

# 2025-26 TITLE VI PROGRAM

NONDISCRIMINATION POLICY

PUBLIC PARTICIPATION PLAN

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

TRANSIT SERVICE STANDARDS AND POLICIES

Kootenai County - 6283

October 2025

**Contents**

2025-26 TITLE VI PROGRAM .....4

Nondiscrimination Policy .....4

    POLICY STATEMENT .....4

    NOTICE TO THE PUBLIC.....5

    APPROVAL OF GOVERNING ENTITY .....5

    TITLE VI OFFICER .....5

    EMPLOYEE TRAINING.....6

    ANNUAL CERTIFICATIONS AND ASSURANCES .....7

    REVIEW OF LOCAL DIRECTIVES .....7

    PROGRAM REVIEW, COMPLIANCE, AND ENFORCEMENT PROCEDURES.....7

    DATA COLLECTION AND ANALYSIS .....7

    SUBRECIPIENT MONITORING .....8

TITLE VI COMPLAINT PROCEDURES .....8

    SUBMITTING A COMPLAINT .....8

    RESPONDING TO COMPLAINTS .....10

    DISPOSITION OF COMPLAINTS .....10

    RECORD KEEPING OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS.....11

    SUBRECIPIENT RESPONSIBILITIES .....11

    PROVISION OF ADDITIONAL INFORMATION UPON REQUEST .....11

PUBLIC PARTICIPATION PLAN .....11

    GOALS AND OBJECTIVES FOR THE PUBLIC PARTICIPATION PLAN .....12

Limited English Proficiency (LEP) Language Assistance Plan .....16

TRANSIT SERVICE STANDARDS AND POLICIES .....21

    NONDISCRIMINATION ON FTA PROJECTS/SERVICES .....21

    SERVICE AREA .....21

    SERVICE STANDARDS AND POLICIES.....22

    PRIMARY PROGRAM AREAS .....22

    EQUITY ANALYSIS FOR NEW FACILITIES.....23

|   |    |
|---|----|
| APPENDICES.....   | 24 |
| Appendix A Title VI Notice .....                                  | 25 |
| Appendix B Approval of Title VI Program .....                     | 27 |
| Appendix C Designation of Title VI Compliance Officer.....        | 29 |
| Appendix D Title VI Complaint Form .....                          | 31 |
| Appendix E Title VI Investigations, Complaints, and Lawsuits..... | 35 |
| Appendix F Public Outreach Efforts.....                           | 37 |
| Appendix G Limited English Proficiency (LEP) Census Data .....    | 42 |
| Appendix H County LEP Surveys .....                               | 51 |

# **2025-26 TITLE VI PROGRAM**

## **Kootenai County**

**EFFECTIVE:** October 2025

**PURPOSE:** This program establishes guidelines to effectively monitor Kootenai County's compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. (Title VI), and with Department of Transportation (DOT) Title VI Regulations at 49 CFR PART 21 as a recipient and subrecipient of DOT funding through administrations including the Federal Transit Administration (FTA) and Federal Aviation Administration (FAA).

### **Nondiscrimination Policy**

#### **POLICY STATEMENT**

Kootenai County ensures that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any of its programs, services, or activities on the basis of race, color, national origin, sex, disability, or age. The County is committed to monitoring, evaluating, and continually improving its compliance with Title VI of the Civil Rights Act of 1964 and all related nondiscrimination authorities, as outlined in this Program Plan.

Title VI requirements for recipients of Federal financial assistance apply to programs, policies, procedures, employment, and services. It is the responsibility of Kootenai County to:

1. Ensure that no linguistic, cultural, or other barriers exist to service or accommodation.
2. Ensure that no discriminatory activity, act, or omission of an act exists which would prevent usage or access of its programs, services, or activities, including public transportation.
3. Train county employees, contractors, and subrecipients as to what constitutes discrimination and barriers to access, including but not limited to harassment, retaliation, denial of service, and seemingly neutral acts if they have disparate impacts on individuals of a protected group.
4. Take prompt and appropriate action to avoid and minimize the incidence of any form of discrimination.
5. Advise contractors and subrecipients receiving federal financial assistance of their responsibility to comply with Title VI and related nondiscrimination statutes, and include appropriate Title VI assurance language in all applicable contracts and agreements.

Kootenai County shall advise all its departments, programs, contractors, and subrecipients of Federal financial assistance to provide in writing the circumstances surrounding any reported allegations of discrimination no later than the next business day.

Kootenai County has appointed a Title VI Compliance Officer responsible for ensuring compliance with this policy, Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d), related nondiscrimination statutes, and the requirements of 23 CFR Part 200 and 49 CFR Part 21.

### **NOTICE TO THE PUBLIC**

To inform the public of their rights and Kootenai County's obligations under Title VI, Kootenai County shall disseminate the Title VI Notice included in this Program as Appendix A.

The Title VI Notice shall be posted on all public transportation vehicles and on the County's website ([www.kcgov.us](http://www.kcgov.us)) in the Document Center. It shall also be highlighted within the Transit Services section and in any other appropriate locations intended for public access.

This Title VI Program shall be posted in full on the County's website and highlighted in the Transit Services Section.

Public meetings held by the County's departments and programs take place in accessible locations throughout the county. Kootenai County posts notice of all public meetings on its website and on the bulletin boards outside Conference Room 1A/1B in the County Administration Building. Notices of special meetings may also be published in the local newspaper.

All agendas and notices for public meetings shall include the following text:

Kootenai County does not discriminate against individuals or groups on the basis of disability, race, color, or national origin in admission access to, or treatment in, its public meetings, programs, or activities. Requests for assistance, translation, or accommodations can be arranged by contacting the Board of County Commissioners Office at (208) 446-1600.

### **APPROVAL OF GOVERNING ENTITY**

This Program and any future updates thereof shall be approved by the Kootenai County Board of County Commissioners (BOCC) in a public Business Meeting, and the minutes of the meeting included as Appendix B to this Program. Such approval shall encompass each of the policies and plans included within the Program, including the Nondiscrimination Policy, the Public Participation Plan, and the Limited English Proficiency (LEP) Language Assistance Plan.

### **TITLE VI OFFICER**

The Kootenai County Board of County Commissioners is responsible for assuring compliance with the provisions of Title VI of the Civil Rights Act of 1964, and has designated a responsible employee to act as the Title VI Compliance Officer and ensure implementation of Kootenai County's Title VI Program. The resolution designating a Title VI Compliance Officer is included as Appendix C.

Responsibilities of the Title VI Compliance Officer include:

1. Submitting this Title VI Program to required state and federal agencies, including ITD;
2. Responding to and coordinating with any Title VI Compliance Reviews from authorized agencies;
3. Coordinating the dissemination of Title VI information to make individuals aware of their rights under Title VI, including providing notice and opportunities for public participation;
4. Reviewing, monitoring, and enforcing Title VI responsibilities within Kootenai County and ensuring staff are adequately trained on Title VI policies;
5. Collecting and analyzing data related to Title VI;
6. Reviewing local directives for Title VI implications;
7. Developing Title VI complaint procedures and receiving, tracking, investigating, and responding to verbal and written Title VI complaints according to the procedures;
8. For complaints pertaining to a program under which Kootenai County is a subrecipient, forwarding the complaint to the relevant prime recipient as applicable; and
9. Ensuring that the Title VI Program remains up to date.

The Title VI Compliance Officer may select a designee to assist in fulfilling these responsibilities.

Chad Ingle  
Kootenai County Title VI Officer  
451 North Government Way  
PO Box 9000  
Coeur d'Alene, Idaho 83816-9000

## **EMPLOYEE TRAINING**

Kootenai County will ensure all employees are notified of their rights and responsibilities under Title VI and this Title VI Program through notifications, postings, and trainings.

The Title VI Officer shall be responsible for coordinating and tracking the provision of Title VI and LEP training for employees, either personally, through a designee, or by communicating with supervisors or department heads. Topics for employee training shall include:

- Title VI and LEP policy and responsibilities

- Language Assistance services and resources, and documentation of requests
- Handling of Title VI / LEP complaints

### **ANNUAL CERTIFICATIONS AND ASSURANCES**

To fulfill its responsibilities as a recipient and subrecipient of Federal financial assistance, and to comply with 49 CFR Section 21.7, Kootenai County Public Transportation must submit annual certifications and assurances of Title VI Compliance to FTA and Idaho Transportation Department (ITD).

### **REVIEW OF LOCAL DIRECTIVES**

Kootenai County will review local city and county directives for Title VI implications. If directives are identified as implicating Title VI, Kootenai County will provide an interpretation of how those directives impact program areas and include such interpretation in this Title VI Program.

### **PROGRAM REVIEW, COMPLIANCE, AND ENFORCEMENT PROCEDURES**

Kootenai County conducts ongoing reviews of its programs, services, contracts, and operations to ensure full compliance with Title VI and all related nondiscrimination requirements. The Title VI Compliance Officer monitors implementation of this Program through periodic internal audits, reviews of service delivery, evaluation of public involvement activities, and oversight of contractors and subrecipients. When potential violations, complaints, or deficiencies are identified, the County will investigate promptly, provide findings in writing, and implement corrective actions as necessary to achieve compliance. Contractors or subrecipients found to be in noncompliance may be required to submit remedial action plans, undergo additional monitoring, or face suspension or termination of federal funding in accordance with applicable regulations. Kootenai County is committed to enforcing this policy and ensuring that no person is subjected to discrimination in any County-supported program or activity.

### **DATA COLLECTION AND ANALYSIS**

Census, HUD, and American Community Survey data regarding race, ethnicity, language proficiency, and income are compiled within this Program and its appendices to identify population groups that may be impacted by County programs and activities. These demographic datasets are analyzed to determine the geographic distribution of minority, low-income, and Limited English Proficient (LEP) populations within the County. This analysis helps the County assess whether its public transportation services and related programs are equitably provided, whether service changes may disproportionately affect protected populations, and where targeted outreach or mitigation measures may be necessary. In addition, data on interactions between County staff and individuals with limited English proficiency—collected on a semi-regular basis through staff surveys—provides insight into language assistance needs and

the adequacy of current language access measures. Together, these datasets support program planning, service monitoring, communication strategies, and compliance evaluations under Title VI.

### **SUBRECIPIENT MONITORING**

Contractors, subrecipients, and service partners of Kootenai County for qualifying programs or activities are responsible for complying with this Title VI Program. The responsibility to comply with Title VI requirements shall be included in Kootenai County's agreements with contractors, subrecipients, and service partners for qualifying programs or activities.

Those who receive information regarding a violation and/or violations of this policy shall forward it on to the Title VI Officer to determine if there is any basis for the allegation and shall proceed with resolution as stated in the Title VI Complaint Procedures.

### **TITLE VI COMPLAINT PROCEDURES**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities that receive Federal financial assistance (See 23 CFR Part 200 and 49 CFR Part 21).

Any person who believes himself, herself, or any specific class of persons to have been discriminated against by Kootenai County on the basis of race, color, or national origin may file a Title VI complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated in a discrimination investigation.

### **SUBMITTING A COMPLAINT**

Complaints should be filed in writing and signed, and must be filed within 180 days from the last date of the alleged discrimination. Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. To submit a complaint via mail, email, fax, or in person, or for assistance in filing a complaint, complainants should contact Kootenai County's Title VI Compliance Officer.

Chad Ingle  
Kootenai County Title VI Officer  
451 North Government Way

PO Box 9000  
Coeur d'Alene, Idaho 83816-9000

A Title VI Complaint form is attached to this Program as Appendix D, available as a hard copy or in a different format by request, and available online through the Transit Services subpage at [www.kcgov.us](http://www.kcgov.us).

Use of the form is not required, but each complaint should at minimum contain the following information:

- The complainant's name and contact information;
- A written explanation of the alleged discrimination;
- The date(s) of the alleged discrimination;
- The basis of the complaint (e.g. race, color, national origin);
- The names of any specific individuals or agencies involved; and
- Sufficient information to understand the facts that led the complainant to believe that discrimination occurred.

**Complaints regarding Public Transportation Services may also be filed directly with the following agencies:**

Idaho Transportation Department  
Office of Civil Rights  
11331 W. Chinden Blvd  
Boise, ID 83714  
CivilRights@itd.idaho.gov  
Phone: (208) 334-8884

Federal Highway Administration, Idaho Division  
3050 Lakeharbor Lane #126  
Boise, ID 83703  
Idaho.fhwa@dot.gov  
Phone: (208) 334-1843

Federal Highway Administration  
U.S. Department of Transportation Office of Civil Rights  
1200 New Jersey Avenue, SE  
8th Floor E81-105  
Washington, DC 20590  
FHWA.TitleVIcomplaints@dot.gov

Phone: (202) 366-0693

## **RESPONDING TO COMPLAINTS**

Once any complaint is received and after forwarding such complaint if applicable, Kootenai County will review it to determine if it has jurisdiction. The complainant will receive an acknowledgement letter within 10 working days stating whether the complaint will be investigated by Kootenai County.

Kootenai County has 90 days to investigate the complaint. If more information is needed to resolve the case, Kootenai County may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, Kootenai County can administratively close the case. A case can also be administratively closed at the complainant's request if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, either a closure letter or a letter of finding will be issued to the complainant. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of involved staff members, or other action will occur.

A complainant may appeal the decision within 15 days of the date of the closure letter or letter of finding. The written or verbal appeal must include the complainant's name, address and telephone/contact number along with a statement of the reason(s) why the applicant is appealing the decision and any supporting information.

The right of the complainant to prompt an equitable resolution of the complaint must not be impaired by the complainant's pursuit of other remedies, such as the filing of a complaint with the Department of Justice or other appropriate federal agency or of a suit in state or federal court. Use of this procedure is not a prerequisite to the pursuit of other remedies.

## **DISPOSITION OF COMPLAINTS**

Each complaint filed will end up with one of the following dispositions:

**Sustained Complaints.** If the complaint is substantiated, this policy and procedure prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to disciplinary procedures.

**Not Sustained Complaints.** If there is insufficient evidence to either prove or disprove the allegation(s); both parties to the complaint will be informed of the reason(s) for this disposition.

**Unfounded Complaints.** If it is determined that an act reported pursuant to this policy/procedure did not in fact occur; an unfounded finding shall be made.

**Exonerated Complaints.** If it is determined that an act reported pursuant to this policy/procedure did in fact occur; but was lawful and proper within the guidelines established herein, a finding of “exonerated” shall be made.

#### **RECORD KEEPING OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

All incidents, investigations, complaints, or lawsuits will be forwarded to the Title VI Compliance Officer and kept on file by Kootenai County. Records will be kept in chronological order of happenings, and resolutions filed with each case. Should case(s) result in court action, all court documents will be retained with the records kept by Kootenai County.

Investigations, complaints, and lawsuits are listed in Appendix F.

#### **SUBRECIPIENT RESPONSIBILITIES**

As a subrecipient of FTA funds through ITD, Kootenai County must forward complaints received regarding Public Transportation services to Idaho Transportation Department (ITD) within 3 business days of receipt.

#### **PROVISION OF ADDITIONAL INFORMATION UPON REQUEST**

At the discretion of the FTA, information other than that required by the referenced circular may be requested from a recipient in writing in order to investigate complaints of discrimination to resolve concerns about possible noncompliance with Title VI requirements.

### **PUBLIC PARTICIPATION PLAN**

The purpose of the Public Participation Plan (PPP) is to establish procedures that allow for, encourage, and monitor participation of citizens in Kootenai County and the Coeur d’Alene Urbanized Area, including but not limited to low income and minority individuals and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This document will lay out procedures to provide all area citizens opportunity to participate in Kootenai County’s public meetings, planning activities, other public participation activities. Where appropriate, public discussions, input, and recommendations are sought to improve programs and services as pertaining to historically underserved populations.

The Title VI Notice shall be posted on public transportation vehicles; and on the County's website, [www.kcgov.us](http://www.kcgov.us), in the Document Center. The latter posting shall be highlighted in the website's Transit Services section.

The Title VI Program including this Public Participation Plan shall be posted in full on the County's website, highlighted in the Transit Services Section.

## **GOALS AND OBJECTIVES FOR THE PUBLIC PARTICIPATION PLAN**

The goal of the PPP is to offer all citizens in Kootenai County and the Coeur d'Alene Urbanized Area equitable opportunity to participate in transportation planning and other public participation activities.

### **Objectives**

- To determine what linguistic, cultural, or other barriers to public participation exist for minority and LEP persons within Kootenai County.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority populations.
- To provide other avenues for input from and two-way flow of information with persons and populations which are less likely to attend meetings.
- To provide a framework of public participation actions appropriate to various types of plans and programs, and to amendments or alterations to any such plan or program.
- To use various illustrative visualization techniques to convey information whenever practicable, including but not limited to: charts, graphs, photos, maps, and online resources.

### **Identification of Stakeholders**

Stakeholders are those who are directly or indirectly affected by a program, activity, service, plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority or low-income persons, public agencies, and private organizations and businesses.

A coordinated planning process must ensure the broadest involvement of stakeholders and perspectives that are relevant for the area. The following list is a non-exhaustive compilation, showing general stakeholder groups and specific local stakeholder groups potentially relevant to the public transportation planning process:

| General Groups   | Specific Local Groups   |
|--|---|
| Advocacy Groups, Social or Human Services Agencies/Programs, Community Action Programs (CAP), or Mental Health, Welfare, or Housing Agencies/Programs                    | Boys and Girls Club,<br>United Way – Kootenai County,<br>Blind Support Group,<br>Disability Action Center                     |
| Job Training or Job Placement Agencies/Programs, Vocational Rehabilitation Centers and their Clients   | Tesh, Inc.,<br>Goodwill Industries Workforce Development & Social Services,<br>Idaho Division of Vocational Rehabilitation    |
| Senior Center/Programs, Aging/Adult Services/Programs  | Senior Centers,<br>Aging and Disability Resource Center,<br>Area Agency on Aging of North Idaho,<br>Idaho Commission on Aging |
| City Governments   | Coeur d’Alene, Hayden, Hauser, Dalton Gardens, Huetter, Post Falls, Rathdrum, Stateline, Fernan                               |
| County or State Agencies   | Idaho Transportation Department,<br>Idaho Department of Health and Welfare,<br>IDHW – Behavioral Health,                      |
| Native American Nations  | The Coeur d’Alene Tribe (Schitsu’umsh)  |
| Employers & Businesses   | Chambers of Commerce  |
| Educational Institutions and College/Trade/Continuing Education Students   | K-12 School Districts, University of Idaho, Lewis Clark State College, North Idaho College                                    |
| Recreational Centers   | KROC Center   |
| Hospitals, Health Agencies & Programs, and other Medical Facilities  | Benewah Medical Center Community Services,<br>Kootenai Medical Center,<br>Panhandle Health,<br>Heritage Health                |
| Transit Agency/Operators, Mobility Brokers, Medicaid Transportation Providers, et al.  |   |
| Residents, including military veterans, elderly/seniors, persons with a disability, and commuters by bicycle, walking, privately owned vehicle, or public transportation |   |
| Group Homes, Independent Living Communities, Independent Living Agencies/Programs, Retirement Homes, Nursing Homes, and Assisted Living Facilities                       |   |

## Local Area Demographics

The population of Kootenai County was estimated at 188,323 (2024 U.S. Census, Quick Facts). Of that number, approximately 9.3 percent of the population is below the poverty level countywide. The table below breaks down population and poverty rates for cities with a population of 5,000 or more according to V2023 Census data.

| Town          | Population<br>(for whom poverty status is<br>determined) | Percent<br>Below Poverty Level |
|---------------|--|--------------------------------|
| Coeur d’Alene | 56,894   | 8.3%                           |
| Hayden        | 16,422   | 7.6%                           |
| Post Falls    | 44,798   | 13.0%                          |
| Rathdrum      | 11,580   | 9.9%                           |

“Rathdrum city, Idaho; Post Falls city, Idaho; Hayden city, Idaho; Coeur d’Alene city, Idaho; Kootenai County, Idaho – Persons in poverty, percent.” *QuickFacts*, United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/rathdrumcityidaho,postfallscityidaho,haydencityidaho,coeurdaleneidaho,kootenaicountyidaho/IPE120223>. Accessed 28 March 2025.

As shown in 2023 American Community Survey table below, racial minorities represent approximately 14.5 percent of the County’s population. Note that the population and percentage for Hispanic or Latino individuals overlaps with the other categories.

## Kootenai County Area Population

| Category                       | Population | Percent |
|--------------------------------|------------|---------|
| Total                          | 185,010    |         |
| White                          | 158,247    | 85.5%   |
| Black or African American      | 608        | 0.3%    |
| American Indian/Alaskan Native | 1,586      | 0.9%    |
| Asian                          | 2,059      | 1.1%    |
| Hawaiian and Pacific Islander  | 62         | 0.0%    |
| Some Other Race                | 2,840      | 1.5%    |
| Two or More Races              | 19,608     | 10.6%   |
| Hispanic or Latino             | 10,901     | 5.9%    |

“Demographic and Housing Estimates.” *2023 American Community Survey 1-Year Estimates*, United States Census Bureau, [https://data.census.gov/table/ACSDP1Y2023.DP05?q=DP05:+ACS+DEMOGRAPHIC+AND+HOUSING+ESTIMATES&g=050XX000US16055\\_040XX000US16](https://data.census.gov/table/ACSDP1Y2023.DP05?q=DP05:+ACS+DEMOGRAPHIC+AND+HOUSING+ESTIMATES&g=050XX000US16055_040XX000US16). Accessed 28 March 2025.

Kootenai County will make reasonable effort to overcome barriers to participation by minority and low English proficiency populations. Availability of this Title VI Program and Public Participation Plan for review is via the Kootenai County webpage in a manner reasonably expected to reach the general public as well as minority populations, low-income persons, and other traditionally under-served populations. When engaging the public in planning processes, public notices will include notations establishing the availability of accommodations and alternate formats. When appropriate, input from particular populations within the community can be gathered through focus groups or surveys. Advocacy groups can be a good resource for contacts and dissemination of information to minority and limited English proficiency populations. Such advocacy groups or agencies can provide insight into the needs of the under-represented populations, as well as valuable contacts or arenas for input. Kootenai County should also maintain contact with local translators, and use translation and interpretation services as needed or upon request. In addition to public meetings, Kootenai County will encourage participation and input from both users and nonusers of public transportation through email, voicemail, surveys or written comments.

Public agencies and non-profits, like food banks, social service agencies, and community health organizations can provide valuable input, and assist in promoting participation from traditionally under-represented populations. Public agencies whose clients fall into under-represented populations, including but not limited to minority, low-income, disabled, and limited English proficiency households have particular insight into the transportation needs of their clients. Such agencies are useful partners in overcoming barriers that Kootenai County may not otherwise foresee.

Private organizations and businesses can also offer a number of perspectives valuable to transportation planning processes. Representation of private business' interests will be welcomed into the planning process, as transportation for employees is of critical concern to private sector employers.

### **Availability of Planning Documents**

When and if planning processes include mapping or large documents, these shall be available for review at the County's Administration building during normal business hours, or as warranted at local specified locations which will be noticed to the public. Electronic versions of such documents will be made available on the Kootenai County website.

### **Outreach Efforts**

In addition to the outreach efforts identified earlier in this policy, Kootenai County may use the following techniques during its planning studies and program or service reviews, as deemed appropriate by Kootenai County.

- Presentations to professional, citizen, and student organizations.
- Articles in community newsletters.
- Information posted in county facilities and in buses.
- Press releases and meetings with local media representatives.
- Informal conversations with individuals and small groups.
- Interviews with people who are or could be affected by study recommendations.
- Presentations by experts when applicable.
- User and non-user surveys.

In addition, visual and illustrative techniques will be used to convey information to the public wherever practicable, including but not limited to charts, graphs, photos, maps and the internet.

A summary record of Kootenai County's outreach efforts is provided as Appendix G.

### **Public Input and Comments**

Any input received outside of studies, surveys, and planning cycles will be documented and referenced for future amendments or updates to planning products.

## **Limited English Proficiency (LEP) Language Assistance Plan**

### **Introduction**

This Limited English Proficiency Plan (Plan) addresses Kootenai County's responsibilities as a recipient of federal financial assistance as the responsibilities relate to the needs of individuals with limited English language skills. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. Executive Order 13166 directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Kootenai County.

### **Summary**

Kootenai County developed this Plan to identify reasonable steps to provide language assistance to persons with limited English proficiency (LEP) who wish to access services

provided by Kootenai County. As defined in Executive Order 13166, LEP persons are those individuals who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This Plan outlines the ways in which assistance may be provided to LEP persons, staff training that may be required, and how to communicate to LEP persons that language assistance is available.

To prepare this Plan, Kootenai County used the four-factor LEP analysis, which considers the following:

- LEP persons served who are likely to require interpretation services.
- The frequency with which LEP persons come in contact with Kootenai County services.
- The nature and importance of services provided by Kootenai County to the LEP population.
- The interpretation services available to Kootenai County, and the provision of LEP interpretation services.

The following provides a summary of the results of the four-factor analysis conducted by Kootenai County through 15 April 2025.

### **Meaningful Access: Four-Factor Analysis**

#### *Local Area Demographics, US Census Bureau*

The 2023 American Community Survey 5-Year Estimates of Language Spoken at Home has determined that 97% of the County's adult population speaks only English at home, with 3% of speaking a language other than English at home.

Review of this data shows that of the 3% of adults speaking a language other than English at home, the percentage of limited English proficiency is significantly lower. Of particular note in the 2023 5-year Limited English Speaking Households study, of the 69,104 households surveyed, although other languages were spoken in 3,761 of the households, only 213 of the households were limited English speaking households. The survey indicates that only 0.3% of the households in Kootenai County are limited English speaking, and Kootenai County has no LEP populations meeting the Safe Harbor Threshold of more than 1,000 persons or 5% of total population served.

#### *Frequency of Contact*

The Board of County Commissioners (BOCC) periodically assesses the frequency with which staff have, or could have, contact with LEP persons. This includes conducting surveys on translation and interpretation assistance.

Points of Contact: In the latest survey of Kootenai County staff, daily contact with LEP individuals was reported by staff representing the Assessor's Office, Sheriff's Department, Juvenile Detention, and District Court. The predominant language encountered for limited English proficiency persons is Spanish. See Appendix K for the results of the latest countywide and Public Transportation surveys.

#### *Importance of Contact*

There is no significant geographic concentration of LEP individuals within Kootenai County. Public transportation is a vital service, as are legal and administrative services provided by the Assessor's Office, District Court, and other County departments. Procedures are in place to provide language assistance to LEP persons as part of the County's standard business practices.

#### *Language Assistance Resource Requirements*

- Proficiency in, and having the ability to communicate accurately in, both English and in the other language(s), as well as proficiency in employing the appropriate mode of interpreting (e.g. consecutive, simultaneous, summarization, or sight translation).
- Understanding and abiding by the same confidentiality and impartiality rules as would the Kootenai County employee for whom they are interpreting, to the extent their position requires.
- Understanding and adhering to the role of interpreter without deviating into a role of counselor, legal advisor, or other inappropriate position. Language is not translated or interpreted word for word as there is often not a literal word for word match between languages. Instead, the exchange normally involves the idea or concept needing to be expressed.

Language services should be provided at a time and place to avoid the effect of denying access to the service or benefit of the program. However, in some situations it may be reasonable to ask the LEP individual to return at a specific date and time to allow time to arrange for interpreter services.

Because LEP persons can file a complaint on the basis of national origin, staff should be trained on how to properly handle a Title VI complaint.

Vital documentation that may require consideration for translation in Spanish (Idaho's largest LEP population) may include, among others:

- Driver's license and automobile forms.
- Violation or deficiency notices.
- Emergency transportation information.

- Notices of proposed public hearings, regarding proposed public transit plans, projects or changes.
- Notices of reduction, denial, or termination of services or benefits.

### *Language Assistance Resources*

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be LEP persons and may be entitled to language assistance from Kootenai County. Language assistance may include interpretation or translation. Interpretation is defined as the oral or spoken transfer of a message from one language into another language. Translation is defined as the written transfer of a message from one language into another language.

### Language Assistance Measures

Although Kootenai County's population of LEP individuals who speak English "less than very well" is small, Kootenai County will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

### **Staff Training**

The following training will be offered to County employees:

- Information on the Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Documentation of language assistance requests
- How to handle a potential Title VI/LEP complaint

### **Translation of Documents**

Kootenai County is committed to pursuing reasonable steps to provide the opportunity for meaningful access to individuals who do not speak English as their primary language and have a limited ability to read, speak, write or understand English. While Kootenai County does not currently track expenditures related to providing language assistance, Kootenai County will continue to monitor language assistance requests and to comply with the goals and provisions of the Limited English Proficiency Plan.

### **Tracking and Monitoring LEP Interactions**

Data Collection is critical to effectively monitoring program compliance. Data ensures that activities, programs and services effectively meet the needs of "all persons" in Kootenai County.

Kootenai County conducts a survey on language-related interactions and reviews language-related usage on a semi-regular basis. See Appendix H to this Program.

Kootenai County shall, at minimum:

- Review the number of documented LEP person contacts encountered annually
- Review how the needs of LEP persons were addressed
- Determine if the need for translation services has changed
- Determine if complaints have been received concerning the County's failure to meet the needs of LEP individuals.

#### **Internal Language Assistance Resources**

- "I Speak" Card – Language identification card allows the LEP person to communicate his or her language visually.
- Microsoft Translator – personal translation application for more than 70 languages, to translate text, voice, conversations.
- Language skills possessed by employees who serve customers with limited English proficiency.

#### **External Language Assistance Resources**

- Qualified Telephonic Interpreter Services – A contracted service providing interpretation via telephone in more than 240 languages and dialects.
- In person Interpreter Services – A contracted service providing interpretation in person.

#### **Dissemination of LEP Plan and Resources**

Kootenai County will post its Title VI Program, including this LEP Plan, on its website at [www.kcgov.us](http://www.kcgov.us). Any person, including social services, nonprofits, law enforcement agencies, and other community partners with Internet access will be able to access the LEP Plan. For those without personal Internet service, area libraries offer free Internet access. Kootenai County residents are asked to contact the local library to determine if this service is available. Copies of the Title VI Program including LEP Plan will be provided to any person or agency requesting a copy. Any questions or comments regarding this LEP Plan should be directed to the Kootenai County Title VI Officer, reachable at the address below.

Chad Ingle  
Kootenai County Title VI Officer  
451 North Government Way  
PO Box 9000  
Coeur d'Alene, Idaho 83816-9000

## **TRANSIT SERVICE STANDARDS AND POLICIES**

FTA requires that all recipients ensure and document their compliance with Title VI and 49 CFR section 21.9(b) by maintaining and submitting an updated Title VI program to their FTA regional civil rights officer once every three years.

The State of Idaho has developed requirements related to transportation services. Kootenai County will comply with required state regulations.

### **NONDISCRIMINATION ON FTA PROJECTS/SERVICES**

The following non-exhaustive list of examples illustrates how the nondiscrimination provisions of this part apply to projects receiving federal financial assistance administered by the US Department of Transportation (DOT) or its operating administrations, including FTA.

Any vehicle operating as part of or in conjunction with federally assisted programs shall provide all persons the same access, seating, and other treatment pertaining to use of the vehicle, without regard to race, color, national origin, or disability.

Any project sponsor, subrecipient, concessionaire, contractor, licensee, or any other organization furnishing public transportation service as part of or in conjunction with a federally assisted program shall not treat any current or prospective employees less favorably than any other with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment on the basis of race, color, national origin, or disability.

No person or group of persons shall be discriminated against on the basis of race, color, national origin, or disability with regard to the routing, scheduling, or quality of transportation service furnished as part of a federally assisted program. Frequency of service, location of routes, age and quality of vehicles assigned to routes and services, and quality of transit facilities may not be determined on the basis of race, color, national origin, or disability.

The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color or national origin.

### **SERVICE AREA**

Kootenai County Public Transportation, also known as Citylink North, currently serves Coeur d'Alene, Dalton Gardens, Fernan, Hayden, Huetter, and Post Falls with fixed route bus service on three routes, ADA Paratransit, and Ring-a-Ride. It is funded by Federal and State funds that are awarded directly to Kootenai County.

- A Route serves downtown Coeur d'Alene.
- B Route provides service between Coeur d'Alene, Huetter, and Post Falls.

- C Route serves Coeur d'Alene, Dalton Gardens, and Hayden.

The service area for ADA Paratransit is defined as the area within a three-quarter mile radius of the fixed route system. Ring-a-Ride service may originate outside of the Paratransit service area, but all trips must have a destination located within the Paratransit service area.

## SERVICE STANDARDS AND POLICIES

### Vehicle Loading Standards

| Vehicle Type                        | Fleet Vehicles | Seated | Standing | Total Capacity | Max. Load Factor |
|-------------------------------------|----------------|--------|----------|----------------|------------------|
| Fixed Route:<br>38' Bus Standard    | 7              | 32     | 16       | 48             | 1.5              |
| Paratransit:<br>23' Specialized Van | 17             | 14     | 0        | 14             | 1                |

### Vehicle Headways

#### Urban Routes A, B & C:

Routes currently operate with one (1) hour headway.

#### Service Frequency leaving from Riverstone:

Routes depart the Riverstone Transit Center hourly.

#### Fixed Route:

Service is available to 65% of the residents within the small urban service area.

## Public Transportation Service Policies

#### Vehicle Assignment:

Vehicles assigned to the urban routes shall be lift equipped and shall have a minimum seven (7) year service life.

#### Transit Amenities:

Installation and replacement of transit amenities are determined by available funding and prioritized using objective criteria, including passenger boarding activity, to ensure equitable and nondiscriminatory access across all populations.

## PRIMARY PROGRAM AREAS

| Program Area                  | General Description                                    | Title VI/Nondiscrimination Concerns and Responsibilities                       |
|-------------------------------|--|--|
| Service Planning & Scheduling | Develops transit routes, schedules, and service levels | Ensures service changes do not result in disparate impacts on minority or low- |

|                                 |   |  |
|---------------------------------|---|--|
|                                 |   | income populations; conducts equity analyses for major service changes; considers community input                                      |
| Operations                      | Daily delivery of transit services        | Ensures services are provided consistently and fairly across all routes and communities; monitors complaints related to discrimination |
| Public Participation & Outreach | Conducts public engagement activities     | Ensures meaningful access for LEP individuals; provides language assistance and accessible meeting formats                             |
| Customer Service                | Handles customer inquiries and complaints | Tracks Title VI complaints; ensures complaint procedures are accessible and responsive   |

**EQUITY ANALYSIS FOR NEW FACILITIES**

When a recipient of FTA funds constructs a transit facility, the recipient is required to include a copy of the title VI equity analysis conducted during its planning stage with regard to the location of the facility.

Kootenai County has not constructed a new facility since the last update to this Title VI Program.

## **APPENDICES**

**Appendix A**  
**Title VI Notice**

# TITLE VI NOTICE

Kootenai County operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964.

Any person who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Kootenai County program or activity on the basis of race, color, or national origin may file a Title VI discrimination complaint.

To file a Title VI discrimination complaint, contact:

**ATTN: Chad Ingle  
Kootenai County Title VI Officer  
451 North Government Way  
PO Box 9000  
Coeur d'Alene, Idaho 83816-9000**

For more information on the Kootenai County civil rights program, obligations required under Title VI, and the procedures to file a complaint, see Kootenai County's Title VI Program, available on [www.kcgov.us](http://www.kcgov.us); contact 208.446.2255, (TTY 711); email [citylinknorth@kcgov](mailto:citylinknorth@kcgov); or visit our administrative office at 2400 W Riverstone Drive, Coeur d'Alene. If information is needed in another language, please call 208.446.2255. This notice is available in alternate formats for persons with disabilities.

**Appendix B**  
**Approval of Title VI Program**

*[replace this page with applicable meeting minutes (relevant item highlighted) in final pdf]*

**Appendix C**  
**Designation of Title VI Compliance Officer**

*[replace this page with resolution designating title vi officer in final pdf]*

**Appendix D**  
**Title VI Complaint Form**

**KOOTENAI COUNTY  
TITLE VI COMPLAINT FORM**

**Section 1**

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_

Home Telephone No: (\_\_\_\_) \_\_\_\_\_ Best time to Contact: \_\_\_\_\_

Work Telephone No: (\_\_\_\_) \_\_\_\_\_ Best time to Contact: \_\_\_\_\_

Email address: \_\_\_\_\_

ACCESSIBLE FORMATS ARE AVAILABLE UPON REQUEST.

**Section 2**

Are you filing this complaint on your own behalf? \_\_\_\_ Yes\* \_\_\_\_ No

\*If you answered yes, go to Section 3

If not, please provide the name and relationship of the person you are filing for:

\_\_\_\_\_

Please provide why you are filing for this person: \_\_\_\_\_

Please confirm you have permission to file on their behalf: \_\_\_\_ Yes \_\_\_\_ No

**Section 3**

I believe the discrimination I experienced as based on (check all that apply):

( ) Race ( ) Color ( ) National Origin

Date of Alleged Discrimination: \_\_\_\_\_

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed, please use as many pages as needed.

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**Section 4**

Have you previously filed a Title VI complaint with this agency? \_\_\_\_ Yes \_\_\_\_ No

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? \_\_\_\_ Yes \_\_\_\_ No

If yes, check all that apply:

|                       |                      |
|-----------------------|----------------------|
| Federal Agency: _____ | Federal Court: _____ |
| State Agency: _____   | State Court: _____   |
| Local Agency: _____   | Other: _____         |

Please provide information about a contact person at the agency or court where the complaint was filed:

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Agency: \_\_\_\_\_

Address: \_\_\_\_\_ Telephone: \_\_\_\_\_

**Section 5**

Name of agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

**Section 6**

Type of Relief Sought:

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

I DO HEREBY CERTIFY THAT ALL STATEMENTS MADE BY ME ON THIS FORM ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF. FURTHER, I UNDERSTAND THAT IN THE EVENT THAT I HAVE KNOWINGLY AND WILLFULLY MADE ANY FALSE STATEMENTS, I WILL BE LIABLE FOR PUNISHMENT IN ACCORDANCE WITH ALL APPLICABLE LAWS AND STATUTES.

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SIGNATURE

Date

Please mail this form to:      KOOTENAI COUNTY  
Title VI Officer  
PO Box 9000  
Coeur d'Alene, Idaho 83816-9000  
FAX: 208.446.1039  
email: [citylinknorth@kcgov.us](mailto:citylinknorth@kcgov.us)

**Appendix E**  
**Title VI Investigations, Complaints, and Lawsuits**

*[insert records of Title VI Investigations, Complaints, and Lawsuits here in the form of a table or a pdf of a spreadsheet]*

*This section is intentionally left blank because there were no applicable items to report.*

**Appendix F**  
**Public Outreach Efforts**

## **Public Outreach and Involvement Summary**

### **Introduction**

This appendix documents Kootenai County's public outreach and involvement activities conducted during Fiscal Years 2024 and 2025 in support of transit planning, service development, and program implementation. These activities were undertaken to ensure meaningful access to the planning process and to provide opportunities for public input consistent with Title VI of the Civil Rights Act of 1964 and related federal requirements.

### **Outreach Approach**

Kootenai County utilized a variety of outreach techniques to engage transit riders, human services providers, local businesses, elected officials, and the general public. Outreach methods were selected to encourage participation from both transit users and non-users and to provide accessible opportunities for education and feedback.

Outreach techniques used, as appropriate, included:

- User and non-user surveys
- Presentations to professional, citizen, and community organizations
- Public meetings and workshops
- Information posted in County facilities and on transit vehicles
- Articles and notices distributed through community communication channels
- Press releases and coordination with local media
- Informal conversations and small group discussions
- Interviews with individuals who are or could be affected by transit services

Visual and illustrative materials such as charts, maps, and graphics were used where practicable to support public understanding.

### **Surveys and Stakeholder Engagement**

During FY24 and FY25, Kootenai County conducted multiple surveys to solicit input from:

- Transit passengers,
- Human services providers, and
- Local businesses.

The surveys gathered feedback related to transit service quality, accessibility, service needs, and potential improvements. Survey results were reviewed and considered during service planning, route evaluation, and program development.

### **Public Meetings and Educational Outreach**

Kootenai County held multiple public meetings throughout FY24 and FY25 to educate the public about available public transportation services, proposed changes, and ongoing planning efforts. These meetings provided opportunities for public questions, discussion, and feedback.

In FY24, the County conducted a public transit workshop with the Board of County Commissioners. The workshop was held in a public meeting format and focused on transit services, system performance, funding, and future planning considerations.

### **Public Comment Opportunities**

Kootenai County provided formal public comment opportunities as part of its planning and service review processes.

- Public comment was solicited for the Program of Projects, allowing the public to review and comment on proposed transit investments and priorities.
- In FY25, the County conducted three separate public comment periods focused on:
  - Transit services,
  - Transit routes, and
  - Route stops.

All public comments received during these periods were documented and considered in the evaluation of service and planning decisions.

### **Consideration and Documentation of Public Input**

Public input received during surveys, public meetings, comment periods, and other outreach activities was documented and retained for reference. Input received outside of formal planning cycles will be considered during future amendments or updates to transit plans, programs, or services, as appropriate.

### **Conclusion**

The outreach activities conducted during FY24 and FY25 demonstrate Kootenai County's ongoing commitment to inclusive public participation and compliance with Title VI requirements. The County will continue to evaluate and refine its outreach practices to ensure equitable access to the transit planning process.

## Summary of Public Outreach Activities

| <b>Fiscal Year</b> | <b>Outreach Activity</b>                            | <b>Target Audience</b>                        | <b>Purpose</b>  | <b>Outreach Method</b>                                  |
|--------------------|---|---|---|---|
| FY24               | Passenger and Community Surveys                     | Transit passengers, general public            | Collect feedback on transit services, accessibility, and service needs          | User and non-user surveys                               |
| FY24               | Stakeholder Surveys                                 | Human services providers, local businesses    | Identify transportation needs, coordination opportunities, and service gaps     | Surveys and interviews                                  |
| FY24               | Public Transit Education Meetings                   | General public                                | Educate community on available public transportation services and programs      | Public meetings, presentations, informational materials |
| FY24               | Transit Workshop with Board of County Commissioners | Board of County Commissioners, general public | Provide overview of transit services, performance, funding, and future planning | Public meeting / workshop                               |
| FY24               | Program of Projects Public Comment Period           | General public                                | Solicit public input on proposed transit projects and funding priorities        | Public notice and formal comment period                 |
| FY25               | Passenger and Community Surveys                     | Transit passengers, general public            | Evaluate service performance and identify improvement opportunities             | User and non-user surveys                               |
| FY25               | Stakeholder Surveys                                 | Human services providers, local businesses    | Gather input on service changes, routes, and community transportation needs     | Surveys and interviews                                  |

| <b>Fiscal Year</b> | <b>Outreach Activity</b>                 | <b>Target Audience</b> | <b>Purpose</b>  | <b>Outreach Method</b>                                  |
|--------------------|--|------------------------|---|---|
| FY25               | Public Transit Education Meetings        | General public         | Provide information on transit services, routes, and planning efforts | Public meetings, presentations, informational materials |
| FY25               | Public Comment Period – Transit Services | General public         | Solicit input on transit service levels and operations                | Public notice and formal comment period                 |
| FY25               | Public Comment Period – Transit Routes   | General public         | Gather feedback on existing and proposed routes                       | Public notice and formal comment period                 |
| FY25               | Public Comment Period – Route Stops      | General public         | Obtain input on stop locations and accessibility                      | Public notice and formal comment period                 |

*All outreach activities were conducted in accordance with Kootenai County’s Public Participation Plan. Outreach methods were selected to provide meaningful opportunities for public input from minority, low-income, and limited English proficient populations, consistent with Title VI requirements.*

**Appendix G**  
**Limited English Proficiency (LEP) Census Data**

| Excerpt of ACS 2023 5-Year Estimates – Selected Social Characteristics: Kootenai County, Idaho |          |                 |         |                         |
|--|----------|-----------------|---------|-------------------------|
| Label  | Estimate | Margin of Error | Percent | Percent Margin of Error |
| <b>PLACE OF BIRTH</b>  |          |                 |         |                         |
| Total population   | 177,736  | *****           | 177,736 | (X)                     |
| Native   | 173,441  | ±613            | 97.6%   | ±0.3                    |
| Born in United States  | 171,972  | ±691            | 96.8%   | ±0.4                    |
| State of residence   | 54,496   | ±1,661          | 30.7%   | ±0.9                    |
| Different state  | 117,476  | ±1,805          | 66.1%   | ±1.0                    |
| Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)                   | 1,469    | ±368            | 0.8%    | ±0.2                    |
| Foreign-born   | 4,295    | ±613            | 2.4%    | ±0.3                    |
| <b>U.S. CITIZENSHIP STATUS</b>   |          |                 |         |                         |
| Foreign-born population  | 4,295    | ±613            | 4,295   | (X)                     |
| Naturalized U.S. citizen   | 2,686    | ±379            | 62.5%   | ±6.8                    |
| Not a U.S. citizen   | 1,609    | ±441            | 37.5%   | ±6.8                    |
| <b>YEAR OF ENTRY</b>   |          |                 |         |                         |
| Population born outside the United States  | 5,764    | ±691            | 5,764   | (X)                     |
| Native   | 1,469    | ±368            | 1,469   | (X)                     |
| Entered 2010 or later  | 133      | ±105            | 9.1%    | ±6.9                    |
| Entered before 2010  | 1,336    | ±355            | 90.9%   | ±6.9                    |
| Foreign-born   | 4,295    | ±613            | 4,295   | (X)                     |
| Entered 2010 or later  | 592      | ±199            | 13.8%   | ±4.4                    |
| Entered before 2010  | 3,703    | ±582            | 86.2%   | ±4.4                    |
| <b>WORLD REGION OF BIRTH OF FOREIGN-BORN</b>   |          |                 |         |                         |
| Foreign-born population, excluding population born at sea                                      | 4,295    | ±613            | 4,295   | (X)                     |
| Europe   | 1,366    | ±293            | 31.8%   | ±6.0                    |
| Asia   | 1,073    | ±205            | 25.0%   | ±5.2                    |
| Africa   | 113      | ±69             | 2.6%    | ±1.7                    |
| Oceania  | 33       | ±35             | 0.8%    | ±0.8                    |
| Latin America  | 981      | ±404            | 22.8%   | ±7.5                    |
| Northern America   | 729      | ±236            | 17.0%   | ±4.4                    |
| <b>LANGUAGE SPOKEN AT HOME</b>   |          |                 |         |                         |
| Population 5 years and over  | 167,933  | ±91             | 167,933 | (X)                     |
| English only   | 162,059  | ±998            | 96.5%   | ±0.6                    |
| Language other than English  | 5,874    | ±1,011          | 3.5%    | ±0.6                    |
| Speak English less than "very well"  | 1,393    | ±437            | 0.8%    | ±0.3                    |
| Spanish  | 3,565    | ±830            | 2.1%    | ±0.5                    |
| Speak English less than "very well"  | 818      | ±377            | 0.5%    | ±0.2                    |
| Other Indo-European languages  | 1,275    | ±361            | 0.8%    | ±0.2                    |

|  |         |        |         |      |
|--|---------|--------|---------|------|
| Speak English less than "very well"            | 229     | ±143   | 0.1%    | ±0.1 |
| Asian and Pacific Islander languages           | 777     | ±215   | 0.5%    | ±0.1 |
| Speak English less than "very well"            | 297     | ±128   | 0.2%    | ±0.1 |
| Other languages                                | 257     | ±149   | 0.2%    | ±0.1 |
| Speak English less than "very well"            | 49      | ±52    | 0.0%    | ±0.1 |
| <b>ANCESTRY</b>                                |         |        |         |      |
| Total population                               | 177,736 | *****  | 177,736 | (X)  |
| American                                       | 7,251   | ±1,005 | 4.1%    | ±0.6 |
| Arab   | 146     | ±96    | 0.1%    | ±0.1 |
| Czech  | 553     | ±181   | 0.3%    | ±0.1 |
| Danish   | 1,253   | ±511   | 0.7%    | ±0.3 |
| Dutch  | 3,308   | ±842   | 1.9%    | ±0.5 |
| English  | 28,888  | ±2,380 | 16.3%   | ±1.3 |
| French (except Basque)                         | 4,044   | ±664   | 2.3%    | ±0.4 |
| French Canadian                                | 1,024   | ±309   | 0.6%    | ±0.2 |
| German   | 38,042  | ±2,065 | 21.4%   | ±1.2 |
| Greek  | 367     | ±178   | 0.2%    | ±0.1 |
| Hungarian                                      | 640     | ±267   | 0.4%    | ±0.1 |
| Irish  | 20,784  | ±1,703 | 11.7%   | ±1.0 |
| Italian  | 7,775   | ±1,042 | 4.4%    | ±0.6 |
| Lithuanian                                     | 106     | ±80    | 0.1%    | ±0.1 |
| Norwegian                                      | 8,200   | ±945   | 4.6%    | ±0.5 |
| Polish   | 3,021   | ±509   | 1.7%    | ±0.3 |
| Portuguese                                     | 765     | ±283   | 0.4%    | ±0.2 |
| Russian  | 700     | ±282   | 0.4%    | ±0.2 |
| Scotch-Irish                                   | 2,209   | ±612   | 1.2%    | ±0.3 |
| Scottish                                       | 5,924   | ±1,168 | 3.3%    | ±0.7 |
| Slovak   | 150     | ±96    | 0.1%    | ±0.1 |
| Subsaharan African                             | 205     | ±132   | 0.1%    | ±0.1 |
| Swedish  | 4,030   | ±533   | 2.3%    | ±0.3 |
| Swiss  | 637     | ±231   | 0.4%    | ±0.1 |
| Ukrainian                                      | 427     | ±218   | 0.2%    | ±0.1 |
| Welsh  | 2,022   | ±654   | 1.1%    | ±0.4 |
| West Indian (excluding Hispanic origin groups) | 60      | ±58    | 0.0%    | ±0.1 |

"DP02|Selected Social Characteristics in the United States." 2019-2023 American Community Survey 5-Year Estimates, United States Census Bureau, [https://data.census.gov/table/ACSDP5Y2023.DP02?g=050XX00US16055\\_040XX00US16](https://data.census.gov/table/ACSDP5Y2023.DP02?g=050XX00US16055_040XX00US16). Accessed 4 April 2025.

| Excerpt of ACS 2023 5-Year Estimates – Limited English Speaking Households: Kootenai County, Idaho |                |                 |         |                 |                                     |                 |         |                 |
|--|----------------|-----------------|---------|-----------------|-------------------------------------|-----------------|---------|-----------------|
|  | All Households |                 |         |                 | Limited English-speaking households |                 |         |                 |
| Label  | Pop.           | Margin of Error | Percent | Margin of Error | Pop.                                | Margin of Error | Percent | Margin of Error |
| All households   | 69,104         | ±735            | (X)     | (X)             | 213                                 | ±130            | 0.3%    | ±0.2            |
| Households speaking --   |                |                 |         |                 |                                     |                 |         |                 |
| Spanish  | 2,159          | ±377            | 3.1%    | ±0.5            | 153                                 | ±120            | 7.1%    | ±5.4            |
| Other Indo-European languages  | 923            | ±234            | 1.3%    | ±0.3            | 39                                  | ±42             | 4.2%    | ±4.4            |
| Asian and Pacific Island languages   | 527            | ±125            | 0.8%    | ±0.2            | 15                                  | ±25             | 2.8%    | ±4.4            |
| Other languages  | 152            | ±76             | 0.2%    | ±0.1            | 6                                   | ±11             | 3.9%    | ±6.7            |

"Limited English Speaking Households." 2019-2023 American Community Survey 5-Year Estimates, United States Census Bureau, <https://data.census.gov/table/ACSST5Y2023.S1602?q=S1602:+Limited+English+Speaking+Households&g=050XX00US16055>. Accessed 4 April 2025.

| Excerpt of ACS 2023 5-Year Estimates – Language Spoken at Home: Kootenai County, Idaho - Total |          |                 |          |                 |
|--|----------|-----------------|----------|-----------------|
|  | Total    |                 | Percent  |                 |
| Label  | Estimate | Margin of Error | Estimate | Margin of Error |
| Population 5 years and over  | 167,933  | ±91             | (X)      | (X)             |
| Speak only English   | 162,059  | ±998            | 96.5%    | ±0.6            |
| Speak a language other than English  | 5,874    | ±1,011          | 3.5%     | ±0.6            |
| SPEAK A LANGUAGE OTHER THAN ENGLISH  |          |                 |          |                 |
| Spanish  | 3,565    | ±830            | 2.1%     | ±0.5            |
| 5 to 17 years old  | 606      | ±333            | 0.4%     | ±0.2            |
| 18 to 64 years old   | 2,524    | ±495            | 1.5%     | ±0.3            |
| 65 years old and over  | 435      | ±153            | 0.3%     | ±0.1            |
| Other Indo-European languages  | 1,275    | ±361            | 0.8%     | ±0.2            |
| 5 to 17 years old  | 197      | ±154            | 0.1%     | ±0.1            |
| 18 to 64 years old   | 809      | ±218            | 0.5%     | ±0.1            |
| 65 years old and over  | 269      | ±115            | 0.2%     | ±0.1            |
| Asian and Pacific Island languages   | 777      | ±215            | 0.5%     | ±0.1            |
| 5 to 17 years old  | 32       | ±47             | 0.0%     | ±0.1            |
| 18 to 64 years old   | 635      | ±172            | 0.4%     | ±0.1            |
| 65 years old and over  | 110      | ±53             | 0.1%     | ±0.1            |
| Other languages  | 257      | ±149            | 0.2%     | ±0.1            |
| 5 to 17 years old  | 30       | ±47             | 0.0%     | ±0.1            |

|                                     |         |      |       |      |
|-------------------------------------|---------|------|-------|------|
| 18 to 64 years old                  | 162     | ±109 | 0.1%  | ±0.1 |
| 65 years old and over               | 65      | ±58  | 0.0%  | ±0.1 |
| <b>CITIZENS 18 YEARS AND OVER</b>   |         |      |       |      |
| All citizens 18 years old and over  | 136,024 | ±460 | (X)   | (X)  |
| Speak only English                  | 131,886 | ±764 | 97.0% | ±0.5 |
| Speak a language other than English | 4,138   | ±636 | 3.0%  | ±0.5 |
| Spanish                             | 2,394   | ±477 | 1.8%  | ±0.3 |
| Other languages                     | 1,744   | ±311 | 1.3%  | ±0.2 |

"Language Spoken at Home." 2019-2023 American Community Survey 5-Year Estimates, United States Census Bureau, <https://data.census.gov/table/ACSST5Y2023.S1601?q=S1601:+Language+Spoken+at+Home&g=050XX00US16055>. Accessed 4 April 2025.

| <b>Excerpt of ACS 2023 5-Year Estimates – Language Spoken at Home: Kootenai County, Idaho – Percent of specified language speakers</b> |   |                 |         |                 |                                     |                 |         |                 |
|--|---|-----------------|---------|-----------------|-------------------------------------|-----------------|---------|-----------------|
| Label  | Speak English only or speak English "very well" |                 |         |                 | Speak English less than "very well" |                 |         |                 |
|  | Pop.  | Margin of Error | Percent | Margin of Error | Pop.                                | Margin of Error | Percent | Margin of Error |
| Population 5 years and over  | 166,540   | ±427            | 99.2%   | ±0.3            | 1,393                               | ±437            | 0.8%    | ±0.3            |
| Speak only English   | (X)   | (X)             | (X)     | (X)             | (X)                                 | (X)             | (X)     | (X)             |
| Speak a language other than English  | 4,481   | ±747            | 76.3%   | ±5.2            | 1,393                               | ±437            | 23.7%   | ±5.2            |
| <b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>   |   |                 |         |                 |                                     |                 |         |                 |
| Spanish  | 2,747   | ±614            | 77.1%   | ±7.9            | 818                                 | ±377            | 22.9%   | ±7.9            |
| 5 to 17 years old  | 513   | ±307            | 84.7%   | ±15.3           | 93                                  | ±94             | 15.3%   | ±15.3           |
| 18 to 64 years old   | 1,947   | ±403            | 77.1%   | ±11.8           | 577                                 | ±343            | 22.9%   | ±11.8           |
| 65 years old and over  | 287   | ±137            | 66.0%   | ±17.9           | 148                                 | ±85             | 34.0%   | ±17.9           |
| Other Indo-European languages  | 1,046   | ±287            | 82.0%   | ±8.5            | 229                                 | ±143            | 18.0%   | ±8.5            |
| 5 to 17 years old  | 193   | ±148            | 98.0%   | ±11.4           | 4                                   | ±23             | 2.0%    | ±11.4           |
| 18 to 64 years old   | 643   | ±165            | 79.5%   | ±10.9           | 166                                 | ±114            | 20.5%   | ±10.9           |
| 65 years old and over  | 210   | ±92             | 78.1%   | ±21.9           | 59                                  | ±71             | 21.9%   | ±21.9           |
| Asian and Pacific Island languages   | 480   | ±183            | 61.8%   | ±14.0           | 297                                 | ±128            | 38.2%   | ±14.0           |
| 5 to 17 years old  | 32  | ±47             | 100.0%  | ±54.4           | 0                                   | ±29             | 0.0%    | ±54.4           |
| 18 to 64 years old   | 401   | ±157            | 63.1%   | ±15.8           | 234                                 | ±110            | 36.9%   | ±15.8           |
| 65 years old and over  | 47  | ±32             | 42.7%   | ±28.1           | 63                                  | ±50             | 57.3%   | ±28.1           |
| Other languages  | 208   | ±119            | 80.9%   | ±14.7           | 49                                  | ±52             | 19.1%   | ±14.7           |
| 5 to 17 years old  | 30  | ±47             | 100.0%  | ±56.2           | 0                                   | ±29             | 0.0%    | ±56.2           |
| 18 to 64 years old   | 141   | ±106            | 87.0%   | ±17.6           | 21                                  | ±26             | 13.0%   | ±17.6           |

|                                     |         |      |       |       |     |      |       |       |
|-------------------------------------|---------|------|-------|-------|-----|------|-------|-------|
| 65 years old and over               | 37      | ±38  | 56.9% | ±49.6 | 28  | ±45  | 43.1% | ±49.6 |
| <b>CITIZENS 18 YEARS AND OVER</b>   |         |      |       |       |     |      |       |       |
| All citizens 18 years old and over  | 135,284 | ±503 | 99.5% | ±0.1  | 740 | ±196 | 0.5%  | ±0.1  |
| Speak only English                  | (X)     | (X)  | (X)   | (X)   | (X) | (X)  | (X)   | (X)   |
| Speak a language other than English | 3,398   | ±562 | 82.1% | ±4.1  | 740 | ±196 | 17.9% | ±4.1  |
| Spanish                             | 2,089   | ±438 | 87.3% | ±4.3  | 305 | ±113 | 12.7% | ±4.3  |
| Other languages                     | 1,309   | ±265 | 75.1% | ±7.8  | 435 | ±162 | 24.9% | ±7.8  |

“Language Spoken at Home.” 2019-2023 American Community Survey 5-Year Estimates, United States Census Bureau, <https://data.census.gov/table/ACSST5Y2023.S1601?q=S1601:Language+Spoken+at+Home&g=050XX00US16055>. Accessed 4 April 2025.

| <b>Excerpt of ACS 2023 5-Year Estimates – Demographic and Housing Estimates: Kootenai County, Idaho</b> |                 |                        |                |                                |
|---|-----------------|------------------------|----------------|--------------------------------|
| <b>Label</b>  | <b>Estimate</b> | <b>Margin of Error</b> | <b>Percent</b> | <b>Percent Margin of Error</b> |
| <b>SEX AND AGE</b>  |                 |                        |                |                                |
| Total population  | 177,736         | *****                  | 177,736        | (X)                            |
| Male  | 88,630          | ±189                   | 49.9%          | ±0.1                           |
| Female  | 89,106          | ±189                   | 50.1%          | ±0.1                           |
| Sex ratio (males per 100 females)   | 99.5            | ±0.4                   | (X)            | (X)                            |
| Under 5 years   | 9,803           | ±91                    | 5.5%           | ±0.1                           |
| 5 to 9 years  | 11,618          | ±829                   | 6.5%           | ±0.5                           |
| 10 to 14 years  | 11,523          | ±817                   | 6.5%           | ±0.5                           |
| 15 to 19 years  | 10,696          | ±175                   | 6.0%           | ±0.1                           |
| 20 to 24 years  | 9,348           | ±175                   | 5.3%           | ±0.1                           |
| 25 to 34 years  | 22,281          | ±174                   | 12.5%          | ±0.1                           |
| 35 to 44 years  | 23,174          | ±138                   | 13.0%          | ±0.1                           |
| 45 to 54 years  | 20,634          | ±140                   | 11.6%          | ±0.1                           |
| 55 to 59 years  | 10,917          | ±770                   | 6.1%           | ±0.4                           |
| 60 to 64 years  | 12,739          | ±766                   | 7.2%           | ±0.4                           |
| 65 to 74 years  | 21,373          | ±130                   | 12.0%          | ±0.1                           |
| 75 to 84 years  | 10,035          | ±547                   | 5.6%           | ±0.3                           |
| 85 years and over   | 3,595           | ±527                   | 2.0%           | ±0.3                           |
| Median age (years)  | 40.8            | ±0.3                   | (X)            | (X)                            |
| Under 18 years  | 40,103          | ±80                    | 22.6%          | ±0.1                           |
| 16 years and over   | 141,916         | ±360                   | 79.8%          | ±0.2                           |
| 18 years and over   | 137,633         | ±80                    | 77.4%          | ±0.1                           |
| 21 years and over   | 132,125         | ±490                   | 74.3%          | ±0.3                           |
| 62 years and over   | 42,814          | ±581                   | 24.1%          | ±0.3                           |
| 65 years and over   | 35,003          | ±95                    | 19.7%          | ±0.1                           |
| 18 years and over   | 137,633         | ±80                    | 137,633        | (X)                            |
| Male  | 67,852          | ±86                    | 49.3%          | ±0.1                           |

|  |         |        |         |      |
|--|---------|--------|---------|------|
| Female   | 69,781  | ±98    | 50.7%   | ±0.1 |
| Sex ratio (males per 100 females)                              | 97.2    | ±0.2   | (X)     | (X)  |
| 65 years and over  | 35,003  | ±95    | 35,003  | (X)  |
| Male   | 16,338  | ±96    | 46.7%   | ±0.2 |
| Female   | 18,665  | ±78    | 53.3%   | ±0.2 |
| Sex ratio (males per 100 females)                              | 87.5    | ±0.7   | (X)     | (X)  |
| <b>RACE</b>  |         |        |         |      |
| Total population   | 177,736 | *****  | 177,736 | (X)  |
| One race   | 162,800 | ±1,374 | 91.6%   | ±0.8 |
| Two or More Races  | 14,936  | ±1,374 | 8.4%    | ±0.8 |
| One race   | 162,800 | ±1,374 | 91.6%   | ±0.8 |
| White  | 156,689 | ±1,288 | 88.2%   | ±0.7 |
| Black or African American                                      | 533     | ±173   | 0.3%    | ±0.1 |
| American Indian and Alaska Native                              | 1,539   | ±300   | 0.9%    | ±0.2 |
| Aztec  | 41      | ±69    | 0.0%    | ±0.1 |
| Blackfeet Tribe of the Blackfeet Indian Reservation of Montana | 12      | ±12    | 0.0%    | ±0.1 |
| Maya   | 0       | ±29    | 0.0%    | ±0.1 |
| Native Village of Barrow Inupiat Traditional Government        | 0       | ±29    | 0.0%    | ±0.1 |
| Navajo Nation  | 14      | ±20    | 0.0%    | ±0.1 |
| Nome Eskimo Community  | 0       | ±29    | 0.0%    | ±0.1 |
| Other American Indian and Alaska Native                        | 1,472   | ±284   | 0.8%    | ±0.2 |
| Asian  | 1,395   | ±295   | 0.8%    | ±0.2 |
| Asian Indian   | 103     | ±85    | 0.1%    | ±0.1 |
| Chinese  | 255     | ±138   | 0.1%    | ±0.1 |
| Filipino   | 361     | ±175   | 0.2%    | ±0.1 |
| Japanese   | 93      | ±56    | 0.1%    | ±0.1 |
| Korean   | 71      | ±52    | 0.0%    | ±0.1 |
| Vietnamese   | 132     | ±112   | 0.1%    | ±0.1 |
| Other Asian  | 380     | ±194   | 0.2%    | ±0.1 |
| Native Hawaiian and Other Pacific Islander                     | 54      | ±61    | 0.0%    | ±0.1 |
| Chamorro   | 2       | ±4     | 0.0%    | ±0.1 |
| Native Hawaiian  | 0       | ±29    | 0.0%    | ±0.1 |
| Samoa  | 14      | ±29    | 0.0%    | ±0.1 |
| Other Native Hawaiian and Other Pacific Islander               | 38      | ±53    | 0.0%    | ±0.1 |
| Some Other Race  | 2,590   | ±701   | 1.5%    | ±0.4 |
| Two or More Races  | 14,936  | ±1,374 | 8.4%    | ±0.8 |
| White and Black or African American                            | 757     | ±198   | 0.4%    | ±0.1 |
| White and American Indian and Alaska Native                    | 2,712   | ±329   | 1.5%    | ±0.2 |
| White and Asian  | 1,544   | ±296   | 0.9%    | ±0.2 |
| White and Some Other Race                                      | 8,465   | ±1,299 | 4.8%    | ±0.7 |

|  |         |        |         |       |
|--|---------|--------|---------|-------|
| Black or African American and American Indian and Alaska Native  | 1       | ±4     | 0.0%    | ±0.1  |
| Black or African American and Some Other Race                    | 150     | ±157   | 0.1%    | ±0.1  |
| <b>Race alone or in combination with one or more other races</b> |         |        |         |       |
| Total population   | 177,736 | *****  | 177,736 | (X)   |
| White  | 171,295 | ±861   | 96.4%   | ±0.5  |
| Black or African American  | 1,741   | ±216   | 1.0%    | ±0.1  |
| American Indian and Alaska Native                                | 4,770   | ±377   | 2.7%    | ±0.2  |
| Asian  | 3,477   | ±235   | 2.0%    | ±0.1  |
| Native Hawaiian and Other Pacific Islander                       | 776     | ±187   | 0.4%    | ±0.1  |
| Some Other Race  | 11,609  | ±1,281 | 6.5%    | ±0.7  |
| <b>HISPANIC OR LATINO AND RACE</b>                               |         |        |         |       |
| Total population   | 177,736 | *****  | 177,736 | (X)   |
| Hispanic or Latino (of any race)                                 | 9,663   | *****  | 5.4%    | ***** |
| Mexican  | 6,609   | ±560   | 3.7%    | ±0.3  |
| Puerto Rican   | 636     | ±267   | 0.4%    | ±0.2  |
| Cuban  | 136     | ±135   | 0.1%    | ±0.1  |
| Other Hispanic or Latino   | 2,282   | ±500   | 1.3%    | ±0.3  |
| Not Hispanic or Latino   | 168,073 | *****  | 94.6%   | ***** |
| White alone  | 153,384 | ±1,234 | 86.3%   | ±0.7  |
| Black or African American alone                                  | 533     | ±173   | 0.3%    | ±0.1  |
| American Indian and Alaska Native alone                          | 1,278   | ±255   | 0.7%    | ±0.1  |
| Asian alone  | 1,337   | ±277   | 0.8%    | ±0.2  |
| Native Hawaiian and Other Pacific Islander alone                 | 52      | ±61    | 0.0%    | ±0.1  |
| Some Other Race alone  | 1,089   | ±578   | 0.6%    | ±0.3  |
| Two or More Races  | 10,400  | ±1,239 | 5.9%    | ±0.7  |
| Two races including Some Other Race                              | 4,953   | ±1,215 | 2.8%    | ±0.7  |
| Two races excluding Some Other Race, and three or more races     | 5,447   | ±451   | 3.1%    | ±0.3  |
| Total housing units  | 78,013  | ±86    | (X)     | (X)   |
| <b>CITIZEN, VOTING AGE POPULATION</b>                            |         |        |         |       |
| Citizen, 18 and over population                                  | 136,024 | ±460   | 136,024 | (X)   |
| Male   | 67,062  | ±263   | 49.3%   | ±0.1  |
| Female   | 68,962  | ±320   | 50.7%   | ±0.1  |

"ACS Demographic and Housing Estimates." 2019-2023 American Community Survey 5-Year Estimates, United States Census Bureau, <https://data.census.gov/table/ACSDP5Y2023.DP05?q=DP05:+ACS+Demographic+and+Housing+Estimates&g=050XX00US16055>. Accessed 4 April 2025.

#### TABLE NOTES:

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, the decennial census is the official source of population totals for April 1st of each decennial year. In between censuses, the Census Bureau's Population Estimates Program produces and

disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units and the group quarters population for states and counties.

Information about the American Community Survey (ACS) can be found on the ACS website. Supporting documentation including code lists, subject definitions, data accuracy, and statistical testing, and a full list of ACS tables and table shells (without estimates) can be found on the Technical Documentation section of the ACS website.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates

ACS data generally reflect the geographic boundaries of legal and statistical areas as of January 1 of the estimate year. For more information, see [Geography Boundaries by Year](#).

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.

Users must consider potential differences in geographic boundaries, questionnaire content or coding, or other methodological issues when comparing ACS data from different years. Statistically significant differences shown in ACS Comparison Profiles, or in data users' own analysis, may be the result of these differences and thus might not necessarily reflect changes to the social, economic, housing, or demographic characteristics being compared. For more information, see [Comparing ACS Data](#).

Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution. For a 5-year median estimate, the margin of error associated with a median was larger than the median itself. N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available. median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-") median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+"). \*\* The margin of error could not be computed because there were an insufficient number of sample observations. \*\*\* The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution. \*\*\*\*\* A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.

**Appendix H**  
**County LEP Surveys**

## Limited English Proficiency (LEP) Analysis

### FTA Circular 4702.1B

#### Four-Factor Analysis

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#### Factor 1: Number or Proportion of LEP Persons Served

**Table 1. Staff-Reported LEP Interaction Frequency**

| <b>Frequency</b> | <b>Percentage</b> |
|------------------|-------------------|
| Frequently       | 18%               |
| Occasionally     | 9%                |
| Rarely           | 55%               |
| Never            | 18%               |
| <b>Total</b>     | <b>100%</b>       |

#### **Narrative:**

A review of staff responses indicates that **82%** of employees have had some level of interaction with individuals with limited English proficiency. While the majority of interactions are reported as infrequent, the widespread distribution of LEP contact across staff functions demonstrates that LEP individuals are present within the service area and may access services at multiple points.

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#### Factor 2: Frequency of Contact with LEP Individuals

Approximately 27% of staff report encountering LEP individuals occasionally or frequently, indicating recurring, though not constant, contact. This level of interaction supports the need for continued awareness and availability of language assistance measures to ensure meaningful access when LEP encounters occur.

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#### Factor 3: Nature and Importance of the Program

The agency provides public services that are fundamental to access, participation, and mobility. Effective communication is necessary to ensure that LEP individuals are able to obtain information, request assistance, and understand available services. Even limited communication barriers may impede access; therefore, reasonable steps must be maintained to provide language assistance consistent with Title VI requirements.

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#### Factor 4: Resources Available and Costs

**Table 2. Languages Encountered by LEP Individuals**

| Language                      | Percentage of Staff Reporting |
|-------------------------------|-------------------------------|
| Spanish                       | 64%                           |
| American Sign Language (ASL)  | 18%                           |
| Ukrainian                     | 18%                           |
| Vietnamese                    | 9%                            |
| Chinese                       | 9%                            |
| Multiple Languages Identified | 36%                           |

Percentages exceed 100% due to the ability to select more than one language.

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#### Language Assistance Practices

| Indicator                                   | Percentage                            |
|---|---------------------------------------|
| Staff reporting LEP encounters              | 82%                                   |
| Staff requesting interpretation/translation | 9%                                    |
| Method utilized                             | Informal (bilingual staff assistance) |
| Staff fluent in a non-English language      | 9%                                    |

#### Narrative:

Formal interpretation requests were limited; however, the agency recognizes that informal assistance methods may be used during initial or brief interactions. The agency remains committed to providing appropriate language assistance when needed and will continue to evaluate cost-effective options based on demand and available resources.

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#### LEP Plan Implementation and Monitoring

Consistent with FTA Circular 4702.1B, the agency will:

- Monitor LEP encounters and service requests
- Reassess language needs periodically

- Maintain procedures for accessing language assistance
  - Provide staff guidance on identifying and responding to LEP needs
- 

### **LEP Determination Summary**

Based on the Four-Factor Analysis, the agency has determined that LEP individuals are present within the service area and access agency programs on a limited but recurring basis. Given the nature of the services provided and available resources, the agency will continue to implement reasonable language assistance measures to ensure meaningful access in compliance with Title VI.