



The State Bar *of California*

OFFICE OF ACCESS & INCLUSION

Date: December 15, 2020

To: Members, Legal Services Trust Fund Commission

From: Amin Al-Sarraf, Chair, LSTFC Rules Committee
Doan Nguyen, Program Supervisor, Office of Access & Inclusion
Erica Carroll, Senior Program Analyst, Office of Access & Inclusion

Subject: Exploring IOLTA Statutory Change to Increase Threshold from 125 Percent of the Federal Poverty Level

EXECUTIVE SUMMARY

As part of the Legal Services Trust Fund Commission (LSTFC) Rules Committee's codification process, this memorandum provides an update on proposed changes to the poverty measure used in the governing authorities of the Interest on Lawyers' Trust Fund Account (IOLTA) grants.¹ This memorandum also advances the request of the legal aid community that the State Bar seek a statutory change to increase the current income threshold for client eligibility.

If approved, this change would impact the current definition of "indigent person" under California Business and Professions Code section 6213(d). This statute currently uses 125 percent of the federal poverty level (FPL) as the measure for determining client eligibility for services.²

State Bar staff is analyzing the likely implications of various changes and as a result does not have a final recommendation at this time. To ensure any recommendation for a statutory change is able to be considered timely by the State Bar Board of Trustees, staff and the Rules Committee request that the LSTFC take the following actions: (1) Direct staff to pursue a statutory change if there is consensus from the legal aid community and (2) Delegate authority

¹ Equal Access Fund (EAF) grants represent a different funding source, but they are administered using the same statutes and rules as the IOLTA grants. Consequently, EAF grants would be impacted by these changes, even though they are not mentioned in the statute.

² The IOLTA grant funding formula under Business and Professions Code section 6216 also uses the percentage of the population living at or below 125 percent FPL in each county to determine county funding allocations throughout the state. We examined a possible change to this statute as well.

to a working group of three LSTFC members to make a final decision regarding the specific recommendation to the Board.

BACKGROUND

CODIFICATION PROCESS

In 2019, the LSTFC began a multi-phase process of revising and/or codifying decision points employed in the grant-making process for IOLTA and EAF grants. The intent was to provide more transparency about the process and to ensure consistency in administering the grants.

The codification process entails members of the LSTFC forming working groups to investigate the questions raised in the Rules Committee's work plan and to develop preliminary recommendations. The working groups then share the preliminary recommendations with the Legal Aid Association of California (LAAC) in order to obtain feedback from the legal aid community. The Rules Committee considers the feedback and discusses before making a final recommendation to the LSTFC, and in turn, the Board of Trustees.

In this instance, the Rules Committee has considered the legal aid community's feedback but determined more investigation was necessary before proceeding with a recommendation to the LSTFC.

GOVERNING AUTHORITIES

IOLTA and EAF grants are awarded to approximately 100 nonprofit legal organizations each year to provide free civil legal aid in California to indigent persons, or legal training, legal technical assistance, or advocacy support without charge to the organizations providing services to indigent persons. Grant recipients must comply with criteria set forth in Business & Professions Code sections 6210-6228 (otherwise known as the "IOLTA Statute"), State Bar Rules, and other governing authorities.³

State Bar Staff and a working group from the Rules Committee reviewed these governing authorities for direction regarding the definition of "indigent person" under Business and Professions Code section 6213(d).

DISCUSSION

ELIGIBILITY FOR SERVICES UNDER THE DEFINITION OF "INDIGENT PERSON"

Business and Professions Code section 6213(d) provides, in relevant part, the following definition of "indigent person": "Indigent person" means a person whose income is (1) 125

³ Additional governing authorities include the Eligibility Guidelines (for Qualified Legal Services Projects and Support Centers), Legal Services Trust Fund General Grant Provisions, and Standards for Financial Management Systems and Audits. However, they are not pertinent to the issues raised in this discussion.

percent or less of the current poverty threshold established by the United States Office of Management and Budget ...” Under Business and Professions Code section 6218, each grant recipient is responsible for developing financial eligibility guidelines to ensure that IOLTA and EAF funding are used solely to defray the costs of providing legal services to indigent persons. To promote consistency in determining eligibility for services under Business and Professions Code section 6213(d), the working group initially recommended creating a State Bar Rule that further clarifies the statutory definition of “indigent person.”

a. Legal Aid Community Feedback

In response to the working group’s recommendation, LAAC submitted written comments to the Rules Committee reflecting the input of the legal aid community requesting that the Committee consider increasing the income threshold, rather than simply clarifying the existing definition. As reported by LAAC, there was consensus from IOLTA-funded organizations that the income threshold is too low, but it was less clear if organizations were in agreement as to what level the new income threshold should be.⁴ (Attachment A.)

Requests from the legal aid community included increasing from 125 percent FPL to 200 percent FPL, or anywhere between 50 and 80 percent of the Area Median Income (AMI), which, as its name implies, varies by region. It was suggested that these changes would bring the IOLTA requirements in line with other grants, including those from the Legal Services Corporation (which allows up to 200 percent FPL after calculating income exceptions) or the Department of Housing and Urban Development (HUD), which typically uses a cutoff of 80 percent of the AMI.

The legal aid community proposed two options for increasing eligibility:

1. A statutory change to Business and Professions Code section 6213(d) to increase the income threshold to 200 percent FPL or substitute use of the AMI, or
2. Maintain the 125 percent FPL in the statute but allow for more explicit and liberal income exceptions that would expand the population of persons defined as “indigent.”

b. Rules Committee Discussion

The last time this idea was discussed, during the Stakeholder Working Group process two years ago, the consensus from the legal aid community seemed to be that it was not the appropriate time to pursue a change to the income threshold. However, given the request initiated by legal aid community more recently—combined with the challenges presented by COVID-19, specifically the economic hardship many individuals and families are experiencing from sudden and prolonged unemployment and high healthcare costs—the Rules Committee agreed that circumstances had changed.

At its October 16, 2020 meeting, the Rules Committee directed staff to explore a statutory change to Business and Professions Code section 6213(d) to increase the IOLTA income threshold. Section 6213(d) and the IOLTA funding formula under section 6216 run on parallel

⁴ LAAC’s Executive Director, Salena Copeland, is a liaison to the LSTFC, and she attended the Rules Committee meeting to make similar comments.

tracks by using the same poverty measure; staff also recommended investigating how such a change would impact the IOLTA funding allocations, or whether different measures should apply to determining client income eligibility versus county award allocations. Staff was instructed to share the results of this investigation with the LSTFC for discussion before proposing any specific change to the Board.

POSSIBLE CHANGES TO THE THRESHOLD

Increasing to 200 Percent of the Federal Poverty Level

a. Income Eligibility

The current poverty measure used to determine client income eligibility as well as the funding allocated to each county in California is 125 percent FPL.⁵ However, FPL is a nationally based income measure that does not take into consideration the high cost of living in many areas in a state like California. Increasing the threshold to 200 percent FPL would expand the number of individuals programs can count as eligible for services using IOLTA or EAF funds by over 5 million people, from approximately 7.3 million to approximately 12.4 million people statewide.⁶ (Of course, the number varies from county to county: Los Angeles County would have approximately 1.5 million more eligible persons, whereas Alpine County would have fewer than 200; see Attachment B.)

b. Funding Formula

As noted above, the IOLTA statute currently utilizes 125 percent FPL for both income eligibility determinations and funding allocations by county. Consequently, the State Bar examined whether any proposed changes to income eligibility should also apply to the county funding formula. If a change to the funding formula were pursued to match the income eligibility threshold (basing county award allocations on the size of the population at or below 200 percent FPL), the distribution of funds would be impacted.

The State Bar's calculations confirmed that the counties that have a higher proportion of their population living at or below 125 percent FPL would stand to lose the most funding and those with significant populations between 125 and 200 percent FPL would gain the most.⁷ (Attachments B and C.) When grouping rural counties together versus urban counties, in the

⁵ Organizations' percentage of qualified expenditures are also determined using 125 percent FPL.

⁶ Some IOLTA-funded organizations currently serve clients over the 125 percent FPL; however, they are prohibited from counting these expenditures as qualified for the purpose of determining IOLTA grant allocations. If the income threshold increased to 200 percent FPL, organizations would be able to count services to these additional clients as qualified expenditures.

⁷ Though we have not conducted an analysis at the level of individual organizations, it also stands to reason that those organizations that currently serve clients above 125 percent FPL with other funds may stand to gain more IOLTA/EAF funding, as their qualified expenditures would increase. However, this outcome is less clear because there are a number of variables at play, including organizations operating in multiple counties, the behavior or decision-making of other organizations regarding service priorities and expenditures, and whether any other organizations not currently funded through IOLTA/EAF would apply and receive funding based on the increased threshold.

aggregate, money would move into urban counties and out of rural counties. However, at the individual county level, the picture is less clear. (See Attachments B and C.)

c. Implications of Changing to 200 Percent FPL

Raising the income eligibility threshold would provide legal services providers more flexibility when determining which cases to accept. Currently, no matter how compelling the case, the work cannot be funded by IOLTA if the client's income is above 125 percent FPL and does not meet any other eligibility criteria.⁸ Yet, raising the income measure utilized by the funding formula in tandem with the client income eligibility threshold may prove counterproductive, by taking net funding away from rural and high poverty areas, as highlighted above.

If the Commission were to support a statutory change based on the FPL, one compromise may be to raise the client income eligibility threshold to 200 percent FPL, thus providing programs with greater latitude, but maintain funding allocations based on 125 percent of the FPL to avoid drawing funds away from already impoverished counties.

Substituting 50 or 80 Percent of the Area Median Income

Another option proposed by the legal aid community was basing income eligibility on some percentage of the area median income (AMI), which varies by county. Generally, 50 percent AMI is considered "very low income" and 80 percent AMI is considered "low income." The federal Department of Housing and Urban Development (HUD) produces income charts to assist in calculating AMI based on household size. (Attachment D.)

a. Employing AMI for the Income Eligibility Threshold

From an organizational perspective, it is easy enough to apply AMI when screening a new client for eligibility for services; it is based on the individual's household data in comparison with the income chart. This is, in fact, a measure that some legal services projects current employ as their IOLTA/EAF income threshold. For organizations receiving a pro bono allocation, they are permitted to use a percentage of AMI (which is higher than 125 percent FPL) to determine eligibility for services.⁹

b. Incorporating AMI into the Funding Formula

From an administrative perspective, applying AMI to the IOLTA formula for allocation purposes is infeasible, regardless of whether 50 percent or 80 percent AMI is used. Not only would the measure vary from county to county—50 percent AMI in Alameda County is very different from 50 percent AMI in Imperial County—factoring it into the funding formula would make the yearly allocation calculation significantly more complex and burdensome. Moreover, unlike the FPL—the data for which comes from the five-year average of the American Community Survey

⁸ A client may also qualify for services as an "indigent person" under Business and Professions Code section 6213(d) if that person is eligible for supplemental security income or free services under the Older Americans Act or Developmentally Disabled Assistance Act.

⁹ Under Business and Professions Code section 6213(d), pro bono programs may apply an income threshold that equates to 75 percent of the 80 percent AMI threshold.

(ACS)—there is no reliable or accessible data source (known to staff) to obtain the necessary numbers to run the formula based on a percentage of AMI.¹⁰ Finally, it would not guarantee that this calculation would more accurately reflect the number of individuals living in poverty in each county than what is already utilized.

c. Implications of Using AMI

In many counties, even 50 percent AMI is higher than 200 percent FPL, and in every county 80 percent AMI is higher than 200 percent FPL.¹¹ (See Attachment E for comparison.) Even though utilizing some percentage of AMI as the income threshold may provide greater flexibility to existing grantees, it will also enable more organizations to become eligible for IOLTA grants. With the decrease of the Federal Funds Rate to near zero earlier this year, the legal services community may raise concerns about this approach, as it may reduce individual program funding.

As discussed above, it is not possible to use AMI for the funding formula. Deciding to use AMI would only be in the context of determining income eligibility for services.

Cost of Living

Staff also considered factoring in the consumer price index (CPI) to make appropriate adjustments for varying costs of living throughout California. However, this approach suffers from the same limitations as AMI in terms of obtaining the necessary data to run the calculation. Further, CPI is only estimated in metropolitan areas, so it would require another step for staff (and grant recipients) to attempt to calculate cost of living in more rural areas. This creates a vulnerability in the calculation that could lead to inaccuracies in determining the income threshold as well as funding allocations.

Initial Conclusions and Next Steps

Based on the above analysis, staff believes that the most viable option—if any change is pursued—would be to increase the income threshold to 200 percent FPL to provide programs with more flexibility but maintain funding allocations based on 125 percent of the FPL so that funding would not be drawn from rural and high poverty areas. This change would be possible to implement, whereas there is currently no reliable data source to determine the impact of changes using AMI or CPI. Before staff and the Commission finalize a recommendation, we would like to solicit additional feedback from the legal aid community through a formal survey and informational webinar.

Following the LSTFC meeting, staff will share this information with the legal aid community and conduct a brief survey to gauge whether the legal aid community's opinion remains the same or

¹⁰ For example, the ACS is already designed to provide estimates of the number of individuals at or below certain poverty levels (e.g. 50, 125, 200 percent FPL, etc.) in each county, but it does not provide summary data based on the AMI, let alone data points at the individual or household levels.

¹¹ Use of 80 percent AMI as the income eligibility threshold would erase any distinction between legal services projects that receive a pro bono allocation and those that do not; the income threshold would become the same for all legal services projects.

if the data analysis provided impacts any desired changes to the income eligibility threshold. Though the community already indicated consensus in raising the eligibility threshold, this survey will demonstrate whether the community has coalesced around one of the alternatives discussed above. It will also provide information on the community's perspective on the funding formula, which was not addressed in the community's initial feedback through LAAC.

Staff recommends that the LSTFC designate a working group to review the information presented at this meeting in more depth and incorporate the legal aid community's feedback before formulating a final recommendation to the Board.

PROPOSED RESOLUTION

Should the LSTFC concur, the following resolution is recommended:

"The LSTFC delegates authority to a three-member working group to make a final recommendation to the Board of Trustees regarding whether to pursue a statutory change in conjunction with the legal services community, and if so, which alternative measure to use."

ATTACHMENTS LIST

- A.** Legal Aid Association of California written comment to LSTFC Rules Committee, dated October 4, 2020
- B.** Spreadsheet demonstrating change from 125 percent FPL to 200 percent, by county
- C.** Charts illustrating changes based on variables (county type, percentage change, etc.)
- D.** Example of AMI chart for Alameda County
- E.** Comparison of income for a household size of four at 125 percent and 200 percent FPL, and 50 percent and 80 Percent AMI based on select counties

DATE: October 4, 2020

TO: Amin Al-Sarraf, Chair, LSTFC Rules Committee

CC: Corey Friedman, Member, LSTFC Rules Committee
 Richard Reinis, Member, LSTFC Rules Committee
 Judge Brad Seligman, Member, LSTFC Rules Committee

FROM: Salena Copeland, Executive Director, Legal Aid Association of California

SUBJECT: LAAC Comments on Proposed Changes to Rules of the State Bar to Define and Demonstrate Indigency

Thank you so much for the opportunity to comment on these proposals prior to the Rules Committee discussion. LAAC convened legal services leaders from both QLSPs and Support Centers on Wednesday, September 30 and Friday, October 2 in an effort to hear concerns from the community and understand if there was consensus or disagreement about the proposed changes.

In contrast to the relatively uncontroversial proposed changes in the primary purpose memo, this discussion raised issues that reflected somewhat of a split in the opinions of our community members. Below, I will try to summarize what seemed to be consensus agreement and what seemed to be more of a split. Additionally, I encouraged organizations to submit short comments directly to Doan when their organization had a deeper understanding of how the proposed changes might impact their organization (especially with the proposed changes to ILAW reporting).

Definition of Income and Indigency

There was unanimous agreement that the current income threshold of 125% is far too low for organizations. Everyone gave specific examples of other sources of funding, including government grants, which allow for 200% or even higher thresholds. It seems the community would strongly support a change in the rules revision process that would allow a higher threshold (knowing, of course, that a more radical shift would need legislative approval).

One suggestion, which many LSC-funded organizations supported, is to more clearly follow the LSC guidelines for income exceptions under Section 1611.5 of Title 45 of the Code of Federal Regulations: <https://www.law.cornell.edu/cfr/text/45/1611.5>. In practice, this allows a new absolute ceiling of 200%, rather than 125%, when income exceptions are accounted for. All organizations supported clarity around income exceptions, as it seems like there is some gray area in what can and cannot be excluded now.

There also were many organizations that would support increasing the income level to HUD income limits by county (Alameda 2020 example here:

<https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn>) Because many legal aid organizations have grants or contracts that are tied to HUD income levels, they stated that this might make record-keeping easier.

Another alternative, but similar to HUD, would be to tie it again to county comparisons to Area Median Income, but instead of the 80% AMI for HUD, another amount, such as 50 or 60%, which is still significantly higher than the 125% of poverty level currently used. It also takes into account regional differences income and expenses.

Yet another alternative, which our community has discussed for over a decade (at least as long as my legal aid career) is just changing the threshold through legislative action to 200% of poverty. I note, though, that this does not take into account regional differences, and it is lower than 50% of AMI (and therefore lower than “very low income limits” under HUD).

There was some discussion, as well, about the difference between the threshold allowed by pro bono organizations and by those that do not receive the pro bono allocation. If a client at 150% of poverty is served by Organization A without a pro bono allocation, services to the client do not count as a qualifying expense. But if the client received the same services at Organization B (with a pro bono allocation) the services count. Organizations understand this is a statutory definition, but wanted to point out the practical implications.

It may help to create charts for the Rules Revision Committee discussion to show what these various income levels would mean for a family of 4. It may also help to add the data point of the average cost of a 2 bedroom apartment by region, if you are highlighting AMI based on a couple of regions.

I think this is a discussion that deserves longer input and legislative involvement, but it is clear that the community *does* support an increase to recognize that there are people who are very low income that the organizations are already serving, but the organizations cannot count services to those people for the purpose of IOLTA.

Indigency and Children

One issue that came up briefly, but for which we could not establish a clear recommendation, is that the community would like a little more guidance on establishing indigency for youth clients. Some QLSPs represent youth with zero income, but they would appreciate more guidance that that determination is appropriate.

Definition of Project for the Purposes of Pro Bono Work

One issue that came up in this discussion, and I hope to have a longer comment prepared by the meeting, is on the definition of “project” for the purposes of counting a higher income level for eligible clients. Although this is related to the discussion above, I am separating it out because it is an issue of statutory interpretation.

This came up in the context of a support center that constantly has to figure out when they are co-counseling with multiple QLSPs whether a client at a given income level is coming from a pro bono allocation organization or a non-pro bono allocation organization to see if the work would count as qualifying. Because there is some fluidity to the pro bono allocation (not all organizations get it year after year, and some may newly be awarded the allocation), it just becomes a tracking challenge.

In the statute, it states, “With regard to a project that provides free services of attorneys in private practice without compensation, ‘indigent person’ also means a person whose income is 75 percent or less of the maximum levels of income for lower income households as defined in Section 50079.5 of the Health and Safety Code.”

We understand that State Bar staff has interpreted “project” in this section to mean “an organization that receives the pro bono allocation” rather than a more broader definition of either a subproject of a larger organization or any nonprofit project (including those who do not receive the pro bono allocation) that is using pro bono services to serve that client. Although there was not broad consensus on this topic, it did seem that many organizations believed that if the client is being served by the pro bono “project” of a larger legal aid organization, even if they do not receive the pro bono allocation, perhaps the client should count as indigent for the purposes of qualified expenditures.

ILAW recommendations

The community was in strong support of all three of the proposed changes, with minor modifications.

1. Only requiring completion of the ILAW report if the amount of time devoted to these activities exceeds the lesser of the following: 10 percent of the organization’s legal services in a given year, or 100 hours (cumulatively), as determined by the organization; and
2. Allowing the use of internal data to provide justification for the activity if independent data is not available. One example would be for the organization to quantify the percentage of its indigent clients who experienced a particular problem in the past few years (as reported in its State Bar Case Summary Report) to demonstrate a nexus with the legal issue now being addressed through an impact litigation case or advocacy activity; and/or
3. Demonstrating disproportionate impact to indigent persons based on the nature of the activity, and—assuming the activity is successful in achieving its aims—the specific anticipated outcomes as they relate to the needs of indigent persons. While the intent behind the activity is certainly important, the working group believes that it needs to be anchored by relevant and current

information regarding the needs of indigent persons in the community served by the activity, even if these activities are not conducive to quantifying the percentage served who are indigent.

As to #1, we suggest changing to the “greater” of the following rather than the lesser. Some speakers on our call were concerned that leaving it as the “lesser” would make it unfair to smaller organizations that might have to report a larger number of activities than larger organizations that had many projects below both thresholds, due to the total number of activities. Interestingly, what some complained of was the mis-match between some organizations reporting a coalition activity as rising to the ILAW threshold, but other organizations within that coalition not reporting the activity, so guidance on how to report or not for coalitions would be helpful. One attorney stated that she likely spent 100 hours on the ILAW report alone, ensuring that their coalition activities matched with others on top of the organization’s reporting on their individual activities. I am certain this is not what State Bar staff intended!

Generally, as to #1, it seems like organizations understand the need to have some way to make sure that State Bar staff know this work is qualifying work and for qualifying clients, but they all felt it would be easier if they reported fewer activities – and easier on State Bar staff.

As to #2, there was broad support. I believe, from my past attendance at LSTFC meetings, that this is frequently allowed, but it is not clearly defined for all programs.

As to #3, again, there was broad support. They suggested a revision to include activities intended to prevent homelessness – for example, impact litigation or policy work that would help keep people in their homes or help open up access to government benefits, even if many of those who would be helped might be over the current 125% of poverty level (but if the organization failed in the litigation or advocacy work, the intended beneficiaries of the work would fall below the threshold). There was also a brief discussion of disproportionate impact in the area of addressing domestic violence. Although intimate partner violence happens at all income levels, the economic impact of the violence disproportionately impacts those at the lowest income level and who are eligible for IOLTA services.

I suspect that you will receive a few more comments prior to the October 16 meeting. Additionally, once the final memo is posted on the meeting portal, we may have updated comments.

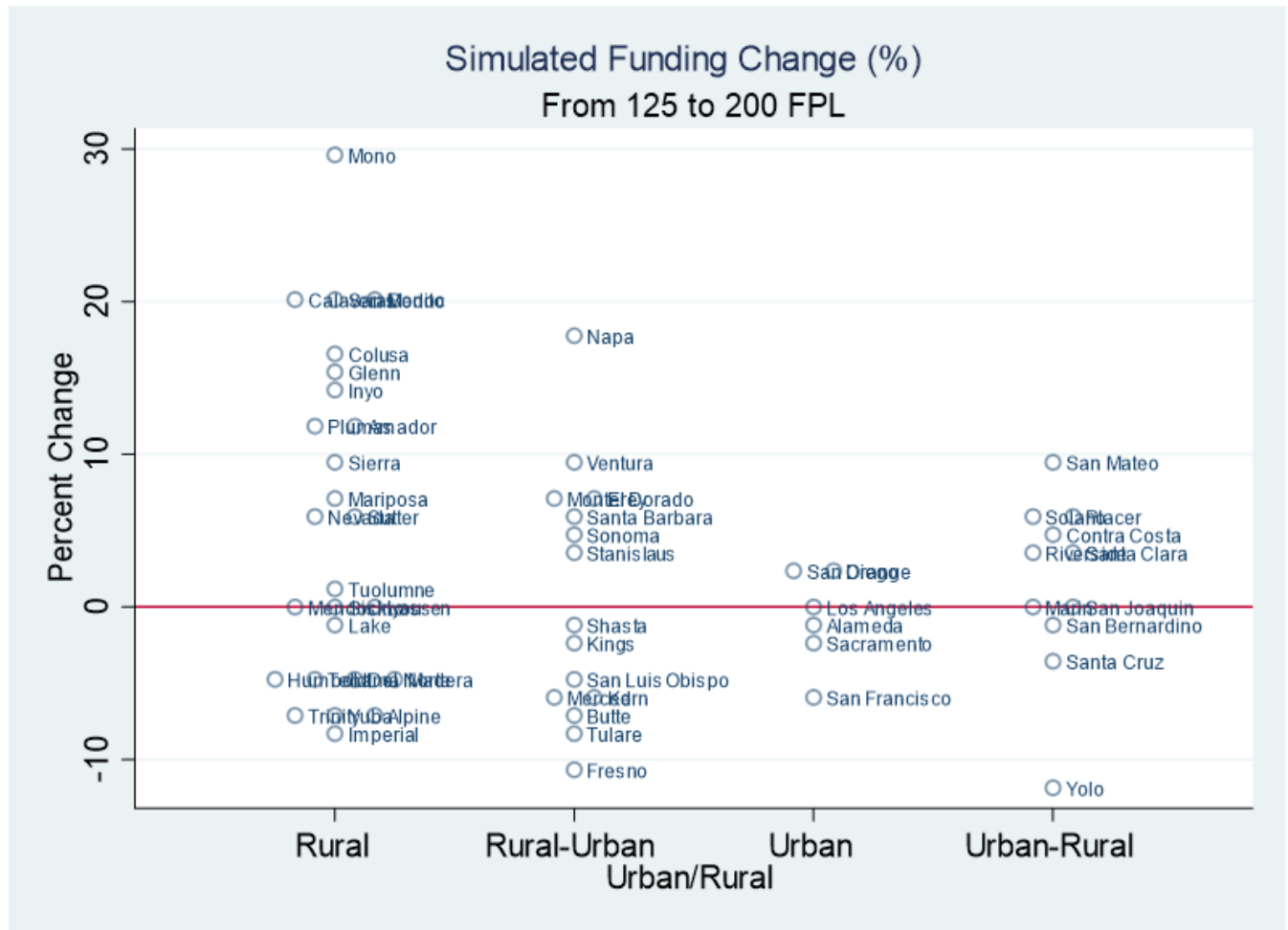
Thank you so much for the opportunity to review this draft memo and for all your work to try to make this reporting easier on both State Bar staff and legal aid staff. I look forward to the discussion.

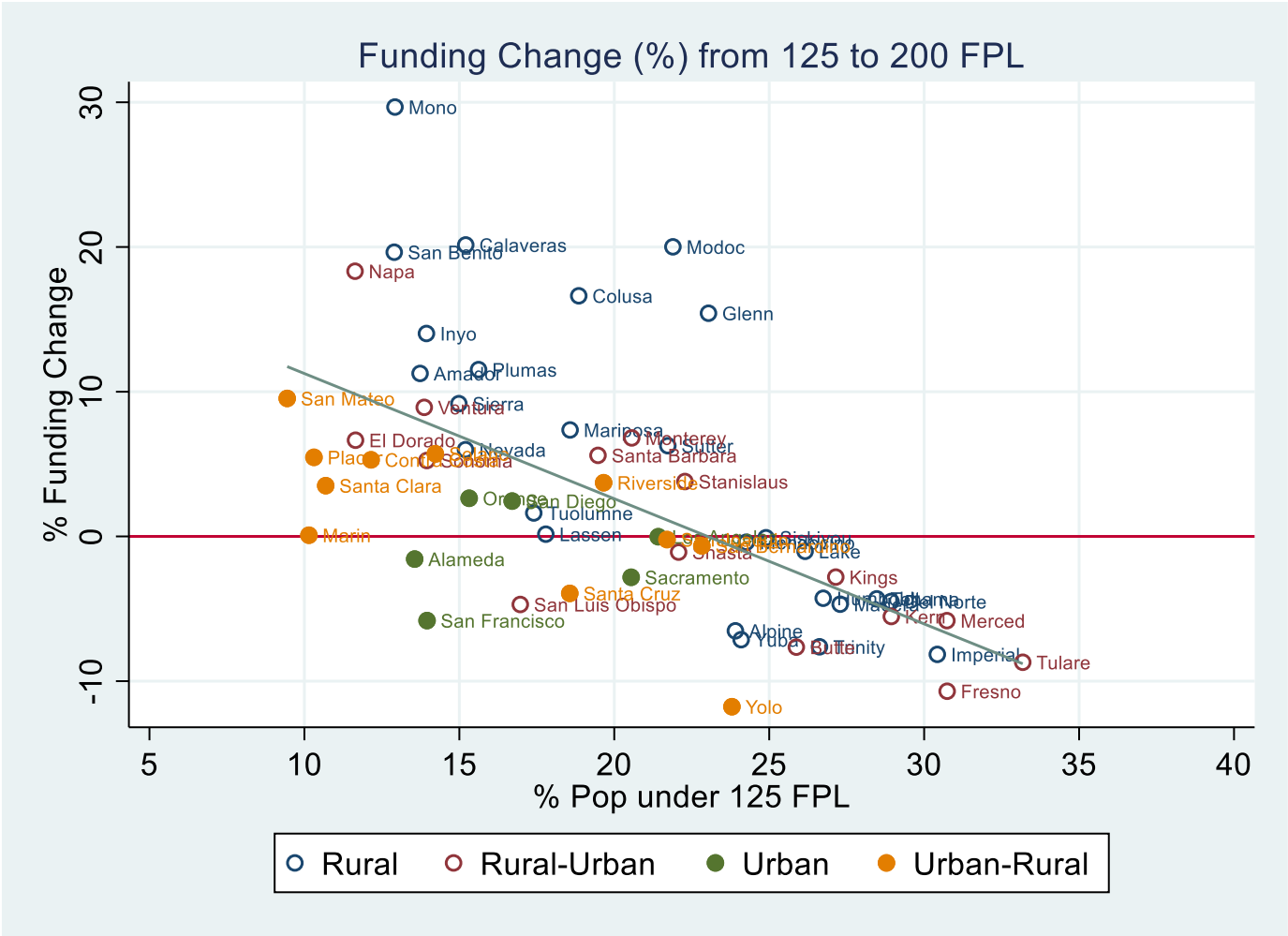
Changes to Funding Allocations from 125 to 200 Percent of the Federal Poverty Level

County	Total population under 125%	County/State Poverty Ratio under 125%	County/State Poverty % under 125%	IOLTA Allocation under 125%	Total population under 200%	County/State Poverty Ratio under 200%	County/State Poverty % under 200%	IOLTA Allocation under 200%	Diff by %	Diff by Amount
Urban Counties										
Alameda County, California	219,286	0.030076415	3.008%	\$601,718	369,977	0.029605696	2.961%	\$592,301	-2%	-\$9,417
Los Angeles County, California	2,130,838	0.292257455	29.226%	\$5,846,993	3,651,509	0.292195101	29.220%	\$5,845,745	0%	-\$1,247
Orange County, California	478,940	0.065689548	6.569%	\$1,314,205	842,554	0.067421483	6.742%	\$1,348,855	3%	\$34,650
Sacramento County, California	306,026	0.041973336	4.197%	\$839,731	509,721	0.040788063	4.079%	\$816,019	-3%	-\$23,713
San Diego County, California	538,120	0.073806447	7.381%	\$1,476,595	944,867	0.075608607	7.561%	\$1,512,649	2%	\$36,055
San Francisco County, California	119,546	0.016396465	1.640%	\$328,033	192,988	0.015442971	1.544%	\$308,957	-6%	-\$19,076
				\$10,407,275				\$10,424,525	0.17%	\$17,251
Urban-Rural Mixed Counties										
Contra Costa County, California	136,556	0.018729490	1.873%	\$374,708	246,448	0.019720860	1.972%	\$394,542	5%	\$19,834
Marin County, California	25,783	0.003536296	0.354%	\$70,748	44,229	0.003539221	0.354%	\$70,807	0%	\$59
Placer County, California	38,820	0.005324400	0.532%	\$106,522	70,175	0.005615429	0.562%	\$112,344	5%	\$5,822
Riverside County, California	461,408	0.063284927	6.328%	\$1,266,098	820,194	0.065632227	6.563%	\$1,313,059	4%	\$46,961
San Bernardino County, California	473,724	0.064974142	6.497%	\$1,299,893	806,627	0.064546591	6.455%	\$1,291,339	-1%	-\$8,554
San Joaquin County, California	155,808	0.021370019	2.137%	\$427,535	266,472	0.021323188	2.132%	\$426,598	0%	-\$937
San Mateo County, California	71,763	0.009842734	0.984%	\$196,917	134,732	0.010781304	1.078%	\$215,694	10%	\$18,777
Santa Clara County, California	202,205	0.027733652	2.773%	\$554,848	358,741	0.028706588	2.871%	\$574,313	4%	\$19,465
Santa Cruz County, California	48,693	0.006678543	0.668%	\$133,613	80,176	0.006415713	0.642%	\$128,355	-4%	-\$5,258
Solano County, California	60,899	0.008352670	0.835%	\$167,106	110,345	0.008829848	0.883%	\$176,653	6%	\$9,547
Yolo County, California	49,263	0.006756722	0.676%	\$135,177	74,501	0.005961598	0.596%	\$119,270	-12%	-\$15,907
				\$4,733,164				\$4,822,972	1.90%	\$89,808
Rural-Urban Mixed Counties										
Butte County, California	57,244	0.007851364	0.785%	\$157,077	90,612	0.007250806	0.725%	\$145,062	-8%	-\$12,015
El Dorado County, California	21,552	0.002955989	0.296%	\$59,138	39,396	0.003152482	0.315%	\$63,070	7%	\$3,931
Fresno County, California	295,680	0.040554319	4.055%	\$811,342	452,590	0.036216419	3.622%	\$724,557	-11%	-\$86,785
Kern County, California	246,508	0.033810079	3.381%	\$676,415	399,140	0.031939330	3.194%	\$638,988	-6%	-\$37,427
Kings County, California	36,610	0.005021285	0.502%	\$100,457	60,987	0.004880202	0.488%	\$97,635	-3%	-\$2,823
Merced County, California	80,822	0.011085231	1.109%	\$221,775	130,470	0.010440258	1.044%	\$208,871	-6%	-\$12,904
Monterey County, California	85,545	0.011733020	1.173%	\$234,734	156,606	0.012531670	1.253%	\$250,712	7%	\$15,978
Napa County, California	15,957	0.002188600	0.219%	\$43,786	32,363	0.002589699	0.259%	\$51,810	18%	\$8,025
San Luis Obispo County, California	45,019	0.006174631	0.617%	\$123,532	73,535	0.005884298	0.588%	\$117,723	-5%	-\$5,808
Santa Barbara County, California	82,669	0.011338559	1.134%	\$226,843	149,633	0.011973688	1.197%	\$239,549	6%	\$12,707
Shasta County, California	38,897	0.005334961	0.533%	\$106,733	65,946	0.005277023	0.528%	\$105,574	-1%	-\$1,159
Sonoma County, California	68,990	0.009462400	0.946%	\$189,308	124,452	0.009958695	0.996%	\$199,237	5%	\$9,929
Stanislaus County, California	119,024	0.016324869	1.632%	\$326,600	211,750	0.016944313	1.694%	\$338,993	4%	\$12,393
Tulare County, California	150,922	0.020699875	2.070%	\$414,128	236,187	0.018899771	1.890%	\$378,115	-9%	-\$36,013
Ventura County, California	116,003	0.015910520	1.591%	\$318,311	216,567	0.017329771	1.733%	\$346,705	9%	\$28,394
				\$4,010,178				\$3,906,600	-2.58%	-\$103,578
Rural Counties										
Alpine County, California	274	0.000037581	0.004%	\$752	439	0.000035129	0.004%	\$703	-7%	-\$49
Amador County, California	4,691	0.000643399	0.064%	\$12,872	8,946	0.000715862	0.072%	\$14,322	11%	\$1,450
Calaveras County, California	6,804	0.000933210	0.093%	\$18,670	14,011	0.001121165	0.112%	\$22,430	20%	\$3,760
Colusa County, California	4,011	0.000550133	0.055%	\$11,006	8,018	0.000641603	0.064%	\$12,836	17%	\$1,830
Del Norte County, California	7,007	0.000961053	0.096%	\$19,227	11,470	0.000917834	0.092%	\$18,362	-4%	-\$865
Glenn County, California	6,324	0.000867375	0.087%	\$17,353	12,511	0.001001135	0.100%	\$20,029	15%	\$2,676
Humboldt County, California	35,429	0.004859304	0.486%	\$97,217	58,132	0.004651744	0.465%	\$93,064	-4%	-\$4,153
Imperial County, California	51,858	0.007112642	0.711%	\$142,298	81,640	0.006532863	0.653%	\$130,698	-8%	-\$11,599

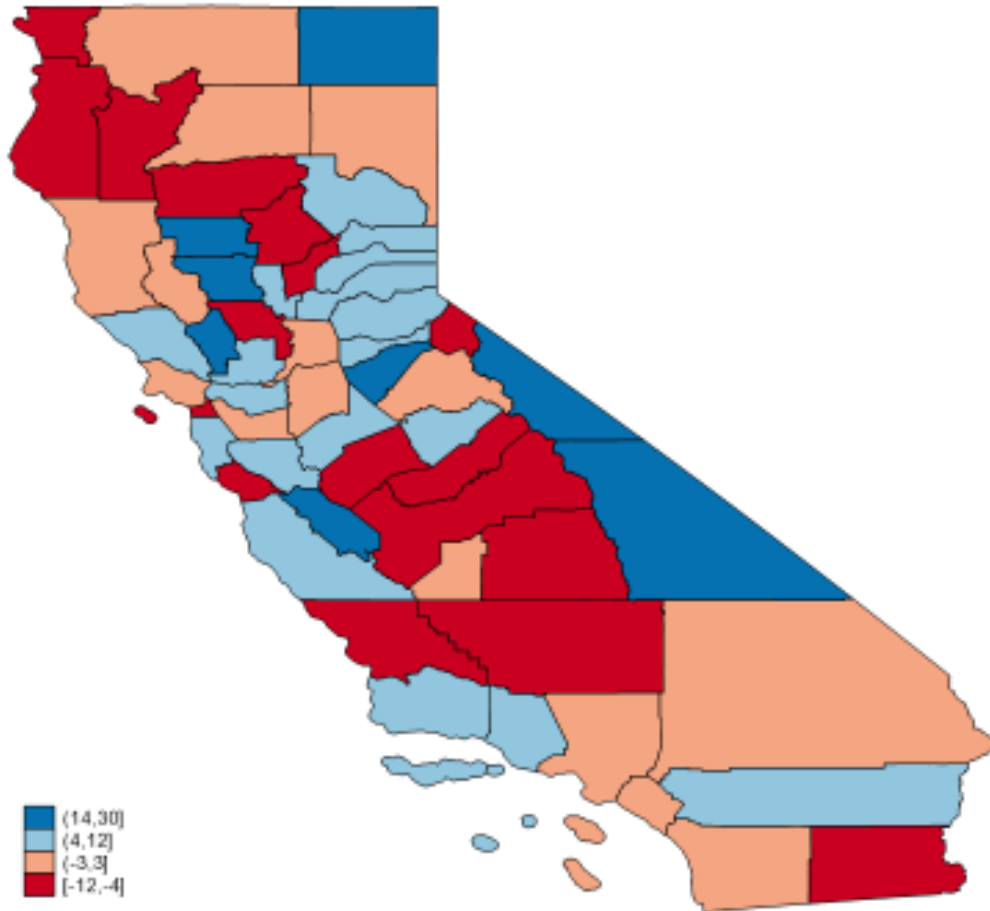
Changes to Funding Allocations from 125 to 200 Percent of the Federal Poverty Level

Inyo County, California	2,454	0.000336581	0.034%	\$6,734	4,796	0.000383778	0.038%	\$7,678	14%	\$944
Lake County, California	16,490	0.002261704	0.226%	\$45,248	27,973	0.002238410	0.224%	\$44,782	-1%	-\$466
Lassen County, California	3,777	0.000518039	0.052%	\$10,364	6,484	0.000518852	0.052%	\$10,380	0%	\$16
Madera County, California	40,000	0.005486244	0.549%	\$109,759	65,350	0.005229331	0.523%	\$104,620	-5%	-\$5,140
Mariposa County, California	3,221	0.000441780	0.044%	\$8,838	5,927	0.000474281	0.047%	\$9,489	7%	\$650
Mendocino County, California	20,829	0.002856825	0.286%	\$57,155	35,558	0.002845364	0.285%	\$56,925	0%	-\$229
Modoc County, California	1,895	0.000259911	0.026%	\$5,200	3,898	0.000311919	0.031%	\$6,240	20%	\$1,040
Mono County, California	1,815	0.000248938	0.025%	\$4,980	4,034	0.000322802	0.032%	\$6,458	30%	\$1,478
Nevada County, California	14,897	0.002043215	0.204%	\$40,877	27,064	0.002165671	0.217%	\$43,327	6%	\$2,450
Plumas County, California	2,872	0.000393912	0.039%	\$7,881	5,490	0.000439312	0.044%	\$8,789	12%	\$908
San Benito County, California	7,623	0.001045541	0.105%	\$20,917	15,632	0.001250878	0.125%	\$25,025	20%	\$4,108
Sierra County, California	435	0.000059663	0.006%	\$1,194	814	0.000065137	0.007%	\$1,303	9%	\$110
Siskiyou County, California	10,747	0.001474017	0.147%	\$29,490	18,404	0.001472695	0.147%	\$29,463	0%	-\$26
Sutter County, California	20,586	0.002823496	0.282%	\$56,488	37,496	0.003000444	0.300%	\$60,028	6%	\$3,540
Tehama County, California	17,803	0.002441790	0.244%	\$48,851	29,198	0.002336435	0.234%	\$46,743	-4%	-\$2,108
Trinity County, California	3,362	0.000461119	0.046%	\$9,225	5,323	0.000425948	0.043%	\$8,522	-8%	-\$704
Tuolumne County, California	8,798	0.001206699	0.121%	\$24,142	15,324	0.001226232	0.123%	\$24,532	2%	\$391
Yuba County, California	17,840	0.002446865	0.245%	\$48,953	28,396	0.002272258	0.227%	\$45,460	-7%	-\$3,493
				\$855,691				\$852,210	-0.41%	-\$3,480
California TOTAL	7,290,962	1.00	100%	\$20,006,308	12,496,818	1.0000	100.000%	\$20,006,308		





Simulated Percent Change of Funding Allocation by County



Example of HUD Area Median Income Chart for Alameda County:

FY 2020 Income Limits Summary

Selecting any of the buttons labeled "Explanation" will display detailed calculation steps for each of the various parameters.

FY 2020 Income Limit Area	Median Family Income Explanation	FY 2020 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Oakland-Fremont, CA HUD Metro FMR Area	\$119,200	Very Low (50%) Income Limits (\$) Explanation	45,700	52,200	58,750	65,250	70,500	75,700	80,950	86,150
		Extremely Low Income Limits (\$) * Explanation	27,450	31,350	35,250	39,150	42,300	45,450	48,550	51,700
		Low (80%) Income Limits (\$) Explanation	73,100	83,550	94,000	104,400	112,800	121,150	129,500	137,850

Income Thresholds Based on Household Size of Four People (2020)

Federal Poverty Level		HUD Very Low Income (50% AMI)					HUD Low Income (80% AMI)				
125% FPL	200% FPL	Fresno, Imperial & Shasta Counties	Los Angeles County	Orange County	Alameda County	State (CA)	Fresno, Imperial & Shasta Counties	Los Angeles County	Orange County	Alameda County	State (CA)
\$32,750	\$52,400	\$34,950	\$56,300	\$64,050	\$65,250	\$43,550	\$55,900	\$90,100	\$102,450	\$104,400	\$69,700

Source: https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn