



LOS ANGELES COUNTY  
**CONSUMER & BUSINESS AFFAIRS**

Board of Supervisors

April 8, 2023

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To: Supervisor Janice Hahn, Chair  
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From: Rafael Carbajal  
Director

**REPORT ON SUSTAINABLY EXPANDING EVICTION DEFENSE SERVICES IN LOS ANGELES COUNTY (ITEM NO. 29, AGENDA OF SEPTEMBER 27, 2022)**

On September 27, 2022, your Board directed the Department of Consumer and Business Affairs (DCBA) to engage property owners, tenants, and other relevant stakeholders, and to report back with an implementation plan to make the Expanded Eviction Defense program, Stay Housed LA, a permanent DCBA program that meets the growing need for countywide eviction defense services by 2027.

Your Board also requested that this report back include, but not be limited to:

- Annual Stay Housed LA (SHLA) projected outputs and outcomes, including the projected impact of preventing evictions in unincorporated areas with greater housing instability and displacement pressure;
- Outcome data and demographics breakdown by Supervisorial District of tenant households served to date through SHLA;
- Recommendations to improve and close any service delivery gaps utilizing the County's Anti-Racism, Diversity and Inclusion Initiative (ARDI) equity lens, framework, and tools with particular attention to: technology and internet access for participants to submit required documentation, wait times in receiving assistance, outreach and engagement efforts for legal assistance to unincorporated areas and areas with greater housing instability and displacement pressures, and residents with lower education attainment and who are non-native English speakers;



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- Recommendations on leveraging existing tenant and legal assistance programs such as Rent Habitability, Rent Registry, and Self-Help Legal Access Centers to provide seamless services;
- Growth projections for expanding the SHLA program to meet tenants' increasing needs, with the plan to achieve a universal access to counsel for eviction legal services by 2027; and
- An implementation budget to make the SHLA program permanent.

DCBA's report responding to your Board's directives is attached, which covers:

- An overview of SHLA and its impact, as currently implemented, including program services, program capacity, outcome metrics to date, and lessons learned;
- A review of the County's COVID-19 Tenant Protections Resolution and the projected impact of its expiration on eviction filings;
- Potential strategies to enhance eviction defense services;
- Lessons learned and key takeaways from program analysis and implementation;
- Recommendations on leveraging existing programs to improve Stay Housed LA and close delivery gaps utilizing the County's ARDI equity lens;
- A proposed framework to make SHLA a permanent program, including growth projections and a proposed implementation budget to achieve a universal access to legal representation countywide by 2030; and
- Recommended next steps.

## **SUMMARY OF REPORT**

Stout Risius Ross, LLC (Stout), a private consulting firm specializing in investment banking, valuation advisory, dispute consulting, management consulting, and transaction opinions, published a cost-benefit analysis report<sup>1</sup> for the Los Angeles Right to Counsel Coalition on their proposed Right to Counsel program (RTC) for the City and County of Los Angeles. Stout found that less than 10 percent of tenants facing eviction are represented by legal counsel in court versus 90 percent of landlords. This is often due to lack of access to reliable information or affordable assistance and shines a light on the significant gap between the need for legal services and the resources available to serve vulnerable tenant households.

Recognizing the need for access to these critical services, the Board adopted a motion in September 2019 to direct the development and implementation of an expanded eviction defense program, launched under the name Stay Housed LA. While the initial program design planned to pilot program services in clusters of ZIP codes in each Supervisorial

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<sup>1</sup> [https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report\\_12-10-19.pdf](https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report_12-10-19.pdf)

District, SHLA pivoted to launch in July 2020 as an emergency response to the COVID-19 pandemic, offering educational “Know Your Rights” workshops and limited-scope legal representation. In September 2020, the full SHLA program was launched as a first of its kind partnership between the County, the City of Los Angeles, legal service providers, and community-based organizations to provide low-income tenants facing eviction: limited and full-scope legal representation, outreach and education, short-term rental assistance, and tenant navigation services to connect clients to wraparound services. This report includes lessons learned through implementation of SHLA, the impact Stay Housed has made on tenant households countywide, the anticipated impact of the County’s emergency tenant protections on unlawful detainer (eviction) filings, opportunities to enhance eviction defense, as well as a recommended framework for expansion of the program, of which the highlights are summarized below.

### Lessons Learned and Key Implementation Takeaways

Data collected by SHLA partners, consultants, and DCBA informed the lessons learned contained in this report. The data and insights provided help to demonstrate program effectiveness and to highlight opportunities for improvement or enhancement:

#### Key Takeaways:

- Eviction prevention **saves jurisdictions money**—cost-benefit analyses have shown that investment in eviction prevention efforts such as SHLA translate to significant cost savings on already overburdened homeless service systems.
- **Increased demand for SHLA services**—as a result of successful outreach efforts and the dire need of low-income tenants, SHLA has experienced more demand, with sharp increases following each change in federal, state, or local policy related to tenant protections. The recent expiration of the County’s pandemic era tenant protections is anticipated to have significant impacts on the demand for SHLA services.
- **Program capacity is limited**—the demand for SHLA services far outweighs its current capacity. Additional funding, increased supply of attorneys engaged in tenant legal defense, and other creative solutions addressed in the report are needed to bridge the gap.
- **Reliable access to eviction data at the ZIP code level is essential to successful program implementation**—Due to challenges obtaining reliable, representative, and timely eviction data, the County has used workarounds to approximate where evictions are most likely to occur. Obtaining regular access to reliable, representative, and timely eviction data would be transformative for the County and any local jurisdictions implementing eviction defense services and would allow the County to more effectively target services to the communities most impacted by eviction filings.

### Potential Strategies to Enhance Eviction Defense

As your Board looks for additional opportunities to strengthen SHLA and complementary services to support vulnerable tenants, we highlight options implemented or explored by other jurisdictions. Some of the options presented may require more in-depth assessments to identify programmatic and financial resources needed to implement. Options detailed in the report include:

- Consideration of adopting a **Pay to Stay** policy, which would allow tenants the opportunity to pay rental arrears up until their unlawful detainer (eviction) court date;
- Consideration of implementing a **Lawyer for the Day** program, partnering with local courts to increase access to low-barrier legal assistance in eviction courts; and
- **Supporting legislation** that enhances SHLA implementation—DCBA is currently working with CEO on County-sponsored Assembly Bill (AB) 875 (Gabriel), which would require local courts to make unlawful detainer data publicly available, improving the way local jurisdictions target eviction prevention services.

### Recommendations to Close Service Delivery Gaps

As addressed above and in the attached report, the overwhelming demand for SHLA relative to program capacity has impacted its ability to provide legal representation to all tenants in need of assistance. While a primary recommendation to address these gaps is an increase in funding and the number of legal aid attorneys available to provide these services, the report addresses additional strategies to strengthen SHLA services, summarized below:

- **Prioritization of legal assistance** to ensure SHLA services are accessible to those most vulnerable.
- **Increased outreach in the unincorporated areas of the County** to address the disparity in SHLA access, as compared to similarly vulnerable areas in incorporated cities.
- **Intensive case management** for up to six months including status checks, continued monitoring of tenants for available services, and financial coaching to reduce debt and build wealth.
- Enhance efficiency of SHLA by **leveraging existing County programs/systems** such as the Rent Stabilization Program's Rent Registry, Self Help Legal Access Centers, Housing for Health, and the Delete the Divide initiative.

## **RECOMMENDATIONS**

DCBA recommends the adoption of a Right to Counsel ordinance for the unincorporated areas of the County and a complementary Universal Access to Legal Representation program using a phased-in approach to full implementation by 2030.

It is important to note that the report consistently highlights the critical need to adequately fund SHLA to not only maintain the current infrastructure and ensure a sustainable expansion, but to meet the current demand for services. The attached report outlines a proposed implementation plan and budget for the expansion of SHLA program that builds upon research conducted to-date and makes the following recommendations that can be adopted by your Board to codify SHLA as a permanent program:

1. Approve DCBA's proposed SHLA's implementation framework to:
  - a. Adopt a Right to Counsel (RTC) ordinance for unincorporated Los Angeles County by Fiscal Year 2024-25 to guarantee legal representation to eligible tenants; and/or
  - b. Phase in the implementation of a Universal Access to Legal Representation program to expand coverage of legal representation services to additional incorporated cities as DCBA scales up program capacity.
2. Direct CEO, in collaboration with Los Angeles County Affordable Housing Solutions Agency (LACAHS), to identify sustainable funding sources for implementation of a RTC ordinance and Universal Access program under the Stay Housed L.A. umbrella to eligible tenants countywide by 2030.
3. Direct CEO to identify an additional \$5 million to supplement the Stay Housed L.A. budget for FY 2023-24 to address service delivery gaps.

In the interim, DCBA will continue providing SHLA services, as currently implemented, and prepare to scale up operations should additional funding and/or resources be identified. DCBA also plans to make a continued effort to improve SHLA services by: (1) leveraging existing County tenant and legal assistance programs to further expand SHLA's reach and effectiveness; and (2) building strategic partnerships with community-based organizations to improve upon and expand SHLA reach in higher needs communities.

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Should you have any questions concerning this report, please contact me or Dana Pratt, Deputy Director, at (213) 634-5923 or [dpratt@dcba.lacounty.gov](mailto:dpratt@dcba.lacounty.gov).

RC:JA:DP  
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Enclosure

c: Executive Officer, Board of Supervisors  
Chief Executive Office  
County Counsel



# **SUSTAINABLY EXPANDING EVICTION DEFENSE SERVICES IN LOS ANGELES COUNTY**

## **REPORT**

**April 8, 2023**

Prepared by:

Los Angeles County Department of Consumer and Business Affairs  
Rafael Carbajal, Director

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## Background

On September 10, 2019, the Los Angeles County Board of Supervisors (Board) approved the development and implementation of a Countywide expanded eviction defense program, which included a startup budget of \$2 million in Measure H funds, to launch in the first quarter of calendar year 2020. Due to the onset of the COVID-19 pandemic in March 2020, the launch and implementation of the program was temporarily halted while the County focused its resources to address the most pressing and immediate service needs of County residents during the health emergency. On June 17, 2020, DCBA entered into a six-month, \$1.95 million, Measure H funded service delivery agreement with Liberty Hill Foundation to implement a Countywide Emergency Eviction Prevention Program (EPPP) to provide information, education, and limited legal services to tenants facing potential eviction during the COVID-19 pandemic. On July 13, 2020, Liberty Hill Foundation and its subcontractors—a group of community-based tenant advocacy organizations and legal service providers from the Right to Counsel Coalition (RTCC)—began delivering services under the EPPP service delivery agreement, which included virtual “Know Your Rights” workshops, targeted outreach and education to tenants living in vulnerable communities throughout the County, and limited scope legal representation to tenant households making up to 80 percent of the area median income.

On August 4, 2020, the Board approved an appropriation adjustment of \$8.7 million in Net County Cost (NCC) from the Affordable Housing Trust Fund to DCBA to further fund eviction defense services in the County. On August 22, 2020, DCBA and the Legal Aid Foundation of Los Angeles (LAFLA) entered into a 12-month, \$5.985 million, NCC-funded service delivery agreement to implement an Expanded Eviction Defense Program (EDP) to provide full scope legal representation and short-term rental assistance to households making up to 50 percent of the area median income. Similar to the service delivery model implemented under the EPPP by the Liberty Hill Foundation, LAFLA entered into subcontracts with a group of legal service providers from the RTCC to deliver services under the EDP.

On September 15, 2020, DCBA, Liberty Hill Foundation, and LAFLA, formally launched Stay Housed L.A County (SHLA), which is the County’s branded, consolidated, and comprehensive eviction defense program that incorporates outreach, education, and limited legal services delivered via the EPPP agreement, as well as full-scope legal services launched for the first time as part of the EDP agreement. On October 4, 2020, the Board approved an additional appropriation adjustment of \$2 million in NCC from the Affordable Housing Trust Fund to DCBA to expand service delivery efforts under SHLA.

On February 22, 2021, DCBA executed a \$250,000 Memorandum of Understanding (MOU) with the City of Long Beach to provide enhanced education, outreach, and legal services offered by SHLA within the boundaries of the City of Long Beach. DCBA executed a \$680,400 amendment to the City of Long Beach MOU on October 26, 2021 to extend the delivery of enhanced eviction defense services in the City of Long Beach through December 31, 2022.

On May 13, 2022, the County entered into new service delivery agreements with LAFLA, funded via \$10.8 million in federal American Rescue Plan Act (ARP) dollars and \$6.2 million in California Permanent Local Housing Allocation (PLHA) dollars, to continue providing eviction defense services under the SHLA program through June of 2023. On September 13, 2022, the Board approved an additional \$18 million allocation from ARP (Tranche 2) for the continued implementation of the program through June of 2024. Lastly, on January 24, 2023, the Board approved a \$2 million supplemental allocation of ARP funding to expand SHLA's rental assistance efforts to coincide with the expiration of the County's COVID-19 Tenant Protections Resolution.

The initial report filed by DCBA on Expanding Eviction Defense Services in Los Angeles County<sup>2</sup> recommended implementing eviction defense programming in phases to facilitate incremental, sustainable growth of the program. SHLA was initially launched in 2020 as a pilot program with components structured so the program could be evaluated on a regular basis with the aim of scaling services as the program matured and as the need for services evolved during the COVID-19 pandemic. SHLA has served as a gateway program for vulnerable County tenants to obtain critical services and resources so they can better understand and exercise their rights to prevent an eviction. Now, nearly two and a half years after launching the first iteration of its expanded eviction defense program, the County is laying the groundwork to make SHLA a permanent program that meets the growing need for countywide, universal access to eviction defense services. The following report will outline how SHLA, as implemented to date, can be utilized as an evaluative tool to make a case for a phased-in, countywide expansion of the program—including a right to counsel program for the unincorporated areas of Los Angeles County—with its production of localized evidence that legal representation for renters is an effective intervention in eviction cases.

## **The Impact of Emergency Tenant Protections Expiring on the Rate of Evictions**

### *LA County COVID-19 Tenant Protections Resolution*

The COVID-19 pandemic brought forth unforeseen disruption and devastation to the health and livelihood of households across the country and the globe. Within weeks, governments at the federal, state, and local levels were forced to take prompt and decisive action to deter further spread of the pandemic and worsening of an economic crisis. One of the more notable responses at all levels of government included temporary moratoria on evictions for tenants experiencing financial hardships due to the pandemic.

While the federal moratorium on evictions provided limited temporary protections for certain tenant households, state-based actions provided a greater level of protections for impacted tenants. Executive orders issued by the Governor of California and rules enacted by the Judicial Council of California provided protections against evictions and utility shutoffs, temporarily paused the filing of court eviction proceedings, and authorized

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<sup>2</sup> [https://file.lacounty.gov/SDSInter/bos/bc/1060189\\_8-26-19BMFromDCBARExpandingEvictionDefenseSvc.pdf](https://file.lacounty.gov/SDSInter/bos/bc/1060189_8-26-19BMFromDCBARExpandingEvictionDefenseSvc.pdf)

local governments to adopt their own local emergency protections. In Los Angeles County alone, more than 40 jurisdictions enacted local protections limiting evictions and rent increases during the emergency period. In March 2020, the Board exercised its authority to adopt an eviction moratorium (now known as the LA County COVID-19 Tenant Protections Resolution) providing critical emergency protections against evictions for residential, mobilehome space renters, and commercial tenants during the pandemic. Since then, the COVID-19 Tenant Protections Resolution (Resolution)<sup>3</sup> has gone through a series of amendments and extensions to provide timely and necessary safeguards against eviction to impacted tenants. Though federal and state protections have been lifted, the County's Resolution remained in effect through March 31, 2023 with certain protections lasting through March 31, 2024.

The expiration of these emergency tenant protections afforded through the Resolution on March 31, 2023 will undoubtedly have an impact on the rate of evictions filed in Los Angeles County, which have surged back to pre-pandemic levels. In calendar year 2022, the average number of Unlawful Detainers (UD) filed per month in the Los Angeles County Superior Court (LASC) system grew to 2,867, up from a low of 1,054 average filings per month during calendar year 2021 (see Appendix A). Over the course of the last six months of available LASC UD data (July through December of 2022), the average number of UD filings ballooned to 3,531 per month, higher than the calendar year 2019 average of 3,381 UD filings per month (see Chart 1 below). Based on the last major surge of eviction filings that began when the State's COVID-19 Rent Relief Program stopped accepting new applications at the end of March 2022, the County could expect to see another surge of eviction filings beginning April 2023, as a result of the expiration of the Resolution, and possibly continue to push UD filings upwards well into the rest of the year.

The County is expected to experience an "eviction cliff," a term coined to describe the expected negative impact of eviction moratoria being lifted at the federal, state, and local levels. Accumulation of eviction filings, unpaid rent, deteriorated tenant-landlord relationships, and increased rates of homelessness are all possible consequences that need to be prepared for as emergency tenant protections come to an end.<sup>4</sup> The role of SHLA as the first line of defense for tenants facing eviction and potential homelessness will become even more critical should this eviction cliff be realized.

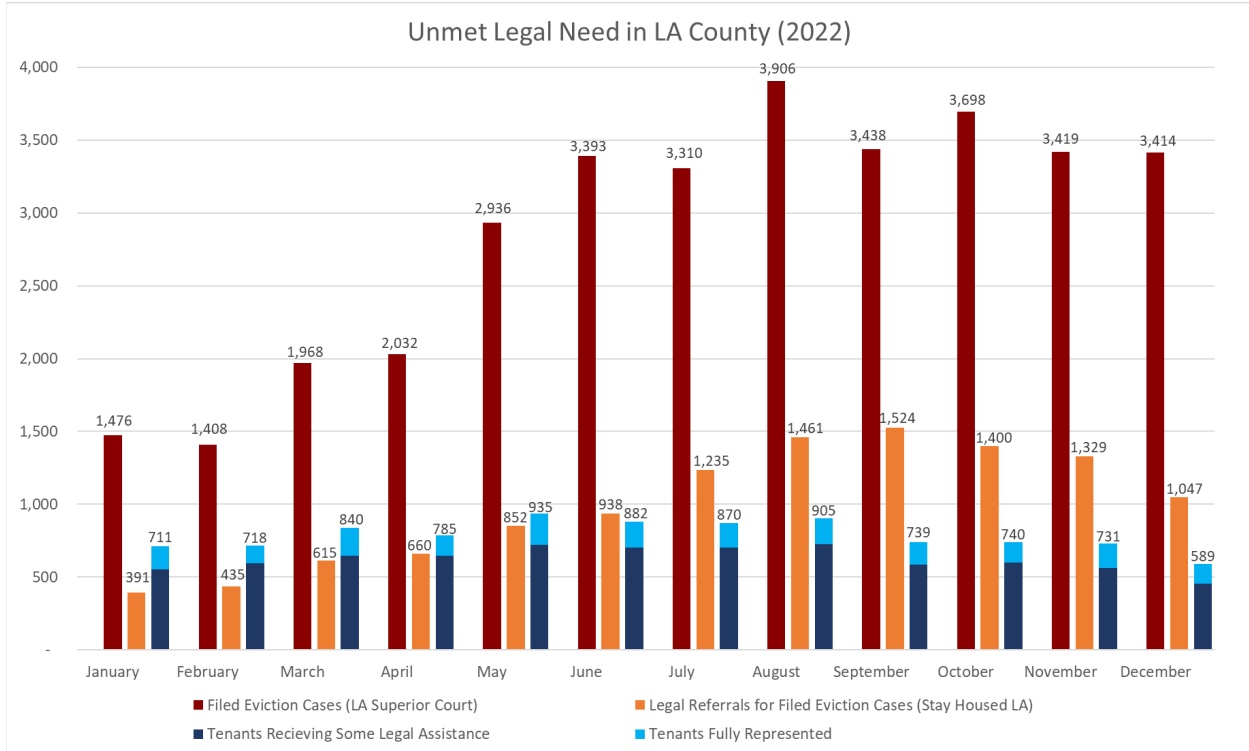
The County currently has permanent tenant protections through the Rent Stabilization and Tenant Protections Ordinance and Mobilehome Rent Stabilization and Mobilehome Owner Protections Ordinance. There are additional local jurisdictions, such as the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, and Santa Monica, that have permanent tenant protections. Additionally, California Assembly Bill 1482 provides some limited additional protections for renters by capping rent increases, requiring just cause for evictions, and providing relocation assistance to tenants who have been evicted due to owner occupancy. Nevertheless, the majority of tenants within Los Angeles County will be more at risk of eviction now that the Resolution has expired.

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<sup>3</sup> <https://file.lacounty.gov/SDSInter/bos/supdocs/0660ce10-253a-43ea-8caa-919aa49009fd.pdf>

<sup>4</sup> <https://doi.org/10.1016/j.lana.2021.100105>

**Chart 1: Eviction Filings in L.A. County and Unmet Legal Need<sup>5</sup>**



As outlined in Chart 1 above, the total number of UD filings countywide in the previous calendar year far exceeded the number of tenants that received some type of legal assistance through SHLA, underscoring the need for the County to continue to invest into and expand the program to stem the growing tide of evictions.

## Legal Representation for Tenants as a Tool to Combat Housing Instability and Homelessness

### *Current Implementation of Stay Housed LA*

Services provided through SHLA are accessible to eligible Los Angeles County tenants living outside the boundaries of the City of Los Angeles, this includes direct tenant outreach, education, legal representation, and short-term rental assistance<sup>6</sup>. However, SHLA intentionally focuses outreach efforts, legal services, and short-term rental assistance to target tenants that live in historically underserved communities with high propensities for evictions and other types of displacement. This strategy emphasizes service delivery efforts to serve the highest need populations and increase equitable

<sup>5</sup> The figures outlined in this chart are Countywide figures which include all 88 cities and unincorporated areas of the County. Legal assistance figures are inclusive of data from the City of LA's eviction defense program, which utilizes the shared Stay Housed LA branding platform.

<sup>6</sup> The County of Los Angeles' eviction defense program originally assisted the City of Los Angeles tenants until the City launched its own program in July of 2021 under the shared branding platform of Stay Housed LA.

access to County services and resources. To help identify these target areas, DCBA utilized a methodology developed by the City of Los Angeles called the Tenant Vulnerability Index (TVI), which identified ZIP codes where tenants are more likely to experience evictions by assigning a composite “vulnerability score” based on the prevalence of certain socio-economic characteristics amongst the residents living in that ZIP code that make them more susceptible to evictions. Examples of the socio-economic characteristics that were used to create the composite vulnerability score for each ZIP code include: (1) the number of rent burdened households; (2) number of households below the federal poverty line; (3) number of Black and Latino households; (4) number of residents that immigrated after 2010; and (5) number of elderly households. DCBA adopted the TVI methodology to identify ZIP codes with high TVI scores in the County’s service delivery area within all five Supervisorial Districts and selected highly vulnerable ZIP codes to target SHLA services (see Appendix B). However, DCBA allows flexibility in assisting tenants in ZIP codes that do not have a high TVI score on a case-by-case basis according to need and capacity.

In addition, the County leverages the cultural and linguistic competencies of its service delivery partners/contractors to provide effective services that are responsive to the needs of a local community or household. To elaborate, the primary contractor subcontracts with community-based non-profit organizations that already work within a targeted, high-need community to conduct door-to-door outreach within apartment buildings and public spaces— such as businesses, schools, churches, etc.—to distribute literature and share information about the program and general tenant rights. This, in turn, drives tenants to participate in legal clinics/workshops and seek legal services if they have received a notice to terminate tenancy.

### *Stay Housed LA Metrics and Milestones*

Since the launch of the first iteration of the program in July of 2020, SHLA has reached several critical implementation milestones and demonstrated success at achieving key goals, as evidenced by the following highlights and metrics from program inception (data current as of February 22, 2023, unless otherwise indicated below):

- Tallied a total of 13.9 million impressions across all virtual platforms, including 8.68 million advertisement views from ads placed across all SHLA digital media platforms and 5.21 million impressions from organic social media on SHLA accounts on Facebook, Twitter, and Instagram<sup>7</sup>
- Delivered 332 media placements on television, radio, print, and online media outlets, including ethnic media<sup>8</sup>

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<sup>7</sup> Metrics from July 2020 through January 2023.

<sup>8</sup> Ibid

- Reached approximately 700,000<sup>9</sup> individuals or households via direct outreach and education efforts, including 974<sup>10</sup> virtual “Know Your Rights” workshops, webinars, legal clinics, and in-person outreach events<sup>11</sup>
- Provided limited legal services and assessments to 15,720<sup>12</sup> tenant households. The following is a breakdown of limited legal services and assessments provided to individuals or households in each Supervisorial District:<sup>13</sup>
  - Supervisorial District 1: 1,059
  - Supervisorial District 2: 1,902
  - Supervisorial District 3: 842
  - Supervisorial District 4: 1,926
  - Supervisorial District 5: 962
- Provided full-scope legal representation to 2,401 tenant households, broken down by Supervisorial District as follows:<sup>14</sup>
  - Supervisorial District 1: 264
  - Supervisorial District 2: 435
  - Supervisorial District 3: 238
  - Supervisorial District 4: 385
  - Supervisorial District 5: 324
- Provided short-term rental assistance<sup>15</sup> to 143 tenant households, totaling \$1,290,326 in financial assistance disbursed (as of January 31, 2023). The breakdown of the total number of households that received short-term rental assistance, by Supervisorial District, is as follows:
  - Supervisorial District 1: 14
  - Supervisorial District 2: 31
  - Supervisorial District 3: 16
  - Supervisorial District 4: 40
  - Supervisorial District 5: 42

For a detailed breakout of other key program metrics, including aggregate demographic information, please reference Appendix C.

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<sup>9</sup> This is the total number of people or households reached via all outreach and education efforts including remote and in-person activities, such as phone banking, text banking and in-person contact.

<sup>10</sup> This metric is an aggregate number consisting of the total number of workshops funded by ARP and City of Long Beach dollars. As mentioned in previous bi-annual reports, City of Long Beach allocated additional funding to Stay Housed L.A. County for specialized eviction defense services to Long Beach residents.

<sup>11</sup> In-person outreach consists of canvassing in neighborhoods and apartment buildings, and in-person workshops, clinics, presentations, and townhalls).

<sup>12</sup> There are 7800 limited scope legal cases accounted for in this metric from previous contracts not tracked in Tableau (our internal data collection system).

<sup>13</sup> The total number of limited legal services and assessments delivered in each Supervisorial District was not tracked prior to March 2022 due to the lack of access of Geographic Information Systems mapping capabilities at the time, so the sum of all of totals by Supervisorial District will not equal the countywide total for limited legal services and assessments.

<sup>14</sup> The total number of full scope legal representation services delivered in each Supervisorial District was not tracked prior to March 2022 due to the lack of access of Geographic Information Systems mapping capabilities at the time, so the sum of all of totals by Supervisorial District will not equal the countywide total for full scope legal representation services.

<sup>15</sup>Rental assistance provided through the Stay Housed L.A. County program is reserved for income eligible households that need financial assistance to settle or resolve a pending unlawful detainer case.

## *Potential Strategies to Enhance Eviction Defense*

### Adoption of a Pay to Stay Policy

“Pay to Stay” ordinances give tenants facing eviction the right to pay their rent in full, including late fees, up until the day of their eviction hearing. In jurisdictions with similar policies, such as Cleveland, Ohio, and Cook County, Illinois, tenants can pay their landlords for all back rent owed up until before having to appear in court, providing tenants with the right to remain in their homes once all financial obligations have been satisfied.<sup>16</sup> Adoption of a Pay to Stay ordinance locally would provide tenants with additional eviction protections against landlords attempting to force tenants out of their units for reasons unrelated to non-payment of rents by intentionally rejecting attempts by tenants to satisfy outstanding financial obligations. However, further research would need to be conducted to better understand how such a policy could be implemented in the County.

### Lawyer for the Day Program

SHLA is not currently able to serve every tenant seeking assistance. While efforts are underway to increase program capacity to serve more tenants, the County must explore other options to meet the need of tenants facing unlawful detainer proceedings. One such option is implementing a County funded “Lawyer for the Day” program in partnership with local legal aid organizations. Such a program would provide populations with limited computer literacy or access with an opportunity to receive in-person legal assistance with a low barrier of entry since lawyers would be on the courthouse premises where legal proceedings take place.

Lawyer for the Day programs, typically administered by a local bar association or legal aid organization, provide tenants with day-of-court basic legal advice, assistance with understanding relevant laws, and assistance with filling out court forms. These day-of-court assistance programs are utilized to help fill a critical service delivery gap for tenants that may not have received any type of legal assistance and are at imminent risk of being evicted. Attorneys assisting tenants through Lawyer for the Day programs do not accompany tenants into the courtroom or establish an attorney-client relationship but are able to assist tenants with information and help equip them to better represent themselves in court.<sup>17</sup> Tenants facing eviction typically lack legal representation throughout the eviction process. In fact, one analysis of County unsealed eviction cases showed that approximately 97 percent of tenants were unrepresented, while landlords were only unrepresented in 12 percent of unsealed cases.<sup>18</sup> During these interventions, tenants may, in addition to assistance with their unlawful detainer cases, be connected to additional financial, legal, or other supportive resources.

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<sup>16</sup> <https://asclev.org/11072021-5/>

<sup>17</sup> <https://www.mass.gov/service-details/lawyer-for-the-day-programs>

<sup>18</sup> [https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report\\_12-10-19.pdf](https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report_12-10-19.pdf)



The County could consider adopting a similar program and draw upon examples in other jurisdictions such as the state of Massachusetts and the city of Allentown, Pennsylvania. The County's Self-Help Legal Access Centers, administered by DCBA, could also be leveraged for this purpose, and integrated into the County's efforts to expand access to justice. It is important to note that implementing a program of this nature would require participation from our local courts and significant ramp up time.

### Access to Unlawful Detainer Data

A major challenge DCBA and its service delivery partners face in effectively targeting program services is the lack of access to unlawful detainer filing data from the LASC system. There is currently no state or local requirement for courts to make detailed eviction-related data publicly available.

The lack of access to reliable eviction data has presented several challenges to local government entities that deliver housing or prevention services. One such challenge is the inability to fully understand where evictions are occurring in the County for the purpose of refining the way in which the current program targets and prioritizes services to the most vulnerable and highest needs communities. As a result, DCBA and its service delivery partners have had to develop workarounds, such as the TVI and the use of the County's Equity Explorer Mapping Tool, as a way of making educated guesses as to the areas to target for eviction prevention services. While these workarounds have been useful in implementation, it would be far more effective to target services based on disaggregated eviction data. In an effort to resolve these challenges, DCBA is currently working with the Chief Executive Office Legislative Affairs and Intergovernmental Relations office to advance California Assembly Bill 875 (AB 875)<sup>19</sup> in the state legislature, which is a County sponsored bill authored by Assembly member Jesse Gabriel that would require local courts to share unlawful detainer data with local government entities implementing eviction defense programs.

## **Lessons Learned: Evaluations of Eviction Defense Programs**

### *Cost-Benefit Analysis of Providing a Right to Counsel to Tenants in Eviction Proceedings*

On December 10, 2019, Stout Risius Ross, LLC (Stout), a private consulting firm specializing in investment banking, valuation advisory, dispute consulting, management consulting, and transaction opinions, published a cost-benefit analysis report<sup>20</sup> for the Los Angeles Right to Counsel Coalition on their proposed Right to Counsel program (RTC) for the City and County of Los Angeles. In this report, Stout estimated that a fully implemented RTC for the service area covered by the County of Los Angeles would cost approximately \$47.3 million a year. The study also estimated that a RTC program would generate a return on investment of approximately \$4.80 for every \$1 invested. In their

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<sup>19</sup> [https://leginfo.ca.gov/faces/billTextClient.xhtml?bill\\_id=202320240AB875](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB875)

<sup>20</sup> [https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report\\_12-10-19.pdf](https://info.stout.com/hubfs/PDF/Eviction-Reports-Articles-Cities-States/Los%20Angeles%20Eviction%20RTC%20Report_12-10-19.pdf)

cost-benefit methodology, Stout quantified the potential costs avoided by the City and County of Los Angeles through significant investments into a RTC program, which included emergency shelter, housing programs, health care, and foster care costs.

Other potential benefits from implementing a RTC program outlined in the Stout report include the following:

- More favorable incomes for tenants;
- Decreased likelihood of shelter entry or living unsheltered;
- Increased housing stability and ability to re-rent, if necessary;
- Decreased impact on employment, credit score and eviction record;
- Decreased impact on physical and mental health of people in eviction proceedings;
- Decreased negative impact on children, including their health, education, and potential future earnings;
- Increased family and community stability;
- Decreased impact on law enforcement; and
- Increased trust in the justice system and civic engagement.

The findings highlighted in the Stout report were used by the Los Angeles Right to Counsel Coalition and DCBA to advocate for the adoption of motions by the Board and the Los Angeles City Council for the implementation of emergency eviction defense programs during the COVID-19 pandemic, resulting in the launch of SHLA in September of 2020. Now, two and a half years after the formal launch of SHLA, the takeaways from the Stout report provide useful context for developing estimated cost projections for the implementation of a RTC program for the unincorporated areas of Los Angeles County and the phasing in universal access to free legal representation throughout all of Los Angeles County by 2030.

### *University of Southern California Mixed Methods Evaluation of the Stay Housed L.A. County Program*

In April 2022, the University of Southern California's Sol Price School of Public Policy (USC Price) produced a report outlining findings from conducting a mixed methods evaluation of the Stay Housed L.A. County program. The County contracted with USC Price to conduct this evaluation of SHLA, which included surveying tenants and landlords, with the aim of producing insights on the regional impact of providing legal services and other eviction supports through SHLA and how program implementation could be improved in the future. The final evaluation report included the following key recommendations to the County on how SHLA implementation could be improved in the future:

- **Improve offline access for disadvantaged populations.** Findings suggest that internet access was a barrier to accessing SHLA support.
- **Reevaluate program targeting.** Respondents from non-targeted neighborhoods reported higher rates of trouble affording the rent and non-renewal of rental

agreements, perhaps because they lived in higher-rent areas with gentrification pressures. Targeting should be based on housing vulnerability with data on eviction rates and rent burden.

- **Continue education efforts on legal assistance for the least advantaged groups.** More disadvantaged populations may not know their rights or know that seeking legal assistance in response to eviction is an option.
- **Continue to target lower resourced communities specifically regarding available legal resources.** Efforts could include workshops and information to landlords that are likely to benefit both landlords and tenants.

Since the production of these recommendations by USC Price, the County and its service delivery partners have worked to refine their outreach and legal service strategies to address the service delivery gaps outlined in the evaluation. DCBA will elaborate on how it plans to continue to close service delivery gaps in the subsequent section titled Recommendations on Closing Service Delivery Gaps.

### *Results for America Advancing Housing Justice: Right to Counsel Sprint Program*

Representatives from DCBA, the City of Los Angeles, and SHLA service providers participated in a national, eight-week program, named the Advancing Housing Justice: Right to Counsel Sprint Program (Sprint Program), dedicated to helping cities and states advance right to counsel programs by sharing best practices and learnings from evaluations conducted on successful programs from across the country. The Sprint Program was organized by Results for America and led by the National Coalition for Civil Right to Counsel (NCCRC), PolicyLink, Heartland Center for Jobs and Freedom, and Red Bridge Strategies. During its participation in the program, DCBA staff received guidance and strategies on how to better design, implement, and sustainability grow SHLA. In addition, DCBA was able to network with other jurisdictions implementing similar eviction defense programs to join the growing coalition of organizations advancing right to counsel programs nationally. Key takeaways for DCBA regarding the future implementation of SHLA include:

- Strategies and best practices for structuring a right to counsel ordinance for unincorporated Los Angeles County that best target vulnerable populations;
- Budgetary and fiscal considerations for the adoption of a right to counsel ordinance for unincorporated Los Angeles County;
- Strategies for expanding and improving existing partnerships with community-based organizations, legal aid organizations, and local courts for more effective implementation of eviction defense services.

### *Feedback from Rental Property Owners*

On February 8, 2023, CEO and DCBA hosted a Rental Property Owner Roundtable to share updates on SHLA implementation and resources available to rental property owners and to solicit feedback on the proposed expansion of the program. Flyers

advertising the feedback session were e-mailed to relevant rental property owner organizations and the meeting agenda was posted on the CEO's agendas website<sup>21</sup>. The meeting was held on the WebEx technology platform and was interactive, allowing attendees to ask live questions and provide comments or submit questions via the Question-and-Answer chat function.

While most of the feedback and questions were related to the Resolution and its impacts on rental property owners, DCBA noted the following key takeaways:

- Direct **financial assistance** should be made available, especially to those who were unable to collect rent during the pandemic to encourage the preservation of non-corporate rental property ownership;
- Additional **supportive services**, including but not limited to the consideration of providing legal support for smaller rental property owners;
- More **outreach** specifically targeted to rental property owners to help them navigate the changing landscape of tenant protections in the region.

## Projected Demand for SHLA Services

The implementation of pandemic era emergency tenant protections and lack of publicly available, disaggregated eviction filing data from the local court system have made it challenging to develop accurate projections of future eviction filings and demand for SHLA services. Eviction filing data in Los Angeles County is only available aggregated at the courthouse level by calendar year, presenting a challenge for making neighborhood or ZIP code level projections which are the most useful type of projections for targeting of services to the most vulnerable populations. Despite this major limitation, SHLA's primary legal services provider, Legal Aid Foundation of Los Angeles (LAFLA), obtained Los Angeles County Sheriff lockout data<sup>22</sup> from 2018 (chosen as the pre-pandemic data baseline due to the quality of data available in this calendar year) to develop a projection of the total expected number of eviction filings by ZIP code in calendar year 2023 and the expected number of households that would seek legal services from SHLA (see Table 1 below). For a full breakdown of the methodology utilized to calculate the total projected UD filings by year and the expected number of households seeking SHLA services, please reference Appendix D.

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<sup>21</sup> <https://ceo.lacounty.gov/agendas/>

<sup>22</sup> LAFLA obtained Sheriff lockout data for calendar years 2000 - 2021 via a Public Records Act request. LAFLA utilized this data to develop estimates of UD filings by ZIP code in 2018 instead of using the actual aggregate total of UDs filed in 2018 because Sheriff lockout data could be disaggregated by ZIP code, which was critical for projecting UD filings by ZIP from 2023 - 2028.

**Table 1: Projected Unlawful Detainer Filings and Demand for SHLA Legal Services in Fiscal Year 2023-24**

<b>Projected FY 2023-24 UD Filings + Households Seeking Legal Services</b>			
<b>Jurisdiction</b>	<b>Total Projected Filings in FY 2023-24</b>	<b>% of County</b>	<b>Projected # of Households Seeking SHLA Services (40% reduction in filings)</b>
City of L.A.	24,850	49.4%	14,900
Unincorporated L.A. County	4,250	8.4%	2,550
Incorporated Cities (Excluding City of L.A.)	21,250	42.2%	12,750
<b>Grand Total</b>	<b>50,350</b>	<b>100%</b>	<b>30,200</b>
<b>County Service Area (Unincorporated Areas + Incorporated Cities)</b>	<b>25,500</b>	<b>50.6%</b>	<b>15,300</b>

The methodology developed by LAFLA for projecting the number of UD filings and the resulting number of households that could potentially seek services from SHLA in 2023 was applied to the following seven years of expected program implementation and is outlined in Table 2 below.

**Table 2: Projected 7-Year Demand for SHLA Legal Services (FYs 2023/24 – 2030/31)**

<b>7-Year Projected Demand for SHLA Legal Services (by # of households)</b>								
<b>Program Year</b>	<b>Year 0</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>	<b>Year 7</b>
<b>Fiscal Year</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>	<b>2027-2028</b>	<b>2028-2029</b>	<b>2029-2030</b>	<b>2030-2031</b>
City of L.A.	14,900	14,900	13,400	12,100	10,850	9,800	9,800	9,800
Unincorporated L.A. County	2,550	2,550	2,300	2,100	1,850	1,650	1,650	1,650
Incorporated Cities (Excluding City of L.A.)	12,750	12,750	11,500	10,300	9,300	8,350	1,650	1,650
<b>Grand Total</b>	<b>30,200</b>	<b>30,200</b>	<b>27,200</b>	<b>24,500</b>	<b>22,000</b>	<b>19,800</b>	<b>19,800</b>	<b>19,800</b>
<b>County Service Area (Unincorporated Areas + Incorporated Cities)</b>	<b>15,300</b>	<b>15,300</b>	<b>13,800</b>	<b>12,400</b>	<b>11,150</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>

-Annual projections assume a 10% reduction in demand for services due to the positive effects of SHLA in reducing eviction filings  
 -The projected demand for SHLA services in Year 0 and Year 1 are identical in Table 2 due to limitations in the applied methodology for projecting the change in demand for SHLA services during those first two years of implementation. The identical figures should not be interpreted to suggest that UD filings and demand for services wouldn't change during those two fiscal years, but that the County and its partners expect demand to remain constant.  
 -In Year 5, the program would expect to see demand to level off and remain constant for subsequent years.  
 -The projected demand for SHLA services during 2023 and all subsequent years is not meant to suggest that the program will have the capacity to meet the expected demand for legal services. The projected figures are meant to provide context what a fully funded program could expect to experience with regards to demand for legal services.

## **Recommendations on Closing Service Delivery Gaps**

Through implementation of SHLA, DCBA and service delivery partners have identified areas of focus as well as programs and proposals that can be leveraged to work towards closing actual or perceived service delivery gaps as the program grows.

### *Prioritization of Legal Assistance Services*

Due to the limited resources allocated to SHLA and the high demand for services, DCBA and its partners have found it necessary to develop a system for prioritizing the delivery of services for tenants that live in very high needs neighborhoods and/or meet certain income thresholds. Until SHLA is a codified right to counsel program with sufficient funding to function at full capacity, the County and its partners will have to prioritize the provision of SHLA services to assist the highest-need tenants living in historically underserved communities. The full scope of SHLA services would still be accessible to tenants living within unincorporated areas and incorporated cities in Los Angeles County, but tenants living in selected ZIP codes from each Supervisorial District would be prioritized to receive legal services and rental assistance based on vulnerability scores, projected eviction filings, and program capacity. A recommended prioritization system for the delivery of legal services and phase-in of targeted ZIP codes will be further expanded upon in the section on Growth projections and Recommendations for Expansion of Stay Housed L.A. County.

### *Recruitment and Retention of Eviction Defense Attorneys*

Since the filing of DCBA's last SHLA bi-annual report,<sup>23</sup> the program has continued to experience capacity challenges due to an overwhelming demand for legal representation. Since May 2022, the program has only been able to assist 62 percent of all legal referrals and intakes received via the program's website and external partners. The capacity issue stems from a shortage of legal aid attorneys that are available to provide legal representation through the program. Additionally, the financial resources currently allocated to the program prevent limit implementation of a sustainable succession and talent management plan and prevent SHLA from hiring more attorneys and growing its pipeline for attorney recruitment and retention.

SHLA is currently working with its legal service provider partners to develop and implement strategies to better prioritize the delivery of legal representation services while additional funding is requested and secured to create a stronger recruitment pipeline for attorneys and other legal support staff. LAFLA is working on creating a recruitment pipeline to offer stipends to law school students and contingent job offers once they pass the Uniform Bar Examination. In addition, LAFLA is currently evaluating the feasibility of working with private attorneys from non-profit incubators to further increase capacity to provide legal representation to tenants. This challenge is not unique to SHLA; this is a

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<sup>23</sup> [https://file.lacounty.gov/SDSInter/bos/bc/1134566\\_2022-12-20Bi-AnnualProgressReportonExpandedEvictionDefenseProgram\\_rc.pdf](https://file.lacounty.gov/SDSInter/bos/bc/1134566_2022-12-20Bi-AnnualProgressReportonExpandedEvictionDefenseProgram_rc.pdf)

common pain point for many of our Access to Justice programs and our Legal Services Providers. Establishing a sustainable succession and talent management plan that supports our Legal Services Providers collectively, offers a unique opportunity to create economies of scale and better support our partners.

### *Increased Outreach in Unincorporated Areas*

Due to the COVID-19 pandemic, the majority of outreach was completed virtually. While necessitated by the health emergency, there is a growing body of data showing that some tenants face barriers to accessing program services if they are primarily or only offered online. As pandemic-era restrictions have begun to lift, there has been a gradual shift to more in-person outreach—but a majority of outreach is still conducted virtually. Now that the COVID-19 state of emergency has ended, SHLA will perform more in-person outreach, which will include regional, in-person workshops, clinics, presentations, townhalls, tabling efforts at public outreach events hosted by other organizations, door-to-door canvassing in apartment buildings, and flyer distribution to major essential businesses (grocery stores, school district offices, medical facilities, etc.)

DCBA is working with its service delivery partners to better target outreach efforts to high needs communities by reviewing current implementation practices and discussing the usage of different data collection measures, including indices developed by service delivery partners—such as LACDA’s TRACT and SAJE’s Owner’s Warning Notification and Information for Tenants (OWN-IT) tools—that better measure housing vulnerability and displacement pressures. Through these exercises, we found that tenants in high-needs unincorporated areas of the County are not accessing SHLA at rates comparable to similarly high-needs areas in incorporated cities. DCBA is working with SLHA service providers on a strategy to expand outreach efforts in the unincorporated areas of the County, including increased door-to-door canvassing in communities with higher densities of rental units, mailers, and in-person events. Additionally, DCBA will continue to leverage the notices of terminations (eviction notices) received from landlords as a requirement of its rent stabilization ordinances to send outreach letters informing tenants in unincorporated areas of the County about SHLA services.

### *Intensive Case Management*

SHLA recommends additional case management to provide ongoing assistance with wraparound services and detailed evaluation of long-term outcomes. The initial stay Housed L.A. County report back<sup>24</sup> recommended case management for up to six months including status checks, continued monitoring of tenants for available services, and financial coaching to reduce debt and build wealth. This additional case management could be provided by community-based organizations in partnership with DCBA programs including Housing & Tenant Protections, Center for Financial Empowerment, Consumer Counseling, Office of Labor Equity, and Office of Immigrant Affairs. To enact such

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<sup>24</sup> [https://file.lacounty.gov/SDSInter/bos/bc/1060189\\_8-26-19BMFromDCBAReExpandingEvictionDefenseSvcs.pdf](https://file.lacounty.gov/SDSInter/bos/bc/1060189_8-26-19BMFromDCBAReExpandingEvictionDefenseSvcs.pdf)



intensive case management, additional resources would need to be allocated to this specific component of the SHLA program.

## **Recommendations on Leveraging Existing Programs and Systems**

The following are examples of programs and initiatives that can be leveraged to provide more seamless service to tenants in the County:

### *LA County Rent Stabilization Program*

In response to the growing rental housing affordability crisis in the region, the County adopted rent stabilization ordinances, the Rent Stabilization and Tenant Protections Ordinance (RSTPO)<sup>25</sup> and the Mobilehome Rent Stabilization and Mobilehome Owner Protections Ordinance (MRSMOPO), administered by DCBA. These ordinances, which took effect April 1, 2020, contain critical protections from unjust rent hikes and evictions without ‘just cause.’ In addition to limiting annual rent increases on applicable units, the RSTPO specifically includes provisions that extend “just cause” eviction protections to tenants in nearly all rental units in unincorporated Los Angeles County. The ordinance also requires landlords to submit to DCBA, within five days after service of a notice of termination on the Tenant, a true and accurate copy of the Landlord’s written notice of termination and proof of such service. As mentioned previously, DCBA has already been able to leverage this information to conduct outreach to tenants who have received notices and may be at risk of eviction.

The ordinances also require rental property and mobilehome park owners in unincorporated County to register their rental units and mobilehome spaces on an annual basis in the County’s Rent Registry (Rent Registry).<sup>26</sup> The Rent Registry was established to house information provided by landlords in compliance with the County’s rent stabilization ordinances, such as changes in tenancies, rental rates, and included amenities, as well as allowing these owners to pay annual registration fees to administer and enforce the program.

As the program matures, there is an opportunity to leverage the information captured through the Rent Registry for the purpose of targeting eviction prevention and other supportive services.

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<sup>25</sup><https://dcba.lacounty.gov/rentstabilizationprogram/>

<sup>26</sup> [https://file.lacounty.gov/SDSInter/bos/bc/1127638\\_2022-07-25ReportonTenantProtectionsLessonsLearned\\_rc.pdf](https://file.lacounty.gov/SDSInter/bos/bc/1127638_2022-07-25ReportonTenantProtectionsLessonsLearned_rc.pdf)



## *Self-Help Legal Access Centers*

The Self- Help Legal Access Centers (SHLAC) are collocated within nine County Courts and provide limited legal information to unrepresented litigants on a variety of issues such as divorce, civil harassment, and debt collection. SHLACs also provide direct assistance to both tenants and landlords who need assistance with issues including, but not limited to: (1) preparation of fee waivers; (2) legal forms to begin or respond to a UD (eviction); (3) COVID-19 declarations; and (4) answers to UDs for tenants. The most recent DCBA Self-Help Access Center quarterly report<sup>27</sup> confirms that unlawful detainers and housing, in general, continue to be highly requested (more than 25 percent) subject matter areas for litigants seeking assistance.

As the initial report back on SHLA implementation recommended presence in and/or near courthouses, the SHLACs present a unique opportunity to leverage service delivery. These centers are designed to provide brief, streamlined interactions with litigants, providing a release valve to SHLA in that it allows tenants to be assisted with more pressing issues (such as filing an answer in response to a UD) as they may be waiting for full-scope legal representation. SHLAC services are delivered by legal service providers who are also a part of the SHLA network, which makes them uniquely qualified to provide appropriate referrals when they identify a tenant who may need a deeper level of assistance.

## *Delete the Divide Initiative*

Delete the Divide (DTD) is an initiative led by the County of Los Angeles Internal Services Department (ISD) to advance digital equity in underserved communities through partnerships, infrastructure investments, and technology resources that empower residents and small businesses.<sup>28</sup> DTD programs currently consists of initiatives to assist specific residents and businesses with affordable internet, installation of communication broadband networks, creating access to technology courses/jobs and small business connections. DCBA can explore leveraging its partnership with ISD to perform targeted SHLA outreach to recipients of DTD services.

## *Rental Housing Habitability and Rental Escrow Account Program (Proposed)*

On April 5, 2022, the Board approved a motion calling for the establishment of a rental housing habitability and rent escrow account program.<sup>29</sup> Recognizing the current patchwork of enforcement processes in place and the challenges it presents for tenants living in substandard living conditions, the motion instructs the Department of Public Health (DPH), in consultation with County Counsel, DCBA, LACDA, the CEO, Department of Public Works (DPW), Department of Regional Planning (DRP), Treasurer and Tax

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<sup>27</sup> [https://file.lacounty.gov/SDSInter/bos/bc/1129868\\_2022-09-12SHLACQuarterlyWorkloadReportNo.25\\_rc.pdf](https://file.lacounty.gov/SDSInter/bos/bc/1129868_2022-09-12SHLACQuarterlyWorkloadReportNo.25_rc.pdf)

<sup>28</sup> <https://www.deletethedivide.org/>

<sup>29</sup> <https://file.lacounty.gov/SDSInter/bos/supdocs/167688.pdf>

Collector (TTC), the Office of the Assessor, and landlord and tenant stakeholders to develop an ordinance to implement a Rental Housing Habitability Program and include a rent escrow account program with a strategy to ensure that properties that enter the program do not remain indefinitely. The motion also directs DPH, DPW, DRP, DCBA, and LACDA to develop a coordinated strategy that includes the integration of case management systems, and to determine types of cross-training in inspection modalities needed among departments.

Should your Board adopt a rental housing habitability ordinance, the implementation of the proposed program and any complementary case management system, could be leveraged to both strengthen tenant protections and to help identify and target eviction prevention services to properties or rental units most vulnerable to displacement.

## **Recommendations for Expansion of Stay Housed L.A. County**

### *Right to Counsel Ordinance for Unincorporated Los Angeles County*

DCBA recommends your Board adopt and implement a Right to Counsel (RTC) ordinance for the unincorporated areas of the County by January of 2025 as the first major step to implementing a countywide universal access program for eviction defense legal services. In general terms, a right to counsel is a guarantee from a local government, established in local law, that all tenants, or a defined class of tenants that meet certain criteria, must be provided legal representation in eviction proceedings.<sup>30</sup> Adoption of a RTC ordinance for the unincorporated areas of the County would establish SHLA as a permanent program, codify services, and would ensure that tenants living in the unincorporated areas of the County have a right to access critical legal defense services if they meet certain eligibility criteria. Eviction defense services have proven to be a critical resource for vulnerable tenants during the pandemic and an effective tool that prevents homelessness. As the County enters the post-COVID-19 era where temporary and emergency tenant protections have expired, codification of a RTC would serve a critical function in preventing displacement and homelessness in the long-term.

Cities across the country are increasingly looking to RTC ordinances to break incessant patterns of unequal representation between tenants and landlords. New York City, San Francisco, Newark, Cleveland, and Philadelphia are among some of the larger jurisdictions that have established the civil right to legal representation for tenants. Early data from those jurisdictions that have enacted RTC legislation have shown significant promise. In New York City, eviction orders are declining five times faster in ZIP codes where the right to an attorney in eviction court has rolled out than in ZIP codes without a right to an attorney.<sup>31</sup> In San Francisco, eviction filings were down 10 percent after a year that the “No Eviction Without Representation Act” ballot measure went into effect, and

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<sup>30</sup> [https://www.aclu.org/sites/default/files/field\\_document/no\\_eviction\\_without\\_representation\\_research\\_brief\\_0.pdf](https://www.aclu.org/sites/default/files/field_document/no_eviction_without_representation_research_brief_0.pdf)

<sup>31</sup> <https://perma.cc/5VPF-QZQV>.

among those tenants facing an eviction filing, 67 percent that received full representation and successfully remained in their homes.<sup>32</sup>

Analysis of SHLA's implementation efforts have revealed that the program would have the capacity to implement a RTC for the unincorporated areas of the County if all County SHLA funding—approximately \$22 million annually—and County funded SHLA legal aid staff were diverted to only focus on serving tenants living in the unincorporated areas of the County as early as 2024. As outlined in Table 3 of the following section, the program would have the capacity to provide full scope legal representation to approximately 2,550 households by Fiscal Year (FY) 2024-25, which would match the estimated demand of 2,550 UD cases per year for implementing a full RTC in the unincorporated areas of Los Angeles County during that same timeframe.

Should the L.A. County Board of Supervisors wish to pursue a RTC ordinance, the scope and focus of the County RTC program would need to be defined (e.g., eligibility criteria, and provision of legal services), and a sustainable funding source for the program would need to be identified. To that end, the newly formed Los Angeles County Affordable Housing Solutions Agency (LACAHS), enacted through the passing of California Senate Bill 679 in September of 2022, would potentially play a key role in developing funding mechanisms for a codified RTC for the unincorporated areas that would complement the funding that the City of Los Angeles would dedicate to eviction defense efforts in their jurisdiction through Measure ULA, which was adopted in November of 2022 (the Homelessness and Housing Solutions Tax). It is important to note that a County RTC ordinance would only codify a tenant's right to legal representation and not the full complement of outreach, education, and rental assistance services currently offered via the program. Accordingly, DCBA recommends that funding be identified to continue to offer the entire suite of SHLA services. In short, DCBA recommends that the Board adopt a RTC Ordinance in the last quarter of calendar year 2024, to become effective in early 2025.

### *Phasing-in Universal Access to Legal Representation Across the County's Service Area*

Should the Board move forward with the adoption and implementation of a RTC for the unincorporated areas of the County and reallocate existing resources to achieve this, tenants living in incorporated jurisdictions currently covered by SHLA would be deprioritized. This would disadvantage vulnerable tenants living in incorporated areas, leaving them to compete for the limited funding resources that would be set aside to help tenants not covered by an RTC ordinance. To achieve Universal Access to Legal Representation (Universal Access) for tenants countywide (outside of the City of Los Angeles, which implements its own, complementary program), where tenants not covered by an RTC ordinance have equitable access to services regardless of where they live, DCBA and its partners would need to scale and grow the capacity of the SHLA program

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<sup>32</sup> <https://www.aclu.org/news/racial-justice/tenants-right-to-counsel-is-critical-to-fight-mass-evictions-and-advance-race-equity-during-the-pandemic-and-beyond>

to meet the demand for services and phase-in the prioritization/delivery of legal services to tenants living in areas not be covered by an RTC ordinance. This phased-in approach would seek to establish Universal Access countywide by FY 2030-31, when the County and its partners anticipate that a consolidated SHLA program would be able to fully meet the total estimated demand for legal representation services across the entire County. Therefore, DCBA recommends that the Board adopt a phased-in approach for implementing a Universal Access program, starting in FY 2023-24, across the entirety of the County’s service delivery area that complements the implementation of an adopted County RTC ordinance. Specifics on the recommended phased-in approach to implementing the RTC and Universal Access program, and projected budget needs, are outlined in the following sections and in Tables 3, 4, and 5 below.

**Table 3: Projected Right to Counsel and Universal Access Phase-in Program Demand and Capacity for Fiscal Years 2023/24 – 2030/31**

Projected SHLA RTC & Universal Access Phase-in Program Demand & Capacity								
County Fiscal Year (FY)	FY 2023-24	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30	FY 2030-31
Program Year	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
<b>Projected County of L.A. Service Area Phase-in Demand &amp; Capacity for Legal Services (by # of UD cases)</b>								
Unincorporated Area Demand	2,550	2,550	2,300	2,100	1,850	1,650	1,650	1,650
Selected Incorporated Area Demand	12,750	12,750	11,500	10,300	9,300	8,350	8,350	8,350
<b>Total County Demand for Legal Services</b>	<b>15,300</b>	<b>15,300</b>	<b>13,800</b>	<b>12,400</b>	<b>11,150</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>
Unincorporated Area Capacity	1,800	2,550	2,300	2,100	1,850	1,650	1,650	1,650
Selected Incorporated Area Capacity	650	650	1,292	2,000	3,150	5,200	6,850	8,350
<b>Total County Service Area Capacity</b>	<b>2,450</b>	<b>3200</b>	<b>3600</b>	<b>4100</b>	<b>5000</b>	<b>6,850</b>	<b>8,500</b>	<b>10,000</b>
Estimated # of Attorneys Needed per FY	49	64	72	82	100	137	170	200
<b>Projected City of L.A. Service Area Phase-in Demand &amp; Capacity (by # of UD cases)</b>								
City Demand for Services	14,900	14,900	13,400	12,100	10,900	9,800	9,800	9,800
City of L.A. Service Area Capacity	1,650	2,550	3,500	4,950	7,500	10,000	10,000	10,000
Estimated # of Attorneys Needed per FY	33	51	70	99	150	200	200	200
<b>Projected Total Countywide Phase-in Demand &amp; Capacity</b>								
Countywide Demand	30,200	30,200	27,200	24,500	22,000	19,800	19,800	19,800
Countywide Capacity	4,100	5,750	7,100	9,050	12,500	16,850	18,500	20,000
Estimated # of Attorneys Needed per FY	82	115	142	181	250	337	370	400
<i>-Year 1 would be the assumed launch year for a RTC in unincorporated L.A. County</i> <i>-Year 7 would be the targeted year for achieving universal access for legal services countywide</i> <i>-Annual projections assume a 10% reduction in demand for legal services due to the positive effects of SHLA in reducing eviction filings</i> <i>-Program capacity based on 50 UD cases per attorney, per fiscal year</i>								

## Programmatic Due Process

Ensuring due process in the development of public programs is important for protecting individual rights, promoting transparency and fairness, and enhancing program effectiveness. Given the lessons learned and the demand for these services, DCBA and County Counsel would need to evaluate and institutionalize the appropriate due processes commensurate with eligibility criteria and codified rights and privileges, should your Board move forward with implementing RTC and Universal Access to Legal Representation.

## Phase in of ZIP Codes

DCBA has worked with LAFLA over the course of the last six months to develop a strategy for prioritizing the delivery of legal services to tenants living in high-needs and vulnerable ZIP codes due to the program's finite resources. The development of such a strategy was necessary to ensure the program best targets the County's resources for maximum impact for vulnerable populations and to help the program scale and grow the capacity necessary to implement an RTC ordinance and a Universal Access program in coming years. SHLA would build off of the current strategy for prioritizing legal services, which focuses on selected ZIP codes within the unincorporated areas of the County and selected Zip codes in incorporated jurisdictions with high tenant vulnerability (see Appendix B for the current list of targeted ZIP codes), to re-prioritize selected ZIP codes in the County in anticipation of the implementation of RTC and Universal Access.

As such, DCBA recommends the phasing in of unincorporated areas and incorporated cities, by ZIP code, as articulated in Appendices D, E, and F, to help achieve full RTC implementation and Universal Access by FY 2030-31.

In FY 2023-24, identified as Program Year 0 in Table 3 (above), DCBA and LAFLA would begin the phase-in by targeting ZIP codes with a significant percentage (at least 15%) of tenants living in an unincorporated area of the County as a first step toward implementing a full RTC. According to projections on demand for legal services in FY 2023-24, there would be approximately 2,550 households from the unincorporated areas seeking services, while SHLA would only have the capacity to assist approximately 1,800 of those households. Due to these capacity constraints, SHLA would not be able to assist every tenant living in an unincorporated area of the County. Thus, it would be imperative that DCBA and its partners start the ZIP code phase-in during Year 0 by prioritizing the highest needs ZIP codes in unincorporated Los Angeles County and include certain high priority ZIP codes in incorporated areas. The remaining ZIP codes in unincorporated areas of the County would be included after the expected launch of RTC in Year 1. The following is a summary of the Year 0 phase in (for details of the specific ZIP codes selected, please reference Appendix E):

- Total Number of ZIP codes prioritized for legal services: 41
- Total Number of UDs covered: 2,450

In FY 2024-25, identified as Program Year 1 and the launch year for RTC, SHLA would incorporate all remaining ZIP codes in unincorporated Los Angeles County not already phased in during Year 0. The Year 1 Phase-in summary is as follows:

- Total Number of additional ZIP codes prioritized for legal services: 70<sup>33</sup>
- Total Number of UDs covered: 3,200

In FY 2025-26, identified as Program Year 2, SHLA would expand ZIP code phase-in to include incorporated cities with high levels of tenant vulnerability. SAJE's OWN-IT tool was utilized to identify ZIP codes with high Tenant Vulnerability Scores for inclusion in the County's phase in during this Program Year (see Appendix D for a full description of SAJE's OWN-IT tool). While the phase-in approach during this Program Year prioritizes SHLA services to certain vulnerable ZIP codes outside of the unincorporated areas of the County (i.e., incorporated cities), legal representation services would still be accessible to all eligible tenants within the County's service area, to the extent there is capacity to serve them.

- Total Number of additional ZIP codes prioritized for legal services: 4
- Total Number of UDs covered: 3,600

In FY 2026-27, identified as Year 3, additional ZIP codes would be added based on vulnerability scores and additional program capacity:

- Total Number of additional ZIP codes selected: 5
- Total Number of UDs covered: 4,100

SHLA would continue adding additional ZIP codes through 2030-31 based on their vulnerability scores until all ZIP codes are phased in in throughout the County's service area to reach full Universal Representation. As DCBA and its partners receive new data on eviction filings and as program capacity increases, DCBA and its partners will adjust this phase-in plan.

## **Projected Implementation Budget**

As highlighted throughout the report, adequately funding SHLA is critical to not only maintaining the current infrastructure and positive impact the program has already made, but to ensure a sustainable expansion. While it is projected that there could be up to 15,300 tenant households that would seek legal representation from SHLA in the County's service delivery area alone by FY 2023-24, current allocated funding would only allow SHLA to provide legal representation to approximately 2,450 tenant households during that same fiscal year (see Tables 4 and 5 below). This demonstrates that even though the County has made significant strides in this space, the need far outweighs capacity.

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<sup>33</sup> 70 is the estimated number of additional ZIP codes that contain measurable number of tenants living in the unincorporated areas of the County.

Given the dynamic variables that must be weighed, Table 4 below details DCBA’s current, Board of Supervisors approved budget allocations for the implementation of SHLA for the current FY and FY 2023-24.

**Table 4: Current Funding Allocations for Stay Housed L.A.**

Current Funding Allocations for Stay Housed L.A.		
Fiscal Year	FY 2022-23	FY 2023-24
Project Year	-	Year 0
Funding Source		
American Rescue Plan Act (ARPA)Tranche I	\$ 12,000,000	\$ -
American Rescue Plan Act (ARPA)Tranche II	\$ -	\$ 18,000,000
Permanent Local Housing Allocation	\$ 7,397,773	\$ -
Supplemental ARPA Tranche I (Rental Assistance)	\$ 2,000,000	\$ -
Emergency Rental Assistance Program (ERAP) II	\$ 1,224,611	\$ -
<b>Total</b>	<b>\$ 22,622,384</b>	<b>\$ 18,000,000</b>

Table 5, below, outlines the projected costs and budget for phasing in the implementation of an RTC ordinance (potentially launching in FY 2024-25) and reaching full Universal Access by FY 2030-31. Of note, the current funding allocations to SHLA already reflect a deficit in investment and implies a larger service gap for FY 2023-24 when juxtaposed with FY 2022-23 and the service levels noted above.

**Table 5: Projected Budget for Phased-in Implementation of a County RTC Ordinance and Universal Access to Legal Representation Program (for FYs 2023/24 – 2030/31)**

Projected Funding Needs for Phased-in Implementation of an RTC & Universal Access Program (FY 2023/24 – 2030/31)								
Fiscal Year	FY 2023-24	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30	FY 2030-31
Program Year	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Projected Demand (by # of UD filings)	15,300	15,300	13,800	12,400	11,150	10,000	10,000	10,000
Projected Capacity (# of represented UD cases)	2450	3200	3,600	4,100	5000	6850	8500	10,000
Legal Services	\$12,287,019	\$16,051,337	\$17,963,975	\$20,420,688	\$25,000,000	\$34,250,000	\$42,500,000	\$50,000,000
Outreach/Education	\$2,457,404	\$3,210,267	\$3,592,795	\$4,084,138	\$5,000,000	\$6,850,000	\$8,500,000	\$10,000,000
Rental Assistance	\$3,600,000	\$3,600,000	\$3,600,000	\$3,600,000	\$3,600,000	\$3,600,000	\$3,600,000	\$3,600,000
Facilities	\$0	\$159,000	\$233,700	\$357,000	\$547,800	\$984,300	\$1,375,300	\$1,739,550
<b>Total</b>	<b>\$18,344,423</b>	<b>\$23,021,423</b>	<b>\$25,419,169</b>	<b>\$28,454,626</b>	<b>\$34,147,800</b>	<b>\$45,684,300</b>	<b>\$55,975,300</b>	<b>\$65,339,550</b>

-The collective projected budget assumes a County Right to Counsel Ordinance begins implementation in FY 2024-25 and reaching full Universal Access by 2030-31

-Annual projections assume a 10% reduction in demand for legal services due to the positive effects of SHLA in reducing eviction filings

-The projected budget for FY 2023-24 (Year 0) was developed using the existing funding allocation from ARPA Tranche 2 (\$18 million)

-The number of represented UD cases during Years 0 – 3 are the number of cases expected from priority ZIP codes

The funding estimates outlined in Table 5 (above) are based on expected costs associated with providing full-scope legal representation to the projected number of represented UD cases, continued outreach and education to tenants, rental assistance, and costs for the procurement of physical office space to support the transition to more in-person services.

## **Next Steps**

DCBA recommends your Board take the following actions:

1. Approve DCBA's proposed implementation framework to:
  - a. Adopt a Right to Counsel (RTC) ordinance for unincorporated Los Angeles County to guarantee legal representation to eligible tenants; and/or
  - b. Phase in the implementation of a Universal Access to Legal Representation program to expand coverage of legal representation services to additional incorporated cities as DCBA scales up program capacity.
2. Direct CEO, in collaboration with Los Angeles County Affordable Housing Solutions Agency (LACAHS), to identify sustainable funding sources for implementation of an RTC ordinance and Universal Access program under the Stay Housed L.A. umbrella to eligible tenants countywide by 2030.

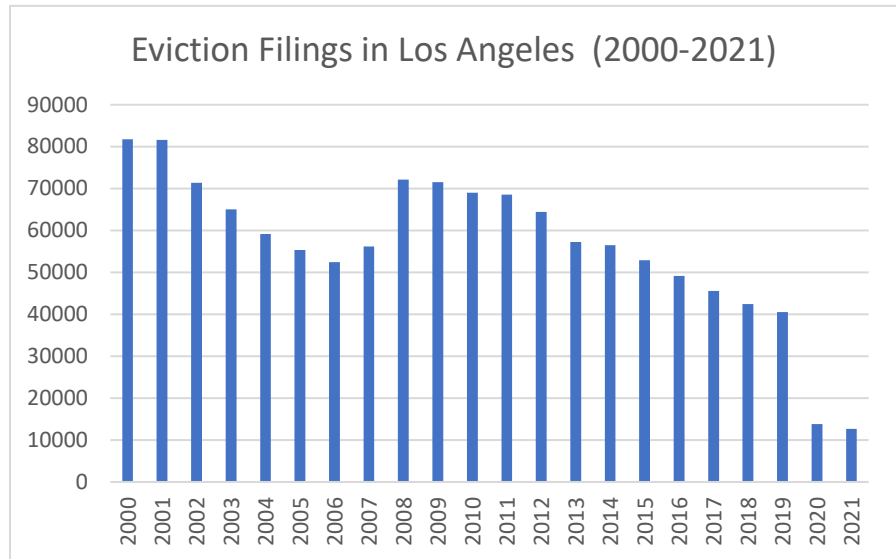
The projections outlined in this report highlight the critical need to adequately fund SHLA to not only maintain the current infrastructure and ensure a sustainable expansion but to meet the current demand for services. Current approved funding levels for FY 2022-23 and FY 2023-24 reflect a deficit in investment and indicate a larger service gap in FY 2023-24 when we take into account the anticipated increase in demand. Accordingly, as your Board evaluates the feasibility of adopting the proposed recommendations, DCBA recommends that the County infuse an additional \$5 million to supplement services in FY 2023-24. In the interim, DCBA will continue providing SHLA services, as currently implemented, and prepare to scale up operations should additional funding and resources be identified. DCBA also plans to make a continued effort to improve SHLA services by (1) leveraging existing County tenant and legal assistance programs to further expand SHLA's reach and effectiveness; and (2) building strategic partnerships with community-based organizations to improve upon and expand SHLA reach in higher needs communities.



## APPENDIX A – Unlawful Detainer (Eviction) Filing Data

### Los Angeles County Superior Court Aggregate Unlawful Detainer (Eviction) Filing Data (Calendar Years 2000 – 2021)

Year	Filings	Monthly Average
2000	81782	6815
2001	81573	6798
2002	71360	5947
2003	65072	5423
2004	59185	4932
2005	55322	4610
2006	52428	4369
2007	56205	4684
2008	72167	6014
2009	71530	5961
2010	68997	5750
2011	68527	5711
2012	64446	5371
2013	57263	4772
2014	56519	4710
2015	52924	4410
2016	49178	4098
2017	45602	3800
2018	42472	3539
2019	40572	3381
2020	13796	1150
2021	12,646	1054



## APPENDIX B – Original Targeted Neighborhoods & ZIP Codes

### Stay Housed LA County Targeted Neighborhoods & ZIP Codes (May 2022 – Present)

Neighborhood/Community + ZIP Code(s)	Supervisory District	Courthouse
<b>Avocado Heights (91746)</b>	1	West Covina
Baldwin Park (91706, 91797)	1	West Covina
<b>Bassett (91746)</b>	1	West Covina
Citrus (91722)	1	West Covina
El Monte (91731, 91732, 91733, 91734, 91735)	1	West Covina
El Monte (91770)	1	Pasadena
<b>Hacienda Heights (90601, 91745)</b>	<b>1</b>	<b>West Covina</b>
<b>Hacienda Heights (90602, 90605)</b>	<b>1</b>	<b>Norwalk</b>
Montebello (90640)	1	Stanley Mosk
Monterey Park (90063, 91754, 91755, 91756)	1	Pasadena
Pomona (91768, 91766, 91767, 91768, 91769, 91799)	1	West Covina
South El Monte (91733)	1	Pasadena
<b>Rowland Heights (91748)</b>	1	West Covina
<b>South San Gabriel (91770)</b>	1	Pasadena
<b>South San Jose Hills (91744)</b>	1	West Covina
<b>Unincorporated Azusa (91702)</b>	1	West Covina
<b>Unincorporated East Los Angeles (90063)</b>	1	Stanley Mosk
<b>Valinda (91744)</b>	1	West Covina
West Covina (91790, 91791, 91792, 91793)	1	West Covina
<b>West Puente Valley (91744)</b>	1	West Covina
Neighborhood/Community	Supervisory District	Courthouse
<b>Athens (90044)</b>	2	Compton
<b>Athens (90047)</b>	2	Inglewood
<b>Athens Village (90061)</b>	2	Compton
Carson (90745, 90746, 90749, 90502)	2	Compton
Carson (90248, 90810)	2	Long Beach
Compton (90220, 90221, 90223, 90224, 90061)	2	Compton
<b>Del Aire (90045, 90250)</b>	2	Inglewood
<b>East Rancho Dominguez (90221)</b>	2	Compton
<b>Florence-Firestone (90001, 90052)</b>	2	Stanley Mosk
<b>Florence-Firestone (90002)</b>	2	Compton
Gardena (90247, 90248)	2	Compton
Gardena (90249)	2	Inglewood
Inglewood (90301, 90302, 90303, 90304, 90305, 90306, 90307, 90308, 90309, 90310, 90311, 90312, 90313, 90397, 90398)	2	Inglewood

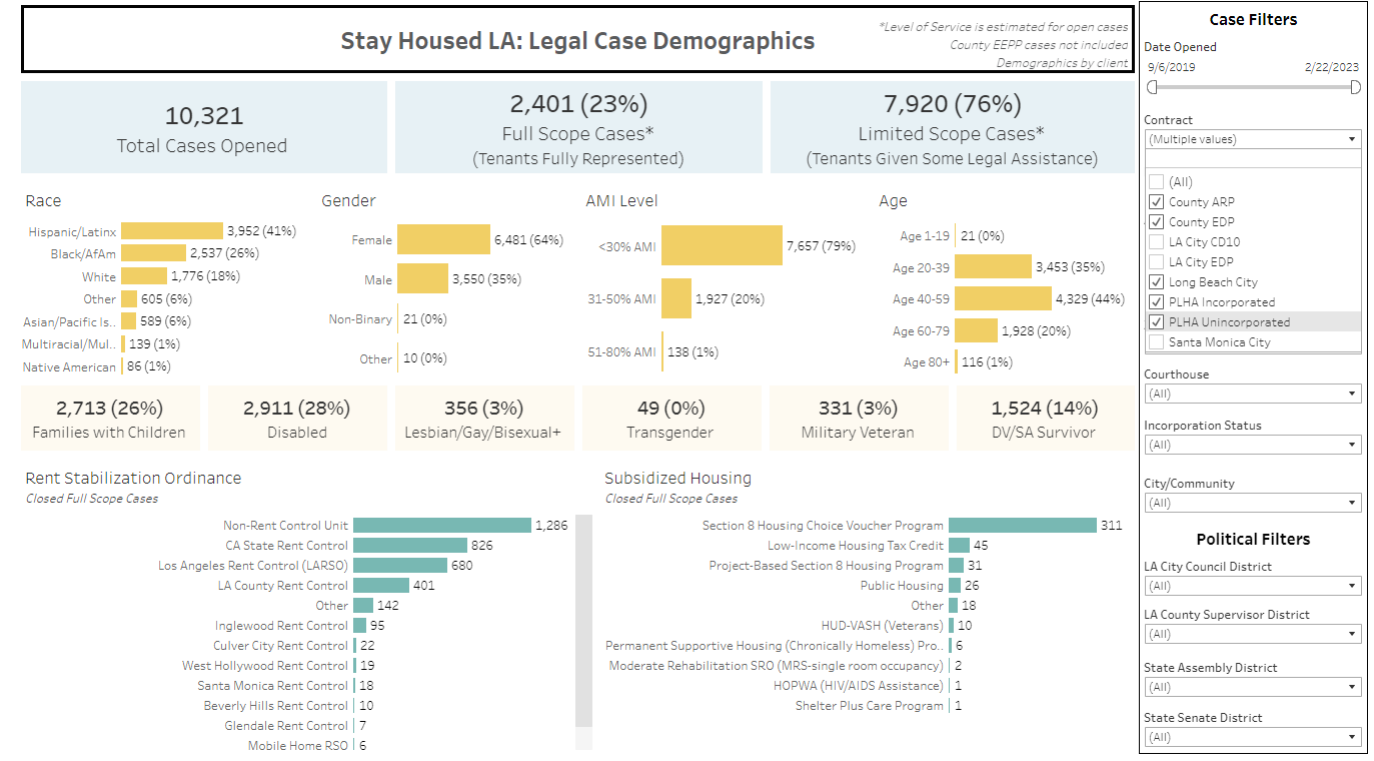
Lawndale (90260, 90261)	2	Inglewood
<b>Lennox (90304)</b>	2	Inglewood
<b>Rancho Dominguez (90220, 90221)</b>	2	Compton
<b>West Athens (90047)</b>	2	Inglewood
<b>West Rancho Dominguez (90059, 90220, 90248)</b>	2	Compton
<b>West Carson (90502)</b>	2	Compton
<b>Westmont (91766)</b>	2	West Covina
<b>Willowbrook (90059, 90222)</b>	2	Compton
<b>Wiseburn (90250)</b>	2	Inglewood
<b>Neighborhood/Community</b>	<b>Supervisory District</b>	<b>Courthouse</b>
<b>Topanga Canyon (90290)</b>	3	Santa Monica
<b>Unincorporated San Fernando (91340, 91341, 91342)</b>	3	Chatsworth
<b>West Chatsworth (91311, 91313)</b>	3	Chatsworth
<b>Neighborhood/Community</b>	<b>Supervisory District</b>	<b>Courthouse</b>
Artesia (90701, 90702, 90703)	4	Norwalk
Bell (90040)	4	Stanley Mosk
Bell (90096, 90201, 90202)	4	Norwalk
Bellflower (90706, 90707)	4	Norwalk
Bell Gardens (90040)	4	Stanley Mosk
Bell Gardens (90103, 90201, 90202)	4	Norwalk
Cudahy (90201)	4	Norwalk
Downey (90239, 90240, 90241, 90242)	4	Norwalk
<b>East La Mirada (90604)</b>	4	Norwalk
Hawaiian Gardens (90716)	4	Norwalk
Huntington Park	4	Norwalk
Long Beach (90840, 90801, 90802, 90803, 90804, 90805, 90806, 90807, 90808, 90809, 90810, 90813, 90814, 90815, 90822, 90832, 90834, 90835, 90842, 90844, 90845, 90847, 90848, 90853, 90888, 90899, 90846, 90831)	4	Long Beach
<b>Los Nietos (90670)</b>	4	Norwalk
Lynwood (90002, 90262)	4	Norwalk
Maywood (90270)	4	Norwalk
North Long Beach (90805)	4	Norwalk
Norwalk (90650, 90651, 90652, 90659)	4	Norwalk
Paramount (90723)	4	Compton
South Gate (90280)	4	Norwalk
<b>South Whittier (90604)</b>	4	Norwalk
<b>Walnut Park (90255)</b>	4	Norwalk
<b>West Whittier (90606)</b>	4	Norwalk

Neighborhood/Community	Supervisory District	Courthouse
<b>Altadena (91001, 91003)</b>	5	Chatsworth
<b>Charter Oak (91724)</b>	5	West Covina
<b>Del Sur (93534)</b>	5	Antelope Valley
<b>Duarte (91008, 91009, 91010)</b>	5	Pasadena
Glendale (91020, 91201, 91202, 91203, 91204, 91205, 91206, 91207, 91208, 91209, 91214, 91221, 91222, 91224, 91225, 91226, 91210)	5	Pasadena
<b>Hi Vista (93535)</b>	5	Antelope Valley
<b>Juniper Hills (93543)</b>	5	Antelope Valley
<b>Lake Los Angeles (93535, 93550, 93591)</b>	5	Antelope Valley
<b>Lakeview (93550)</b>	5	Antelope Valley
Lancaster (93534, 93535, 93536, 93539, 93584, 93586)	5	Antelope Valley
<b>Llano (93544)</b>	5	Antelope Valley
Palmdale (93550, 93551, 93590, 93591, 93599)	5	Antelope Valley
Pasadena (91001, 91011, 91101, 91102, 91103, 91104, 91105, 91106, 91107, 91108, 91109, 91110, 91114, 91115, 91116, 91117, 91121, 91123, 91124, 91126, 91129, 91131, 91175, 91182, 91184, 91185, 91186, 91187, 91188, 91189, 91191)	5	Pasadena
<b>Pearblossom (93553)</b>	5	Antelope Valley
<b>Quartz Hill (93536)</b>	5	Antelope Valley
<b>Redman (93535)</b>	5	Antelope Valley
<b>Roosevelt (93535)</b>	5	Antelope Valley
<b>Sun Village (93552)</b>	5	Antelope Valley
<b>Valyermo (93563)</b>	5	Antelope Valley
<b>Wilsona Gardens (93535)</b>	5	Antelope Valley

\***Bolded** neighborhoods represent high-risk and high-need areas in unincorporated Los Angeles County that were especially targeted for SHLA services as part of the service delivery agreements executed in May of 2022.

# APPENDIX C – SHLA Metrics and Milestones

## Stay Housed L.A. County: Legal Case Demographics (September 6, 2019 – February 22, 2023)



# Stay Housed L.A. County: Rental Assistance (May 19, 2021 – January 31, 2023)

Stay Housed LA: Rental Assistance			
Invoiced Applications			
<b>Applications</b>	<b>Assistance</b>	<b>\$1,290,326</b> Total Assistance	<b>Demographics</b>
143 Invoiced Applications	6.7 Average Months	\$9,023 Average Assistance	Black: 44 Hispanic/Latinx: 37 White: 16 Asian/Pacific Islan...: 6 Other: 5 Multiracial: 1  Disabled: 29 DV/SA Survivor: 29 Transgender: 0 Veteran: 2 Subsidized Housing: 19 Rent Stabilized: 20  Female: 93 Male: 27

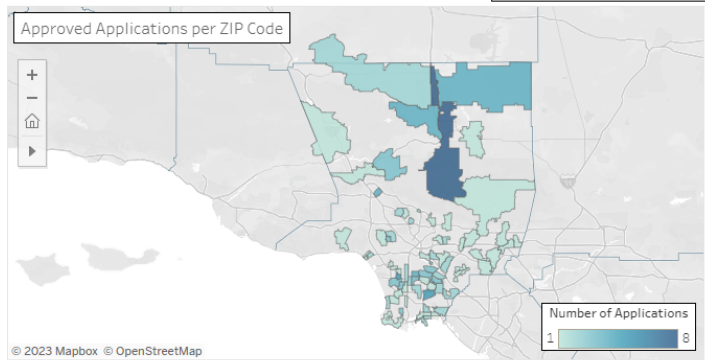
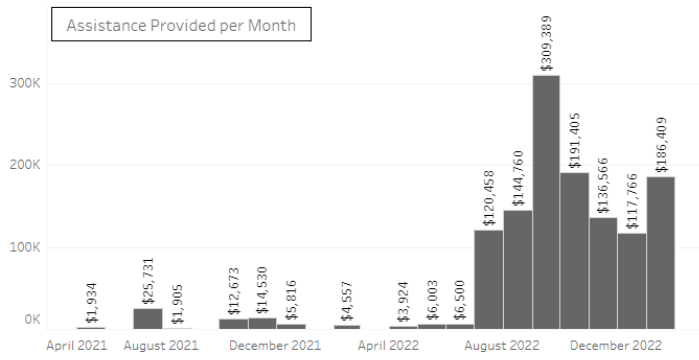
**Filters**

Contract: (Multiple values) [v]

Date: 5/19/2021 to 1/31/2023 [range]

Age: 21 to 89 [range]

Supervisor District: (All) [v]



## **APPENDIX D – Legal Aid Foundation of Los Angeles Right to Counsel ZIP Code Prioritization Methodology**

### **Right to Counsel Phase-In: ZIP Code Prioritization Methodology**

The purpose of this analysis is to create a phase-in plan for a right to counsel in Los Angeles County through the Stay Housed LA program. Phase-in will be conducted by ZIP codes and prioritized based on vulnerability, projected eviction filings, and Stay Housed LA program capacity.

This document outlines the data sources, calculations, assumptions, and selection process used to create the ZIP code phase-in plan for the City and the County.

### **Vulnerability**

Strategic Actions for a Just Economy (SAJE) [OWN-IT](#) tool calculates the displacement vulnerability for each ZIP code as a single composite score. This composite score includes: (1) renter population score, (2) non-white renter population score, (3) renter cost burden score, (4) owner cost burden score, (5) long-time renter score, (6) median income score, and (7) unemployment score. The composite score ranges from 1-78.

Additionally, the City conducted its own analysis of ZIP code vulnerability. The analysis used Emergency Rental Assistance Program (ERAP) application approvals and housing vulnerability indices to identify Census tracts with high vulnerability and low approvals. From this analysis, the City selected 60 priority ZIP codes. The City's chosen ZIP codes align with high scoring ZIP codes from OWN-IT. The City has expressed interest in using OWN-IT going forward as a tool for measuring vulnerability. For the prioritization, the OWN-IT score is used as the primary vulnerability metric to prioritize ZIP codes.

### **Political Jurisdictions**

Currently, eviction filing information is only available aggregated at the countywide level. To plan for implementation funding, it is critical to understand the distribution of evictions among City of Los Angeles residents, unincorporated residents, and residents of other incorporated cities. Furthermore, it is necessary to understand this distribution within each ZIP code, where several jurisdictions often overlap.

The [LA County Parcels](#) file was used to calculate the percentage of unincorporated, incorporated, and City of Los Angeles rental units within a ZIP code. First, the parcels were filtered for residential parcels without a homeowner tax exemption to create a dataset of all rental parcels. Each parcel has information about the city, ZIP code, and number of units, which was used to add up the number of rental units for each jurisdiction. This results in a percentage of rental units that are unincorporated, City of Los Angeles, and other cities for each ZIP code. Overall, 50 percent of rental units are for Los Angeles City, 8 percent are unincorporated, and 42 percent are in other cities.

Furthermore, it is necessary to understand which City Council Districts and Supervisor Districts the ZIP code crosses for political considerations of the phase-in plan. Using shapefiles for [Los Angeles City Council Districts](#) (2021) and [Los Angeles County Supervisor District](#) (2021), the primary and secondary districts were calculated by area.

## Eviction Filing Projections

Eviction filing data in Los Angeles County is only available aggregated at the Courthouse level, presenting a challenge for ZIP code level projections. However, a ZIP code level dataset of Sheriff’s Lockouts is available for 2009-2022 (acquired through a Public Records Act request from LA County Superior Court, which can be used to estimate the number of filings.

First, ZIP code level lockouts in 2018 were used to estimate the total number of filings. Using a partial dataset of actual 2018 filings, the lockout/filing ratio was calculated as 0.50 (approximately half of eviction filings result in a lockout). This ratio is consistent with historic data for Los Angeles County. Applying this ratio to 2018 lockouts results in an estimated number of eviction filings for each ZIP code in 2018.

Pandemic era protections end at the beginning of 2023 and make it challenging to predict how many evictions will be filed in 2023. To estimate the number of eviction filings, LAFLA assumes a 25 percent increase in 2018 filings. This estimate assumes that filings will return to pre-pandemic levels, plus an initial spike due to pandemic-era eviction protections ending. This results in an estimate of 50,000 eviction filings in 2023 in the entire county.

To estimate the number of tenants with an eviction who come to the Stay Housed LA program, we reduce the 2023 estimated filings by 40 percent. This reduction accounts for defaults, move-outs, ineligible tenants, and tenants who otherwise do not come to Stay Housed LA. This results in an estimated 30,000 households with pending evictions seeking services from Stay Housed LA in 2023.

To project annual demand for Stay Housed L.A. services over the seven-year phase-in period, a 10 percent yearly reduction is applied to account for the effects of the program. The chart below shows projected number of households experiencing an eviction that would potentially seek SHLA by jurisdiction over the next seven years. (The breakdown by jurisdiction was found using the percentages calculated in a previous step).

7-Year Projected Demand for SHLA Legal Services (by # of households)								
Program Year	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Fiscal Year	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
City of L.A.	14,900	14,900	13,400	12,100	10,850	9,800	9,800	9,800
Unincorporated L.A. County	2,550	2,550	2,300	2,100	1,850	1,650	1,650	1,650



Incorporated Cities (Excluding City of L.A.)	12,750	12,750	11,500	10,300	9,300	8,350	1,650	1,650
<b>Grand Total</b>	<b>30,200</b>	<b>30,200</b>	<b>27,200</b>	<b>24,500</b>	<b>22,000</b>	<b>19,800</b>	<b>19,800</b>	<b>19,800</b>
<b>County Service Area (Unincorporated Areas + Incorporated Cities)</b>	<b>15,300</b>	<b>15,300</b>	<b>13,800</b>	<b>12,400</b>	<b>11,150</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>

-Annual projections assume a 10% reduction in demand for services due to the positive effects of SHLA in reducing eviction filings  
 -The projected demand for SHLA services in Year 0 and Year 1 are identical in Table 2 due to limitations in the applied methodology for projecting the change in demand for SHLA services during those first two years of implementation. The identical figures should not be interpreted to suggest that UD filings and demand for services wouldn't change during those two fiscal years, but that the County and its partners expect demand to remain constant.  
 -In Year 5, the program would expect to see demand to level off and remain constant for subsequent years.  
 -The projected demand for SHLA services during 2023 and all subsequent years is not meant to suggest that the program will have the capacity to meet the expected demand for legal services. The projected figures are meant to provide context what a fully funded program could expect to experience with regards to demand for legal services.

## Program Capacity

Current program capacity is calculated using the existing number of attorneys in the program, assuming 50 UD/attorney each year (see Year 0 on the chart for existing capacity). For the County, capacity for the first three years is determined by need in the selected ZIP codes, then scales up for to a full RTC by Year 7. City program expansion begins in FY 2024-25 and increases steadily each year until full RTC in Year 5.

The goal is to increase program capacity to handle 20,000 evictions a year, as shown in the seven-year UD projection. Evictions are split evenly between the City and County, based on the jurisdiction percentages calculated previously.

Projected SHLA RTC & Universal Access Phase-in Program Demand & Capacity								
County Fiscal Year (FY)	FY 2023-24	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30	FY 2030-31
Program Year	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
<b>Projected County of L.A. Service Area Phase-in Demand &amp; Capacity for Legal Services (by # of UD cases)</b>								
Unincorporated Area Demand	2,550	2,550	2,300	2,100	1,850	1,650	1,650	1,650
Selected Incorporated Area Demand	12,750	12,750	11,500	10,300	9,300	8,350	8,350	8,350
<b>Total County Demand for Legal Services</b>	<b>15,300</b>	<b>15,300</b>	<b>13,800</b>	<b>12,400</b>	<b>11,150</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>
Unincorporated Area Capacity	1,800	2,550	2,300	2,100	1,850	1,650	1,650	1,650
Selected Incorporated Area Capacity	650	650	1,292	2,000	3,150	5,200	6,850	8,350
<b>Total County Service Area Capacity</b>	<b>2,450</b>	<b>3200</b>	<b>3600</b>	<b>4100</b>	<b>5000</b>	<b>6,850</b>	<b>8,500</b>	<b>10,000</b>
Estimated # of Attorneys Needed per FY	49	64	72	82	100	137	170	200
<b>Projected City of L.A. Service Area Phase-in Demand &amp; Capacity (by # of UD cases)</b>								
City Demand for Services	14,900	14,900	13,400	12,100	10,900	9,800	9,800	9,800
City of L.A. Service Area Capacity	1,650	2,550	3,500	4,950	7,500	10,000	10,000	10,000

Estimated # of Attorneys Needed per FY	33	51	70	99	150	200	200	200
<b>Projected Total Countywide Phase-in Demand &amp; Capacity</b>								
<b>Countywide Demand</b>	<b>30,200</b>	<b>30,200</b>	<b>27,200</b>	<b>24,500</b>	<b>22,000</b>	<b>19,800</b>	<b>19,800</b>	<b>19,800</b>
<b>Countywide Capacity</b>	<b>4,100</b>	<b>5,750</b>	<b>7,100</b>	<b>9,050</b>	<b>12,500</b>	<b>16,850</b>	<b>18,500</b>	<b>20,000</b>
<b>Estimated # of Attorneys Needed per FY</b>	<b>82</b>	<b>115</b>	<b>142</b>	<b>181</b>	<b>250</b>	<b>337</b>	<b>370</b>	<b>400</b>
<i>-Year 1 would be the assumed launch year for a RTC in unincorporated L.A. County</i> <i>-Year 7 would be the targeted year for achieving universal access for legal services countywide</i> <i>-Annual projections assume a 10% reduction in demand for legal services due to the positive effects of SHLA in reducing eviction filings</i> <i>-Program capacity based on 50 UD cases per attorney, per fiscal year</i>								

## Selecting ZIP Codes

The information calculated in the previous steps was compiled into an Excel spreadsheet to use for ZIP code selection.

The spreadsheet was first sorted by vulnerability, so the most vulnerable ZIP codes were at the top. The implementation committee then selected ZIP codes for Year 0, Year 1, and Year 2 based on the number of projected evictions, until the number of UDs in selected ZIP codes equaled program capacity for that year. Also considered was the share of unincorporated tenants in a ZIP code and ensuring that each council district and supervisor district had at least one ZIP code.

ZIP codes were only selected through Year 3 of the program. At that point, program capacity and need will be reassessed and a phase-in plan for the remaining ZIP codes will be created.

<b>County Phase-In Summary</b>				
<b>Supervisory District</b>	<b>Year 0</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>
1	91745, 91749, 90022, 91724, 91722, 91746, 90063, 91744, 90601, 91775	Add remaining 7,252 unincorporated tenants		
2	90001, 90222, 90002, 90221, 90502, 90056, 90304, 90044, 90220	Add remaining 4,126 unincorporated tenants		90303, 90301
3	90290	Add remaining 1,706 unincorporated tenants		
4	90605, 90601, 90630, 90604, 90606	Add remaining 2,372 unincorporated tenants	90201, 90262, 90255, 90270	90813, 90280
5	91775, 93544, 91381, 93243, 93532, 93553, 93510, 93563, 93543, 91384, 93591, 91001, 91020, 91241, 91390, 90608, 91310, 93590	Add remaining 13,715 unincorporated tenants		91201

## APPENDIX E – ZIP Code Phase-In Justification Table

Justification Table

This table summarizes why each ZIP code was chosen for the phase-in. See above for more detail.

ZIP Code	Supervisor District	Percent Unincorporated	Vulnerability Score	Phase-In Year	Justification
90605	4	63.0%	44	Year 0	Significant percentage of unincorporated tenants
90222	2	52.8%	70	Year 0	Significant percentage of unincorporated tenants
91748	1	99.9%	45	Year 0	Significant percentage of unincorporated tenants
90221	2	23.7%	68	Year 0	Significant percentage of unincorporated tenants
90002	2	30.6%	75	Year 0	Significant percentage of unincorporated tenants
91722	1	46.3%	39	Year 0	Significant percentage of unincorporated tenants
91745	1	100.0%	32	Year 0	Significant percentage of unincorporated tenants
90001	2	78.3%	71	Year 0	Significant percentage of unincorporated tenants
90022	1	98.3%	62	Year 0	Significant percentage of unincorporated tenants
91724	1	47.3%	36	Year 0	Significant percentage of unincorporated tenants
90601	4, 1	27.6%	37	Year 0	Significant percentage of unincorporated tenants
91775	5, 1	61.6%	34	Year 0	Significant percentage of unincorporated tenants
91746	1	77.4%	49	Year 0	Significant percentage of unincorporated tenants
90063	1	72.7%	59	Year 0	Significant percentage of unincorporated tenants
91744	1	61.0%	45	Year 0	Significant percentage of unincorporated tenants

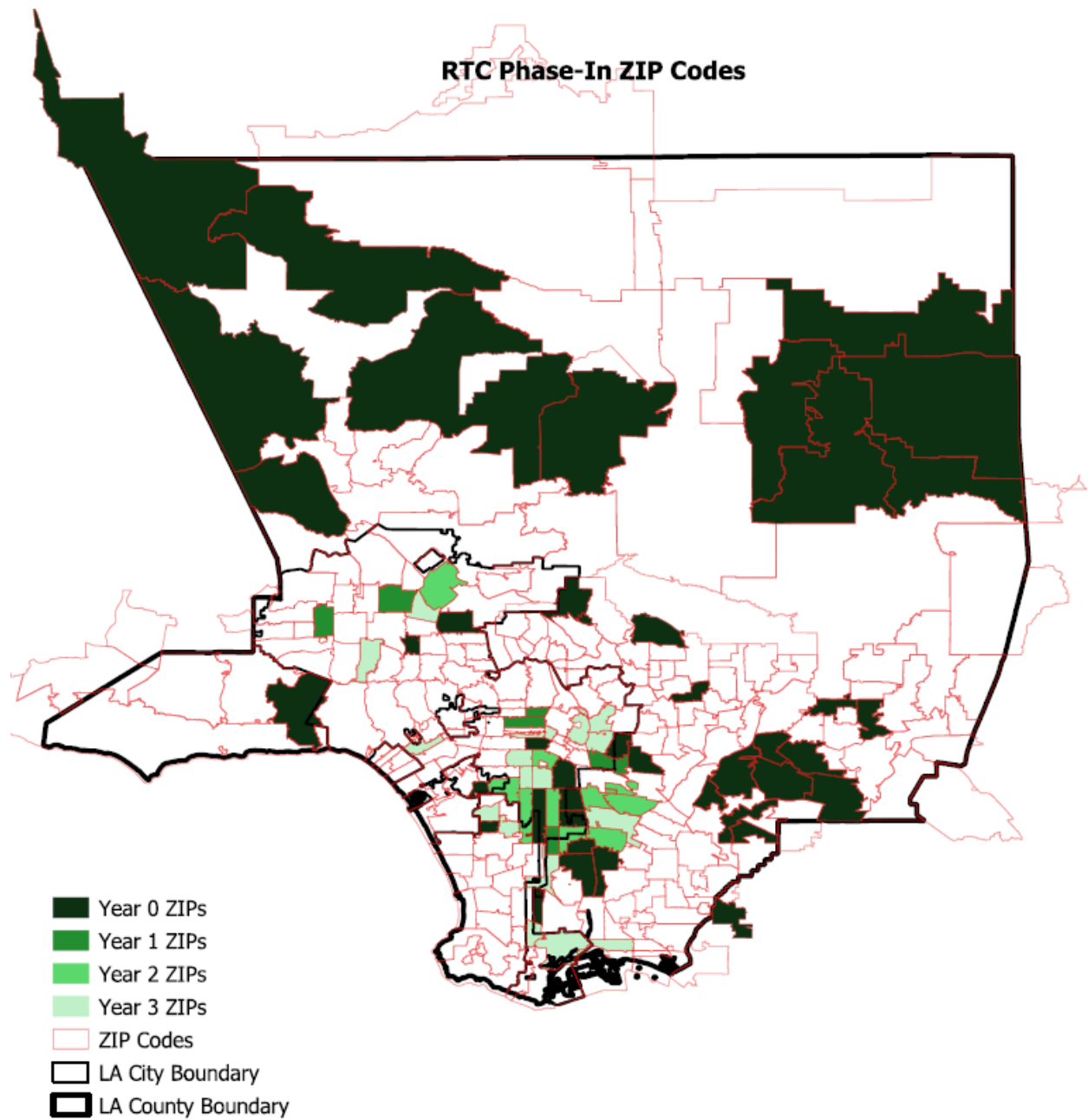
90502	2	100.0%	29	Year 0	Significant percentage of unincorporated tenants
90056	2	90.3%	53	Year 0	Significant percentage of unincorporated tenants
90304	2	83.7%	68	Year 0	Significant percentage of unincorporated tenants
90044	2	30.8%	74	Year 0	Significant percentage of unincorporated tenants
90220	2	16.5%	60	Year 0	Significant percentage of unincorporated tenants
90290	3	98.3%	22	Year 0	Significant percentage of unincorporated tenants
90630	4	100.0%	N/A	Year 0	Significant percentage of unincorporated tenants
90604	4	96.9%	37	Year 0	Significant percentage of unincorporated tenants
90606	4	79.7%	43	Year 0	Significant percentage of unincorporated tenants
93544	5	100.0%	44	Year 0	Significant percentage of unincorporated tenants
91381	5	100.0%	39	Year 0	Significant percentage of unincorporated tenants
93243	5	100.0%	39	Year 0	Significant percentage of unincorporated tenants
93532	5	100.0%	38	Year 0	Significant percentage of unincorporated tenants
93553	5	100.0%	37	Year 0	Significant percentage of unincorporated tenants
93510	5	100.0%	26	Year 0	Significant percentage of unincorporated tenants
93563	5	100.0%	17	Year 0	Significant percentage of unincorporated tenants
93543	5	99.9%	46	Year 0	Significant percentage of unincorporated tenants

91384	5	99.9%	27	Year 0	Significant percentage of unincorporated tenants
93591	5	99.7%	46	Year 0	Significant percentage of unincorporated tenants
91001	5	98.7%	39	Year 0	Significant percentage of unincorporated tenants
91020	5	77.3%	52	Year 0	Significant percentage of unincorporated tenants
91214	5	42.8%	31	Year 0	Significant percentage of unincorporated tenants
91390	5	36.8%	N/A	Year 0	Significant percentage of unincorporated tenants
90608	N/A	100.0%	N/A	Year 0	Significant percentage of unincorporated tenants
91310	N/A	100.0%	N/A	Year 0	Significant percentage of unincorporated tenants
93590	N/A	100.0%	N/A	Year 0	Significant percentage of unincorporated tenants
90006	2	0.0%	72	Year 0	City of LA Phase-In
90011	2	0.0%	78	Year 0	City of LA Phase-In
91605	3	0.0%	64	Year 0	City of LA Phase-In
91411	3	0.0%	58	Year 0	City of LA Phase-In
90023	1	35.7%	68	Year 1	City of LA Phase-In
90029	1	0.0%	67	Year 1	City of LA Phase-In
90061	2	36.1%	66	Year 1	City of LA Phase-In
90004	2	0.0%	60	Year 1	City of LA Phase-In
91343	3	0.0%	59	Year 1	City of LA Phase-In
91306	3	0.0%	58	Year 1	City of LA Phase-In
90262	4	0.0%	70	Year 2	Highly vulnerable ZIP code in an incorporated city
90255	4	20.8%	70	Year 2	Highly vulnerable ZIP code in an incorporated city

90201	4	0.0%	71	Year 2	Highly vulnerable ZIP code in an incorporated city
90270	4	0.0%	71	Year 2	Highly vulnerable ZIP code in an incorporated city
90059	2	38.0%	71	Year 2	City of LA Phase-In
90043	2	21.5%	65	Year 2	City of LA Phase-In
90007	2	0.0%	70	Year 2	City of LA Phase-In
90003	2	0.0%	75	Year 2	City of LA Phase-In
90047	2	27.7%	64	Year 2	City of LA Phase-In
91331	3	0.0%	62	Year 2	City of LA Phase-In
90280	4	0.0%	67	Year 3	Highly vulnerable ZIP code in an incorporated city
90303	2	0.0%	64	Year 3	Highly vulnerable ZIP code in an incorporated city
90301	2	0.0%	63	Year 3	Highly vulnerable ZIP code in an incorporated city
90813	4	0.0%	69	Year 3	Highly vulnerable ZIP code in an incorporated city
91201	5	0.0%	62	Year 3	Highly vulnerable ZIP code in an incorporated city
90057	1	0.0%	69	Year 3	City of LA Phase-In
90033	1	0.0%	66	Year 3	City of LA Phase-In
90031	1	0.0%	65	Year 3	City of LA Phase-In
90012	1	0.0%	60	Year 3	City of LA Phase-In
90037	2	0.0%	75	Year 3	City of LA Phase-In
90005	2	0.0%	63	Year 3	City of LA Phase-In
90018	2	0.0%	67	Year 3	City of LA Phase-In
90062	2	0.0%	61	Year 3	City of LA Phase-In
91402	3	0.0%	69	Year 3	City of LA Phase-In
91316	3	0.0%	46	Year 3	City of LA Phase-In

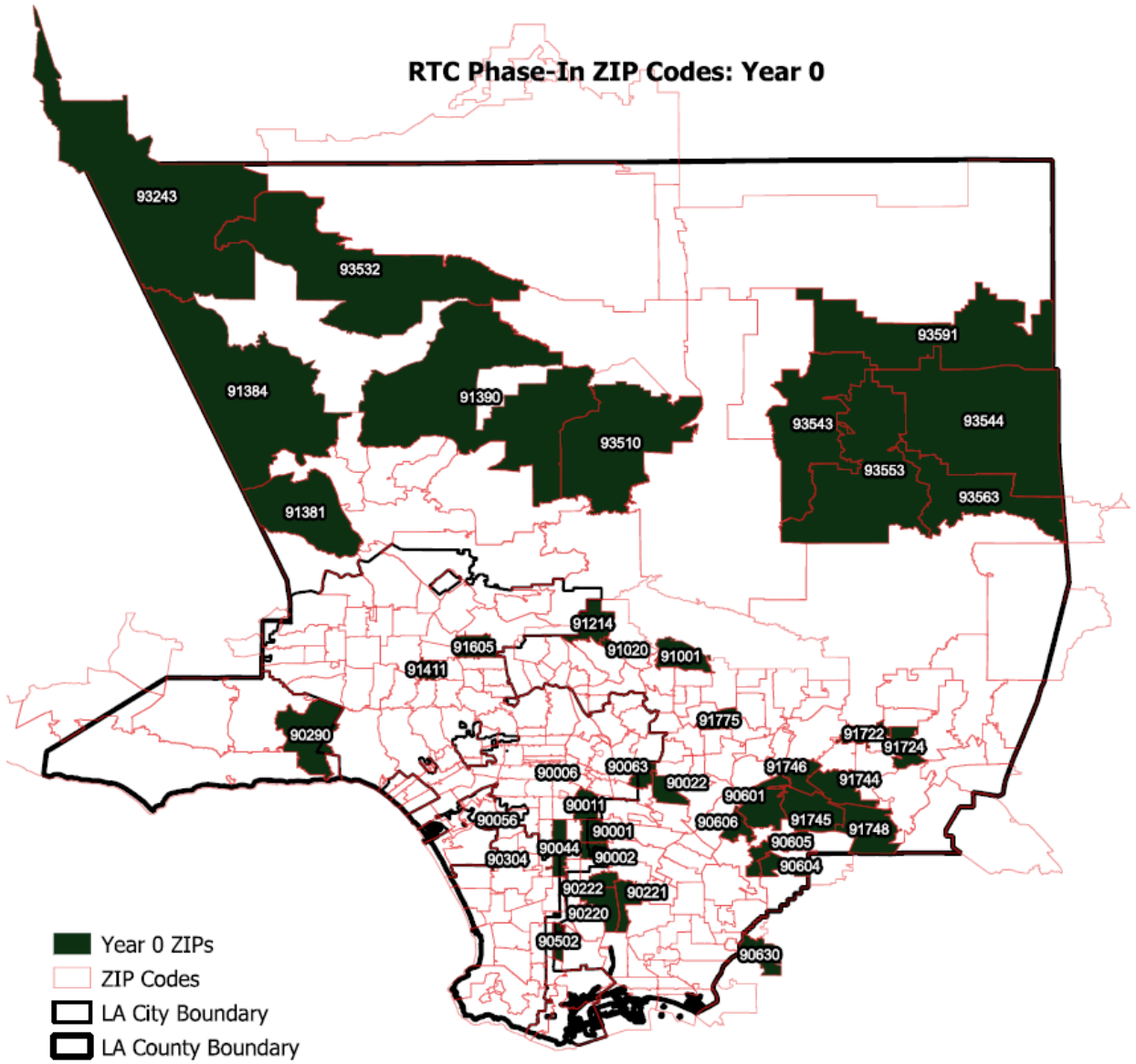
90025	3	0.0%	36	Year 3	City of LA Phase-In
90710	4	12.9%	56	Year 3	City of LA Phase-In
90744	4	0.0%	68	Year 3	City of LA Phase-In

## APPENDIX F – Right to Counsel Phase-In ZIP Code & Tenant Vulnerability Maps



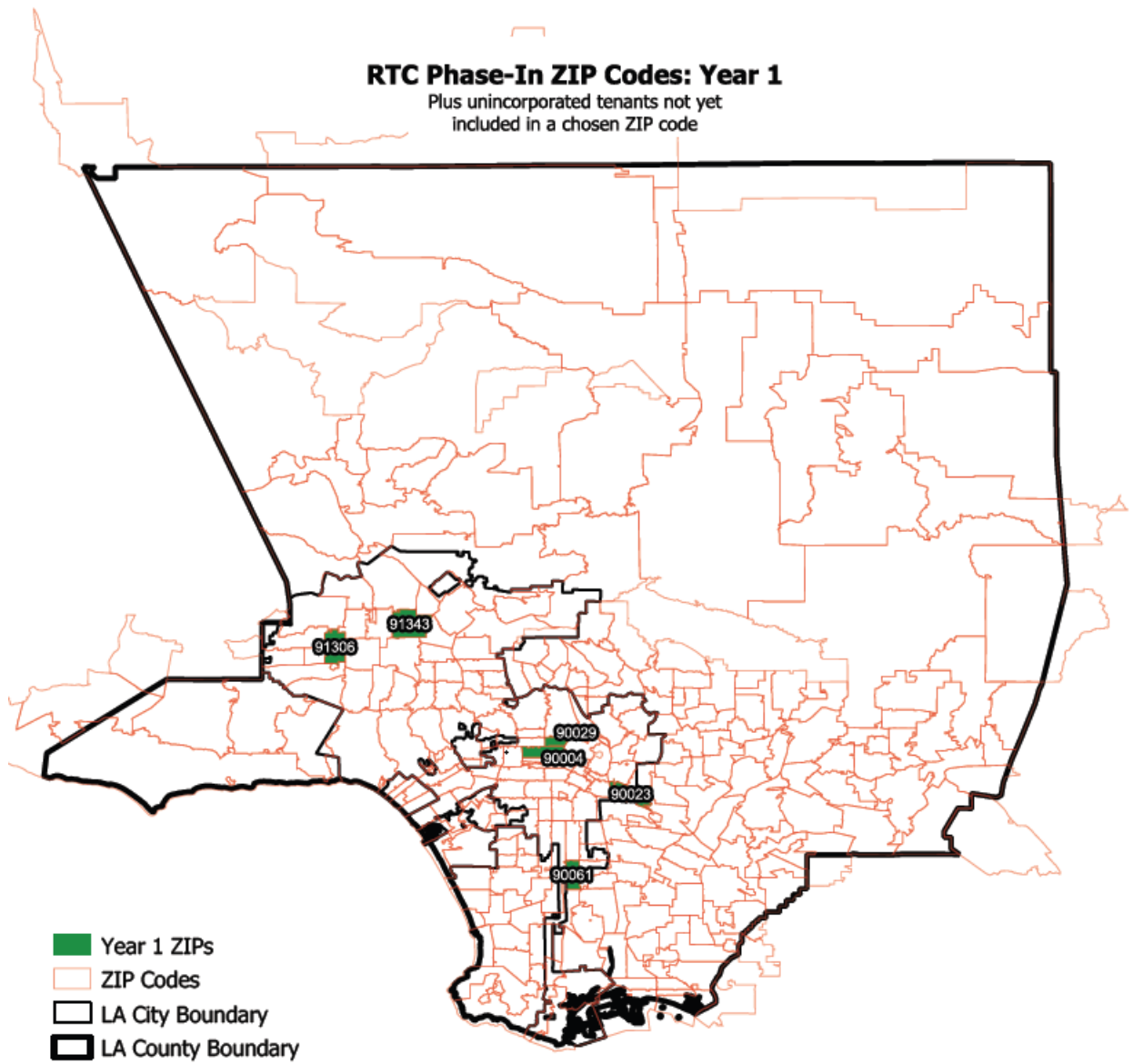


### RTC Phase-In ZIP Codes: Year 0



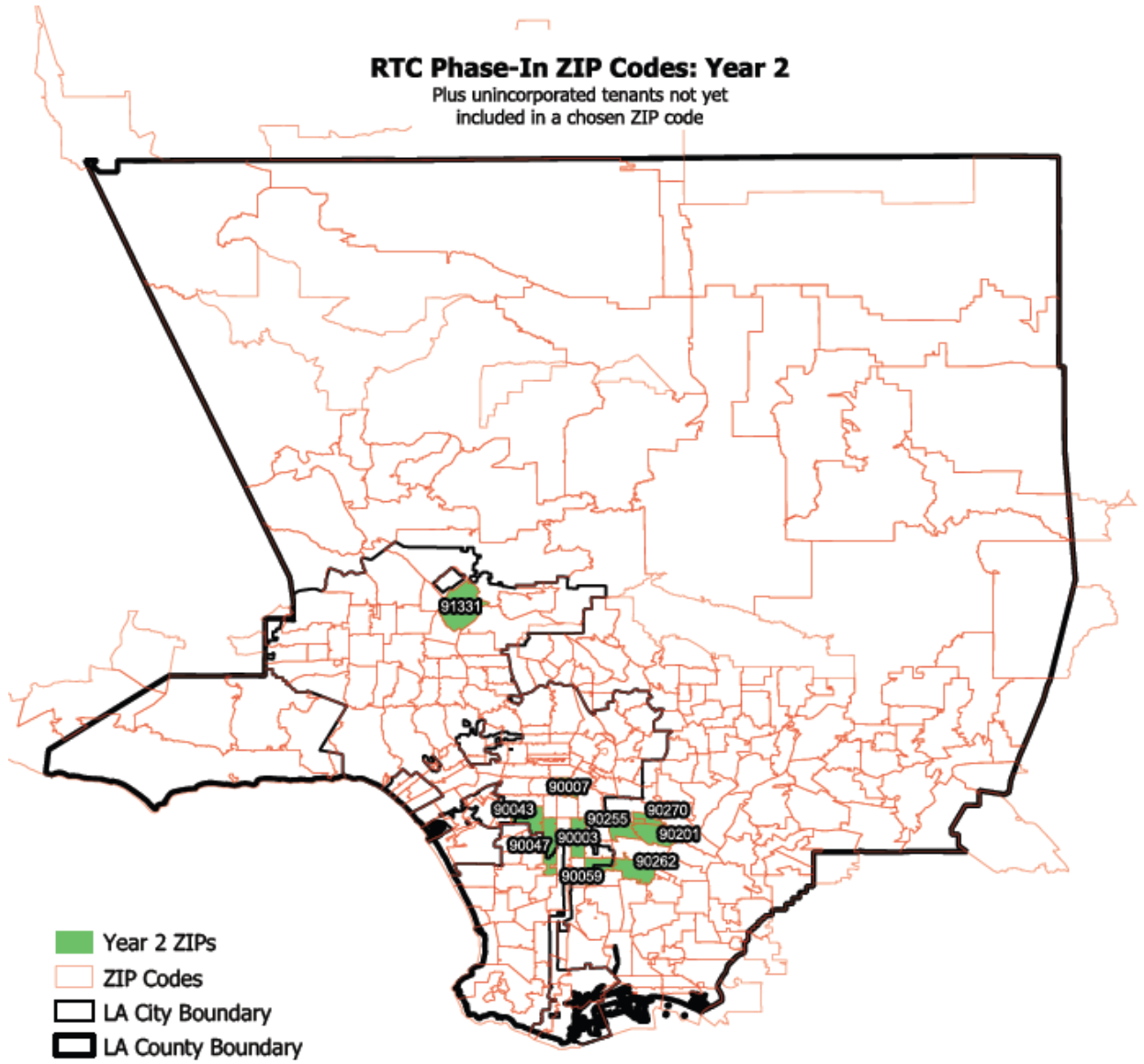
### RTC Phase-In ZIP Codes: Year 1

Plus unincorporated tenants not yet included in a chosen ZIP code



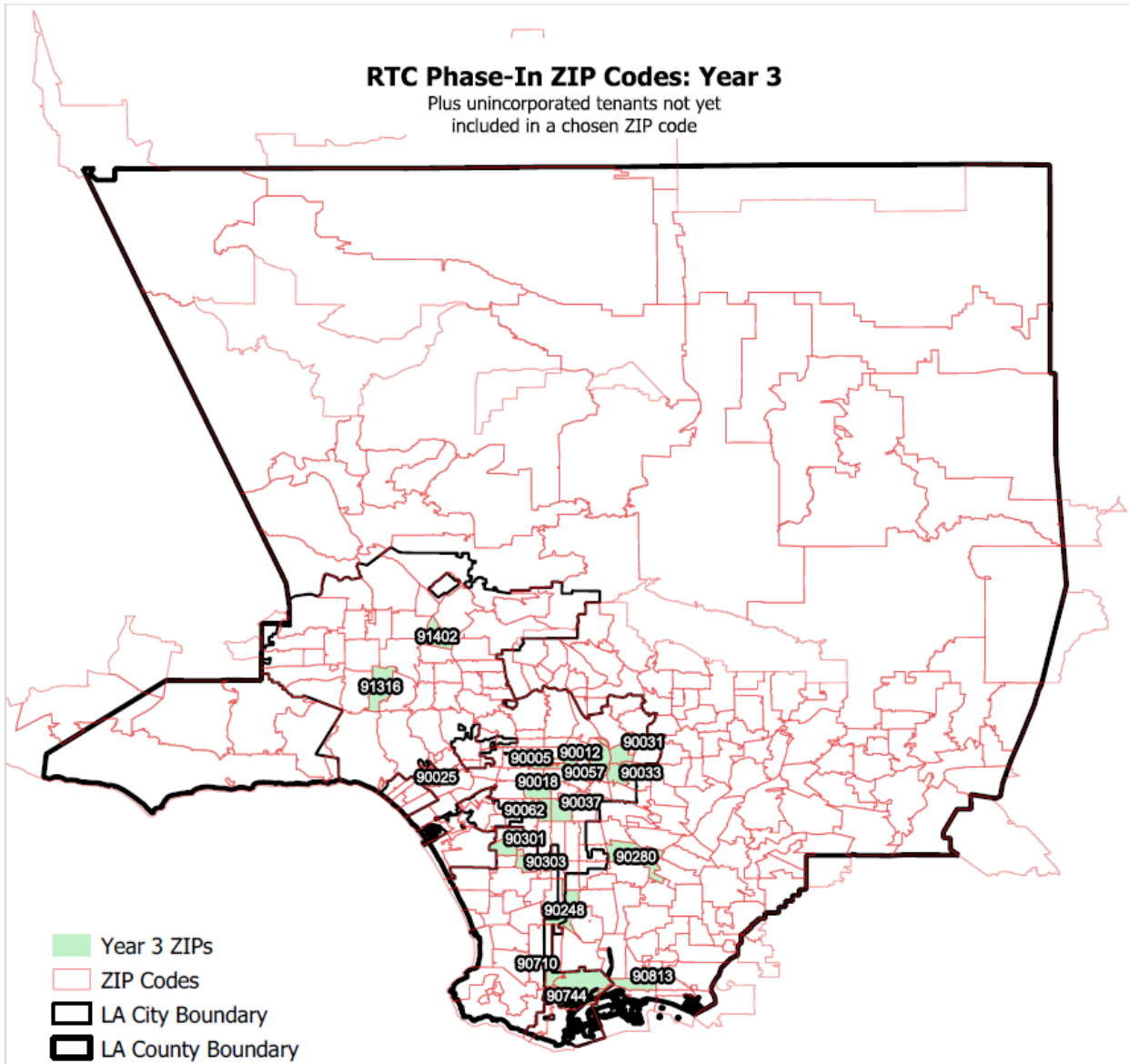
### RTC Phase-In ZIP Codes: Year 2

Plus unincorporated tenants not yet included in a chosen ZIP code

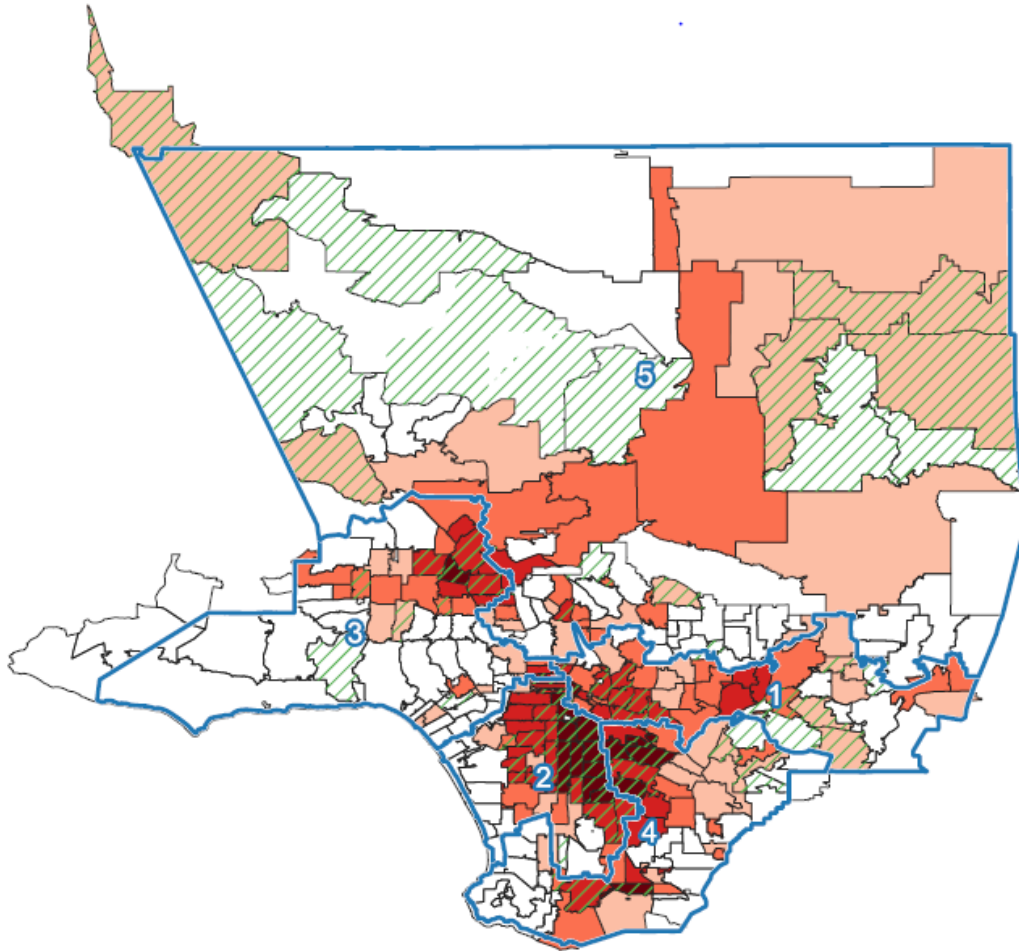









### RTC Phase-In ZIP Codes: Year 3

Plus unincorporated tenants not yet included in a chosen ZIP code



Displacement Vulnerability and Phase-In ZIP Codes  
LA County Supervisor Districts



-  Phase-In ZIP Codes (Any Year)
- Displacement Vulnerability (OWN-IT)
  -  68 - 78
  -  58 - 68
  -  48 - 58
  -  38 - 48
  -  0 - 38
-  Supervisor Districts