

# ULA TENANT OUTREACH AND EDUCATION PROGRAM GUIDELINES

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

## **INTRODUCTION**

### **1. Program Summary**

#### **a. Goals and Requirements**

The Tenant Outreach and Education Program seeks to prevent homelessness by ensuring that tenants are educated about their rights, understand how to exercise their rights, and avail themselves of available resources. The Tenant Outreach and Education Program is designed to be synergistic with other United to House LA (ULA) programs and services that focus on eviction prevention, promote collaboration with Legal Service Providers, and draw upon and incorporate local expertise on eviction prevention and homeless prevention. The Tenant Outreach and Education Program is intended to be implemented consistent with and in coordination with other ULA Homelessness Prevention Programs.

These Guidelines describe how to implement the section of the ULA measure and ordinance which supports eviction and homelessness prevention via tenant outreach and education. These Tenant Outreach and Education Program Guidelines are applicable not only to Los Angeles Housing Department (LAHD)-administered, ULA-funded tenant outreach and education programs, but also to community-based organizations and any umbrella entity overseeing or directing the activities of community-based organizations described below. For the purposes of these guidelines, these community-based organizations individually, collectively, and the umbrella entity, shall be referred to as the “Contracting Partners.” These Tenant Outreach and Education Program Guidelines shall also apply to future outreach and education programs established at the direction of the ULA Citizen Oversight Commission (COC).

The Tenant Outreach and Education Program seeks to ensure housing stability for lower-income households at risk of displacement from their homes and communities through proactive homelessness prevention and eviction prevention efforts. It is anticipated that the Tenant Outreach and Education Program will be administered in coordination with LAHD services, provide connection and referrals to local resources and community groups, and align with other programmatic aspects of ULA.

The goals of the Tenant Outreach and Education Program are to:

- Increase public awareness of tenants’ rights, obligations, and protections by making contact with at least 250,000 residents within the City annually.
- Educate tenants about their rights in order to reduce displacement and eviction.
- Empower tenants to assert their rights through providing Tenant Navigation, in which a tenant receives support to address housing and housing-related issues.

- Prevent and reduce homelessness by connecting tenants at risk of homelessness to resources such as rental assistance, wrap-around services, and supportive services.
- Maintain and preserve the current affordable housing stock by informing tenants of their rights, how to seek unit repairs, file complaints with the City, and address code violations, and more.

**b. List of subprograms or activities**

The Tenant Outreach and Education Program is a ULA Homelessness Prevention Program, designed to complement ULA's direct service and/or financial assistance programs by ensuring that tenants are informed about and able to assert their rights, and informed about and able to access resources. In addition, the Program will provide Tenant Navigation services to connect tenants with appropriate programs and services. The program will be implemented in a way that supports and expands existing City-funded outreach efforts.<sup>1</sup>

**2. Context**

The ULA measure and ordinance requires two percent (2%) of the annual ULA Program revenue to be dedicated to the Tenant Outreach and Education Program, as a core and proactive strategy to prevent homelessness.<sup>2</sup>

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.<sup>3</sup> 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, and can also result in increased costs associated with child dependency and incarceration of unhoused family members.

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<sup>1</sup> At the time of the drafting of these Tenant Outreach and Education Program Guidelines, Stay Housed LA (SHLA) was under contract with LAHD to operate as the outreach contractor, or the Contracting Partner as defined above. These Tenant Outreach and Education Program Guidelines are intended to be read as consistent with SHLA's existing contractual obligations. If these Tenant Outreach and Education Program Guidelines conflict with an existing contractual obligation, that conflict shall not be deemed a material breach of any obligation. Notwithstanding the forgoing, these Tenant Outreach and Education Program Guidelines are applicable to any subsequent contract with any party for operation of Tenant Outreach and Education activities.

<sup>2</sup> Los Angeles Administrative Code, Section 22.618.3(d)(2)(ii)b.

<sup>3</sup> Rent burden data from 2023 Comprehensive Housing Affordability Strategy (CHAS) estimates.

Another ULA program, the Eviction Defense and Prevention Program, is a right-to-counsel program which provides legal services to eligible tenants facing eviction. Providing counsel to tenants in eviction cases has proven to prevent the disruptive displacement of families and the resulting social, economic, and public health costs of such displacement. Inherent to providing counsel to tenants in eviction cases is ensuring that those tenants are aware of the opportunity to seek counsel through LAHD. Making tenants' rights education accessible to tenants helps mitigate and reduce the serious threats to the public health, safety, and general welfare of residents in Los Angeles caused by displacement and illegal eviction. Accordingly, the Tenant Outreach and Education Program is a necessary, complementary component of the City's right-to-counsel program for tenants to prevent illegal evictions.

ULA also mandates that the City establish a program to provide protections and enforcement against illegal tenant harassment. The Los Angeles Municipal Code prohibits tenant harassment and authorizes the City Attorney to pursue criminal penalties, individual tenants a right to pursue a private cause of action in civil proceedings, and through the Administrative Citation Enforcement ordinance, LAHD to issue citations. Vital to the effective implementation and enforcement of those protections is providing tenants and landlords with an understanding of their rights and responsibilities. Toward those ends, the ULA measure and ordinance requires that a minimum of 30% of the Protections from Tenant Harassment program funding be allocated to non-profit organizations such as those currently included under Stay Housed LA (SHLA). These organizations will play a critical role in providing direct outreach in areas identified as particularly vulnerable to displacement and/or harassment.

Finally, tenants must be made aware of long-standing state statute and Los Angeles Municipal Code tenant protections, as well as the recent additional protections provided by City Council through the adoption of TAHO. General public awareness campaigns intended to ensure Angeleno tenants are aware of the laws that affect them will provide critical context to the more targeted ULA-funded homelessness prevention efforts.

### **3. Commitment to Racial Equity**

Existing data and scholarship confirms that Black, Latinx, and other communities of color are disproportionately affected by homelessness. These Tenant Outreach and Education 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 Tenant Outreach and Education 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 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 Tenant Outreach and Education Program is intended 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.. Tenant harassment is strongly correlated to historically marginalized communities. To this end, the Tenant Outreach and Education Program is committed to delivering culturally relevant outreach, grounded in activities, communication, and interventions that consider the community context and audience being served. Consequently, the Tenant Outreach and Education Program will emphasize the importance of interpretation, translation, and other agreed upon language justice accommodations to those whose primary language is not English.

Further, the program should strive to hire staff and partner with organizations that are reflective of the target populations to be served, to best ensure that the Tenant Outreach and Education Program is responsive to the community context.

#### **4. Program Metrics**

The Los Angeles Housing Department (LAHD) and Contracting Partners 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 Tenant Outreach and Education Program, and shall on an ongoing basis track and report data and metrics identified on the chart below. LAHD and Contracting Partners shall also regularly collect and report on pertinent qualitative data, including oral histories, to highlight program participant and service provider success stories.

Goal	Metrics
<p>Increase public awareness of tenants' rights, obligations, and protections by making contact with at least 250,000 residents within the City annually.</p>	<ul style="list-style-type: none"> <li>• Number of reaches and contacts made providing exposure to and awareness of services (e.g., number of workshop participants, number of doors knocked, phone calls made, text messages sent, emails sent, fliers distributed, digital ads placed, and digital ads clicked.)</li> </ul>
<p>Educate tenants about their rights to prevent displacement and eviction.</p>	<ul style="list-style-type: none"> <li>• Number of Tenant Education workshops, clinics, and other educational events held, as defined by Section 3.1.</li> <li>• Number of participants at events.</li> </ul>
<p>Empower tenants to assert their rights through providing Tenant Navigation, in which a tenant receives support to address housing and housing-related issues.</p>	<ul style="list-style-type: none"> <li>• Number of households assisted with Tenant Navigation.</li> <li>• Number of instances of assistance provided to each household.</li> </ul>
<p>Prevent and reduce homelessness by connecting tenants at risk of homelessness to resources such as rental assistance, wrap-around services, supportive services.</p>	<ul style="list-style-type: none"> <li>• Number of displacements and evictions as compared to previous years.</li> <li>• Number of households assisted with Tenant Navigation.</li> <li>• Number of instances of assistance provided to each household.</li> </ul>
<p>Maintain and preserve the current affordable housing stock by informing tenants of their rights, how to seek unit repairs, file complaints with the City, and address code violations.</p>	<ul style="list-style-type: none"> <li>• Number of reports made to LAHD and cases filed with the Los Angeles Department of Building and Safety regarding Building Code violations.</li> </ul>

Consistent with *Section 5.2* of these Tenant Outreach and Education 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 Tenant Outreach and Education Program is meeting the goals and the priorities of the COC.

## SECTION 1: PROGRAM ADMINISTRATION

### 1.1 Program Administrator

LAHD shall administer the Tenant Outreach and Education Program, procure contracts with service providers, and administer the Program in partnership with the awardees. The LAHD General Manager, or designee, shall be empowered to delegate and/or revoke administrative responsibilities to Contracting Partners and/or appropriate LAHD staff at their discretion.

### 1.2 Selection Process

The Tenant Outreach and Education Program, is to be administered by LAHD's General Manager, or designee, consistent with *Section 1.1* above, and implemented by Contracting Partners procured as described in *Section 5*.

## SECTION 2: GENERAL PROVISIONS

### 2.1 Eligible Participants

Eligible Participants: The Tenant Outreach and Education Program shall serve tenants (inclusive of individual tenants and tenant households) in the City. The Tenant Outreach and Education Program does not focus on landlords or master tenants. Tenant rights information and education will be communicated citywide, with an emphasis on targeted outreach to areas of the City where tenants are at highest risk of eviction and displacement. Provision of Tenant Navigation services is limited to low-income households at or below 80% of the Area Median Income.

### 2.2 Eligible Forms of Funding

The ULA measure and ordinance allocates two percent (2%) of overall annual program revenue for the Tenant Outreach and Education Program. LAHD may seek and spend additional funding for the Tenant Outreach and Education Program, including but not limited to potential grants, consistent with LAHD's general procedures and requirements.

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 activities of the Tenant Outreach and Education Program fall broadly within four categories: Public Awareness, Outreach, Education, and Tenant Navigation. In addition to

these four categories, data collection and reporting activities will be included to monitor the efficacy of the Tenant Outreach and Education Program. Additional detail regarding these activities is provided in *Section 3.1, Scope of Services*. Eligible activities include any Tenant Outreach and Education Program activity engaged in in coordination with or supplementary to outreach and education activities under the Homelessness Prevention Programs. Activities not determined to be within these identified categories may still be determined to be eligible activities consistent with the Tenant Outreach and Education Program, subject to the discretion of LAHD.

## **2.4 Program Funding - Caps and Limits**

The ULA measure and ordinance allocates 2% of overall annual program revenue for the Tenant Outreach and Education Program. Funding allocated to the Tenant Outreach and Education Program shall be apportioned and prioritized for the eligible activities identified in these guidelines subject to the approval, discretion, and delegation of LAHD.

## **2.5 Timing / Frequency of Awards**

Notwithstanding the fact that ULA funds are allocated annually, LAHD may execute multi-year contract(s) with Contracting Partners, currently SHLA, for the implementation of eligible activities identified in *Section 2.3*.

# **SECTION 3: PROGRAM REQUIREMENTS: SERVICES AND FUNDING PRIORITIES**

## **3.1 Scope of Services**

LAHD, Contracting Partners, or any designee, shall effectuate these guidelines and provide services necessary for the execution and performance of the Eligible Activities identified in *Section 2.3* of these Tenant Outreach and Education Program Guidelines.

### **Public Awareness**

Citywide multilingual public awareness campaigns shall educate tenants regarding their rights and responsibilities under the Rent Stabilization Ordinance (RSO), Just Cause for Eviction, and Tenant Anti-Harassment ordinances, as well as other laws of the City, the County of Los Angeles, the State of California, and the federal government. Public awareness campaigns shall highlight the resources and services available to tenants and other relevant tenant rights information applicable in the City, and be broadly accessible to all tenants and communities in the City, regardless of immigration status, technical literacy, language skills, and/or access to online information. The public awareness campaign shall be consistent with the ongoing *Know Your Rights* educational campaign, the tenant outreach and education activities of the Tenant Outreach and Education Program, and other applicable programs.



This Public Awareness element of the Tenant Outreach and Education Program shall be managed and implemented directly by LAHD, which may, at its discretion, assign these responsibilities to the Contracting Partners, or any other independent entity. LAHD may subcontract with qualified strategic communications experts to execute all aspects of a public awareness campaign, including but not limited to:

#### Advertising

- Digital advertisements on major social media platforms to educate tenants regarding their rights and the services available to them through the Tenant Outreach and Education Program. Digital advertising activities include development, assessment of placement, placement, facilitating of advertising purchasing, and digital marketing implementation. Designated partners such as community-based organizations may be consulted, as appropriate, to develop a coordinated strategy for targeting digital advertisements.
- Print advertisements, including but not limited to fliers, postcards, mailers, banners, and other appropriate assets, which shall be produced and distributed in collaboration with designated partners.
- An Earned Media engagement plan, including a strategy for media outreach including pitching media placements about tenant protections and services provided by the Tenant Outreach and Education Program. Target media outlets may include major print, television, and radio outlets, housing specific publications, hyperlocal media, and non-English outlets.

#### Web page and Graphic Design

A multilingual, ADA accessible web page shall be established, maintained, and updated as a centralized location for information on tenant rights and resources pertinent to tenants across the City. The webpage shall include, but not be limited to the following information:

- Executive orders and emergency protections enacted by the City
- Information on the RSO, resources offered by LAHD, and other relevant tenant rights information for City tenants. Information regarding relevant County, State, and Federal tenant protections shall also be made available.
- Archive of digital materials and resources, such as fact-sheets, letter/notice templates, FAQs, and other materials as necessary.
- Contact information and links for the relevant programs, including programs related to the RSO, and Family Source Centers (FSCs).
- Links to key City and County departments that offer wrap-around and supportive services.

All digital and non-digital resources shall be regularly updated to maintain their functionality and provide timely, current, and relevant information. In addition, continuous efforts should

be made to improve accessibility and the user experience. Updates should also be made regularly to LAHD's related web-based resources including the LAHD Property Look Up system, which provides access and transparency to critical tenants' rights information, including the history of complaints, filings, and management of their rental property.

### **Outreach**

Outreach shall be conducted in a manner that is professional, culturally competent, multilingual, and ADA accessible. Tenant outreach activities shall be both citywide as well as focused in high-need areas in the City to inform tenants of their rights and the resources that are available, with the objective of linking tenants to the education activities and tenant navigation described below. Outreach activities include, but are not limited to:

- Phone and text banking
- Canvassing
- Flier distribution to and at locations such as grocery stores, hardware stores, pharmacies, medical facilities, foodbanks, and locations where homeless services are provided.
- Mailing fliers or postcards to low-income households in targeted buildings or blocks.
- Door to door outreach to low-income households in targeted buildings or blocks at high risk of displacement

Outreach staff shall be trained, equipped, and prepared to:

- Refer tenants to legal service providers to receive emergency rental assistance (as available), pre-eviction services, legal representation/ consultation, or any other legally related issue.
- Refer tenants to wrap around services if the tenant is interested in or needs additional services to facilitate housing stability.
- Refer tenants to other resources applicable to the tenant's needs, drawing upon the local expertise of community-based organizations.
- Facilitate the submission of any applicable complaints related to RSO housing, Code Enforcement, harassment, and/or fair housing issues or referrals to the applicable agency.
- Follow complaint resolution procedures.
- Provide referrals to tenant navigation and education services as described below.
- Address any issues raised regarding other ULA Homelessness Prevention Programs and/or provide direct referrals to LAHD Staff that can assist with such issues.

### **Education**

Culturally competent, multilingual, ADA accessible, tenant education activities shall be delivered citywide as well as focused in high-need areas in the City to accomplish the goals

of the Tenant Outreach and Education Program, namely to educate tenants on their rights and available services in the City. Tenant education activities include but are not limited to:

- **Workshops:** Events that feature a presentation to a group of tenants, focused on *Know Your Rights* topics. Workshops may be held at LAHD facilities, or other public or private facilities, including within a building or residential property where tenants reside (“Building Workshops”). Workshops may be conducted virtually or in-person, and shall be conducted in multiple languages and be ADA accessible, as necessary.
- **Clinics:** Events hosted by a community-based organization facilitating individualized tenant engagement with a qualifying legal service provider for the purpose of obtaining legal advice.
- **Other Education Events:** Alternative formats or structures may be utilized as deemed appropriate and effective in homelessness and eviction prevention. These events may be held virtually, in-person, or hybrid as is deemed most effective for the target audience. Virtual educational events may be delivered on social media.

Tenant education staff shall be trained, equipped, and prepared to:

- Refer tenants to legal service providers to receive emergency rental assistance (as available), pre-eviction services, legal representation/ consultation, or any other legally related issue.
- Refer tenants to wrap around services if the tenant is interested in or needs additional services to facilitate housing stability.
- Refer tenants to other resources applicable to the tenant’s needs, drawing upon the local expertise of community-based organizations.
- Facilitate the submission of any applicable complaints related to rental housing, Code Enforcement, harassment, and/or fair housing issues or referrals to the appropriate agency.
- Follow complaint resolution procedures.
- Provide referrals to tenant navigation and education services as described below.
- Address any issues raised regarding other ULA Homelessness Prevention Programs and/or provide direct referrals to LAHD Staff that can assist with such issues.

### **Tenant Navigation**

Tenants shall be assisted in navigating the complex and often confusing housing rights and legal system. Tenant navigation generally includes, but is not limited to:

- Answering tenant questions regarding their housing situation via email, phone, text, video chat, and in-person.
- Assisting tenants with completing online intake forms and/or enrolling in workshops.
- Monitoring conditions and circumstances at buildings, including where an owner has filed an Ellis Act withdrawal application or has requested a Replacement Unit

- Determination, to assess compliance with notice and other requirements, and explain the process to tenants.
- Reminding tenants to submit necessary paperwork to their landlords and/or their assigned attorney.
  - Helping tenants connect with their assigned attorney to receive legal guidance and representation.
  - Providing other types of support to tenants and referrals, on an as-needed basis, to help them resolve their housing crisis, including seeking rental assistance and other housing-related resources.

### **Data Collection and Documentation**

These guidelines recognize that in addition to the public awareness, outreach, education, and tenant navigation activities identified and described above, the collection and analysis of key metrics related to the effectiveness of the Tenant Outreach and Education Program are essential activities in order to monitor the efficacy of the Programs and to ensure compliance with the reporting requirements in the ULA measure and ordinance. The following program metrics and participant data shall be collected on a monthly basis:

- Number, type, and location (when applicable) of activity (including virtual workshops, webinars, clinics, or other engagement events)
- Number of tenants reached (through all platforms, including but not limited to online public awareness, outreach, digital ads, and educational platforms) with socio and demographic data as deemed available.
- Narrative reports with overviews of communications, outreach, and education activities
- As available, oral narratives to highlight program participant and service provider success stories

Tenant Outreach and Education Program metrics and participant data shall be analyzed annually to allow for an assessment of whether ULA Programs are meeting their stated goals and accomplishing the priorities of the COC.

### **3.2 Program Budget**

The ULA measure and ordinance allocates two percent (2%) of overall program revenue for the Tenant Outreach and Education Program. Funding will be allocated for all services identified in *Sections 2.3 and 3.1*. Funding allocated to the Tenant Outreach and Education Program shall be apportioned and prioritized subject to the approval, discretion, and delegation of LAHD.

## **SECTION 4: IMPLEMENTATION PLAN**

Stay Housed LA was secured as a Contracting Partner in 2020 to provide services which LAHD has deemed to be consistent with the purpose and intent of the ULA measure and ordinance. The eligible activities identified in these Tenant Outreach and Education Program Guidelines (*Sections 2.3 and 3.1*) are consistent with and intended to enhance the provision of services already being implemented by SHLA. The existing Contracting Partners will continue to operate as it is currently tasked and as enhanced by these Tenant Outreach and Education Program Guidelines. At the expiration of the Contracting Partners' existing contracts, the Contracting Partners will be required to re-establish their membership through a procurement process, consistent with the City Administrative Code and any relevant City and LAHD policies.

## **SECTION 5: CONTRACTUAL SERVICES**

Implementation of the Tenant Outreach and Education Program requires contracting with the Contracting Partners, and most likely other contractors, for a portion of Program activities. 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 the Contracting Partners, LAHD may consider extending the term of that contract consistent with the terms of the existing agreement, or conducting a competitive bid for outreach and education services, consistent with the City's competitive bidding requirements.

### **5.1 Evaluation and Selection Process**

Award of a contract for Tenant Outreach and Education 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:

- 1) Experience and approach to providing tenant-based outreach and education services of a similar nature
- 2) Experience and approach to providing tangentially related services
- 3) Experience with and approach to providing services to the communities anticipated to be targeted for direct outreach and education
- 4) Experience with and approach to providing homelessness and eviction prevention services
- 5) A cost proposal for the solicited services

At the discretion of LAHD, the Department may allocate a portion of Program funds into contracts that may be procured for services to be provided under any other Homeless Prevention Program, to conduct outreach and education activities related to those programs.

## 5.2 Contract Administration

At least once per year, LAHD will provide a report to the COC and City Council summarizing the work accomplished, and recommending programmatic improvements and contract amendments. Changes to the service contract(s) may shift elements of the Program Scope of Services between LAHD and the Contracting Partners, to best reflect organizational capacity, changes in service priority, and learning during the course of program administration.

### Payment and Invoicing Policies

The contractor shall submit invoices to LAHD with an accounting of costs incurred. The contract will stipulate the frequency that costs will be invoiced to LAHD.

The contract may provide that LAHD may approve payment to be advanced to the contractor on an as-needed basis, especially if there are major startup costs and challenges.

## 5.3 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.

## 5.4 Data Collection and Reporting

Consistent with *Section 3.1* of these Tenant Outreach and Education Program Guidelines, program metrics and participant data shall be collected by the Contracting Partners and provided to 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:

- Number and type of activity (including virtual workshops, webinars, clinics, or other engagement events).
- Number of tenants reached (through all platforms including online public awareness, outreach, digital ads, and educational platforms) with socio and demographic data as deemed available.
- Narrative reports with overviews of communications, outreach, and education activities.
- As available, oral histories to highlight program participant and service provider success stories.

LAHD shall analyze Tenant Outreach and Education Program metrics and participant data annually and provide a summary of its analysis to COC to allow for an assessment of whether the Programs are meeting their goals and the priorities of the COC.

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