



Catholic Charities
EASTERN WASHINGTON

Catholic Charities Eastern Washington

Title VI of the Civil Rights Act of 1964
Implementation Plan

Reviewed and Approved by Catholic Charities Eastern Washington Board of Directors

Date:

11/29/2021

A handwritten signature in blue ink, appearing to read "Mary Ann [unclear]". The signature is written over a horizontal line.

Title VI Plan

Program Overview

Catholic Charities Eastern Washington (CCEW) affirms the dignity of every person, partnering with parishes and the greater community to serve and advocate for those who are vulnerable, bringing stability and hope to people throughout Eastern Washington. CCEW serves primarily low-income people through programs that respond in crisis, stabilize lives, and advocate in hope in the 13 counties of Eastern Washington, serving over 74,000 people annually.

CCEW receives federal assistance from a variety of sources, including but not limited to, the Departments of Health and Human Services, Agriculture, Housing and Urban Development, and Transportation.

Policy Statement

CCEW is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities: the delivery of equitable and accessible services. CCEW recognizes its responsibilities to the communities in which it operates and to the society it serves. It is CCEW's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs of crisis response, stabilization, and advocacy.

Objective

Toward this end, it is CCEW's objective to:

- A. Ensure that the level and quality of service is provided without regard to race, color, or national origin;
- B. Promote the full and fair participation of all affected populations in programmatic decision making;
- C. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- D. Ensure meaningful access to programs and activities by persons with limited English proficiency.

Responsibility

The President & CEO of CCEW has delegated to the CCEW Title VI Program Coordinator oversight of CCEW's Title VI responsibilities Agency-wide. All program directors are responsible for the implementation of Title VI activities and requirements in their individual programs. The Title VI Program Coordinator will receive and investigate Title VI complaints; however, all managers, supervisors and employees share in the responsibility for making CCEW's Title VI program a success. CCEW will notify the public of their rights under Title VI through its website and notices available in its offices.

Low-Income and Minority Demographics

The table below shows US Census Bureau Data downloaded from [Census.gov/quickfacts](https://www.census.gov/quickfacts).¹ The data shows that all counties served by CCEW programs have poverty rates greater than the state average, except Lincoln County, where the poverty rate is only seven tenths of a percentage point lower than the state average.

Percent of Persons in Poverty		
County or State	Persons in Poverty, Percent	Population Estimates, July 1, 2019 (V2019)
Lincoln County	9.10%	10,939
Walla Walla County	12.70%	60,760
Franklin County	13.50%	95,222
Okanogan County	16.40%	42,243
Adams County	16.80%	19,983
Whitman County	26.30%	50,104
Asotin County	13.80%	22,582
Garfield County	12.90%	2,225
Columbia County	12.30%	3,985
Ferry County	18.00%	7,627
Stevens County	14.90%	45,723
Pend Oreille County	16.10%	13,724
Spokane County	12.90%	522,798
Washington State	9.80%	7,614,893

¹ U.S. Census Bureau (2019). QuickFacts. Retrieved from [<https://www.census.gov/quickfacts/fact/table/US/PST045219>]. Sept 15, 2021.

The below table of US Census Bureau data, downloaded from [Census.gov/quickfacts](https://www.census.gov/quickfacts),² shows the percentage of minority populations in all counties served by CCEW.

Percent of Persons in Counties by Race														
Racial Group	Lincoln	Walla Walla	Franklin	Okanogan	Adams	Whitman	Asotin	Garfield	Columbia	Ferry	Stevens	Pend Oreille	Spokane	WA State
Pop. Total	10,939	60,760	95,222	42,243	19,983	50,104	22,582	2,225	3,985	7,627	45,723	13,724	522,798	7.614M
White Alone	93.8%	91.4%	89.9%	81.2%	88.5%	83.8%	93.2%	92.8%	91.1%	76.1%	89.2%	91.1%	88.9%	78.5%
Black/African American Alone	0.6%	2.2%	2.8%	0.9%	2.2%	2.4%	0.8%	0.1%	0.7%	0.8%	0.6%	0.7%	2.0%	4.4%
American Indian and Alaska Native, Alone	2.0%	1.4%	1.7%	13.2%	6.2%	0.9%	1.8%	0.7%	1.8%	16.6%	5.8%	3.7%	1.8%	1.9%
Asian Alone	0.5%	0.1%	2.4%	1.3%	1.4%	8.4%	1.0%	3.2%	1.4%	1.1%	0.8%	1.2%	2.4%	9.6%
Native Hawaiian and other Pacific Islander Alone	0.1%	0.4%	0.4%	0.3%	0.1%	0.3%	0.3%	X	2.0%	0.3%	0.2%	0.2%	0.6%	0.8%
Two or More Races	2.8%	2.8%	2.7%	3.1%	1.7%	4.2%	2.9%	3.2%	3.0%	5.0%	3.4%	3.1%	4.2%	4.9%
Hispanic or Latino	3.6%	21.7%	53.6%	20.7%	64.7%	6.5%	4.4%	5.6%	7.9%	4.8%	3.8%	4.1%	6.1%	13.0%
White Alone, Not Hispanic or Latino	90.8%	71.3%	39.9%	64.3%	32.5%	78.4%	89.9%	88.1%	84.4%	73.0%	86.3%	88.2%	84.0%	67.5%

Inclusive Public Participation

Title VI requires community outreach that seeks out and considers the viewpoints of minority and low-income populations regarding the services CCEW offers. The activities described below detail CCEW’s outreach activities since the last update of this plan and will continue to form the basis of outreach efforts in the coming years.

Targeted Public Participation

CCEW makes targeted outreach both to potential clients and volunteers for this program. Our main avenues of outreach are college and university volunteer fairs, community senior wellness fairs, and community health fairs hosted by major medical systems like Providence and MultiCare; fliers at medical clinics and senior centers, ads in the Senior Directory and church bulletins, and Public Service Announcements (PSAs) on radio stations.

² U.S. Census Bureau (2019). QuickFacts. Retrieved from [<https://www.census.gov/quickfacts/fact/table/US/PST045219>]. Sept 15, 2021.

General Public Participation

CCEW's population comprises almost exclusively low-income clients. We place suggestion boxes at each program and actively solicit anonymous comments about our services from clients. As part of our ongoing Continuous Quality Improvement (CQI) initiatives, clients across programs also fill out satisfaction surveys to identify ways we can serve clients better. We also place a prominent "Find Help" link on our website and another "Contact Us" link that provides a variety of phone numbers and addresses for our programs.

Customer Complaint and Comment Process

Stakeholders have several methods for communicating comments or complaints:

- By phone at 509-358-4250 (central administration building front desk)
- By email at info@cceasternwa.org

The Title VI Program Coordinator logs and distributes all complaints received to the relevant manager, who researches each complaint and responds to the complainant. Comments and suggestions are also forwarded to the relevant manager for possible actions or improvements.

Minority and LEP Populations Outreach Activities

The following are activities CCEW has conducted to reach out to minority and Limited English Proficiency (LEP) populations since the last update:

- In 2018, CCEW created a Diversity, Equity, and Inclusion (DEI) plan, and subsequently established a DEI Committee, one of only two standing committees in our Agency. By charter, the DEI Committee must comprise a majority of Black, Indigenous and People of Color (BIPOC) members, including the Committee Chair and Vice Chair. The DEI Committee will inform our Agency-wide and programmatic efforts to reach out to minority and LEP populations.
- Across our growing footprint of 2,500+ affordable residential units, CCEW regularly engages with tenant councils at existing properties and facilitates focus groups with prospective tenants for new properties we develop. These measures help us to design buildings with our diverse audience in mind and support continuous quality improvement in housing operations.
- Through our participation in the Spokane Regional Continuum of Care, we have participated in community listening sessions and have helped develop strategies to create an inclusive homeless system.
- Rising Strong, CCEW's family-centered treatment program, works with the Washington State Department of Children, Youth and Families' Indian Child Welfare (ICWA) Unit, and its court team, to help American Indian/Alaska Native families maintain cultural connections through family stability.
- CCEW partnered with the City of Spokane and Emmanuel Life Center to identify BIPOC young adults (18-24) in need of rental assistance; 58% of clients served were youth of color.
- We expanded a school-based intervention focusing on outcomes for Marshallese families. In 2020, our Community Health Workers helped 100% of families exit the program into housing.
- We are creating a program to stabilize housing for child welfare-involved BIPOC families with the goal of preventing additional child welfare involvement and tackling over-representation.

- We have collaborated with Salish cultural leaders to design culturally appropriate elements into our most recently developed permanent supportive housing complex, Gonzaga Family Haven, opening in fall 2021. These elements include ventilation systems that allow for smudging rituals, art sourced via RFP from local Native artists, and culturally significant landscaping.
- We have signed a Memorandum of Understanding (MOU) with the Salish School of Spokane to explore the construction of a new school building co-located with future CCEW housing on culturally significant land near the Spokane River.
- We have begun concerted outreach efforts to small community-based organizations led by the people from the minority communities they serve, including APIC Spokane (Asian Pacific Islander Coalition), Carl Maxey Center, Emmanuel Family Life Center, Mujeres in Action, Operation Healthy Family, SCAR (Spokane Community Against Racism), and Spectrum Center.

Limited English Proficiency Plan

Policy Statement

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

To provide clients with meaningful access to services, CCEW programs ensure that communications are provided in the languages of the major populations we serve and that individuals who identify as needing services in another language and/or request documents translated into their language of origin are connected to a translator/provided with documents in their native language.

LEP Assessment

CCEW conducted an LEP assessment for the service area by using US Census Bureau estimates based on the 2019 American Community Survey of the US Census and input from senior leadership and central administration services staff with knowledge of day-to-day operations of our programs. CCEW conducted the “four-factor analysis” widely recommended in guidance from federal government agencies. The results are as follows:

- 1. Determine the number of LEP persons eligible to be served or likely to be encountered by a program, activity or service.** Census figures indicate generally low levels of LEPs in our service area. The exception is four farming counties with high populations of Spanish speakers who lack English proficiency: Walla Walla, Franklin, Okanogan, and Adams. In all counties, LEP speakers of non-Spanish languages tend to be very low, mostly below 1% of the population or very low single digits.

2019 American Community Survey³

³ U.S. Census Bureau (2019). 2019 American Community Survey Language Spokane at Home. Retrieved from [\[https://data.census.gov/cedsci/table?q=language%20spoken%20at%20%20home&g=0500000US53001,53003,53\]](https://data.census.gov/cedsci/table?q=language%20spoken%20at%20%20home&g=0500000US53001,53003,53)

Language Spoken at Home by Persons over 5 Years Old

County	Pop. Total (persons over 5 years old)	Spanish-Speak English Less than Very Well		Other Indo-European-Speak English Less than Very Well		Asian/Pacific Islander-Speak English Less than Very Well		Other Languages-Speak English Less than Very Well	
		Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage
Lincoln	10,042	24	0.24%	21	0.21%	29	0.29%	2	0%
Walla Walla	57,035	4,348	7.62%	295	0.52%	176	0.31%	32	0%
Franklin	83,656	19,562	23.38%	566	0.68%	608	0.73%	195	0%
Okanogan	39,257	2,637	6.72%	176	0.45%	99	0.25%	50	0%
Adams	17,673	4,698	26.58%	36	0.20%	25	0.14%	358	2%
Whitman	47,141	346	0.73%	258	0.55%	1283	2.72%	273	1%
Asotin	21,302	123	0.58%	20	0.09%	61	0.29%	19	0%
Garfield	2,118	0	0.00%	0	0.00%	23	1.09%	0	0%
Columbia	3,818	105	2.75%	51	1.34%	12	0.31%	0	0%
Ferry	7,267	177	2.44%	12	0.17%	12	0.17%	4	0%
Stevens	42,269	145	0.34%	195	0.46%	112	0.26%	0	0%
Pend Oreille	12,772	5	0.04%	45	0.35%	13	0.10%	0	0%
Spokane	474,707	3,019	0.06%	4,444	0.09%	3,472	0.07%	831	0%

2. Determine the frequency with which LEP persons come into contact with our programs.

Program directors evaluate annually or more often the diversity of households served by their program and update translated documents accordingly. Our Immigration Legal Services program and our farmworker housing, which primarily benefit Hispanic populations in farming counties, serve substantial numbers of LEP clients. Our programs that serve mainstream low-income clientele across the service area tend to serve a small number of clients who lack proficiency in English.

3. Determine the importance of the program, activity, or service to people’s lives. CCEW offers well over a dozen distinct programs that respond in crisis, stabilize lives, and advocate in hope for low-income populations. CCEW serves more than 74,000 people per year, and many of those people access programs that provide for their most basic needs of shelter, food, clothing, and community: consequently, we know our programs are of critical importance to helping people achieve their goals and live with dignity. We also know that Black, Indigenous, and People of Color—and by likely extension, people with LEP—are overrepresented in low-income populations in our region but underrepresented in our programs. Our services are also of critical importance to them, so CCEW continues our concerted efforts to increase program outreach, build community partnerships, and better serve our neighbors with LEP.

4. Determine the resources available and cost. CCEW incorporates interpretation and translation services into program costs as part of delivering effective, inclusive services. We make translation and interpretation services available through the following process:

- provide or arrange for bilingual personnel/interpreters as requested by the LEP or service provider/advocate (CCEW prefers to commission third-party services or in-house speakers, but we honor clients’ requests to use family or friends).

[013,53019,53021,53023,53043,53047,53051,53063,53065,53071,53075&tid=ACSST5Y2019.S1601&hidePreview=true](#)]. Sept 15, 2021.

- procure translation/interpretation services through Spokane International Translation (spokanetranslations.com) at the cost applicable for service required.
- arrange for the use of communication technology, as needed.
- continuously evaluate the written and oral language communication needs of program clients and adjust communications accordingly.
- Ensure all employees are trained on Agency LEP and translation service procedures.

Based on our annual program evaluations, CCEW believes we provide adequate access to LEP persons. We will always take additional steps to provide adequate services for individual clients who need them.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and easily updated. CCEW will follow the Title VI program update schedule for monitoring and updating the LEP plan.

Each update should examine all plan components, such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the languages needing translation services?
- Is there still a need for continued language assistance for previously identified programs? Are there other programs that should be included?
- Have CCEW's available resources, such as technology and staff changed?
- Were there any complaints received?

Safe Harbor Provision

According to the US Department of Justice's Safe Harbor Provision, a recipient of federal funds will provide written translation of vital documents for language when the LEP population constitutes five percent (5%), or 1,000 persons of the total population served by the agency. CCEW Program Directors are responsible implementing this provision as applicable.

Transit-Related Committees, Councils and Boards

Title VI regulations require that the Title VI plan include a table depicting the membership of any transit-related non-elected committees, councils, and boards, broken down by race, and the process the Agency uses to encourage the participation of minorities on such committees. CCEW has no transit-related non-elected committees, councils, or boards.

Equity Analysis of Facilities

Title VI regulations require that the Title VI plan include an equity analysis if the Agency has constructed a facility, such as a vehicle storage facility, maintenance facility, or operations center. CCEW has not constructed any such facilities that would require a Title VI equity analysis.

Title VI Notice to the Public

To comply with 49 CFR 21.9(d), CCEW and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. CCEW has established a policy statement to inform individuals of their Title VI rights and posts this statement in its offices.

Non-Discrimination Notice

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

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

Please contact Catholic Charities Spokane at (509) 358-4250 to request a meeting with a language translator to assist you in completing the Title VI Complaint form if needed.

If information is needed in another language, contact (509) 358-4250

Si necesita información en otro idioma, comuníquese al (509) 358-4250

Для получения информации на другом языке звоните по тел. (509) 358-4250

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 358-4250 "

Title VI Complaints

Title VI Complaint Procedure

CCEW will communicate to anyone wishing to file a Title VI complaint that if he or she believes that he or she has been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color, or national origin under CCEW’s programs of transportation service delivery, he or she may file a complaint with CCEW at 12 E 5th Ave, Spokane, WA 99202. A Civil Rights Complaint Form has been developed for this purpose (see attached).

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. CCEW will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigation will:

- identify and review all relevant documents, practices and procedures; and
- identify and interview a person with knowledge of the Title VI violation, i.e., the person making the complaint, witnesses or anyone identified by the Complainant, anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, CCEW will complete a final report for the President and CEO, Executive Vice President, and cognizant Vice President. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report. The investigation process and final report should take no longer than thirty (30) business days. If no violation is found and the Complainant wishes to appeal the decision, he or she may appeal directly to the President and CEO at 12 E 5th Ave, Spokane, WA 99202.

The Complainant has the right to file a complaint or lawsuit with the following organizations:

Organization Name and Address			
Spokane Transit Authority Attn: STA Ombudsman 1230 West Boone Ave Spokane, WA 99201	Washington State DOT Public Transportation Division Attn: Title VI Coordinator PO Box 47387 Olympia, WA 98504-47387	Federal Transit Administration Attn: Title VI Program Coordinator East Building, 5 th Floor—TCR 1200 New Jersey Ave, SE Washington DC 20590	US Dept of Justice Civil Rights Division Coordination and Review Section NWB 950 Pennsylvania Avenue NW Washington, DC 20530

Record Keeping

The Title VI Program Coordinator shall maintain a log of Title VI complaints, including lawsuits, received from this process that name CCEW and shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken by CCEW in response to the complaint. The log shall include investigations by outside agencies. The log and related records shall be kept according to federal and state record retention requirements, but at least six years from the closure of the grant project or the useful life of equipment, whichever is applicable.

Title VI Complaints Received Since Last Plan Update

CCEW has not received any Title VI complaints since last plan update.

Protection from Retribution

Customers should be able to make complaints without fear of retribution. If a customer feels that s/he is being treated unfairly in response to a Complaint, s/he may contact the President & CEO.

Board Approvals

Catholic Charities Eastern Washington (CCEW) Title VI Complaint Form

CCEW does not discriminate in the provision of service on the basis of race, color, and national origin.

Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

Office of Grants, Contracts and Assessments
ATTN: Title VI Program Coordinator
Catholic Charities Eastern Washington
PO Box 2253
Spokane, WA 99210-2253

Please type or print clearly

1. Complainant's Name

2. Address

3. City, State, Zip Code

4. Home Phone Number and Cell Phone Number

5. Email Address

6. Are you the Complainant?

Yes No

If Not, What Is Your Name and Relationship to the Complainant?

What Is Your Relationship to the Complainant?

What Is Your Home Phone Number and Cell Phone Number?

What Is Your Email Address?

Does the Complainant know you are filing this complaint?

Yes No

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

- Race
- Color
- National Origin

8. Date of alleged discrimination (month/day/year)

9. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

10. Please give the name, mailing address, home phone number, and cell phone number for anyone who witnesses the alleged discrimination

11. What would you consider an appropriate resolution to your complaint?

12. Have you filed this complaint with any other agency?

Yes No

If yes, what is the name of the other agency?

What is the agency contact person's name and phone number?

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

Complainant's Signature

Date (month/day/year)

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

Upon request, alternative formats of this document will be produced for people who need accommodations. Call 509-358-4250.