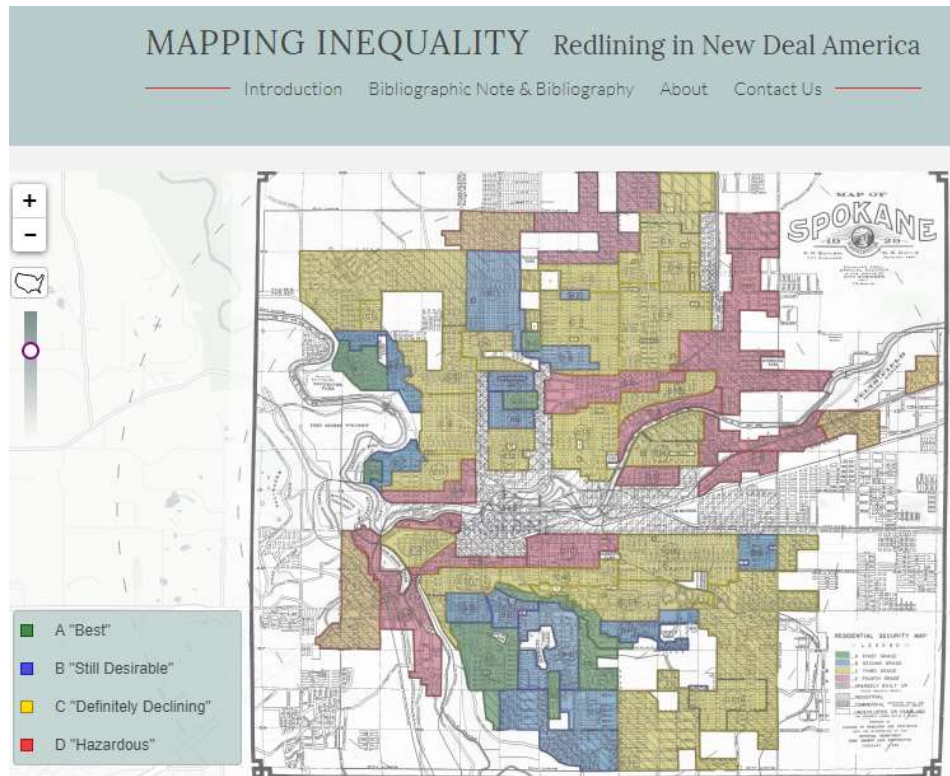
Source: <https://www.policymap.com/newmaps#/>

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



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#/>

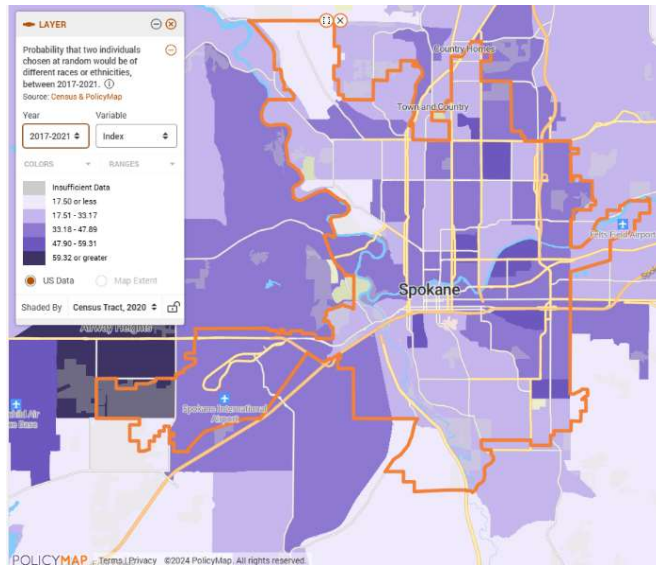
Diversity Index

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

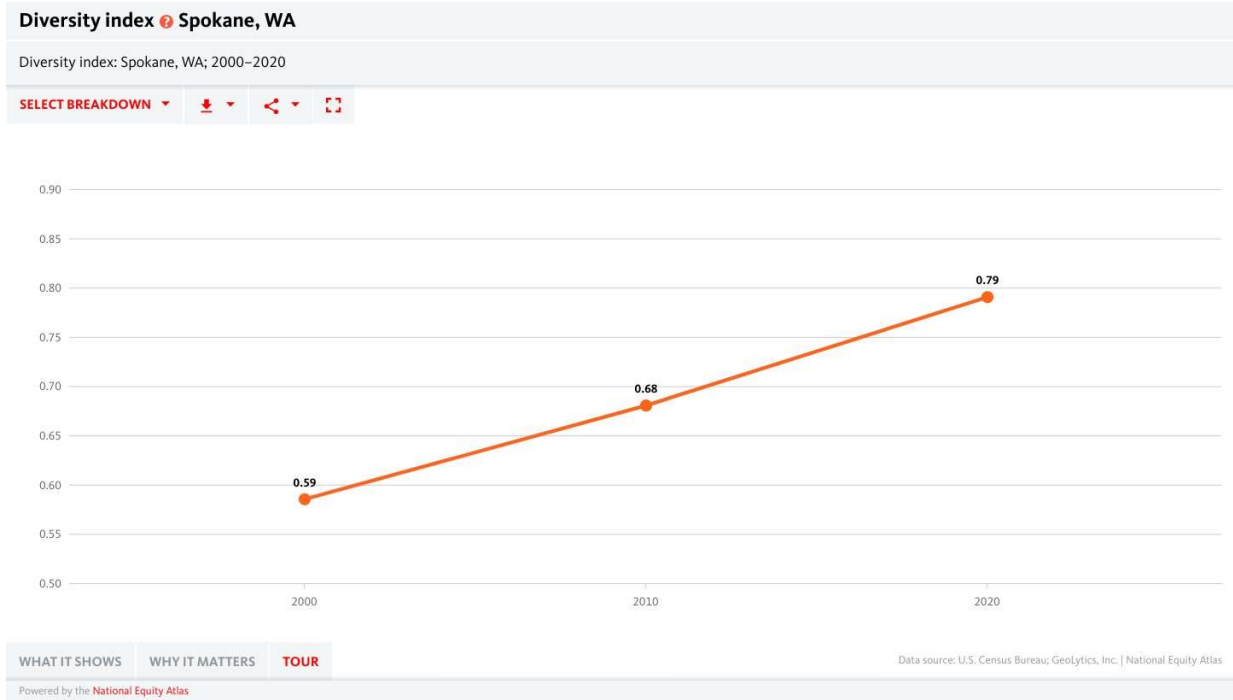


Source: <https://www.policymap.com/newmaps/> (ACS 2017-2021). Data were obtained from the Census' American Community Survey 2017-2021 estimates and calculated by PolicyMap.

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

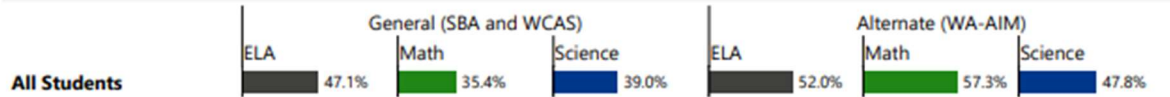
2022-23

Smarter Balanced Assessments (SBA): English Language Arts (ELA) and math for grades 3–8 and 10

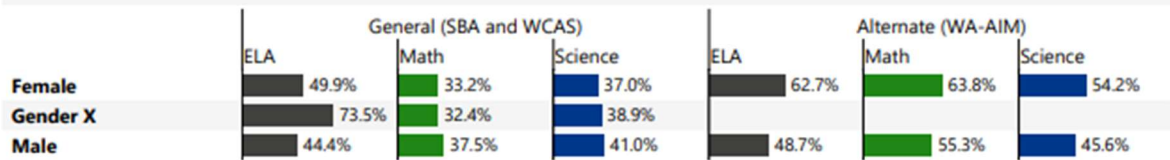
Washington Comprehensive Assessment of Science (WCAS): grades 5, 8, and 11

Washington - Access to Instruction and Measurement (WA-AIM): for students in grades 3–11 with significant cognitive disabilities

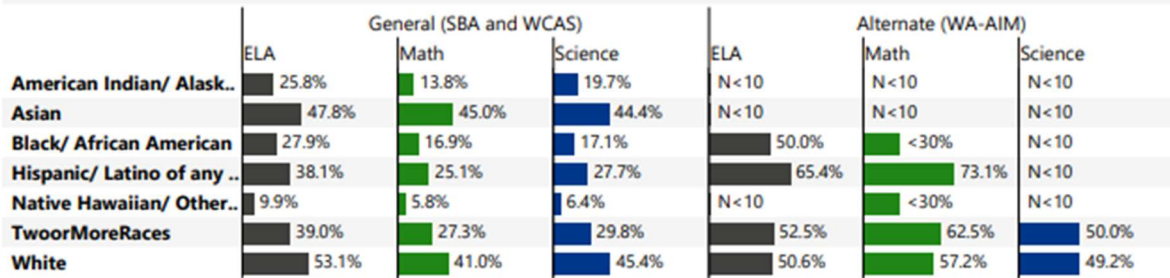
All Students



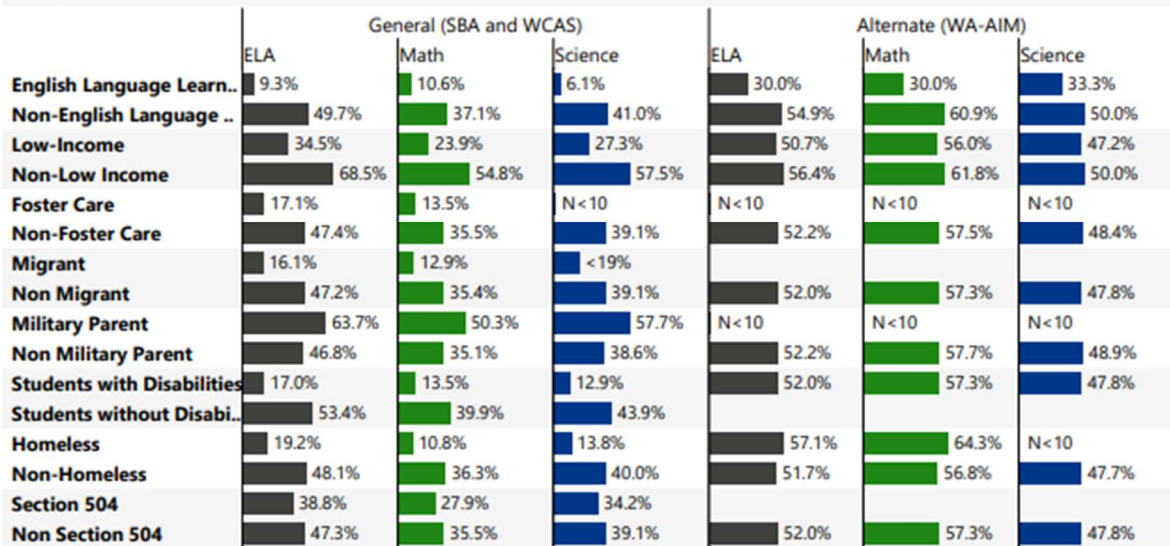
Gender



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.

Table 27	
(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

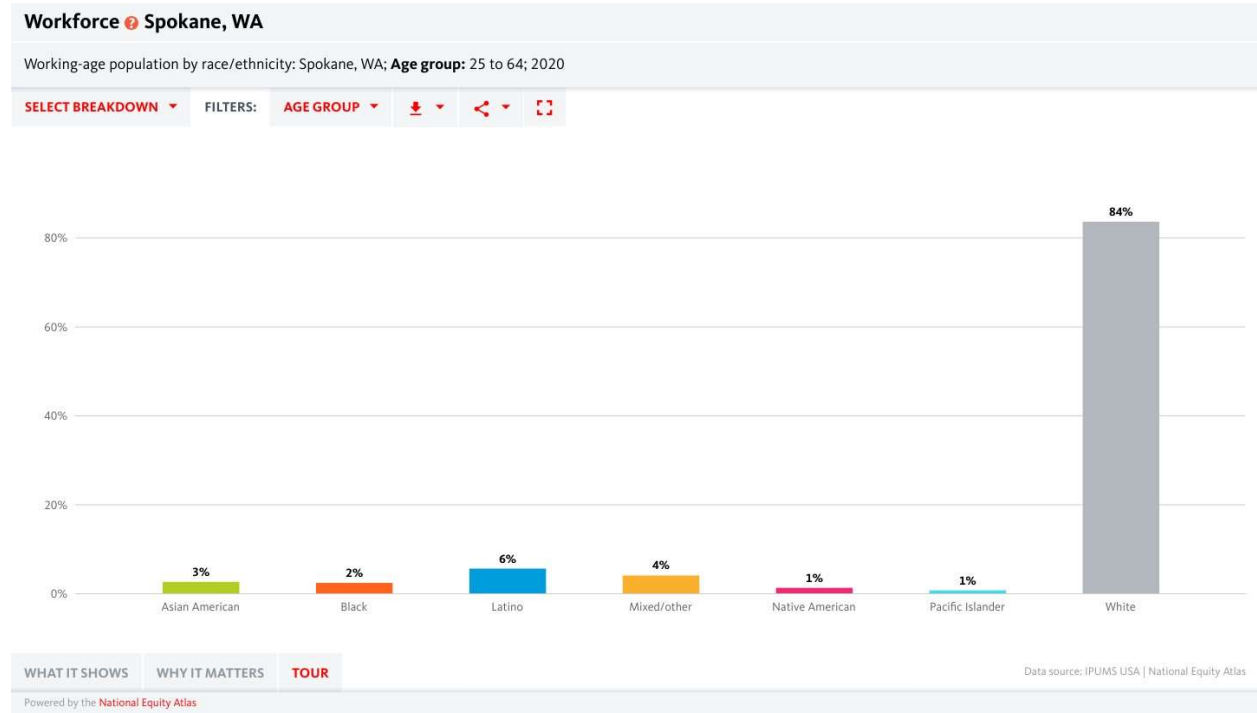
The labor market index for white, non-Hispanics, exceeded that for all other races, for both the total population (white, non-Hispanics: 45.6; blacks: 36.2; Hispanics: 38.3; Asian and Pacific Islanders: 39.9; and Native Americans: 33.1), and the population below the federal poverty line (white, non-Hispanics: 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.

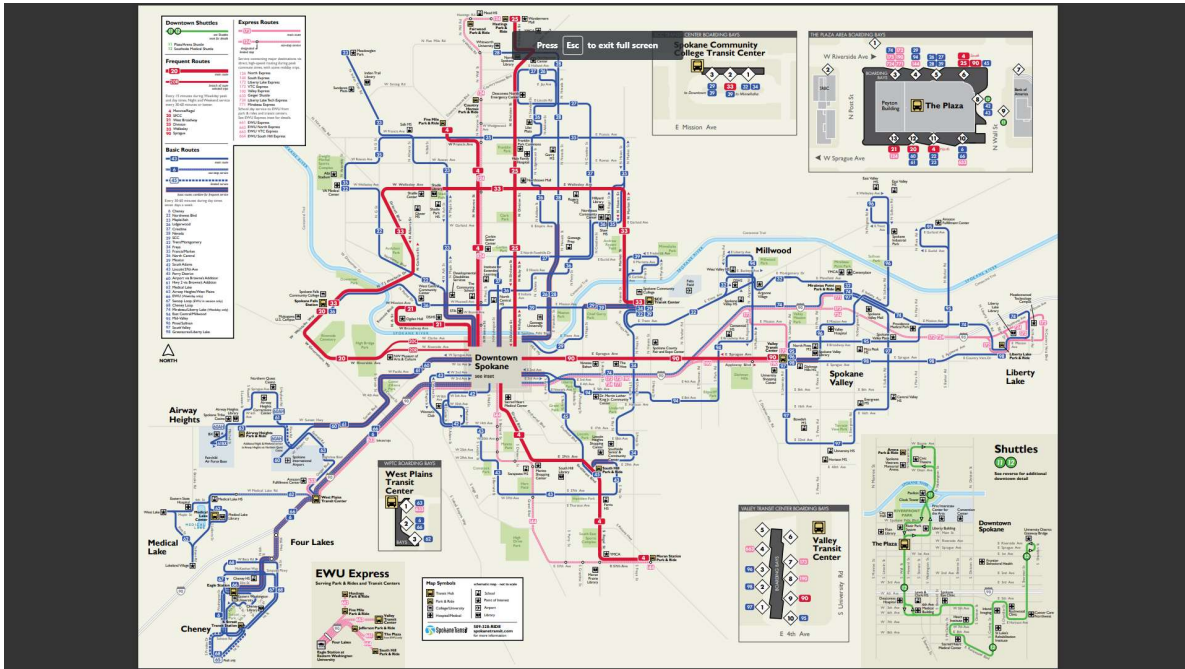
Table 30		
(Spokane, WA CDBG) Jurisdiction	Transit Trip Index	Low Transportation Cost Index
Total Population		
White, Non-Hispanic	66.8	49.1
Black, Non-Hispanic	72.8	54.7
Hispanic	69.2	52
Asian or Pacific Islander, Non-Hispanic	67.9	51.3
Native American, Non-Hispanic	71.3	55
Pop. below fed. poverty line		
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.

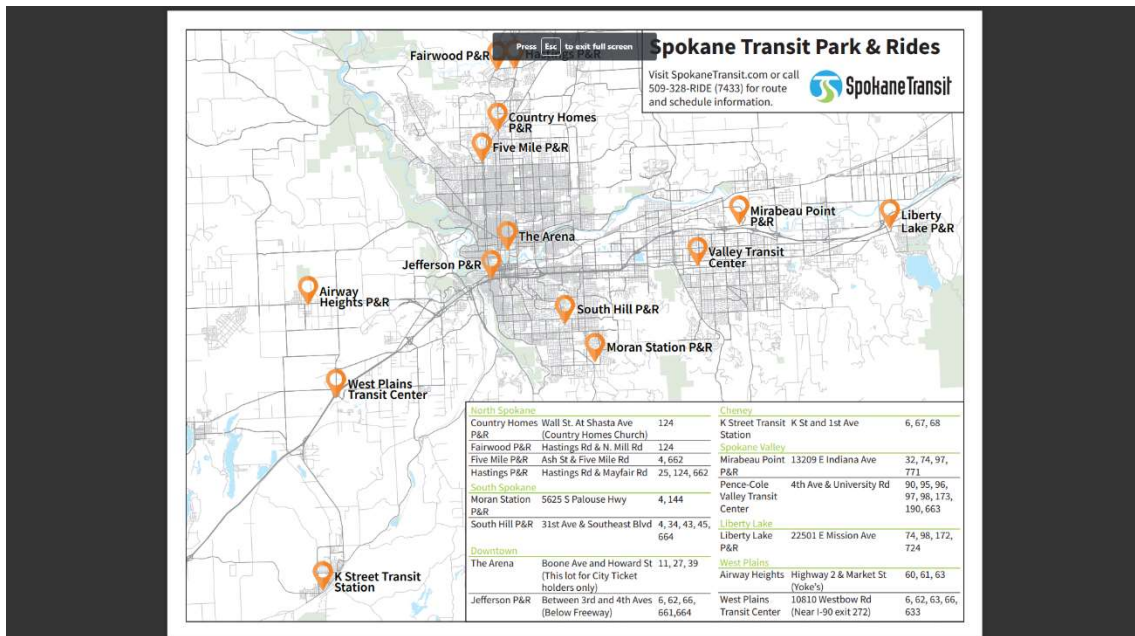
Paratransit is a wheelchair-accessible shared ride transportation service for individuals whose disability prevents them from using the regular fixed route buses. A person must be unable, because of a disability, to get to or from the bus stop, get on or off a lift or ramp equipped bus, or successfully 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>

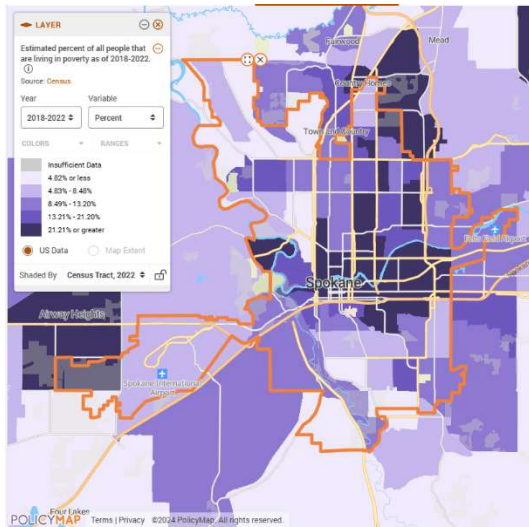
Access to Low Poverty Neighborhoods

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

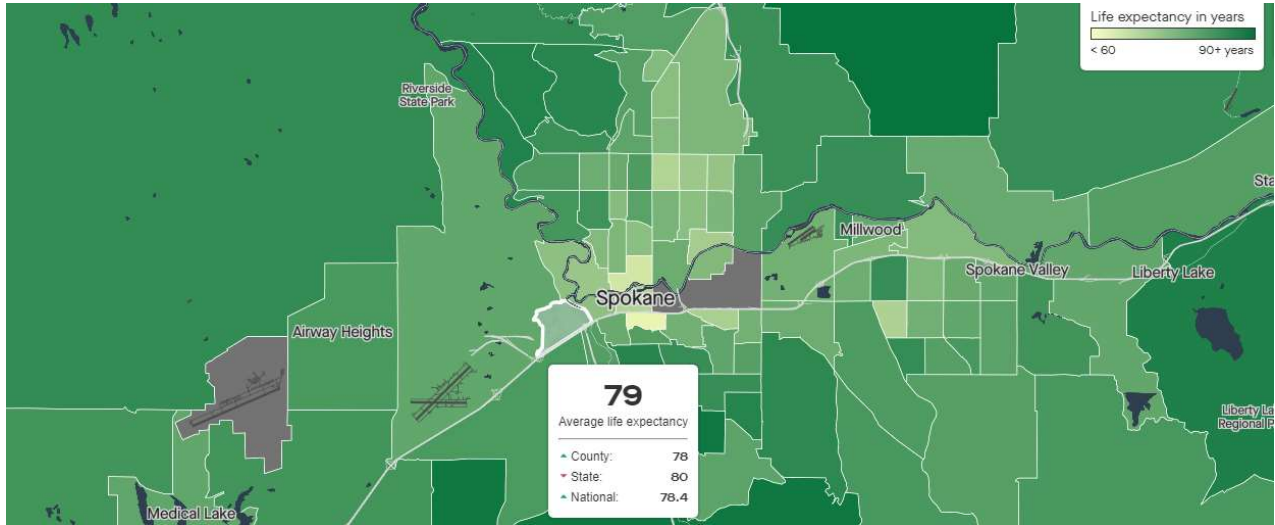
Life Expectancy

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/>

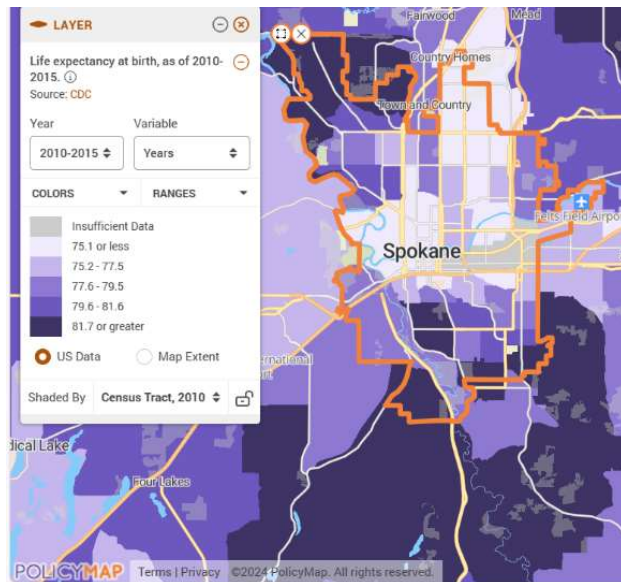
²⁵ See *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)* Data Documentation, Data Version AFFHT0006, July 10, 2020, Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research.

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	Spokane 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**.

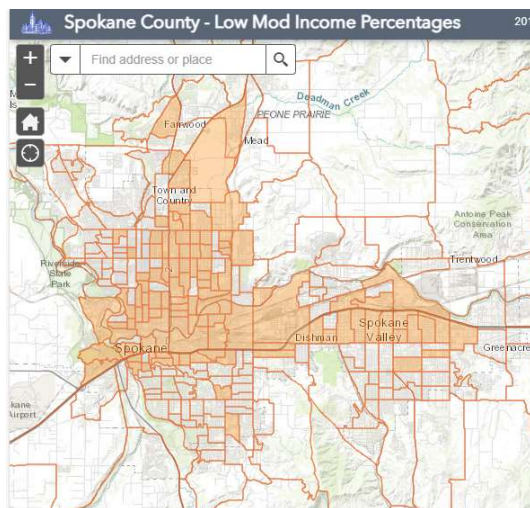
The Community Development Block Grant (CDBG) program requires each CDBG funded activity to principally benefit low- and moderate-income (LMI) persons, aid in the prevention or elimination of slums or blight, or meet a community development need having a particular urgency. Additionally, activities may 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%

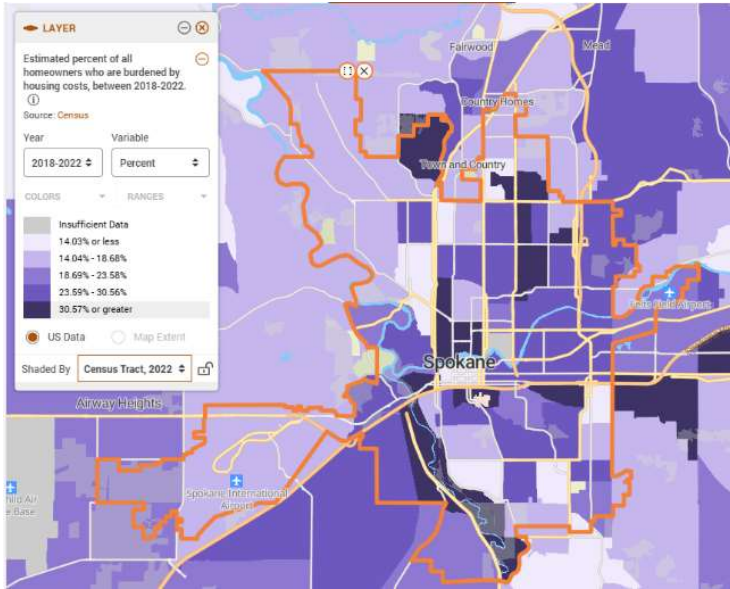
Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities). For owners- housing cost is "select monthly owner costs" which includes mortgage payment; utilities; association fees; insurance; and real estate taxes.
Source: CHAS 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%

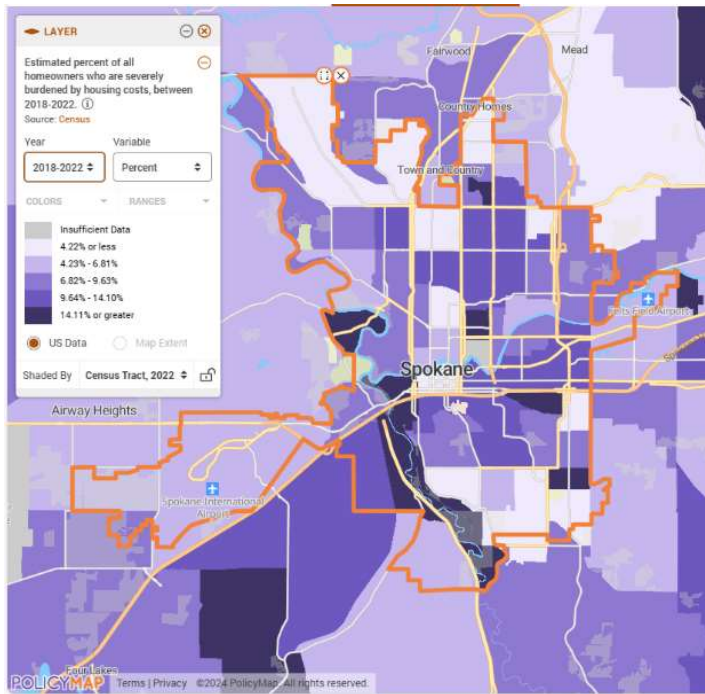
Source: ACS



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

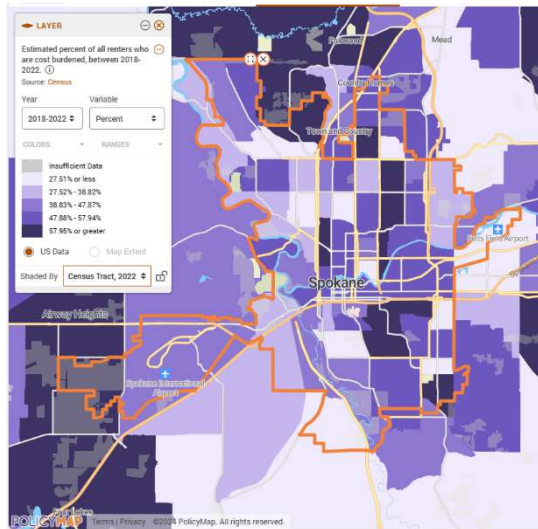
Renters are cost burdened when monthly housing costs including utilities exceed 30% of monthly income, and severely cost burdened when costs exceed 50% of monthly income.

- 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

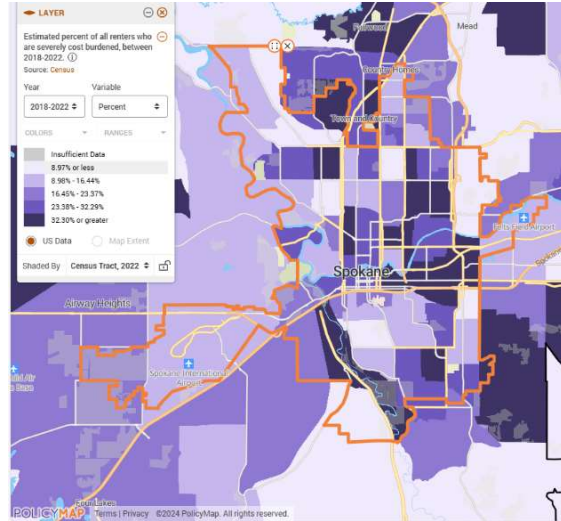
Table 55 - Percent of all renters who are cost burdened					
2013 -2017			2018-2022		
Spokane Co.	Spokane City	WA	Spokane Co.	Spokane City	WA
49.6%	51.4%	46.2%	48.9%	49.7%	46.3%

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.

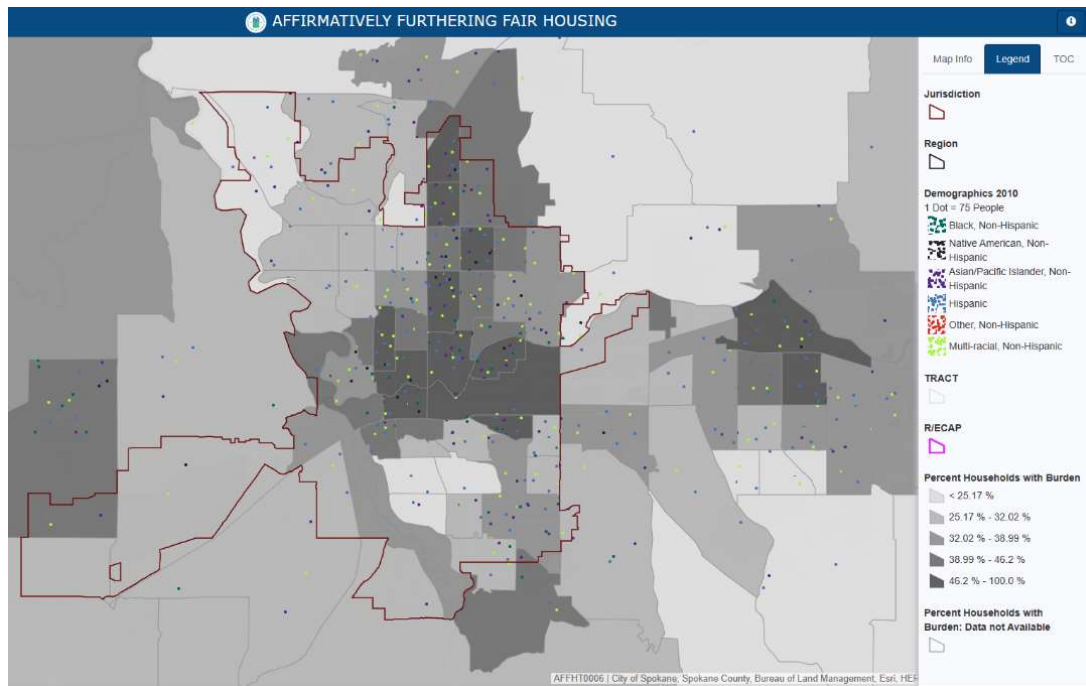
As of 2012-2016 HUD provided data, in Spokane, 16% of white non-Hispanic households had a severe housing cost burden, defined as paying more than 50% of their income for housing.

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

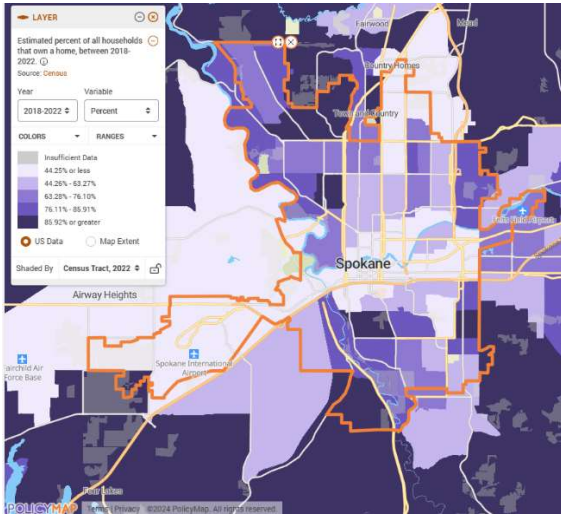
The numbers of rental or owner households vary significantly by neighborhood. Maps 47 & 48

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

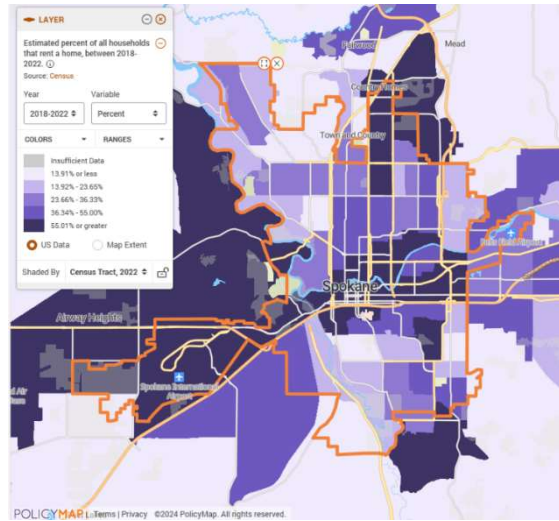
Source: U.S. Census Bureau, 2013-2017 & 2018-2022 AC Survey 5-Yr Estimates

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

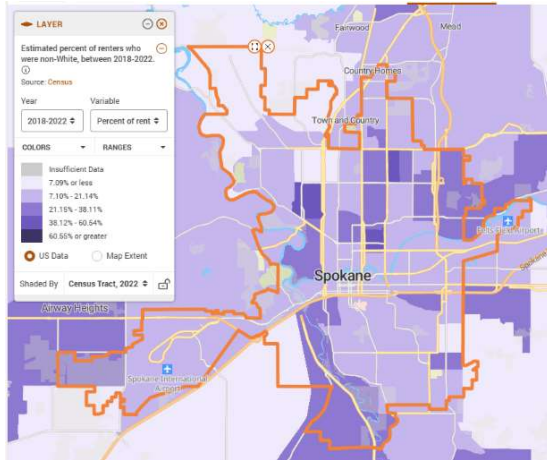
- Native Hawaiian and Other Pacific Islanders have the lowest homeownership rate in Spokane (20.8%). Table 67
- Black and African Americans have the second lowest homeownership rates in Spokane (30%), Spokane (31%), and WA (34%). Table 67
- Whites have the highest ownership rate (60%)

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

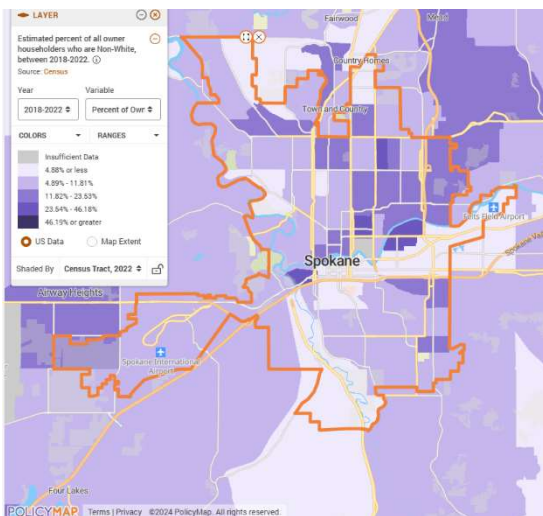
Conversely, non-white and Hispanic/Latino populations in Spokane have higher renter rates than whites. Table 68.

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	Filings per Day	1.52%	Est. Filing Rate	3.95	Filings per Day	1.94%	Est. Filing Rate
Eviction Filings	16,190	Households Threatened	15,381	Eviction Filings	1,440	Households Threatened	1,408
Households Threatened Rate	1.44%	Households Threatened Rate	1.9%	Households Threatened Rate	1.9%	Households Threatened Rate	1.9%

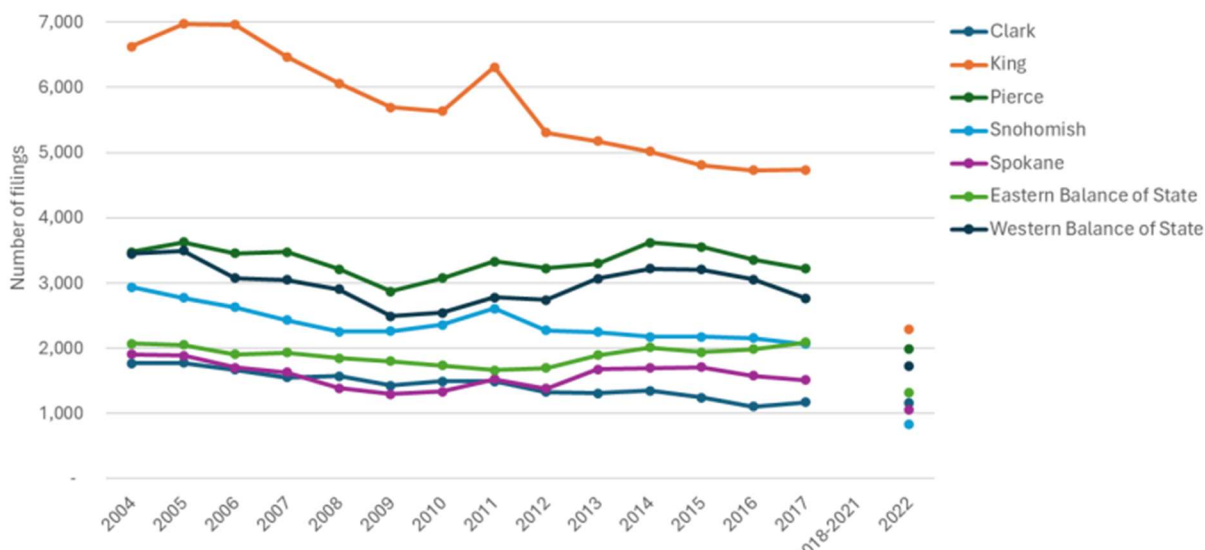
Table 69 - Evictions, 2000 – 2018						
Year	Geo	Filings-per-day	Eviction-filing-rate	Geographic	Filings-per-day	Eviction-filing-rate
2000	WA	48.23	2.19	Spokane Co.	3.84	2.49
2001	WA	52.15	2.33	Spokane Co.	4.16	2.64
2002	WA	51.55	2.26	Spokane Co.	3.72	2.32
2003	WA	54.67	2.36	Spokane Co.	3.72	2.29
2004	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/2023/05/23/policy-primer-incorporating-racial-equity-into-housing-policy) – 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/2023/05/23/policy-primer-incorporating-racial-equity-into-housing-policy) – 5/23.

⁴⁹[Exec. Order On Advancing Racial Equity & 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/](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/ordinances)). 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

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</p> <p>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.	
Rental Assistance <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 	Race Disability Families Children with
Houselessness <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. 		Race Disability
Equity In City Institutions and Programs <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	8.81%	933	12.81%	277	3.81%	208	2.86%
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				Add'l Terms
								Monetary	Training	Policy Req.		
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 Reqt.	Policy Reqt.	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%

Bisexual	14.3%	3
Pansexual	0.0%	0
Asexual	0.0%	0
Other (please specify)	4.8%	1
	Answered	21
	Skipped	0
	Other (please specify)	
		nunya
Q9. What is your gender?		
Answer Choices	Responses	
Female assigned at birth (cisgender)	38.1%	8
Male assigned at birth (cisgender)	47.6%	10
Transgender Female	0.0%	0
Transgender Male	0.0%	0
Gender-nonconforming	4.8%	1
Intersex	0.0%	0
Bi-gender	0.0%	0
Other (please specify)	9.5%	2
	Answered	21
	Skipped	0
Other (please specify)		
	Male	
	there are only 2	
Q10. Do you have children under 18 in your household?		
Answer Choices	Responses	
Yes	23.8%	5
No	76.2%	16
	Answered	21
	Skipped	0
Q11. How many people are in your household?		
Answer Choices	Responses	
1	23.8%	5
2	38.1%	8
3	14.3%	3
4	14.3%	3
5	4.8%	1
6 or more	4.8%	1
Other (please specify)	0.0%	0
	Answered	21

Bisexual	12.9%	27	30	13.0%
Pansexual	4.8%	10	10	4.3%
Asexual	2.9%	6	6	2.6%
Other (please specify)	4.8%	10	11	4.8%
	Answered	209	230	100.0%
	Skipped	4	4	
Other (please specify)				
queer			2	
Why is this question important? I'm heterosexual.				
None of your business / nunya			2	
do not wish to say				
Straight				
That's a lot of options				
N/A				
Pass				
Q6. What is your gender?				
Answer Choices	Responses		Responses	
Female assigned at birth (cisgender)	63.8%	134	142	61.5%
Male assigned at birth (cisgender)	24.8%	52	62	26.8%
Transgender Female	0.5%	1	1	0.4%
Transgender Male	1.0%	2	2	0.9%
Gender-nonconforming	3.8%	8	9	3.9%
Intersex	0.5%	1	1	0.4%
Bi-gender	0.5%	1	1	0.4%
Other (please specify)	7.6%	16	18	7.8%
	Answered	210	231	100.0%
	Skipped	3	3	
Other (please specify)				
Agender, genderqueer, non-binary				
Nonbinary (3)				
Human female				
Two Spirit				
Female. Not sure why this question is important either.				
Female				
do not wish to say				
Male				
Female assigned at birth - drop the cisgender please				
Straight				
Mamma hi Sleeping puppy can you say that bye-bye bye-bye let'sis i'm going on the beach and I'm gonna be in a car and I'm going on a little walk with the dogs so I'm going on on my phone so so I will call me when you're done done bye I will be there bye I I will call me back back back in the the phone number I will give no ilmmq				
N/A				
Pass				
thereareonly2				
Q7. Do you have children under 18 in your household?				
Answer Choices	Responses		Responses	
Yes	30.6%	64	69	30.0%
No	69.4%	145	161	70.0%
	Answered	209	230	100.0%
	Skipped	4	4	
Q8. How many people are in your household?				
Answer Choices	Responses		Responses	
1	24.88%	52	57	24.8%
2	35.4%	74	82	35.7%
3	14.4%	30	33	14.3%
4	14.4%	30	33	14.3%
5	5.3%	11	12	5.2%
6 or more	4.8%	10	11	4.8%
Other (please specify)	1.0%	2	2	0.9%
	Answered	209	230	100.0%

	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			

Race	90.5%	19
Color	85.7%	18
Religion	90.5%	19
National Origin	76.2%	16
Sex	85.7%	18
Disability	90.5%	19
Familial state (children)	66.7%	14
Sexual orientation	76.2%	16
Military / Veteran status	61.9%	13
Creed	57.1%	12
Immigration or citizenship status	57.1%	12
Marital status (Married or Not Married)	57.1%	12
Source of income	52.4%	11
Age	57.1%	12
Other (please specify)	9.5%	2
	Answered	21
	Skipped	0
Other (please specify)		
		Gender identity
		all the above
Q14. How well do you understand fair housing laws?		
Answer Choices		
I don't know anything about fair housing laws	0.0%	0
I understand some of the basics	42.9%	9
I have a good understanding of fair housing laws	57.1%	12
	Answered	21
	Skipped	0
Q15. How often do you believe that discrimination in the rental of housing occurs in Spokane?		
Answer Choices		
It does not occur	4.8%	1
Rarely	28.6%	6
Occasionally	33.3%	7
Commonly	38.1%	8
	Answered	21
	Skipped	0
Q16. 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?		
Answer Choices		
Age	19.1%	4
National origin	4.8%	1
Race	61.9%	13
Disability	19.1%	4
Color	42.9%	9
Sexual Orientation	28.6%	6
Marital status	38.1%	8
Source of Income	23.8%	5
Sex/Gender	9.5%	2
Familial Status (children under 18)	61.9%	13
Veteran Status	9.5%	2
Religion	23.8%	5
Immigration / Citizenship Status	9.5%	2
Criminal history	9.5%	2
Political ideology	42.9%	9
Other (please specify)	23.8%	5
	Answered	21
	Skipped	0
Other (please specify)		

Race	94.7%	196
Color	79.7%	165
Religion	83.6%	173
National Origin	70.5%	146
Sex	83.1%	172
Disability	88.9%	184
Familial status (children)	57.0%	118
Sexual Orientation	75.9%	157
Military / Veteran status	64.7%	134
Creed	44.4%	92
Immigration / Citizenship status	41.6%	86
Marital status (Married or Not Married)	45.4%	94
Source of income	35.3%	73
Age	54.6%	113
Other (please specify)	2.9%	6
	Answered	207
	Skipped	6
Other (please specify)		
None are enforced		
Don't know		
None		
Pregnancy		
Law is different than enforcement		
all of the above duh		
Q14. How well do you understand fair housing laws?		
Answer Choices		
I don't know anything about fair housing laws	14.6%	31
I understand some of the basics	63.7%	135
I have a good understanding of fair housing laws	23.1%	49
	Answered	212
	Skipped	1
Q15. How often do you believe that discrimination in the rental of housing occurs in Spokane?		
Answer Choices		
It does not occur	1.4%	3
Rarely	8.1%	17
Occasionally	34.1%	72
Commonly	56.9%	120
	Answered	211
	Skipped	2
Q16. If you believe that discrimination occurs in the rental of housing, on what bases do you believe that discrimination is most often based on?		
Answer Choices		
Age	32.9%	69
National origin	35.2%	74
Race	64.3%	135
Disability	50.0%	105
Color	40.5%	85
Sexual Orientation	41.0%	86
Marital status	14.3%	30
Source of Income	69.1%	145
Sex/Gender	26.7%	56
Familial Status (children under 18)	33.3%	70
Veteran Status	8.1%	17
Religion	13.8%	29
Immigration / Citizenship status	51.9%	109
	9.5%	20
	Answered	210
	Skipped	3
Other (please specify)		
	Answered	205
	Skipped	3
Other (please specify)		

215	0.94
183	0.80
192	0.84
162	0.71
190	0.83
203	0.89
132	0.58
173	0.76
147	0.64
104	0.46
98	0.43
106	0.46
84	0.37
125	0.55
8	0.04
228	1.00
6	
Responses	
31	13.3%
144	61.8%
61	26.2%
233	100.0%
1	
Responses	
4	1.7%
23	9.9%
79	34.1%
128	55.2%
232	100.0%
2	
Responses	
73	32.3%
75	33.2%
148	65.5%
109	48.2%
94	41.6%
92	40.7%
38	16.8%
150	66.4%
58	25.7%
83	36.7%
19	8.4%
34	15.0%
111	49.1%
22	9.7%
219	96.9%
8	3.5%
226	100.0%
3	

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

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 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

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	

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.

All of the above plus incentivized by money or where the rent is coming from

Negative interactions

bias is exceedingly rare in housing

Q18. How often do you believe that discrimination in the sale of housing occurs in Spokane?		
Answer Choices	Responses	
It does not occur	15.0%	3
Rarely	25.0%	5
Occasionally	40.0%	8
Commonly	20.0%	4
	Answered	20
	Skipped	1

Q19. 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?

Answer Choices	Responses	
Age	25.0%	5
National origin	15.0%	3
Race	40.0%	8
Disability	25.0%	5
Color	20.0%	4
Sexual Orientation	25.0%	5
Marital status	20.0%	4
Source of Income	60.0%	12
Sex/Gender	20.0%	4
Familial Status (children under 18)	15.0%	3
Veteran Status	0.0%	0
Religion	15.0%	3
Immigration / Citizenship Status	40.0%	8
Other (please specify)	15.0%	3
	Answered	20
	Skipped	1

Other (please specify)
N/a
I'm not involved with residential sales and don't possess sufficient knowledge.
bias in housing is so exceedingly rare as to be non-existent

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.

All of the above plus incentivized by money or where the rent is coming from

Negative interactions

bias is exceedingly rare in housing

Q18. How often do you believe that discrimination in the sale of housing occurs in Spokane?		
Answer Choices	Responses	
It does not occur	2.8%	6
Rarely	18.5%	39
Occasionally	46.5%	98
Commonly	34.1%	72
	Answered	211
	Skipped	2

Q19. If you believe that discrimination occurs in the sale of housing, on what bases do you believe that discrimination is most often based on?

Answer Choices	Responses	
Age	30.9%	64
National origin	40.1%	83
Race	67.6%	140
Disability	34.8%	72
Color	44.4%	92
Sexual Orientation	41.1%	85
Marital status	30.4%	63
Source of Income	63.3%	131
Sex/Gender	30.0%	62
Familial Status (children under 18)	22.2%	46
Veteran Status	12.1%	25
Religion	13.0%	27
Immigration / Citizenship status	50.2%	104
Other (please specify)	11.6%	24
	Answered	207
	Skipped	6

Other (please specify)
It does not occur
I'm sure it occurs but most people sell to the highest bidder. No room for discrimination when someone is waving money at you.
Sellers can decide whatever they want when selling their house. Based on the buyer's letter or how the realtor presents them, they could infer all kinds of information. Additionally there are a million hurdles to getting a mortgage. and make a decision based on that
socioeconomic status, type of home loan (FHA, VA, etc.)
Political affiliation
background check status
i dont, its more or less anonymous and based on highest bids, loan status, etc. it actually takes out most bias
None
Speculation isn't data
Socioeconomic status
I don't know
Did anyone proof read this?
I do not believe that a qualified person would be discriminated against.
I have no idea
Every property owner has a right to choose who they want to sell their home to.
Homeowners literally pick who to sell to based on a letter sometimes
Does not
(Religion is misspelled!)
It does not happen in Spokane
Political Party Affiliation
location and crime activity

Responses	
9	3.9%
44	19.0%
106	45.9%
76	32.9%
231	100.0%
3	
Responses	
69	30.4%
86	37.9%
148	65.2%
77	33.9%
96	42.3%
90	39.6%
67	29.5%
143	63.0%
66	29.1%
49	21.6%
25	11.0%
30	13.2%
112	49.3%
27	11.9%
227	100.0%
7	

misunderstanding between buyer and seller		
All the above		
bias is exceedingly rare in housing sales		
Q20. If you believe that discrimination occurs in the sale of housing in Spokane, why do you believe it most often occurs?		
Answer Choices	Responses	
Unconscious or immediate thought process	20.0%	4
Intentional bias	20.0%	4
Laws and written or unwritten policies within institutions and across systems	10.0%	2
Deeply embedded beliefs and company culture within institutions and across systems	25.0%	5
All of the Above	30.0%	6
Other (please specify)	20.0%	4
	Answered	20
	Skipped	1
Other (please specify)		
I do not think very many people say nope not selling to you because your the wrong color, sex or age if they have the money If there is discrimination it would be from the lending side, where almost everybody has a hard time, so those with challenging income sources or amounts would even have it more difficult... I do think		
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		
N/a		
bias in housing is so exceedingly rare as to be non-existent		
Q21. How often do you believe that discrimination in mortgage lending occurs in Spokane?		
Answer Choices	Responses	
It does not occur	23.8%	5
Rarely	23.8%	5
Occasionally	28.6%	6
Commonly	23.8%	5
	Answered	21
	Skipped	0
Q22. If you believe that discrimination occurs in mortgage lending in Spokane, on what bases do you believe that discrimination is most often based on?		
Answer Choices	Responses	
Age	15.8%	3
National origin	21.1%	4
Race	42.1%	8
Disability	21.1%	4
Color	15.8%	3
Sexual Orientation	15.8%	3
Marital status	21.1%	4
Source of Income	47.4%	9

misunderstanding between buyer and seller		
All the above		
bias is exceedingly rare in housing sales		
Q20. If you believe that discrimination occurs in the sale of housing in Spokane, why do you believe it most often occurs?		
Answer Choices	Responses	
Unconscious or immediate thought process	28.3%	58
Intentional bias	22.9%	47
Laws and written or unwritten policies within institutions and across systems	16.6%	34
Deeply embedded beliefs and company culture within institutions and across systems	25.9%	53
All of the Above	54.2%	111
Other (please specify)	8.3%	17
	Answered	205
	Skipped	8
Other (please specify)		
It does not occur		
similar to systemic racism in areas like hillyard		
Owner concerned the person will not qualify for the loan		
Lack of sufficient legal protection for both renters and landlords		
ability to obtain loan		
Income		
i dont		
None		
Speculation isn't data		
Housing unaffordability is intrinsically discriminatory, as well.		
I do not believe that a qualified person would be discriminated against.		
It does not		
Likely across the board; unknowingly		
Illegal status		
It does not happen, people sell to anyone to make a profit		
realtor might steer people away from "white neighborhoods" or "higher class" neighborhoods. NIMBY attitudes toward new housing developments. People do not want mixed income/disability housing projects in their neighborhoods. They successfully petition City to keep non-profits from buying or rehabilitating properties even though they legally have a right to do it in any neighborhood they want.		
bias is exceedingly rare in housing sales		
Q21. How often do you believe that discrimination in mortgage lending occurs in Spokane?		
Answer Choices	Responses	
It does not occur	6.7%	14
Rarely	17.1%	36
Occasionally	42.9%	90
Commonly	35.2%	74
	Answered	210
	Skipped	3
Q22. If you believe that discrimination occurs in mortgage lending in Spokane, on what bases do you believe that discrimination is most often based on?		
Answer Choices	Responses	
Age	39.6%	80
National origin	35.2%	71
Race	60.9%	123
Disability	42.1%	85
Color	39.6%	80
Sexual Orientation	31.2%	63
Marital status	32.2%	65
Source of Income	70.8%	143

Responses	
62	27.6%
51	22.7%
36	16.0%
58	25.8%
117	52.0%
21	9.3%
225	100.0%
9	
Responses	
19	8.2%
41	17.7%
96	41.6%
79	34.2%
231	100.0%
3	
Responses	
83	37.6%
75	33.9%
131	59.3%
89	40.3%
83	37.6%
66	29.9%
69	31.2%
152	68.8%

Sex/Gender	21.1%	4
Familial Status (children under 18)	15.8%	3
Veteran Status	0.0%	0
Religion	5.3%	1
Immigration / Citizenship Status	36.8%	7
Other (please specify)	31.6%	6
	Answered	19
	Skipped	2

Other (please specify)

NA

income verification.

N/a

I'm not involved with residential sales or mortgage lending and don't possess sufficient knowledge.

unsure

bias in housing is so exceedingly rare as to be non-existent

Q23. If you believe that discrimination occurs in the mortgage lending in Spokane, why do you believe it most often occurs?

Answer Choices	Responses	
Unconscious or immediate thought process	15.8%	3
Intentional bias	5.3%	1
Laws and written or unwritten policies within institutions and across systems	10.5%	2
Deeply embedded beliefs and company culture within institutions and across systems	21.1%	4
All of the Above	36.8%	7
Other (please specify)	26.3%	5
	Answered	19
	Skipped	2

Other (please specify)

NA

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

N/a

I'm not involved with mortgage lending and don't possess sufficient knowledge.

Sex/Gender	29.2%	59
Familial Status (children under 18)	20.3%	41
Veteran Status	13.9%	28
Religion	12.9%	26
Immigration / Citizenship Status	47.0%	95
Other (please specify)	13.4%	27
	Answered	202
	Skipped	11

Other (please specify)

All, depending
all of the above
It does not occur
not a lender, I have no idea
N/a
socioeconomic status
Political affiliation
Not sure
background check status
based on income, so source would not be discrimination...
None
Speculation isn't data
Socioeconomic status (SES)
ldk
Look up bias. Don't use bases when you mean basis.
NA
I do not believe that a qualified person would be discriminated against.
Underwriting is reviewing and basing loans on many factors including credit history, source of income, length of employment, etc.
Does not
Across the board; unknowingly.
It absolutely does not happen, mortgage people want to earn a commission and will not jeopardize their paycheck over a bias
See previous comments.
N/A
I knew an elderly woman who owned her home. She wanted to sell it to downsize to a smaller home. Her plan was to use the cash as a downpayment and take a smaller mortgate. The bank refused to consider her application. This was around 2008 when the market crashed. Bank said she was too high risk even though she successfully owned a home many years. They thought she was too old.
misunderstanding between parties
All the above
bias in mortgage lending is exceedingly rare

Q23. If you believe that discrimination occurs in mortgage lending in Spokane, why do you believe it most often occurs?

Answer Choices	Responses	
Unconscious or immediate thought process	22.5%	45
Intentional bias	17.5%	35
Laws and written or unwritten policies within institutions and across systems	20.5%	41
Deeply embedded beliefs and company culture within institutions and across systems	24.0%	48
All of the Above	52.5%	105
Other (please specify)	9.5%	19
	Answered	200
	Skipped	13

Other (please specify)

It does not occur
may be that the language barrier prohibits those otherwise qualified
N.a
Political reasons (redlining of areas against perceived "liberals", etc.)

63	28.5%
44	19.9%
28	12.7%
27	12.2%
102	46.2%
33	14.9%
221	100.0%
13	

Q23. If you believe that discrimination occurs in mortgage lending in Spokane, why do you believe it most often occurs?

Responses	
48	21.9%
36	16.4%
43	19.6%
52	23.7%
112	51.1%
24	11.0%
219	100.0%
15	

bias in housing is so exceedingly rare as to be non-existent

F

Q24. Which agency(cies) could a person contact to file a fair housing complaint?		
Answer Choices	Responses	
Washington State Attorney General	61.90%	13
Northwest Fair Housing Alliance	66.67%	14
U.S. Dept. of Housing and Urban Development	52.38%	11
Washington State Human Rights Commission	47.62%	10
Northwest Justice Project	57.14%	12
Spokane Housing Authority	33.33%	7
Other (please specify)	9.52%	2
	Answered	21
	Skipped	0

Other (please specify)
I would imagine all of them, but your better off to rise above and find a deal you can close.

all of the above

Q25. What are you most concerned about with respect to fair housing opportunity in Spokane? Check your top 5 concerns.

Answer Choices	Responses	
Rental affordability – cost of rental and impact on protected classes	57.1%	12
Housing purchase affordability – cost of home purchase and impact on protected classes	47.6%	10
Rental unit availability – quantity available for rent and impact on protected classes	76.2%	16
Availability of homes for sale – quantity available for sale and impact on protected classes	33.3%	7
Public transportation – frequency or connections between housing and employment / education opportunities	9.5%	2

Income
i dont
U either have the money or you don't. We need education!
Speculation isn't data
Housing unaffordability is intrinsically discriminatory, as well.
ldk
I do not believe that a qualified person would be discriminated against.
Banks dont give loans to people that don't have good credit or work history.
Not sure, but definitely none of the above
Does not
It does not happen
N/A
Lack of understanding of a variety of loan options - filling out paperwork correctly
misunderstanding
bias is exceedingly rare in mortgage lending

Q24. Which agency(cies) could you contact to file a fair housing complaint?		
Answer Choices	Responses	
Washington State Attorney General	44.2%	92
Northwest Fair Housing Alliance	68.3%	142
U.S. Dept. of Housing and Urban Development	42.8%	89
Washington State Human Rights Commission	47.1%	98
Northwest Justice Project	40.9%	85
Spokane Housing Authority	53.4%	111
Other (please specify)	8.2%	17
	Answered	208
	Skipped	5

Other (please specify)
Not sure
i don't know
unsure
I believe there is too much support to file to achieve undue rewards.
Don't know
Tenants Union
The system is working as it was intended. No one cares so we just keep living.
whichever governing body would advocate for the owner
Na
Disabilities rights Washington
Your list has plenty
I was made homeless via false allegations. I was homeless for ten months with three children, despite owning a home. No one could help me. I now known 98% of women in shelters are there because of DV. Why is this not a discussion in housing finding? Reform family court now. Family court can take a woman and children out of their home, with no recourse.
Kalispel Tribe Victim Assistance Services
don't know
All
? Non, they would all give you some other number to call
all of the above, duh

Q25. What are you most concerned about with respect to fair housing and access to housing opportunities in Spokane? Check your top concerns.

Answer Choices	Responses	
Rental affordability – cost of rental and impact on protected classes	80.5%	169
Housing purchase affordability – cost of home purchase and impact on protected classes	69.1%	145
Rental unit availability – quantity available for rent and impact on protected classes	54.8%	115
Availability of homes for sale – quantity available for sale and impact on protected classes	33.3%	70
Public transportation – frequency or connections between housing and employment / education opportunities	30.0%	63

Responses	
105	45.9%
156	68.1%
100	43.7%
108	47.2%
97	42.4%
118	51.5%
19	8.3%
229	100.0%
5	

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%
Discrimination in mortgage lending because of protected class	0.0%	0	Acceptance of rental assistance by housing providers	38.6%	81	81	35.1%
Discrimination in home sales because of protected class	0.0%	0	Discrimination in mortgage lending because of protected class	23.3%	49	49	21.2%
Discrimination in rental housing because of protected class	14.3%	3	Discrimination in home sales because of protected class	22.4%	47	47	20.3%
Steering of home buyers to neighborhoods by real estate agents because of protected class	0.0%	0	Discrimination in rental housing because of protected class	32.4%	68	71	30.7%
Steering of tenants to housing complexes by property managers because of protected class	9.5%	2	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 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
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Other (please specify)	9.5%	2
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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

Answered	21
Skipped	0

Other (please specify)
 I just do not agree you are promoting fair housing as much as you are trying to create victims.
 bias in housing is so exceedingly rare as to be non-existent

Q28. What languages are most needed for fair housing education materials in Spokane?

Answer Choices	Responses
Spanish	52.6% 10
Ukrainian	52.6% 10
Russian	57.9% 11
Chinese	5.3% 1
Arabic	15.8% 3
Nepali	0.0% 0
Japanese	5.3% 1
Korean	0.0% 0
French	0.0% 0
Vietnamese	5.3% 1
Marshallese	42.1% 8
Laotian	0.0% 0
Hindi	5.3% 1
Swahili	5.3% 1
Farsi	10.5% 2
Pashto	0.0% 0
Dari	0.0% 0
Tagalog	5.3% 1
Sign Languages	21.1% 4
Other (please specify)	21.1% 4
	Answered 19
	Skipped 2

Other (please specify)
 English 2
 English, if you want to achieve the American dream then learn the language. Why would you expect your hosts to cater to you like that?????

all official documents should be in English. Other non-governmental-organizations are free to provide translations as they find necessary

Answered	205
Skipped	8

Other (please specify)
 Include it with as an addendum with leases and with homebuyers paperwork.
 Everyone needs to take this survey to see how bad things have become
 Email
 Text
 News media
 it would be amazing if multi-unit complexes actually created a sense of community so that there'd be relationships and safety within your complex and that there could be communal events and information could be shared.
 website information
 I don't know
 Google
 Require annual Continuing Education courses for realtors, brokers, bank managers, and housing unit managers and owners

 I don't know if any of these work
 None of this matters without enforcement and laws that protect vulnerable members of the population.
 landlords should be notified directly as a condition of being a landlord in Washington state or city of spokane.
 education around accountability, people know who are being discriminatory in their practices and just avoid placing people there or cross their fingers that the appraiser isn't "that guy", there needs to be education on accountability and a
 All of the ABOVE
 All
 unsure, but I can 100% guarantee the person/organization that made this survey is so biased they should be nowhere near any method of providing information on these subjects

Q28. What languages are most needed for fair housing education materials in Spokane?

Answer Choices	Responses
Spanish	79.0% 158
Ukrainian	65.0% 130
Russian	58.0% 116
Chinese	17.5% 35
Arabic	29.5% 59
Nepali	8.5% 17
Japanese	9.5% 19
Korean	12.5% 25
French	8.5% 17
Vietnamese	21.0% 42
Marshallese	52.0% 104
Laotian	12.0% 24
Hindi	10.5% 21
Swahili	16.5% 33
Farsi	20.5% 41
Poshto	12.0% 24
Dari	13.0% 26
Tagalog	13.0% 26
Sign Languages	36.5% 73
Other (please specify)	20.5% 41
	Answered 200
	Skipped 13

Other (please specify)
 English 13
 Karen, Pashto

As many of the listed languages and any other languages needed.

all 2
 How would I know?
 Spanish
 English, it's the USA
 probably all of the above and more, because everyone who speaks a different language should have a right to this information

Responses	
168	76.7%
140	63.9%
127	58.0%
36	16.4%
62	28.3%
17	7.8%
20	9.1%
25	11.4%
17	7.8%
43	19.6%
112	51.1%
24	11.0%
22	10.0%
34	15.5%
43	19.6%
24	11.0%
26	11.9%
27	12.3%
77	35.2%
45	20.5%
219	100.0%
15	

all languages	
I'm not sure. Likely all of them.	
none	
unsure	
I don't know	4
I'm not sure	
As many as possible	
What an idiotic question.	
English....this is America!	
this is unknown to me, you might ask refugee non-profits what is needed / partner with those organizations to assist in fair housing assistance	
Native American	
As many languages as possible	
Chukkese, Farci, South American Spanish	
English, because anyone that immigrates here needbto learn the language. Just as all other countries expect	
All of the above, English Spanish Russian	
all of the above, if we make it the most accessible then you have the best chance of meeting the needs of the community	
there should be no need for printing official documents in anything other than English. If other organizations want to provide translations and assistance, that is right and proper for them to do so	

Q29. What is most needed to improve equal access to housing opportunities in Spokane?

Answer Choices	Responses	
Fair housing training	50.0%	10
Fair housing testing and investigation	40.0%	8
Fair housing public service announcements	40.0%	8
Fair housing enforcement by govt. administrative	45.0%	9
Fair housing enforcement in the courts	35.0%	7
	20.0%	4
	Answered	20
Other (please specify)	Skipped	1
	Answered	19
	Skipped	1
Other (please specify)		
law enforcement		
Stop implementing laws and policies that chase small SFR landlords out of the market. 90+% of SFR rentals are sold to owner-occupants. This reduces affordability, availability and exacerbates whatever few problems we have with fair housing. More competition among landlords will reduce any fair housing issues to a negligible level.		
Nothing		
bias in housing is so exceedingly rare as to be non-existent		

all languages	
I'm not sure. Likely all of them.	
none	
unsure	
I don't know	4
I'm not sure	
As many as possible	
What an idiotic question.	
English....this is America!	
this is unknown to me, you might ask refugee non-profits what is needed / partner with those organizations to assist in fair housing assistance	
Native American	
As many languages as possible	
Chukkese, Farci, South American Spanish	
English, because anyone that immigrates here needbto learn the language. Just as all other countries expect	
All of the above, English Spanish Russian	
all of the above, if we make it the most accessible then you have the best chance of meeting the needs of the community	
there should be no need for printing official documents in anything other than English. If other organizations want to provide translations and assistance, that is right and proper for them to do so	

Q29. What is most needed to eliminate barriers to fair housing and improve access to equal housing opportunities in Spokane?

Answer Choices	Responses	
Fair housing training	53.7%	109
Fair housing testing and investigation	50.7%	103
Fair housing public service announcements	23.7%	48
Fair housing enforcement by govt. administrative agencies	59.6%	121
Fair housing enforcement in the courts	49.8%	101
Adopt or amend laws related to housing	44.8%	91
Changes to government policies, practices, or programs	54.2%	110
Other (please specify)	13.3%	27
	Answered	203
	Skipped	10
Other (please specify)		
It does not occur		
Accountability on every bodies part		
S		
Help others besides just low income		
Public school education on fair housing		
Reducing the added costs of government bureaucracy		
Force the housing market/property owners to join the 21st century. Require landlords to possess a business license, pass a quality assurance test, as well as pay a luxury tax for property that is listed above the local FMR.		
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		
overhaul on what it means to be human and inhabit this planet and be a part of this planet, not conquer it and its inhabitants for the sake of capitalism. decolonize our world		
I fear that fair housing initiatives may take rights away from landlords, who also deserve to be protected from destructive and disrespectful (even dangerous/threatening/unsafe) tenants.		
Nothing further needed.		
Stop building apartments and make houses more affordable.		
Financial literacy/education in public schools		
Job creation through more job friendly legislation		
Stop making everything harder.		
an accessible reporting system that creates accountability on a local level		
More housing in Spokane.		
social/public housing		

Responses	
119	53.6%
111	50.0%
56	25.2%
130	58.6%
108	48.6%
95	42.8%
130	58.6%
28	12.6%
222	100.0%
11	

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.

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

bias in housing is exceedingly rare, to the point of being non-existent

	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
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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>		