



The State Bar of California

OFFICE OF ACCESS & INCLUSION

Date: April 26, 2023

To: Members, Legal Services Trust Fund Program Eligibility & Budget Review Committee

From: Erica Carroll, Lead Program Analyst

Subject: Approve 2022 Impact Litigation and Advocacy Work (ILAW) Activities

EXECUTIVE SUMMARY

Business and Professions Code section 6216 prescribes the method for distributing IOLTA funds to qualified legal services organizations based on a formula centered in part on the organization's "qualified" expenditures (i.e., expenditures for free civil legal services to indigent persons or in support of organizations that provide such services). Equal Access Fund (EAF) grants are also distributed according to the IOLTA formula. Each year, both qualified legal services projects (QLSPs) and support centers (SCs) submit Impact Litigation and Advocacy Work (ILAW) reports. These reports are intended to highlight work that affects significant segments of the eligible population or is expected to achieve relatively permanent improvement in legal rights or basic living conditions of those affected.

Reports from 2022 were reviewed by staff prior to the IOLTA and EAF application process to streamline application review and ensure the reports reflect qualifying work. Where the activity initially appears to be nonqualifying, or where the qualifying nature of the activity is unclear, staff brings the activity to the Eligibility & Budget Review (EBR) Committee for further review and decision. Activities found to be nonqualifying will be deducted in the 2024 IOLTA and EAF grant applications. A reduction in the amount of an organization's qualifying expenditures could reduce an organization's grant award and/or impact its primary purpose.

BACKGROUND

GOVERNING AUTHORITIES

Business and Professions Code section 6216 provides for distribution of IOLTA funds to qualified legal services organizations based on a formula centered in part on the organization's

“qualified” expenditures. An organization’s determination of primary purpose and function as either a QLSP or SC is also based on its qualified expenditures under State Bar Rule 3.671. QLSPs and SCs have different requirements for what is considered a qualifying activity.

QLSP Requirements

According to Business and Professions Code section 6213(a), a QLSP’s primary purpose is to provide civil legal services to indigent persons in California without charge. As such, to be considered qualifying, the activities in a QLSP’s ILAW report must (1) be civil legal services and (2) primarily impact indigent Californians.

State Bar Rule 3.672(A) currently defines “legal services” (as distinct from legal support services) to “include all professional services provided by a member of the State Bar and similar or complementary services of a law student or paralegal under the supervision and control of a member of the State Bar.” Business and Professions Code section 6213(d) currently defines “indigent person” as someone whose income is 200 percent or less of the federal poverty threshold, a senior, a person with a developmental disability, or a person who is eligible for Supplemental Security Income. QLSPs that receive a pro bono allocation may use a different income threshold under indigency guidelines issued by the Department of Housing and Urban Development (Bus. & Prof. Code § 6213(d)).

Under the Eligibility Guidelines for Legal Services Projects, the commentary to Guideline 2.3.4. provides guiding factors for determining whether an activity is qualifying when performed on behalf of a group or class of persons, rather than individual clients:

In determining whether a legal matter is primarily for the benefit of indigent persons, the Commission may consider the following factors and any others that aid in making that determination: (1) the forum in which the matter is being pursued, e.g., courts, administrative agency, legislature, etc.; (2) whether named clients are indigent persons or qualifying organizations (under Commentary 2.3.3 above); (3) in the case of a class action, the definition of the class contained in the complaint and proposed or actual class certification orders; (4) a description of the group of individuals that would benefit from a favorable resolution of the legal matter; (5) whether a majority of those who would benefit are indigent persons; (6) the relation of the legal issues raised by the matter to the needs of indigent persons; and (7) whether indigent persons are disproportionately impacted by the legal issues raised by the matter.

If a QLSP is engaged in impact litigation in California that pertains to a civil legal issue, and the client or class is indigent, the activity is generally considered qualifying. Governing authorities do not define qualified advocacy work for QLSPs. However, if the QLSP is drafting bills or regulations or otherwise supporting a campaign to enact or change legislation/regulations, or

enforce existing law—as long as it pertains to a civil legal need and the QLSP can demonstrate that the activity will primarily benefit indigent persons—this is also considered qualifying. “Primarily benefit” has been interpreted to mean that 50 percent or more of those impacted by the activity would be considered indigent.

Support Center Requirements

Unlike QLSPs, SCs are not restricted to providing services specific to indigent persons. According to Business and Professions Code section 6213(b), a SC’s primary purpose is the provision of legal training, technical assistance, or advocacy support for civil legal services without charge, and which provides a significant level of these support services to QLSPs on a statewide basis.

State Bar Rules and Support Center Eligibility Guidelines refine this definition, providing that direct representation to clients, including in impact litigation, is not considered a qualifying support service unless the case is:

- co-counseled with a QLSP (State Bar Rule 3.672(b);
- co-counseled at the request of a private attorney representing indigent clients without charge (Support Center Eligibility Guidelines 2.3(c)); or
- undertaken at the request of a QLSP that is unable to assist the client (State Bar Rule 3.672(b)).

Governing authorities do not define qualified advocacy work for SCs. However, similar to QLSPs, drafting bills or regulations or otherwise supporting a campaign to enact or change legislation/regulations, or enforce existing law, as long as it would be of benefit to QLSPs (e.g., allow them to better serve and/or advocate on behalf of their clients), it has been considered qualifying.

LSTFC CODIFICATION PROCESS

In 2019, the Legal Services Trust Fund Commission (LSTFC) began a long-term codification process to update and harmonize the Rules of the State Bar and Eligibility Guidelines related to grants administration. Two topics that have pending rule changes include the definition of “civil legal services” and methods for defining and demonstrating indigency. (The indigency topic only applies to QLSPs.) Staff was mindful of these rule changes—which have been approved by the LSTFC but are pending final approval with the State Bar’s Board of Trustees—when reviewing ILAW reports.

Definition of Civil Legal Services

A recent statutory change made it clear that only areas of law traditionally considered civil, or where an exception has been made (such as for expungements and infractions), will be counted

as civil legal services for the purposes of State Bar-administered grants. (Bus. & Prof. Code, section 6213(l).) The proposed rule reflects the statutory change.

Additionally, “legal services” are defined under State Bar Rule 3.672(A) as, “[A]ll professional services provided by a licensee of the State Bar and similar or complementary services of a law student or paralegal under the supervision and control of a licensee of the State Bar in accordance with law.” However, the LSTFC observed that this definition may be both over-inclusive (an attorney may engage in work that is nonlegal in nature at times) and under-inclusive (many legal aid organizations have adopted a holistic services model that incorporates other disciplines, such as social work, where the services provided are intended to support the client’s legal goals and outcome). Thus, the new proposed definition is the following:

“Legal services” mean work that uses legal knowledge and skills to create, advance, protect, or enforce the legal rights of indigent clients or communities. This encompasses legal representation and non-representational services for individuals and groups. Examples of non-representational services include providing legal information, advice, trainings, and self-help resources. Non-representational services can also include studying legal needs and outcomes to inform legal aid delivery, investigating legal violations, and advocating directly to government bodies on issues of importance to the legal rights of indigent clients or communities. Representation and non-representational services must be performed or supervised by an attorney.

Defining and Demonstrating Indigency

For QLSPs, demonstrating indigency is the primary concern when approving ILAW activities because—unlike direct services to an individual where the QLSP can ascertain income or any other basis for eligibility—when working to create systemic change, the activity naturally will impact broad constituencies where it is not always obvious or easy to demonstrate the primary benefit to indigent persons. As a result, the EBR Committee in prior years has allowed QLSPs to demonstrate that an activity will have a disproportionate impact or benefit for indigent persons, even if that activity is not confined primarily to the needs of indigent persons. The new rule explicitly allows disproportionate impact as a basis for approving these activities. Thus, future years of ILAW review will not elevate those activities for committee review if there is evidence to demonstrate disproportionate, rather than primary, impact on indigent persons.

Moreover, grantees currently report up to a maximum of 25 ILAW activities (up to 15 impact litigation and 10 advocacy activities) with no minimum number of hours. The rule change will only trigger reporting for activities that meet or exceed 50 hours, and only a total of 10 activities will be reported based on number of hours, without requiring a minimum of impact litigation or advocacy. (Currently, this will only pertain to QLSPs, though this will be a consideration for Support Centers through the codification process later this year.)

DISCUSSION

STAFF REVIEW PROCESS

Staff conducted an initial review of the ILAW reports according to the requirements for QLSPs and SCs discussed above. The overwhelming majority of activities have been marked as “approved” given their clearly qualifying nature. Others were marked as “approved” because they represent ongoing activities that were reviewed and approved by the EBR Committee in prior years, and the nature of each activity remains substantially similar. Additionally, some activities were already marked “nonqualifying” by staff based on the grantee’s acknowledgment at the time it prepared the report that the activity was nonqualifying and/or the grantee’s agreement that the activity was nonqualifying after conferring with staff.

However, there are some instances in which staff may not be able to say definitively that an activity is qualifying but believes it likely meets the requirements for approval:

Categories Where a Nexus to Indigency Has Historically Been Presumed

Since 2019, the EBR Committee has recognized that legal services in certain issue areas typically benefit a large number of indigent persons or provide a particularly substantial benefit to them. On this basis the commission has found activities within these categories to be qualified even where objective evidence of a primary impact on indigent people was not available. Four such categories were initially approved by this committee in 2019; two more were added in 2020.

In the absence of policy providing further guidance, staff proposes that this year the EBR Committee continue its practice of approving impact litigation and advocacy activities as meeting the indigency requirement, even if specific quantitative evidence of a primary benefit to indigent people is not available, in the following six categories: affordable housing, educational equity, low-income immigrants, low-wage workers, public benefits, and youth in detention.

A. Affordable Housing

Grantees reported 8 impact cases and 17 advocacy activities related to affordable housing which did not include direct evidence of primary impact on indigent persons. Examples include litigation to protect affordable housing opportunities and funding and enforce housing elements; services focused on specific locations with special housing challenges; and advocacy to enhance tenant protections.

The lack of affordable housing disproportionately impacts seniors and low-income individuals and families, and the problem is exacerbated in high-cost areas such as San Francisco and Los

Angeles. Staff recommends that affordable housing impact cases and advocacy activities be approved as meeting the indigency requirement.

B. Education Equity

Grantees reported 2 advocacy activities related to education equity for low-income students in California which did not include direct evidence of impact on a primarily indigent constituency. Advocacy included efforts to enforce the right of foster youth to return to their school of origin, including nonpublic schools, after being detained or moving placements, and extending the same loan forgiveness protections that exist in federal loans to Dream Loan recipients (undocumented students with demonstrated financial need) who are not eligible for federal loans.

Limited or no data exist that clearly demonstrates that more than 50 percent of those impacted fall within the IOLTA definition of indigent; however, the activities have particular significance and benefit for indigent students.

C. Low-Income Immigrants

Grantees reported 8 impact cases and 10 advocacy activities related to low-income immigrants in California which did not include direct evidence of a primarily indigent constituency. Examples of reported activities benefitting low-income immigrants include advocating for obtaining U Visa certifications for noncitizens who are victims of violent crime, opposing rules that would limit work authorization for individuals seeking asylum, and obtaining bond hearings for individuals in long-term immigration detention, among other things.

Limited or no data exist that clearly demonstrate that more than 50 percent of those impacted are within the IOLTA definition of indigent. However, the activities reported describe how this constituency is generally low-income and likely indigent per the IOLTA income requirement, particularly when individuals lack work authorization or are detained. Staff recommends that impact cases and advocacy activities that disproportionately impact low-income immigrants be approved as meeting the indigency requirement.

D. Low-Wage Workers

Grantees reported 2 impact litigation cases and 9 advocacy activities related to the needs of low-wage workers which did not include direct evidence of impacting a primarily indigent population.¹ Examples of these activities included advocacy to ensure workers are provided notice of labor protections, workplace and leave protections in response to COVID-19, and

¹ Approximately half of these activities overlapped with the low-income immigrants bucket.

language access improvements from state agencies like the Employment Development Department, among other things.

These reports were not able to calculate the percentage of workers who were indigent based on the Business and Professions Code definition. However, minimum wage in California in 2022 was an indigency wage for a household of two or more. Low-wage workers also include many Californians who earn less than minimum wage for a variety of reasons, are charged by their employers for work expenses until their income is below poverty level, and/or are trapped in exploitative or abusive working conditions. While worker protection advocacy can benefit all workers, it most benefits those low-wage workers. Staff recommends approval of activities that disproportionately benefit low-wage workers.

E. Public Benefits

There were no impact litigation or advocacy activities reported under this heading requiring committee approval this year. While grantees reported several public benefits activities, they were able to demonstrate that the activity primarily benefitted indigent persons, thus allowing for approval. Staff attributes this to the fact that the income threshold for indigency increased to 200 percent of the federal poverty level in 2022. This change made more of these activities clearly qualifying due to similar or even lower income thresholds for many of the relevant public benefits programs compared to the IOLTA statute's income threshold.

F. Youth in Detention

Grantees reported 1 impact litigation case and 2 advocacy activities that involved youth who were detained, which did not include direct evidence of a primarily indigent client population. Examples included litigation to clarify the standard for youth offender parole and advocacy to distinguish when a court order is required to obtain a police report that references minor victims versus minors taken into custody.

Most minors have limited to no income, and youth who are detained face another barrier to obtaining assistance as many are cut off from accessing their family or community resources. Thus, the vast majority of youth would meet the definition of indigency. However, clear data is not available to demonstrate this. Staff recommends that ILAW activities related to youth in detention be approved.

Activities with a Disproportionate Impact on Qualified Constituencies

Some ILAW reports do not identify a primary impact on indigent people and are not within the categories where such an impact has been presumed in prior years. Nonetheless, they provide evidence that indigent individuals are particularly impacted by the issue or derive particular benefit from the activity. Staff have identified 12 reports that provide persuasive evidence of a

disproportionate impact on indigent Californians. Each report was reviewed to identify the basis for finding a particular or disproportionate impact on indigent individuals; in many instances staff conducted follow-up for more information. Based on this review process, staff recommends approval of 3 impact litigation and 9 advocacy activities. Staff further notes that under the pending rule change, staff will have clearer guidance for approving these reports.

Individual ILAW Activity Reports for Committee Review

In addition to the activities listed above, where staff believes the nexus to indigency is presumed even in the absence of definitive data, the following activities are being elevated for EBR Committee review due to the fact that staff is unable to conclude that they are clearly civil legal services and/or primarily or disproportionately impacting indigent persons in California (in the case of QLSPs) or do not meet the requirement of partnering with a QLSP or pro bono attorney (in the case of SCs):

A. QLSP Activities for Committee Review

Public Counsel submitted an impact litigation case entitled *Stephen C. v Bureau of Indian Education*, which was filed in the US District Court for the District of Arizona. Usually, QLSPs should only operate in California, so out-of-state cases would typically be nonqualifying activities. However, this case pertains to federal regulations and statutes that, if appealed, would go before the Ninth Circuit, which impacts California. Public Counsel states in its report that the case established a legal principle impacting Native American students in California. The activity cites to the indigency of the clients in Arizona but not California. Thus, the questions to consider are whether this activity has a sufficient nexus to the needs of indigent Californians, and whether the evidence of indigency provided is sufficient. (Attachment A.)

B. Support Center Activities for Committee Review

California Rural Legal Assistance Foundation reported on a case entitled *City of Huntington Beach v. State of California, et al.*; *California Coalition for Rural Housing, Housing California, and The Kennedy Commission (Intervenors)*. The organization co-counseled with other SCs but listed no QLSP or pro bono partners as required when providing direct services. Staff believes this activity is nonqualifying and should be deducted on the organization's application. (Attachment B.)

Staff is not elevating any other individual Support Center activities for review. However, a question arose during staff review where staff would like EBR Committee guidance: A number of impact litigation/representation activities reported by SCs lacked a QLSP or pro bono partner. The requirements under the Rules of the State Bar and the Eligibility Guidelines for Support Centers are that, in order for direct representation of an indigent person to be considered qualifying, the SC must co-counsel with a QLSP or pro bono, OR take the case when

referred by a QLSP that lacks capacity to provide representation. However, upon discussion with the SCs that worked on these cases, many expressed that—while the client may not have been referred by a QLSP and came to the SC’s attention through some other mechanism—the SC still endeavored to invite QLSP participation as co-counsel. When that was lacking, the SC provided representation regardless, usually at the request of one or more QLSPs and because the case would help avoid the creation of bad law and/or otherwise support future QLSP practice.

Individual activities that fall into this category have not been elevated for review, because the concern lies not with the substance of the activity itself. Rather, staff would like committee guidance as to whether these activities can be approved as being at the request of a QLSP (even if it was not the QLSP’s client originally) or if the activities are nonqualifying. Staff requests permission to approve these activities under the existing guidelines as they are still calculated towards providing advocacy support to QLSPs, even if the client did not originate with a QLSP. Further, staff intends to relay this example to the working group that will focus on SCs as part of the codification process later this year for possible elaboration in a new/updated rule.

RECOMMENDATIONS

Should the Eligibility and Budget Review Committee concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, that the Eligibility and Budget Review Committee of the Legal Services Trust Fund Commission approves staff’s recommendations regarding approval of ILAW reports and activities for 2022, including approval of all activities presented as part of a category of activities where the nexus to indigency is presumed, and those activities found to have particular or disproportionate impact on indigent individuals.

This Committee should also make a determination:

- Whether the out-of-state litigation activity reported by Public Counsel in *Stephen C.* demonstrates a sufficient connection to the legal concerns of indigent Californians to be approved; and
- Whether the *Huntington Beach* impact litigation case reported by CRLAF is nonqualifying due to its lack of a QLSP or pro bono partner; and
- Whether impact litigation cases reported by SCs where the SC made unsuccessful efforts to recruit QLSP co-counsel, but the SC was encouraged/requested to continue the case by QLSPs, can be considered qualifying.

ATTACHMENTS

- A.** Public Counsel ILAW Report for *Stephen C. v. Bureau of Indian Education*
- B.** California Rural Legal Assistance Foundation ILAW Report for *City of Huntington Beach v. State of California, et al.*; *California Coalition for Rural Housing, Housing California, and The Kennedy Commission*

Organization:	Public Counsel
1. Case name:	Stephen C. v. Bureau of Indian Education (“BIE”)
2. Case status:	Open
3. Court name:	United States District Court for the District of Arizona

4. Do you believe this to be an IOLTA qualifying activity as defined by B&P 6213, State Bar Rule 3.672, and Eligibility Guideline 2.3?

If you answered no, remember to deduct expenditures related to this non-qualifying activity in the next IOLTA/EAF grant application cycle.

Yes

4. Partner Organizations:

Partner Organizations	
State Bar Grantees	
Other Organizations	
Legal Non-Profit	Native American Disability Law Center
Private Law Firm (Pro Bono)	Munger, Tolles & Olson LLP
Private Law Firm (Pro Bono)	Sacks Tierney, P.A.

5.a. Support Centers
Only: If this is an IOLTA qualifying activity, and no QLSP was listed as a partner organization, indicate how the activity is qualifying under B&P 6213.:

Suggested word limit: 500

6. Counties Impacted

Check all that apply

Out of State

7. Substantive Area

Check all that apply

Disability Rights, Education

Describe
"Miscellaneous":

8. Constituencies Impacted

Check all that apply

Children/Youth, Persons with Disabilities, Rural, Other (Explain)

a. Other
Constituencies:If the constituencies
impacted are not
included, please list
them.

Native Americans

9. Parties or Class Represented

Students attending Havasupai Elementary School and the Native American Disability Law Center.

a. If available, provide
the estimated total
number of people
impacted:

10. Is the represented party indigent?

This answer alone will not decide whether the activity is or is not a qualifying expense.

Yes

11. Explain how the majority of those impacted are indigent, as defined in B&P §6213(d)

If the majority of persons impacted are not indigent, type n/a.

Nearly three quarters of Havasupai Elementary School students are from low-income families, as measured by their eligibility for free or reduced-price lunch programs.

12. Describe the impact this case will have on indigent persons

If available, include the estimated number of total indigent persons impacted and how this was determined. If no impact on indigent persons, type n/a.

The case seeks to hold the BIE accountable for providing quality education to Native children by providing access to an adequate public education, including access to all required subjects, content, and curriculum; access to education provided by sufficient numbers of qualified teachers and related service providers based on the needs of the school-age population in Havasupai; access to education that is culturally relevant based on the unique culture and tradition of the Havasupai tribe; and access to instruction appropriate to students' native language. This case established a legal principle impacting Native students in California.

13. Briefly describe the legal issue(s) of the case and the overall goal(s)

The lawsuit alleges that the United States government has failed to provide the plaintiffs equal educational opportunities afforded to other students throughout the country. The BIE failed to enforce federal statutes and regulations to provide Native American children with a basic education, a system of special education, and necessary wellness and mental health services. The Havasupai Tribe is a federally recognized Native American tribe located at the bottom of the Grand Canyon in Northern Arizona. The lawsuit seeks compensatory and remedial education on behalf of the Havasupai children, including the provision of general education curricula taught by fully certified teachers with access to appropriate instructional materials; special education and related services taught by appropriately trained teachers; as well as necessary wellness and mental health resources for Havasupai students.

14. List case outcomes

If case remains open, highlight accomplishments (if any) achieved during the evaluation year.

We reached a settlement on the disability claims that allowed us to appeal to the Ninth Circuit claims that Judge Logan resolved in the government's favor at summary judgment pertaining to the provision of general education. We argued the appeal on February 9, 2022 before Chief Judge Murguia, Judge Graber, and Judge Fitzwater in the Northern District of Texas. On March 16, 2022, the Ninth Circuit issued a ruling fully in our favor and remanded the case back to the district court. After remand, the parties filed a joint report setting forth a discovery calendar, with a deadline extension set for May 15, 2022. The parties identified two mediators and have been actively engaged in mediation since August 2022. The parties have reached a tentative agreement and we are in the process of explaining and addressing any concerns with our clients.

15. If applicable, describe any economic benefit(s) achieved (client award and/or costs averted)

If the case remains open, but there is an expected future economic benefit, describe the estimated benefit. Report the information you have available (e.g., estimated range). Do not extrapolate.

a. Enter economic
benefit amount, if
applicable:

430

16. Total Staff Hours

Report total staff hours spent on this case in the evaluation year

551

17. Total Volunteer Hours

Report total volunteer hours spent on this case in the evaluation year. Enter 0 if there were no volunteer hours.

0

Q8:

Organization:	California Rural Legal Assistance Foundation
1. Case name:	City of Huntington Beach v. State of California, et al.; California Coalition for Rural Housing, Housing California, and The Kennedy Commission (Intervenors)
2. Case status:	Open
3. Court name:	Superior Court of the State of California for the County of Los Angeles

4. Do you believe this to be an IOLTA qualifying activity as defined by B&P 6213, State Bar Rule 3.672, and Eligibility Guideline 2.3?

If you answered no, remember to deduct expenditures related to this non-qualifying activity in the next IOLTA/EAF grant application cycle.

Yes

4. Partner Organizations:

Partner Organizations
State Bar Grantees
Other Organizations

5.a. Support Centers Only: If this is an IOLTA qualifying activity, and no QLSP was listed as a partner organization, indicate how the activity is qualifying under B&P 6213.: Suggested word limit: 500	Working with Western Center on Law and Poverty and Public Interest Law Project on this case.
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6. Counties Impacted

Check all that apply

*Statewide

7. Substantive Area

Check all that apply

Housing

Describe
"Miscellaneous":

8. Constituencies Impacted

Check all that apply

Low Wage Workers, Rural

9. Parties or Class Represented

Intervenors

a. If available, provide
the estimated total
number of people
impacted:

10. Is the represented party indigent?

This answer alone will not decide whether the activity is or is not a qualifying expense.

No

11. Explain how the majority of those impacted are indigent, as defined in B&P §6213(d)

If the majority of persons impacted are not indigent, type n/a.

N/A

12. Describe the impact this case will have on indigent persons

If available, include the estimated number of total indigent persons impacted and how this was determined. If no impact on indigent persons, type n/a.

N/A

13. Briefly describe the legal issue(s) of the case and the overall goal(s)

This case arose out of the city of Huntington Beach's ("City") constitutional challenge to Senate Bills 35, 166, 1333 and Assembly Bill 101 (the "Housing Bill"). These bills ensure all cities throughout the state, including charter cities, can accommodate high density housing. The state argued that the Housing Bills violated the municipal affairs doctrine because zoning is a local issue, and that California's 121 charter cities should be free to make their own decisions. The City's challenge fundamentally threatened the availability of low-income housing for California's low-income residents. The goal of this case was to uphold the Housing Bills against the City's constitutional challenge to ensure that all cities across the state, including charter cities in rural areas, complied with their obligation to provide affordable housing for low-income residents.

14. List case outcomes

If case remains open, highlight accomplishments (if any) achieved during the evaluation year.

The Superior Court of Los Angeles issued a judgment against the City, reasoning that the lack of affordable housing addressed in the Housing Bills is a matter of statewide concern, and therefore does not violate the municipal affairs doctrine.

15. If applicable, describe any economic benefit(s) achieved (client award and/or costs averted)

If the case remains open, but there is an expected future economic benefit, describe the estimated benefit. Report the information you have available (e.g., estimated range). Do not extrapolate.

This case achieved significant economic benefits for California's low-income residents and affordable housing advocates. If the City's challenge had been upheld, it would have led to significantly less availability of affordable housing. As a result, California's low-income residents would likely be forced to spend more money on housing payments, including rent. Furthermore, had the City prevailed, affordable housing advocates, such as our clients, Housing California and California Coalition for Rural Housing, would have had to expend drastically more resources to carry out their respective missions of advancing the housing needs of low and very low-income individuals, including those in rural communities.

a. Enter economic benefit amount, if applicable:

16. Total Staff Hours

Report total staff hours spent on this case in the evaluation year

0

17. Total Volunteer Hours

Report total volunteer hours spent on this case in the evaluation year. Enter 0 if there were no volunteer hours.

0

Q8: