ULA EVICTION DEFENSE AND PREVENTION PROGRAM GUIDELINES

Draft Recommended by the United to House LA Citizen Oversight Committee for Mayor and City Council Consideration

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INTRODUCTION

1. Program Summary

a. Goals and Requirements

The Eviction Defense and Prevention Program is a right-to-counsel program that seeks to prevent homelessness and to promote housing stability by providing legal representation and other legal services, including tenants' rights education, to eligible tenants facing eviction. The Eviction Defense and Prevention Program is intended to be implemented consistent with and in coordination with other United to House LA (ULA) Homelessness Prevention Programs.

These Eviction Defense and Prevention Program Guidelines are applicable to Los Angeles Housing Department (LAHD)-administered ULA-funded programs and any and all programs funded with ULA "Eviction Defense/Prevention" program funding.²

The goals of the Eviction Defense and Prevention Program are to:

- Provide Full Scope Legal Services, as defined in Section 3.1 of these Eviction Defense and Prevention Program Guidelines, to low-income tenants in eviction proceedings
- Provide Limited Scope Legal Services, as defined in Section 3.1 of these Eviction Defense and Prevention Program Guidelines, to low-income tenants not eligible to receive Full Scope Legal Services
- Increase tenant awareness of their rights and responsibilities

b. List of subprograms or activities

Consistent with the ULA measure and ordinance, the Eviction Defense and Prevention Program is a right-to-counsel program designed to complement other ULA Homelessness Prevention Programs by ensuring that eligible tenants have access to legal resources to prevent and defend evictions. These Eviction Defense and Prevention Program Guidelines implement two tiers of legal services: 1) Full-scope services which include but are not limited to defending a tenant throughout the legal process after an eviction complaint has been filed by their landlord or a housing authority termination of

¹ Los Angeles Administrative Code Section 22.618.3 (d)(2)(ii)(a).

² At the time of the drafting of these Eviction Defense and Prevention Guidelines, LAHD is under contract with Stay Housed LA (which includes Legal Service Providers), which may one day be funded to implement this program. These Eviction Defense and Prevention Guidelines are intended to be read as consistent with Stay Housed LA's existing contractual obligations. If these Eviction Defense and Prevention Guidelines conflict with an existing contractual obligation, including a contract with StayHousedLA, that conflict shall not be deemed a material breach of any obligation. Notwithstanding the foregoing, these Eviction Defense and Prevention Guidelines are applicable to any subsequent contract with any party funded by ULA's Eviction Defense/Prevention program funds.

subsidized housing; and, 2) Limited-scope services which are shorter-term services that include consultation or legal clinic support that seeks to prevent an eviction complaint from being filed in the first place, as well as pro per assistance to assist tenants advocating for or representing themselves in an eviction action.

Full Scope Legal Services are provided by attorneys and staff who represent tenants in Unlawful Detainer eviction proceedings or subsidized housing terminations. Until there are sufficient resources available to provide Full Scope Legal Services to all eligible low-income tenants in the City facing eviction, the program prioritizes tenants living in zip codes that are at higher risk of eviction. As more resources become available, the program will expand Full Scope Legal Services to more zip codes, according to eviction risk, until all City zip codes are covered.

Limited-scope legal services include clinics that enable and empower tenants to address eviction complaints and prepare for eviction proceedings and prevention legal services. Limited Scope Legal Services will be available to qualifying tenants residing in all zip codes.

2. Context

The ULA measure and ordinance requires ten percent (10%) of annual tax revenue to be "allocated to fund a right-to-counsel program" to provide housing-related legal services to Lower Income household(s)."³ The Eviction Defense and Prevention Program is that program.

According to the 2022 American Community Survey (ACS) 5-year estimate, there are approximately 886,998 renter households in the City, and approximately 2,245,299 people are renters. Of those renters, approximately 54% of tenants are rent-burdened, and 29% are severely rent-burdened.⁴ As of March 31, 2024, approximately 24,000 eviction cases are filed each year in the City. Black and Latinx tenants, especially female head of households, are disproportionately impacted by evictions in the City. Evictions that ultimately lead to homelessness create significant costs for local and state governments, including but not limited to the costs associated with providing emergency shelter, interim and long-term housing, hospital-based health care, and transportation costs, which can also result in increased costs associated with child dependency and incarceration of unhoused family members.

Providing counsel and legal services to defend and prevent evictions has proven to prevent the disruptive displacement of families that results in social, economic, and public health costs. Preventing these costs helps to mitigate and reduce the serious threats to the public health, safety, and general welfare of residents in Los Angeles caused by displacement and

³ Los Angeles Administrative Code, Section 22.618.3 (d)(2)(ii)(a).

⁴ Rent burden data from 2023 Comprehensive Housing Affordability Strategy (CHAS) estimates.

eviction. Accordingly, the Eviction Defense and Prevention Program is a core component of ULA's Homelessness Prevention Program.

3. Commitment to Racial Equity

Existing data and scholarship confirms that Black, Latinx, and other communities of color are disproportionately affected by homelessness. These Eviction Defense and Prevention Program Guidelines acknowledge that this disproportionality is the result of generations of structural racism. Decades of land use policies and zoning practices have reinforced racial segregation, poverty, environmental injustice, and disinvestment that is manifested in the demographics of our contemporary homeless population.

As ULA seeks to combat homelessness through a variety of interventions, the implementation of the Eviction Defense and Prevention Program is specifically designed to promote racial equity, with a focus on preventing homelessness by preventing eviction in the City's most vulnerable communities, both because of their historic mistreatment and because of the modern currents of gentrification, which manifests in a disproportionate number of tenants of color being evicted.

Consistent with this commitment to promote racial equity, the Eviction Defense and Prevention Program is designed to be attuned to the needs and realities of historically marginalized communities, and how racism, as well as disability, transphobia, sexism, and other tenant experiences, affect the vulnerability of a tenant and their experiences. To this end, until sufficient resources are available to provide a right-to-counsel to all eligible tenants facing eviction, the Eviction Defense and Prevention Program prioritizes full-scope legal services for renters living in zip codes that are at higher risk of eviction, which tend to have a strong correlation to historically marginalized communities.

Further, legal services providers (LSPs) or other entities receiving ULA funding to implement this program are encouraged to hire staff and partner with organizations that are reflective of the target populations that will be served, to best ensure that the Eviction Defense and Prevention Program is responsive to the community context.

4. Program Metrics

LSPs shall collect program metrics and participant data in alignment with the ULA measure and ordinance reporting requirements and in a manner that supports the evaluation of long-term impacts and outcomes for the Eviction Defense and Prevention Program, and shall continuously track and report data and metrics identified on the chart below. To the extent feasible, LSPs shall regularly report the status of legal proceedings and the outcomes associated with legal services provided, and any umbrella entity that subcontracts with LSPs will be required to collect this reporting and submit to LAHD on a regular basis.

Goal	Metrics
As part of a right-to-counsel program, provide Full Scope Legal Services to qualifying low-income tenants in eviction proceedings.	 Number of displacements and evictions as compared to previous years. Outcomes of Unlawful Detainer and eviction cases. Number of tenants provided case management services. Number of clients assisted with Full Scope Legal Services. Number of Unlawful Detainer cases, and outcomes, where LSPs were engaged and provided Full Scope Legal Services. Amount of rental assistance paid and the number of instances in which rental assistance was paid to settle Unlawful Detainer and eviction cases. Number of subsidized housing termination hearings.
Provide Limited Scope Legal Services to low-income tenants not eligible to receive Full Scope Legal Services.	 Number of clients assisted with Limited Scope Legal Services. Specific types of Limited Scope Legal Services engaged in by LSPs.
Increase tenant awareness of their rights and responsibilities	Number of Tenant Education workshops, clinics, and other educational events held, as defined in the Tenant Outreach and Education Program Guidelines, participated in by LSPs.

Consistent with *Section 5.2* of these Eviction Defense and Prevention Program Guidelines, LAHD shall analyze these metrics and participant data annually and provide a summary of its analysis to the COC to allow for an assessment of whether the Eviction Defense and Prevention Program is meeting its goals and priorities.

SECTION 1: PROGRAM ADMINISTRATION

1.1 Program Administrator

LAHD shall administer the Eviction Defense and Prevention Program, with the LAHD General Manager, or designee, designated as the Eviction Defense and Prevention Program Administrator. At their discretion, the LAHD General Manager shall be empowered to delegate and/or revoke administrative responsibilities over the Eviction Defense and Prevention Program to participating LSPs and/or appropriate LAHD staff.

1.2 Selection Process

The Eviction Defense and Prevention Program is to be administered by LAHD's General Manager, or designee, consistent with *Section 1.1* above, and implemented by LSPs as further discussed in *Section 2* of these Eviction Defense and Prevention Program Guidelines. Should LAHD delegate administrative responsibilities over the Eviction Defense and Prevention Program to any outside party, such a determination shall be made consistent with LAHD and City policy, and with *Sections 1.1* and *1.2* of these Eviction Defense and Prevention Program Guidelines amended as required and appropriate.

SECTION 2: GENERAL PROVISIONS

2.1 Eligible Participants and Grantees

Eligible Participants: The Eviction Defense and Prevention Program shall serve tenants (inclusive of individual tenants and tenant households) in the City of Los Angeles. The Eviction Defense and Prevention Program does not apply to or extend to, landlords, homeowners, or building owners. All tenants in the City that are low-income households, at or below 80% of the Area Median Income (AMI), that do not reside in the same dwelling as their landlord are considered *Eligible Participants* for the Eviction Defense and Prevention Program and may receive legal services and/or assistance consistent with the Eviction Defense and Prevention Program. Tenants requesting legal services shall fill out an application to the program to assess eligibility (see *Section 6* of these Eviction Defense and Prevention Program Guidelines).

For the Eviction Defense and Prevention Program, *Eligible Participants* include both *Covered Tenants* (those who live in zip codes where Full Scope Legal Services are being provided), and *Non-Covered Tenants* (those who live outside of zip codes where Full Scope Legal Services are being provided but are still eligible to receive Limited Scope Legal Services). *Covered Tenants* who do not receive Full Scope Legal Services are also eligible to receive Limited Scope Legal Services. *Non-Covered Tenants* may, at the discretion of the LSP, receive Full Scope Legal Services depending on capacity.

As further described below, the provision of Full Scope Legal Services will be phased in by zip code over a five-year period, contingent on funding availability. Prioritization of zip codes for the purposes of phasing in Full Scope Legal Services shall be subject to the discretion of LAHD, or its designee, based on relevant factors including but not limited to:

- Prioritization of certain groups of vulnerable individuals in zip codes utilizing the City
 of Los Angeles' forthcoming anti-displacement mapping tool to identify and predict
 existing and future direct and indirect displacement risks as part of LAHD's efforts to
 implement goals, policies, and objectives of the Eviction Defense and Prevention
 Program Guidelines;
- Availability of funding from all eligible sources;
- Availability of trained and qualified attorneys to provide legal representation;
- Geographic considerations vis-a-vis shared zip codes with other jurisdictions;
- Scope of the need for legal representation; and
- Other appropriate logistical considerations.

LAHD or its designee may, at its discretion, further study the projected need for eviction defense services to inform geographic prioritization and availability of LSPs in those areas. Depending on the level of resources available relative to the projected level of need, LAHD or its designee may consider evaluating additional or alternative prioritization criteria to implement limited resources.

<u>Eligible Grantees</u>: Eviction Defense and Prevention Program funding may be disbursed to designated nonprofit LSPs, either directly or through umbrella entities sub-contracting with nonprofit LSPs. Participating LSPs are chosen subject to the terms of *Section 5* of these Eviction Defense and Prevention Program Guidelines.

To provide services under the Eviction Defense and Prevention Program, an LSP must be designated to do so by LAHD, or its designee. As a requirement for designation, an LSP shall demonstrate substantial experience and effectiveness in defending renters in Unlawful Detainer eviction actions, preventing evictions from being filed, and in administering rental assistance to resolve evictions. In addition, an LSP shall provide documentation demonstrating incorporation as a 501(c)(3) nonprofit organization in good standing.

Subject to the preceding requirements for designation, LSPs may be non-profit organizations that contract directly with LAHD, or contract with LAHD through an umbrella entity serving as its designee, to provide full or limited-scope legal services to Covered Tenants. Any designated LSP may provide limited scope legal services to Non-Covered Tenants as directed by LAHD or its designee, consistent with terms of their contracts executed with LAHD and/or the umbrella entity.

LAHD, or its designee, shall conduct an annual review of all LSPs and may decline to renew the designation of any such organization.

2.2 Eligible Forms of Funding

The ULA measure and ordinance allocates ten percent (10%) of overall annual program revenue for a right-to-counsel Eviction Defense and Prevention Program. LAHD may seek and allocate additional funding for this Eviction Defense and Prevention Program, including but not limited to potential grants, consistent with LAHD's general restrictions and requirements but that additional funding shall not change or limit in any way how the ULA funding is allocated or administered.

Funding may be expended to facilitate eligible activities (further defined and discussed in *Section 2.3*) through contracts, purchase orders, and any other contracting mechanism consistent with City requirements.

2.3 Eligible Activities

Eligible right-to-counsel program activities of the Eviction Defense and Prevention Program include the provision of Full Scope Legal Services, the provision of Limited Scope Legal Services, and the disbursement of rental assistance to resolve evictions. Eligible activities may also include participation in a pilot program implemented for the purposes of pre-litigation filing dispute resolution or mediation. Eligible activities include any Eviction Defense and Prevention Program activity administered in coordination with or supplementary to any Homelessness Prevention Program, including, but not limited to, participating in workshops, clinics, and/or events consistent with the Tenant Outreach and Education Program and any activities requiring the assistance of LSPs in furtherance of the goals and objectives of the Protections from Tenant Harassment Program. Activities not specifically identified within these Eviction Defense and Prevention Program Guidelines may still be determined to be eligible activities consistent with the Eviction Defense and Prevention Program, subject to the discretion of the COC, LAHD General Manager, or its designee. Additional detail regarding these activities is provided in *Section 3.1*, *Scope of Services*.

2.4 Ineligible Activities

Any provision of services to landlords or property owners is expressly prohibited under this Program.

2.5 Timing / Frequency of Awards

Notwithstanding the fact that Measure ULA funds are allocated annually, LAHD may execute multi-year contract(s) with designated LSPs, or an umbrella entity administering LSP service provision, for the implementation of eligible activities identified in *Sections 2.3* and *3.1*.

SECTION 3: PROGRAM REQUIREMENTS: SERVICES AND FUNDING PRIORITIES

3.1 Scope of Services

Designated LSPs shall provide services necessary for the execution and performance of the Eligible Activities identified in *Section 2.3* of these Eviction Defense and Prevention Program Guidelines.

Full Scope Legal Services

Full Scope Legal Services is ongoing legal representation, inclusive of all legal advice, advocacy, and assistance associated with that representation, provided by an LSP to a Covered Tenant in any (or, as determined by LAHD, the functional equivalent of an) Unlawful Detainer or judicial proceeding to terminate the tenancy of a Covered Tenant or any appeal of such a proceeding where an LSP determines that there are good grounds for an appeal. Full Scope Legal Services include, but are not limited to:

- Preparation and submission of a formal response to a notice of termination of tenancy on behalf of a tenant.
- Representation of a tenant in mediation, negotiation, or other dispute resolution between a tenant and a landlord.
- Legal research, investigation, and/or document review in preparation for trial or any other judicial proceeding.
- Representation of tenants at an Unlawful Detainer trial, settlement negotiations, or any administrative proceedings that may result in the termination of a tenancy or the loss of a federal, state, or local rent subsidy.
- Provision of additional and/or ongoing services after the formal conclusion of an eviction proceeding or trial to stabilize a tenant's housing, including but not limited to sealing eviction records.
- Out-of-court assistance with mediation, negotiation, and/or other dispute resolution between a tenant and a landlord, including negotiating rental assistance.
- Any other service ordinarily provided by an attorney or otherwise contracted legal service provider, reasonably related to preventing a tenant from eviction or disruptive displacement.

<u>Limited Scope Legal Services</u>

Limited Scope Legal Services is legal consultation/advice, assistance with filing or completing forms in pro per (self-representing proceedings), and/or referrals provided by a LSP to a Non-Covered Tenant. In addition to the direct services provided to Non-Covered Tenants specified below, Limited Scope Legal Services may also include the facilitation of in-person and virtual clinics that enable tenants to answer eviction complaints and prepare for eviction trials. Limited Scope Legal Services may include, but is not limited to:

- One-on-one consultations in-person, via phone, virtual meetings, or videoconference.
- Preparation of a formal response to a Notice to Terminate Tenancy on behalf of a tenant.
- Assistance with preparation of responsive eviction pleadings, such as answers and fee waiver forms on behalf of a pro per tenant.
- Other pro per trial preparation assistance.
- Enforcement of existing ordinances and local executive orders through such means as drafting demand letters to landlords.
- Counsel and advise on housing matters including but not limited to rent increases, tenant harassment, and landlord notices
- Requests for reasonable accommodations
- Determination that the three-day notice is in violation of any applicable laws and referring any potential violations to LAHD for investigation and any other appropriate action
- Assisting tenants with LAHD complaints to ensure tenants receive responses to their issues and can file complaints with the appropriate City bureau, and for assistance with Tenant Navigation issues, as defined by the Tenant Outreach and Education Program Guidelines.
- Any other service ordinarily provided by an attorney or otherwise contracted legal service provider, reasonably related to preventing a tenant from eviction or displacement.

If it is determined a Non-Covered Tenant receiving Limited Scope Legal Services requires Full Scope Legal Services, the LSPs may at their discretion provide Full Scope Legal Services to a Non-Covered Tenant, pending availability of Full Scope Legal Services capacity.

Clinics and Workshops

Consistent with other Homelessness Prevention Programs, including, but not limited to the Tenant Outreach and Education Program and the Protections from Tenant Harassment Program, the LSPs are responsible for educating tenants about their rights. LSPs shall work in conjunction with LAHD, entities LAHD deems appropriate, and other community-based organizations to provide legal expertise at workshops and clinics.

Where appropriate, providers will refer clients to services provided through other relevant ULA Programs, including the Tenant Outreach and Education Program.

Settlement Rental Assistance

The Homelessness Prevention Program includes funding for LSPs to provide rental assistance in the form of financial settlement of eviction lawsuits. If, through the course of providing Full or Limited Scope Legal Services, an LSP determines that the case could be

favorably resolved for the tenant contingent upon a to-be-determined repayment of rental debt, the LSP will have the authority to offer up settlement terms, pending available funds. The amount available for settlements in any given year may vary depending on available ULA revenue and/or contractual terms between the LAHD and the LSPs. Accordingly, the facilitation and provision of Settlement Rental Assistance, in conjunction with an LSP's provision of Full Scope Legal Services or Limited Scope Legal Services shall be considered an *eligible activity* consistent with these Eviction Defense and Prevention Program Guidelines.

Pre-Litigation Filing Dispute Resolution or Mediation

The COC, LAHD, or its designee may implement a Pre-Litigation Filing Mandatory Dispute Resolution/Mediation pilot program, allowing LSPs to represent tenants in dispute resolutions, mediations, or other structured negotiations with landlords. To be an eligible use of this funding, the pilot program's structured negotiations must occur prior to any commencement of eviction proceedings or the filing of an Unlawful Detainer action, and landlord participation is required before the landlord can commence eviction proceedings or file an Unlawful Detainer action. Should a Pre-Litigation Filing Dispute Resolution or Mediation pilot program as described above be implemented, during the pilot period, such services shall be within the ambit of Full Scope Legal Services available to Covered Tenants. At the conclusion of the pilot period, if the COC, LAHD, or its designee determines to include Pre-Litigation Filing Dispute Resolution/Mediation as eligible activities of the Eviction Defense and Prevention Program, it may, at its discretion, limit access to that activity to Covered Tenants or extend access to Non-Covered Tenants, based on resource availability.

3.2 Program Budget

The ULA measure and ordinance allocates ten percent (10%) of overall annual program revenue, minus administrative costs, for a "for a right-to-counsel program to provide housing-related legal services to Lower Income Household tenants threatened with eviction" that shall be the Eviction Defense and Prevention Program. Funding will be allocated for all services identified in *Sections 2.3* and *3.1*.

3.3 Funding Priorities

Funding allocated to the Eviction Defense and Prevention Program shall be apportioned and prioritized for the eligible activities identified in Eviction Defense and Prevention Program Guidelines subject to the approval, discretion, and delegation of LAHD or its designee.

Consistent with Sections 2.3 and 3.1 of these Eviction Defense and Prevention Program Guidelines, in addition to legal services, the Eviction Defense and Prevention Program authorizes LAHD, its designee, or LSPs to disburse one-time financial settlement assistance

to tenants or owners to facilitate agreements to prevent eviction, such as to pay back rent or deposits.

SECTION 4: IMPLEMENTATION PLAN

The Eviction Defense Program was officially launched and began providing services on July 1, 2021. The City of Los Angeles partnered with Los Angeles County, as well as local community and legal service providers to keep City residents in their homes by providing information, services, and resources through the Stay Housed LA. The eligible activities identified in these Eviction Defense and Prevention Program Guidelines (Sections 2.3 and 3.1) are consistent with and intended to enhance the provision of services already being implemented by Stay Housed LA and its subcontractor LSPs and CBOs. The existing Stay Housed LA program is anticipated to continue to operate as implemented and as enhanced by these Eviction Defense and Prevention Program Guidelines. At the expiration of the existing contracts, a procurement process may be required, consistent with the City Administrative Code and any relevant City and LAHD policies.

SECTION 5: CONTRACTUAL SERVICES

Implementation of the Eviction Defense and Prevention Program requires contracting with LSPs. All procurement activities must be conducted consistent with the City Administrative Code and any relevant City and LAHD policies. Upon the completion of any existing contract term for Stay Housed LA and/or any independently-contracted LSP, the COC and LAHD, pending approval of the City Council and Mayor, may 1) consider extending the term of that contract consistent with the terms of the existing agreement or 2) conducting a competitive bid for LSPs, consistent with the City's competitive bidding requirements.

5.1 Evaluation and Selection Process

Award of a contract for services shall be based on a best value competitive bid. Prior to release of a Request for Proposals (RFP), LAHD shall establish a scoring system assigning values to the following criteria, and rating responses to proposals accordingly:

- Experience with and approach to defending renters in Unlawful Detainer eviction actions, preventing evictions from being filed, and in administering rental assistance to resolve evictions.
- 2) Experience with and approach to providing related eviction defense and prevention services.
- 3) Experience with and approach to providing services to the communities anticipated to be targeted for Full Scope Legal Services.
- 4) Cost proposal for the solicited services.

The COC may consider recommending an integrated RFP process that allows service providers to bid for multiple Homelessness Prevention Programs under the same Measure ULA-funded contract.

5.2 City Living Wage Ordinance

All contractors shall comply with the Living Wage Ordinance, Los Angeles Administrative Code Section 10.37 et seq., as amended from time to time. Contractors further shall agree to comply with federal law proscribing retaliation for union organizing. Any subcontract entered into by a contractor for work to be performed under these Program Guidelines must include an identical provision.

5.3 Data Collection and Reporting

Consistent with Section 4 (Program Metrics) of the Introduction to these Eviction Defense and Prevention Program Guidelines, information on the number of people served by this program, as well as outcomes where relevant, shall be collected and provided to the LAHD on a monthly basis. Wherever relevant, data shall be disaggregated by race, family composition, sexual orientation, age, ability, gender, and location (address, zip code, and Council District). This information includes, but is not limited to:

- Upon completion of representation, a summary of specific legal services provided to tenants, including: outcome (including sealed eviction record and administrative proceedings which may result in the termination or protection of a federal, state, or local rent subsidy), and benefits to the tenant (including extra time to move out and economic benefits such as fee waivers, relocation assistance, and waived back rent).
- Number of tenants Full Scope Legal Services provided to.
- Number of tenants Limited Scope Legal Services provided to.
- Number of households for whom extra time to move out, waived back rent, moving expenses, and/or other quantifiable outcomes are negotiated.
- Number of tenants who stay in place.
- Number of residents served by location, disaggregated and searchable by legal service provided, race, family composition, sexual orientation, age, ability, and gender.
- Number of Tenant Education workshops, clinics, and other educational events participated in by LSPs, by location.

Eviction Defense and Prevention Program metrics shall be analyzed annually to allow for an assessment of whether Measure ULA Programs are meeting their stated goals and accomplishing the priorities of the COC.

SECTION 6: APPLICATION PROCESS AND REQUIREMENTS

Consistent with Section 2.1 of these Eviction Defense and Prevention Program Guidelines, tenants requesting legal services shall fill out an application to assess eligibility. Eligibility determinations shall be made by Designated LSPs procured to provide Program services.

6.1 Eligible Applicants

Eligible Applicants include Eligible Participants identified in *Section 2.1* of these Eviction Defense and Prevention Program Guidelines. All tenants in the City that are low-income households, at or below 80% AMI, are eligible to apply for and receive legal services and/or assistance from the Eviction Defense and Prevention Program. Consistent with *Section 2.1* of these Eviction Defense and Prevention Program Guidelines, the geographic consideration of the applicant's zip code will not affect their eligibility to receive Eviction Defense and Prevention Program services, but may be a distinguishing factor in whether the applicant, if otherwise eligible, will receive Full Scope Legal Services.

