

# Stout's Independent Evaluation of Oklahoma County and Tulsa County Eviction Right to Counsel Pilot Programs

Prepared for: Legal Aid Services of Oklahoma

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## **Section I-Introduction**

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In May 2022, the United States Department of Housing and Urban Development (HUD) granted Legal Aid Services of Oklahoma (LASO) \$2.4 million to fund an eviction diversion program.<sup>1</sup>

In January 2023, Stout was engaged by the LASO as the 18-month independent evaluator of the Oklahoma County and Tulsa County Eviction Right to Counsel Pilot programs (RTC Pilot). Stout has interacted LASO over the past 18 months through bi-weekly virtual meetings to develop data collection strategies and methods, review data metrics and analysis, and discuss implementation planning and strategy. Stout also conducted in-person court observations and meetings with LASO staff in November 2023.

Since the beginning of its independent evaluation, Stout has developed more than 100 analyses (with additional variations through filters and selections) in a data visualization platform used by LASO and Stout to monitor key performance metrics, identify opportunities for refinement and further research, and evaluate the impact of the RTC Pilot. The data visualization platform, in combination with qualitative feedback from rental property owners and LASO staff, has enabled an iterative evaluation – one that is completed in parallel to implementation rather than after implementation. This process has resulted in new and unique insights including, but not limited to: circumstances renter households are experiencing leading up to eviction, the goals that clients have for their cases, the intersections of race and gender with eviction, sub-standard housing conditions (defective conditions) that RTC Pilot clients experience, rental property owner experiences with the RTC Pilot, and the impact of an eviction on residents in Oklahoma County and Tulsa County. While this iterative evaluation technique has enabled significant progress over the past year, it has also identified opportunities for continued improvement.

Stout's evaluation methodology uses robust analysis of available data and information, while also appreciating the limitations of such data, the opportunities for continued improvement and the challenges that can arise in the analysis of intricate, complicated, and intertwined micro- and macro-economic social and capitalist systems. The data collected by the courts and LASO is inherently limited and imperfect. These limitations and imperfections arise from resource constraints at each organization to collect information, the systems used to collect data before the RTC Pilot launched, the nuanced and complex lived experiences of Oklahoma County and Tulsa County renter households with low incomes, the experiences and practices of rental property owners of various sizes, and the adversarial nature of the United States civil legal system (which includes eviction cases).

Further, Stout's methodology is not a randomized control trial and does not use a designed control group to draw comparisons. The RTC Pilot is designed to assist Oklahoma County and Tulsa County renter households experiencing a high-stakes legal proceeding. It is essential that these services are provided through effective advocacy due to the circumstances faced by the parties, the complexity of the process, and potential consequences for the individuals involved and their communities. Thus, Stout uses the best available information and feedback from a wide range of stakeholders to provide analyses and assessments of the RTC Pilot. This evaluation technique creates an ongoing dialogue about the impact of the RTC Pilot and

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<sup>1</sup> "HUD Expands Eviction Prevention and Diversion Program with Additional \$20 Million." US Department of Housing and Urban Development.

opportunities for continued refinement of the data collected, analyses completed, and insights developed.

## **Section II-Executive Summary**

LASO attorneys have assisted RTC Pilot clients in achieving approximately 95% of their case goals.

Approximately 27% of RTC Pilot clients reported that they experienced homelessness due to a past eviction. Approximately 40% of RTC Pilot clients indicated that they experienced a barrier (e.g., had to miss work, change childcare plans, miss or change a medical appointment) that made it challenging to attend their hearing.

Stout estimates that Oklahoma County and Tulsa County likely realized economic and fiscal benefits of approximately \$6.3 million between August 1, 2022 and June 5, 2024 as a result of the RTC Pilot.

Plaintiff (landlord / rental property owner) legal counsel appreciates the importance of tenant legal representation and indicated to Stout that when a tenant is represented, cases are generally resolved more efficiently and effectively.

### Key Findings

LASO has been assisting Oklahoma County and Tulsa County residents in eviction proceedings through the RTC Pilot since August 2022 in Tulsa County and since June 2023 in Oklahoma County. LASO significantly expanded data collection as an element of Stout’s independent evaluation, which enabled a quantitative approach to evaluation. LASO is the first civil legal services organization Stout was engaged by that collected data to demonstrate: (1) the frequency with which clients experienced homelessness as a result of a past eviction; and (2) systemic barriers that clients may be experiencing when trying to attend their hearings (e.g., needed to miss work, change childcare plans). Throughout the independent evaluation, Stout sought feedback from LASO staff and rental property owners (RPOs) and their counsel related to their experiences engaging with the RTC Pilot. The combination of quantitative and qualitative evaluation measures demonstrates the impact of the RTC Pilot through different lenses.

### RTC Pilot Attorneys Assisted Clients in Achieving Their Goals

For RTC Pilot cases opened and closed between June 1, 2023 and June 5, 2024 where the client received extensive services, LASO attorneys achieved approximately 95% of clients’ stated case goals.<sup>2</sup> The 3 most common goals are listed below with the frequency of the goal being achieved, the number of clients with the goal, and the percent of clients with that goal.

Client Goal	Frequency Goal Was Achieved	# of RTC Pilot Clients with Goal <sup>3</sup>	% of RTC Pilot Clients with Goal <sup>4</sup>
Prevent eviction judgment	94%	269	50%

<sup>2</sup> Based on goals the 3 most frequently stated client goals.

<sup>3</sup> Clients can have more than 1 goal for their case.

<sup>4</sup> Total will be greater than 100% because clients can have more than 1 goal for their case.

Secure additional time to move	98%	229	42%
Prevent involuntary move	94%	219	42%

### LASO Made a Significant Commitment to Data Collection and Iterative Evaluation

Stout worked closely with LASO to expand structured data collection that would be used to inform the iterative evaluation and assist in quantifying the impact of the RTC pilot. LASO invested significantly in a comprehensive client interview process intended to better understand clients and their circumstances. LASO’s dedication to data collection has been critical for developing a data-oriented approach to the RTC Pilot evaluation. Based on the data collected by LASO, Stout evaluated the client goals achieved by LASO, analyzed client household demographics and case characteristics (including case complexities), and estimated the preliminary fiscal impacts of the RTC Pilot. These quantitative analyses were combined with and informed by qualitative feedback from LASO, rental property owners, RTC Pilot clients, and other Oklahoma eviction ecosystem stakeholders.

### RTC Pilot Clients Are Experiencing Substantive Legal Issues Beyond Non-payment of Rent

In jurisdictions<sup>5</sup> where Stout has conducted evaluations of eviction right to counsel programs, attorneys representing tenants in eviction proceedings have communicated (and the data collected has shown) that tenants are often trying to navigate complex situations related to their eviction. Stout’s evaluation found that while most eviction filings in Oklahoma County and Tulsa County, (and throughout the country) are brought for non-payment of rent, there are often substantive legal issues or procedural deficiencies with how the case was brought. Tenants seeking legal representation through the RTC Pilot are often doing so because they want an attorney to assist them with substantive legal issues with their case, potential defenses, or they are experiencing challenges within the household exacerbating the trauma of the eviction process.

Stout analyzed data from the client intake interview to determine the frequency with which RTC Pilot clients who received extensive services indicated they were experiencing at least 1 complex case criteria. In 64% of closed RTC Pilot cases where the client received extensive service<sup>6</sup>, clients were experiencing at least 1 complex case criteria<sup>7</sup>, and in 32% of closed RTC Pilot cases, clients were experiencing multiple complex case criteria. In Stout’s evaluation of Cleveland and Milwaukee’s eviction right to counsel program, it found approximately 86% of closed extensive service cases had at least 1 complex case criteria.

Additionally, approximately 27% of RTC Pilot clients reported that they had experienced homelessness due to a past eviction. Clients who experienced past homelessness due to an eviction were more likely to be female (76%) than male (24%). Clients who identified as White disproportionately indicated they experienced past homelessness due to an eviction. Approximately 35% of clients who identified as White indicated they experienced past homelessness due to an eviction compared to approximately 27% of clients who identified as

<sup>5</sup> These jurisdictions include Cleveland, Connecticut, Davidson County (Nashville), and Milwaukee.

<sup>6</sup> Approximately 71% of RTC Pilot clients received extensive service.

<sup>7</sup> Complex case criteria include defective conditions, the presence of a disability in the client’s household, living in public or subsidized housing, or previous issues with the rental property owner.



Black, approximately 8% of clients who identified as Native American, and approximately 5% of clients who identified as Hispanic or Latino.

### RTC Pilot Created Economic and Fiscal Benefits

Stout estimates that Oklahoma County and Tulsa County likely realized economic and fiscal benefits of approximately \$6.3 million between August 1, 2022 and June 5, 2024 as a result of the RTC Pilot. LASO spent approximately \$860,000 on the RTC Pilot between August 2022 and June 2024, resulting in an estimated return on investment of \$7.37 for every dollar spent. Stout understands that the funding LASO has used for the RTC Pilot is a portion of a larger \$2.4 million grant it received from HUD. Using the total funding received of \$2.4 million, Stout estimates the return on investment to be approximately \$2.63 for every dollar invested. The estimated economic and fiscal benefits were related to:

- Fiscal impacts related to housing social safety net responses - \$1.7 million
- Economic value preserved by retaining residency in Oklahoma -\$1.2 million
- Reduction in crimes related to lack of shelter - \$740,000
- Fiscal impacts related to increased educational attainment - \$720,000
- Fiscal impacts related to responding to unsheltered homelessness - \$710,000
- Fiscal impacts related to employment stability - \$470,000
- Sustained education funding for children in Oklahoma schools - \$420,000
- Fiscal impacts related to criminalizing homelessness - \$160,000
- Fiscal impacts related to Medicaid spending on health care - \$130,000

Stout's preliminary estimate of fiscal impact is likely significantly understated. Included in the calculation are benefits of the RTC Pilot that can be quantified based on currently available data. However, Oklahoma County and Tulsa County (as well as individual cities within the counties) would likely realize additional benefits that are not currently quantifiable based on available data. These benefits that are not currently quantifiable include but are not limited to:

- The juvenile justice costs and child welfare costs associated with children experiencing homelessness
- The negative impact of an eviction filing (regardless of the outcome) on a tenant's ability to re-rent and/or retain a housing voucher or subsidized housing
- The cost of mental health care
- The cost of family, community, and neighborhood instability
- Preservation of financial and personal assets
- A reduction, over time, of the number of eviction cases filed resulting in improved use of Oklahoma County District Court and Tulsa County District Court resources.

### The Estimated Cost to Fully Implement RTC in Oklahoma County and Tulsa County

Stout worked with LASO to estimate the cost to fully implement RTC in Oklahoma County and Tulsa County. Stout estimates the cost to fully implement RTC in Oklahoma County to be \$3.5 million annually, and the cost to fully implement RTC in Tulsa County to be \$3 million annually. The cost estimates include personal costs for hiring staff attorneys, supervising attorneys, paralegals / intake specialists, and social workers. The cost estimates also include costs for

facilities, technology, equipment, training, outreach, and other costs necessary to provide legal representation under an eviction right to counsel program. The table below shows the staffing required and other select metrics for each jurisdiction at full implementation of RTC.

	<b>Oklahoma County</b>	<b>Tulsa County</b>
Staff attorneys	23	20
Supervising attorneys	6	5
Paralegals / Intake specialists	4	3
Social workers	5	4
Est. tenant households fully assisted <sup>8</sup> annually	4,252	3,605
Est. % of tenant households fully assisted relative to expected number of eviction filings	25%	25%
Estimated cost per case	\$815	\$822

### Qualitative Feedback from Rental Property Owners’ Counsel

Stout sought feedback from attorneys representing rental property owners to learn from their experiences interacting with the RTC Pilot. The plaintiff attorneys with whom Stout engaged represented large corporate rental property owners and small “mom and pop” rental property owners. Feedback about the RTC Pilot from plaintiffs’ counsel was (consistent with Stout’s engagement with rental property owners and their counsel throughout the country) centered on several key themes: (1) plaintiff legal counsel appreciates the importance of tenant legal representation; (2) when a tenant is represented, cases are generally resolved more efficiently and effectively; and (3) sustained rent assistance and processes for identifying cases where there are no legal defenses could result in rental property owners being more willing to negotiate repayment plans for longer move out periods.

### Opportunities for Sustaining and Expanding the RTC Pilot

Based on quantitative and qualitative findings of Stout’s independent evaluation of the RTC Pilot, Stout recommends the following for sustaining and expanding the RTC Pilot:

1. Should LASO expand the RTC Pilot, it should assess internal capacity and continually assess personnel needs, reasonable caseloads, and the ability to expand sustainably. If the RTC Pilot were expanded, LASO should consider seeking regular feedback from the local rental property owner community, including attorneys representing rental property owners, regarding the implementation of the expanded RTC Pilot.
2. Maintain a commitment to timely, accurate data collection. Use available tools and dashboards to monitor data collection and ensure client interview information is complete whenever possible, and cases are promptly closed. Capturing as much data as possible during the interview, and recording that information promptly, can create a comprehensive view of what clients are experiencing and how LASO are responding to those circumstances. Prompt case closure will be important to having current, reasonably accurate data throughout the year to inform LASO’s operations and activities.

<sup>8</sup> “Fully assisted” refers to the level of legal assistance or legal representation that is deemed to be appropriate to meet the client’s needs by an attorney.

3. Explore pathways for preventing eviction filings and opportunities for early intervention. There may be opportunities for LASO to collaborate or partner with rental property owners or housing authorities to create pilot programs with the goal of avoiding eviction filings for tenants and the eviction process for rental property owners. There may also be opportunities to collaborate with Tulsa District Court personnel who are implementing the National Center for State Courts' Eviction Diversion Initiative to ensure seamless referrals, when necessary.
4. Consider mechanisms for collecting client feedback at different intervals after service delivery. Client feedback after service delivery may provide insights into external challenges clients are experiencing that contribute to ongoing housing insecurity for RTC Pilot clients.
5. Consider door-to-door canvassing and implement an outreach strategy centered on local trusted messengers. In Stout's experience, in-person interactions are impactful for connecting people with resources and can be used as an opportunity to understand why people may not be willing to engage with the eviction process. Information gleaned from these conversations could be used to inform other types of outreach or supplemental services that could increase the number of tenants engaging with the legal process and seeking legal representation, while also potentially decreasing the frequency of tenant non-appearances / defaults.
6. Engage with the Oklahoma County and Tulsa County District Courts to assess opportunities for collaboration. There may be opportunities for LASO to work with court personnel to develop best practices for improving messaging to people facing eviction, including when tenants are appearing pro se and may be eligible for the RTC Pilot services.
7. Consider the role of housing navigators and other non-attorney staff as complements to attorneys and to assist with non-legal work.
8. Develop a methodology for assessing the frequency of repeat RTC Pilot clients and systemic / persistent barriers to housing stability for them. Data collected by LASO indicated approximately 40% of RTC Pilot clients previously had an eviction filing against them, with approximately 57% indicating the eviction filing occurred within the last year, and approximately 24% of clients who previously had an eviction filed against them were represented by LASO in that filing. Of clients whose previous eviction filing was in the past year, approximately 38% were represented by LASO.

# **Section III-Independent Evaluation Findings**

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## LASO's Investment in Data Collection

During the first quarter of 2023, Stout provided LASO with an extensive list of potential data elements to collect that would enable a robust evaluation. Stout and LASO met bi-weekly to refine the list of data elements and discuss which were already being collected, could be collected easily, and would be challenging to collect. The initial set of data elements was finalized in April 2023, and Stout received the first data export from LASO in June 2023. Throughout the process of implementing the new data elements, LASO attorneys and staff were highly engaged and participatory. The monthly data submissions Stout receives from LASO are high-quality, substantially complete, and have minimal errors. LASO's dedication to data collection has been critical for developing a data-oriented approach to the RTC Pilot evaluation. Using the data collected by LASO, Stout built a dynamic data visualization platform for use by Stout and LASO that presents LASO data and eviction filing data in a user-friendly format.

## Preliminary Findings from RTC Pilot Client Interviews

Residents who are eligible for the RTC Pilot are interviewed by LASO staff to collect more information about them, their household, and the circumstances surrounding their eviction. The intake interview has provided the opportunity to understand clients' experiences more deeply and develop strategies to inform refinements to the RTC Pilot and potential expansion of services.<sup>9</sup>

The analyses presented in this section are for the period of expanded data collection and include cases opened since June 1, 2023. Stout analyzed the results of key interview questions and organized them below by category: (1) number of tenant households assisted and cases opened by zip code; (2) household demographics and characteristics; (3) presence of disability in household; (4) employment status; (4) housing type, previous eviction filings, and issues with rental property owner; (5) whether the client wants to stay or move; (6) alternative living arrangements if evicted or forced to move; (7) presence of defective conditions; and (8) client barriers to attending their hearing.

### Number of Tenant Households and Individuals Assisted

Since the RTC Pilot began in August 2022 in 2 Tulsa County zip codes and in June 2023 in 2 Oklahoma County zip codes, LASO has assisted 1,824 of tenant households containing 3,749 individuals. Throughout the past 12 to 18 months LASO has expanded the RTC Pilot to include 3 additional zip codes in Tulsa County and 2 additional zip codes in Oklahoma County.<sup>10</sup>

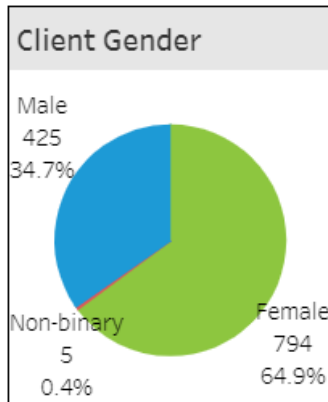
### Household Demographics and Characteristics

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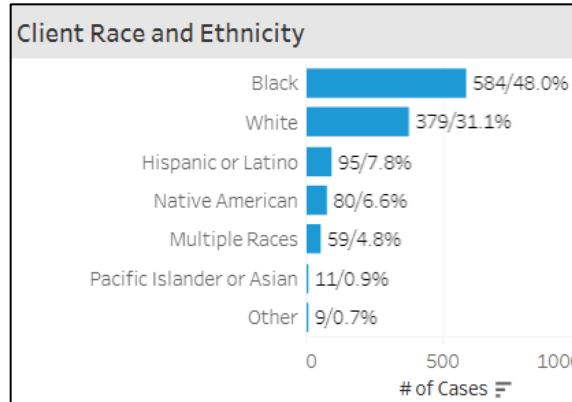
<sup>9</sup> Client circumstances and case characteristics often vary. Because of this variation, not all interview questions are applicable to all RTC Pilot clients and therefore are not asked to all clients. While the goal is to ask all RTC Pilot clients all questions applicable to their circumstance and case, Program attorneys exercise discretion during the interview process. There may be interview questions not asked based on a client's lived experiences, comfort level with certain topics, and having to recount traumatic experiences.

<sup>10</sup> It is Stout's understanding that defendant / tenant address (including zip code) is collected and made available publicly in a PDF rather than in the electronic docket from which Stout receives data.

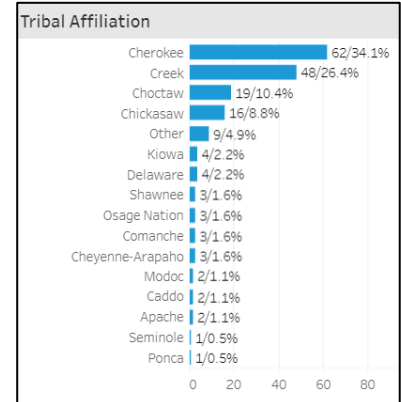
Approximately 65% of RTC Pilot clients identified as female, approximately 35% as male, and less than 1% as non-binary (Figure 1). Approximately 69% of RTC Pilot clients identified as non-White. Approximately 7% of RTC Pilot clients identified specifically as Native American (Figure 2). Of clients who indicated affiliation with a tribe, approximately 34% affiliated with the Cherokee Nation and 26% affiliated with the Creek Nation (Figure 3).



**Figure 1**

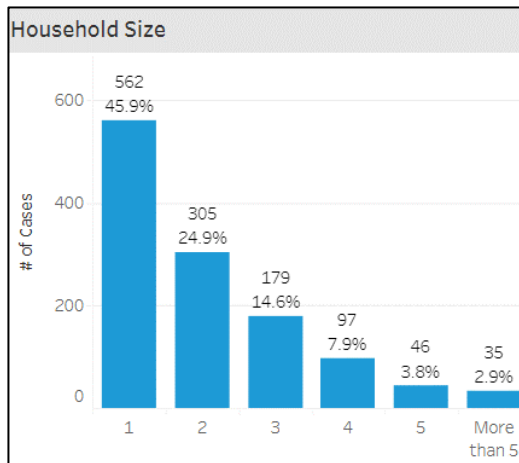


**Figure 2**

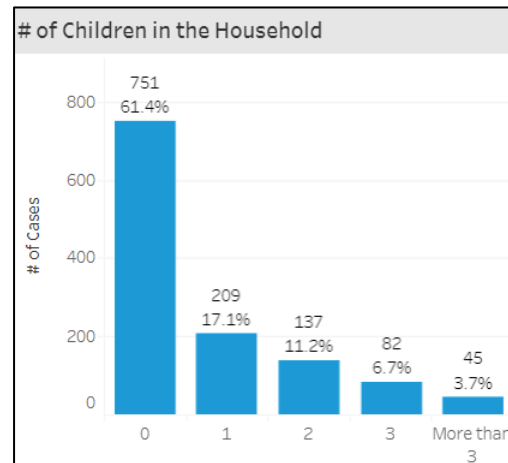


**Figure 3**

Approximately 98% of clients identified English as their primary language. Figures 4 and 5 shows the distribution of RTC Pilot clients by household size and the number of children in the household. Approximately 46% of RTC Pilot households had 1 person, and approximately 54% had more than 1 person. Male RTC Pilot clients (57%) were more likely to be the only person in their household compared to female RTC Pilot clients (40%). Approximately 61% of RTC Pilot client households did not have any children, and of the 39% that had at least 1 child, approximately 90% had 1-3 children. The number of children per RTC Pilot client household ranged from 0 to 9, and the average number of children per RTC Pilot client household with at least one child was 2.



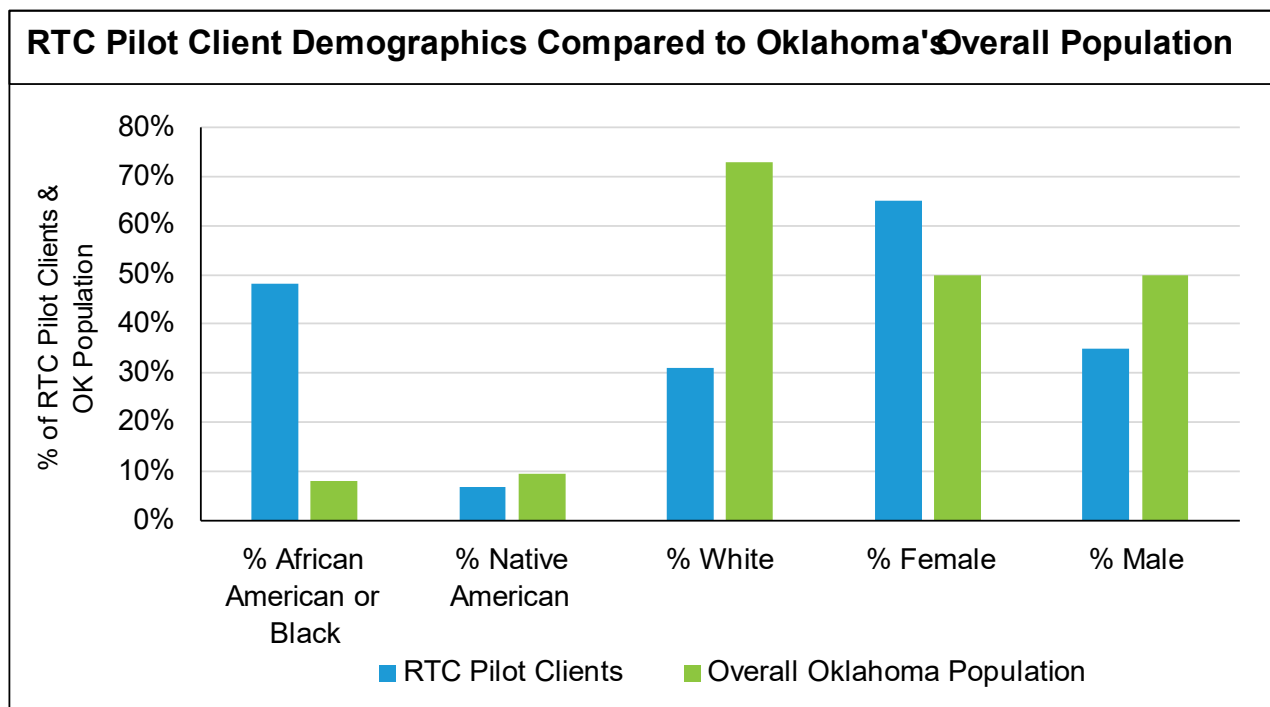
**Figure 4**



**Figure 5**

Figure 6 shows race, ethnicity, and gender statistics for RTC Pilot clients compared to Oklahoma’s overall population. RTC Pilot clients disproportionately identify as African American or Black and female compared to Oklahoma’s overall population.

**Presence of Disability in Household**

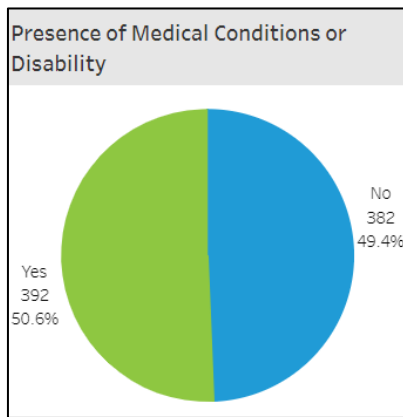


**Figure 6**

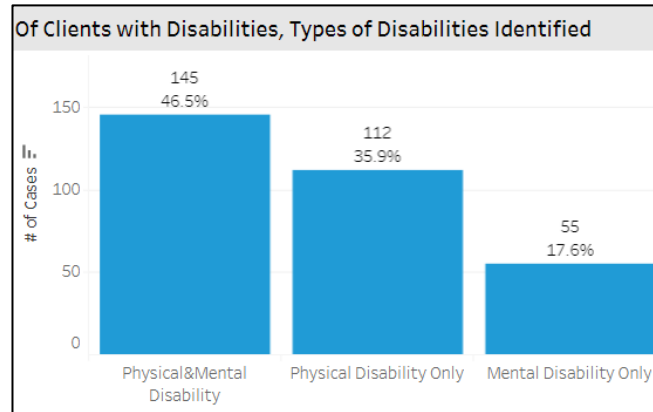
Approximately 51% of RTC Pilot clients who answered questions related to disabilities indicated that they or someone else in their household had a medical condition or disability (Figure 7). Of clients who indicated they or someone else in their household has a disability, approximately 47% indicated the presence of both a physical and mental disability, approximately 36% indicated only a physical disability, an approximately 18% indicated only a mental disability

(Figure 8). An estimated 16% of adults in Oklahoma have a disability, but approximately 51% of RTC Pilot clients or someone in their household had a disability.<sup>11</sup> Data from Stout’s independent evaluations of eviction right to counsel programs in Connecticut, Cleveland, Davidson County (Nashville), and Milwaukee consistently indicates that eviction right to counsel clients experience disabilities at more frequent rates than the general population in the jurisdiction. Figures 9-12 show the number of adults and children in the household with physical disabilities or health conditions and mental disabilities or health conditions. Female clients were more likely (55%) than male clients (44%) to report that someone in their household had a mental or physical disability. There were no differences in the presence of disabilities in client households based on race or ethnicity.

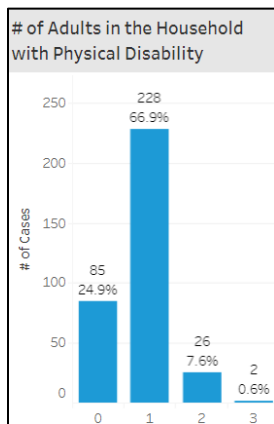
Approximately 21% of clients who indicated that they or someone in their households has a disability believes their disability is the cause of their eviction. Approximately 73% of clients who believe the disability is related to their eviction stated that an adult has a mental disability in the



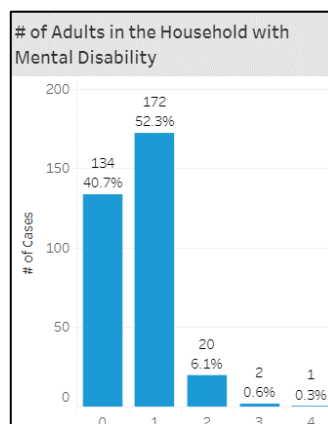
**Figure 7**



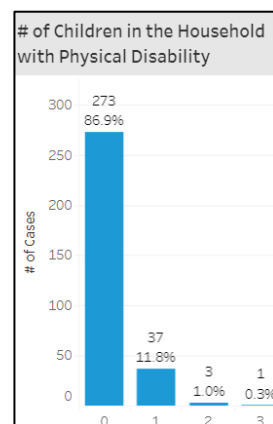
**Figure 8**



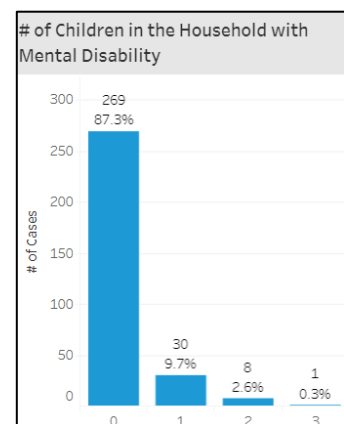
**Figure 9**



**Figure 10**



**Figure 11**



**Figure 12**

household. This is 14 percentage points higher than the 59% percent of households who have an adult with a mental disability but do not believe the disability is related to their eviction. This indicates that cases where clients who believe the presence of a disability in their household is

<sup>11</sup> American Community Survey 5-Year Estimates. Table DP02. United Stats Census Bureau. 2020.

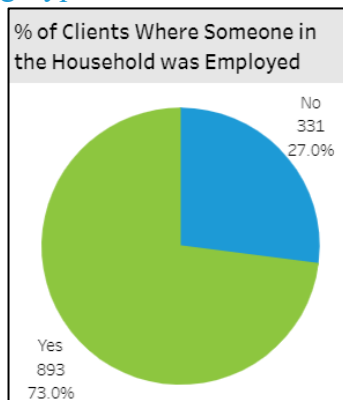


the cause of the eviction are more likely to involve an adult with a mental disability in the household.

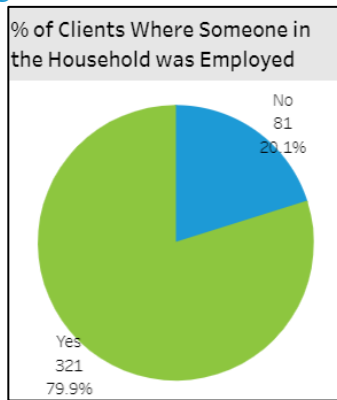
### Employment Status

Approximately 27% of RTC Pilot client interview respondents indicated that no one in the household is currently working, and approximately 73% indicated they were working (Figure 13). Oklahoma County clients were more likely live in a household where someone is currently working (80%) compared to Tulsa County clients (70%) (Figures 14 and 15). Household demographics such as gender, race, and number of children in the household were consistent between clients in households with at least 1 person working and those without someone working. RTC Pilot clients who were not currently working indicated they had a disability (53%) more frequently than RTC Pilot clients who were employed (33%).

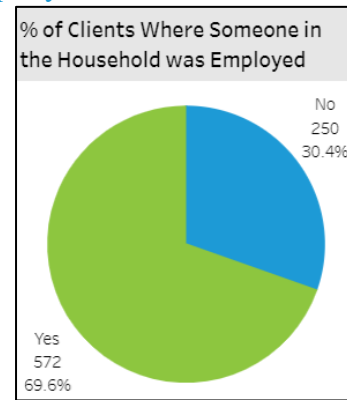
### Housing Type, Previous Eviction Filings, and Issues with Rental Property Owner



**Figure 13**



**Figure 14**



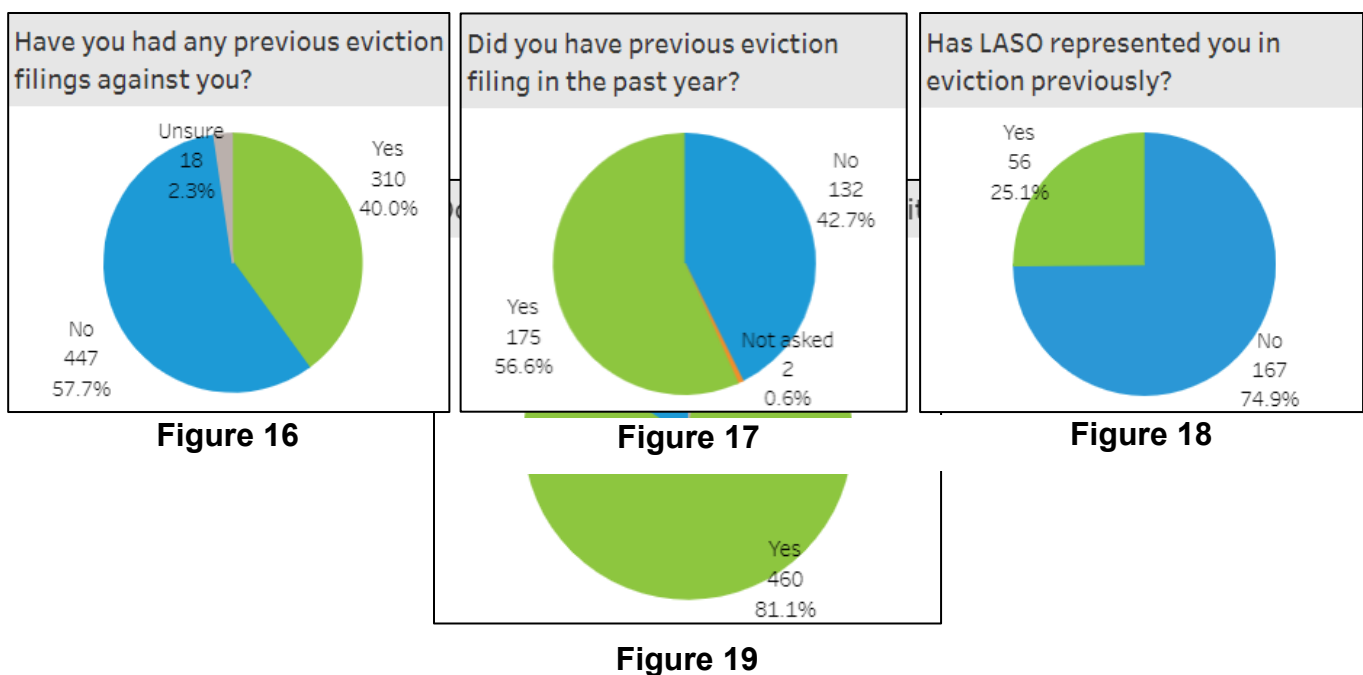
**Figure 15**

Approximately 83% of RTC Pilot clients were living in private housing, and approximately 16% were living in public or subsidized housing. Of RTC Pilot clients living in public or subsidized housing, approximately 80% received a Section 8 voucher, approximately 11% lived in public housing, and approximately 9% received another form of housing assistance. Of the approximately 16% of RTC Pilot clients living in public or subsidized housing, approximately 76% were living in Tulsa County.<sup>12</sup>

<sup>12</sup> The RTC Pilot zip codes in Tulsa were selected because of the significant concentration of subsidized units in the zip codes. Additionally, Oklahoma City has 2,718 public housing units compared to Tulsa, which has 240 public housing units. Tulsa has 7,099 Housing Choice Vouchers, and Oklahoma City has 4,819 Housing Choice Vouchers. See <https://www.tulsa-housing.org/wp-content/uploads/2024/01/OK073-Housing-Authority-of-the-City-of-Tulsa-2024-Annual-Plan-HUD-50075-SM.pdf> and <https://www.ochanet.org/newsimages/2024%20Annual%20Plan%20Significant%20Amendment%20draft.pdf>

Approximately 40% of RTC Pilot clients indicated that they previously had an eviction filing against them, with approximately 57% indicating the eviction filing occurred within the last year (Figures 16 and 17). Significantly more RTC Pilot clients identifying as female (47%) indicated they had a previous eviction filed against them compared to RTC Pilot clients identifying as male (30%). Additionally, RTC Pilot clients who identified as Native American indicated they experienced a previous eviction filing more frequently (52%) compared to RTC Pilot clients who identified as White (41%) and RTC clients who identified as African American or Black (39%). Approximately 25% of clients who previously had an eviction filed against them were represented by LASO in that filing (Figure 18). Of clients whose previous eviction filing was in the past year, approximately 38% were represented by LASO.

### Whether Clients Want to Stay or Move



Understanding what RTC Pilot clients are seeking to achieve in their case is critically important to LASO and evaluating the impact of the RTC Pilot. When asked if they wanted to stay in their home, approximately 81% of RTC Pilot clients indicated that they did, and 16% indicated that they did not (Figure 19).

Data collected by civil legal services providers in Cleveland, Connecticut, and Nashville indicates that approximately 60% to 70% of eviction right to counsel clients want to stay in their home. Consistent with feedback Stout has received in other jurisdictions, LASO attorneys shared that the reason for a higher proportion of RTC Pilot clients wanting to stay in their home is likely indicative of the lack of other housing options clients have, which has become particularly challenging following the COVID-19 pandemic.

When RTC Pilot clients want to stay in their home, LASO attorneys can help clients achieve this goal by negotiating with rental property owners or their counsel about terms for paying back rent owed and / or securing rent assistance. When RTC Pilot clients do not want to stay in their home, LASO attorneys can assist clients in their negotiation with rental property owners or their counsel

to resolve cases efficiently and effectively, help clients understand their rights and the legal process, and secure time for clients to move enabling them to find alternative housing and minimizing disruption to their lives. LASO attorneys can also serve as an important connector to other housing services (e.g., relocation services, moving assistance).

### [Alternative Living Arrangements if Evicted or Forced to Move and Prior Homelessness](#)

Research from around the country has demonstrated that when people experience eviction, particularly when they have to navigate the eviction process unassisted, they often subsequently experience homelessness.<sup>13</sup> Entering emergency shelter or living unsheltered is generally not immediate, however. People are more likely to stay with family and friends while seeking alternative housing, but if alternative housing is unavailable, people experiencing eviction may need to access the shelter system. An estimated 15% to 25% of people who experience eviction will also experience homelessness/enter the emergency shelter system.<sup>14</sup>

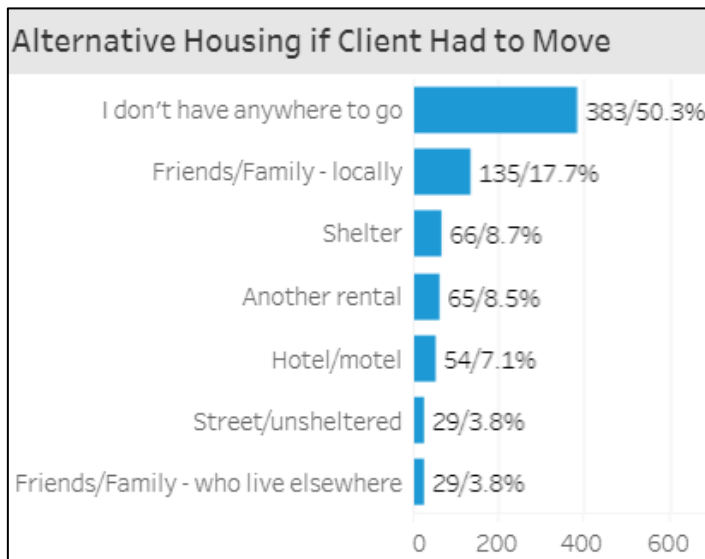
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<sup>13</sup> See: “Capacity and Gaps in the Homeless Residential and Service System, Harris and Fort Bend Counties.” Coalition for the Homeless Houston/Harris County. 2011. “Regional Networks to End Homelessness Pilot Final Evaluation Report.” Massachusetts Interagency Council on Housing and Homelessness. February 15, 2011. “Homeless Service Utilization Report.” Center on Family at the University of Hawaii and the Homeless Programs Office of the Hawaii State Department of Human Services. 2010. “Losing Home: The Human Cost of Eviction in Seattle.” The Seattle Women’s Commission and the Housing Justice Project of the King County Bar Association. September 2018. Metraux, Stephen PhD et al. “Prior Evictions Among People Experiencing Homelessness in Delaware.” Delaware Academy of Medicine/Delaware Public Health Association. August 2022. Flaming, Daniel et al. “Escape Routes: Meta-Analysis of Homelessness in L.A.” Economic Roundtable. April 2018. San Francisco Right to Civil Counsel Pilot Program Documentation Report. John and Terry Levin Center for Public Service and Public Interest, Stanford Law School. May 2014. Collinson, Robert and Reed, Davin. “The Effects of Evictions on Low-Income Households.” New York University Law. December 2018. “The Rising Number of Homeless Families in NYC, 2002-2012: A Look at Why Families Were Granted Shelter, the Housing They Had Lived in and Where They Came From.” New York City Independent Budget Office. 2014. Rolston, Howard et al. “Evaluation of the Homebase Community Prevention Program.” Abt Associates. June 2013. Culhane, Dennis et al. “Testing a Typology of Family Homelessness Based on Patterns of Public Shelter Utilization in Four U.S. Jurisdictions: Implications for Policy and Program Planning.” Housing Policy Debate. May 2007.

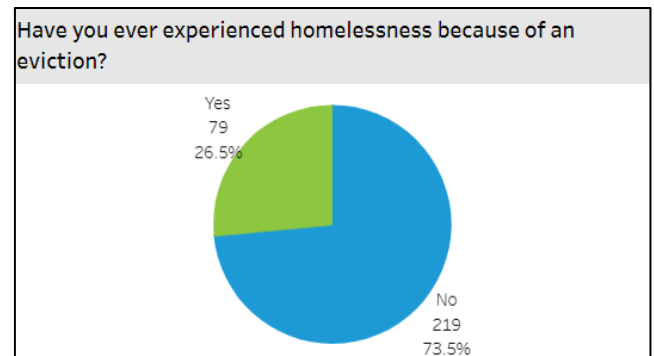
<sup>14</sup> Ibid.

Understanding where people would go if they were evicted, or otherwise disruptively displaced, provides insights as to what the social safety net responses to eviction might be. During the intake interview, RTC Pilot clients were asked where their household would stay if they had to move. Approximately 50% indicated that they did not know where they could stay. LASO attorneys indicated that clients who answered with this response likely do not have anywhere to go or have not yet considered where they could go if they had to move. Approximately 18% indicated that they would stay with family or friends locally, approximately 9% indicated that they would need to enter emergency shelter, approximately 9% indicated they would move to another rental, approximately 7% indicated they would have to stay in a hotel or motel, approximately 4% indicated they would be living on the street or unsheltered, and approximately 4% indicated they would stay with family or friends in another county (Figure 20). Approximately 27% of RTC Pilot clients had reported that they had experienced homelessness due to a past eviction (Figure 21).

Clients who experienced past homelessness due to an eviction were more likely to be female (76%) than male (24%). Clients who identified as White disproportionately indicated they



**Figure 20**



**Figure 21**

experienced past homelessness due to an eviction. Approximately 35% of clients who identified as White indicated they experienced past homelessness due to an eviction compared to approximately 27% of clients who identified as Black, approximately 8% of clients who identified as Native American, and approximately 5% of clients who identified as Hispanic or Latino.

Clients who had previously experienced homelessness as a result of an eviction were also more likely to indicate they would experience homelessness if they had to move because of their current eviction case (38%) compared to clients who had not previously experienced homelessness because of an eviction (20%). The table below shows the differences in alternate housing if the client had to move that would cause the client to experience homelessness between clients who previously experienced homelessness and all clients.

Alternative Housing if Client Had to Move	Clients Who Previously Experienced Homelessness because of an Eviction	Clients Who Had Not Previously Experienced Homelessness because of an Eviction
Hotel/motel	17%	7%
Emergency shelter	14%	12%
Unsheltered	8%	2%

Of those who had experienced homelessness due to an eviction, approximately 37% experienced homelessness for 3 months or less, approximately 54% experienced homelessness for 6 months or less, and 73% experienced homelessness for 1 year or less (Figure 22).<sup>15</sup>



**Figure 22**

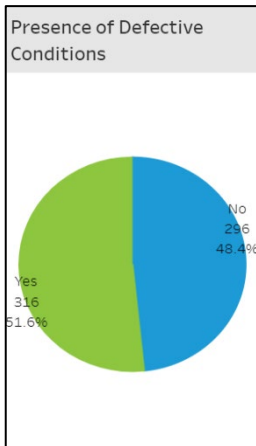
### Presence of Defective Conditions

Approximately 50% of RTC Pilot clients indicated that there were defective conditions issues in their home (Figure 23), and of these clients, approximately 96% indicated that they made the rental property owner aware of the defective conditions issues (Figure 24). Approximately 54% of RTC Pilot clients with defective conditions in their homes indicated that there were multiple defective conditions (Figure 25). The 3 most frequently cited defective conditions were pest infestation (33%), plumbing leaks (30%), and wall, ceiling, or floor damage (25%). Clients who reported defective conditions were more likely to not want to stay in their home. Approximately 69% of clients reporting defective conditions wanted to stay in their unit while approximately 90% of client who did not report defective conditions wanted to stay in their unit (Figure 26). Approximately 15% of clients with defective conditions reported 4 or more defective conditions in their home. These clients were least likely to want to stay in their home, with approximately

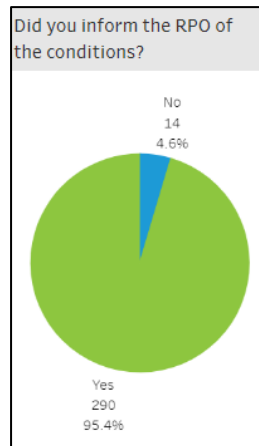
<sup>15</sup> It is important to appreciate that the number of responses in Figure 22 is less than 100. Stout does not recommend drawing conclusions from these metrics but presents them as preliminary observations.

56% indicating they want to stay in their home. Approximately 29% of RTC Pilot clients indicated they had previous issues with the rental property owner (RPO) (Figure 27).

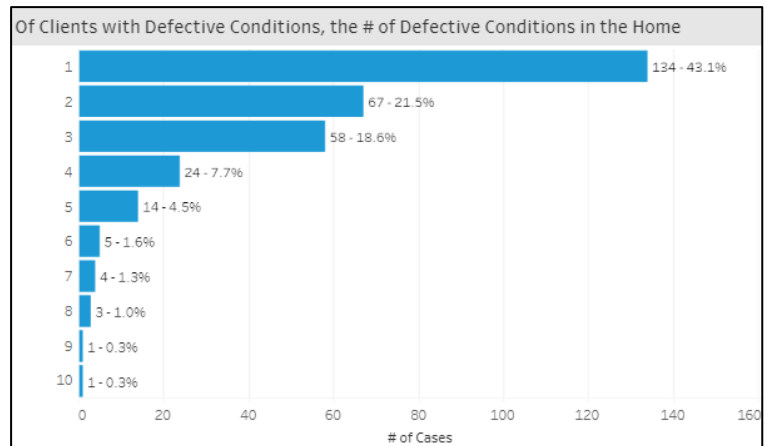
Stout analyzed the intersection of race, ethnicity, and gender with the presence of defective conditions at RTC Pilot clients' homes. While female and male clients indicated the presence of



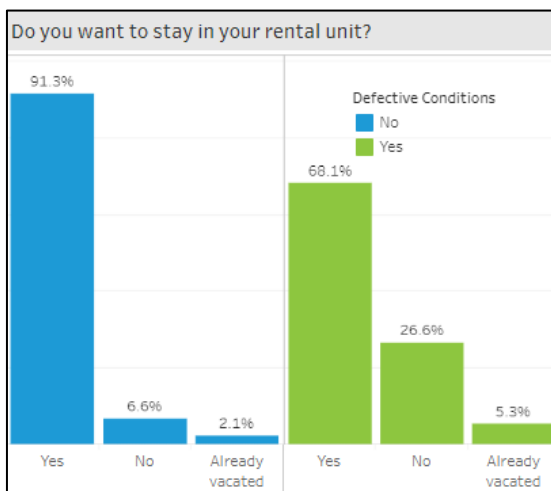
**Figure 23**



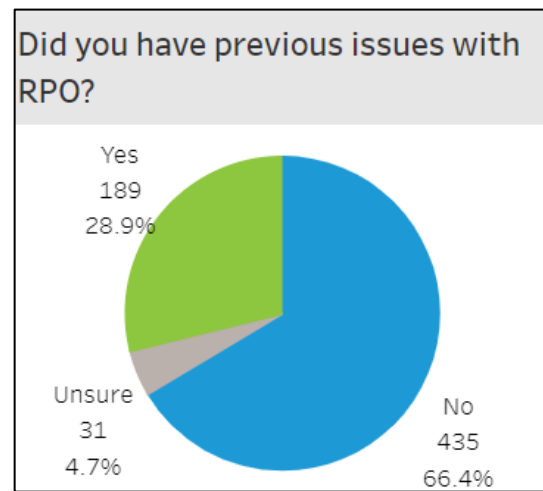
**Figure 24**



**Figure 25**



**Figure 26**



**Figure 27**

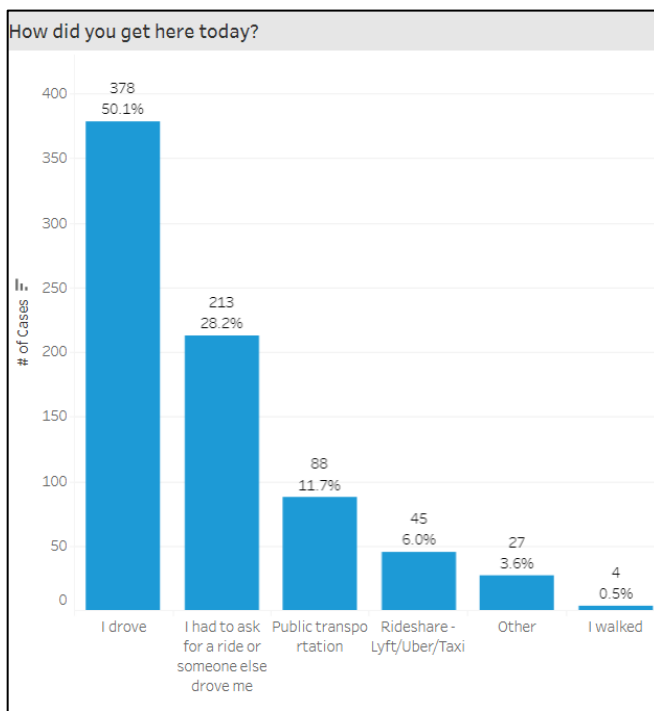
defective conditions at similar frequencies, clients identifying as female were more likely to report multiple conditions. Approximately 57% of RTC clients identifying as female indicated there were multiple defective conditions in their homes compared to approximately 48% of RTC Pilot clients identifying as male. Clients identifying as female disproportionately indicated the presence of mold in their home (27%) compared to male clients (16%). There was not a material difference in this experience when adding race and ethnicity as factors.

### RTC Pilot Client Barriers to Attending Court

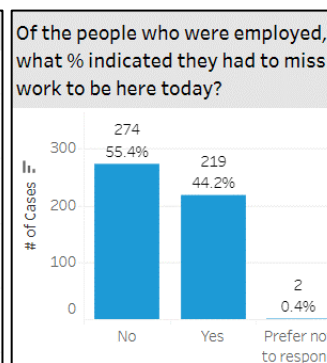
Tenants throughout the country often experience barriers that can make attending court challenging. LASO collected data related to barriers that RTC Pilot clients experienced related

transportation, having to miss work, miss or change medical appointments, or change childcare plans in order to attend court.

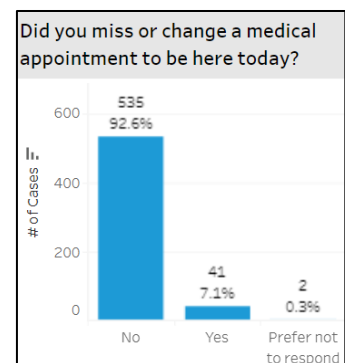
Approximately 50% of clients drove to their hearing, approximately 28% had to ask for a ride or someone else drove them, approximately 12% used public transportation, approximately 6% used a rideshare or taxi, approximately 4% took another means of transportation and less than 1% walked (Figure 28). Figures 29-31 show the percentage of clients who had to miss work, miss or reschedule a medical appointment, or had to change childcare plans to attend their hearing. Approximately 40% of clients indicated they had to miss work *or* miss or reschedule a medical appointment *or* change childcare plans to attend their hearing. Approximately 27% of clients stated that they had a medical condition that made it difficult for them to be present at their hearing (Figure 32).



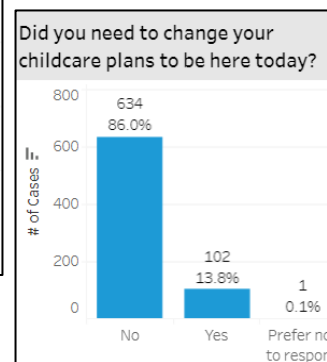
**Figure 28**



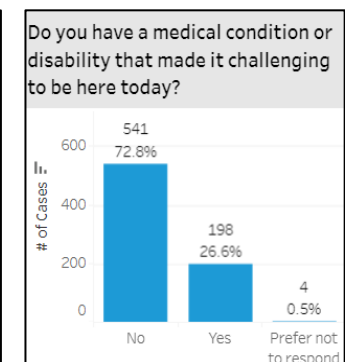
**Figure 29**



**Figure 30**



**Figure 31**



**Figure 32**

Approximately 17% of RTC Pilot clients who identified as African American or Black indicated they had to change childcare plans to attend their hearing compared to approximately 8% of RTC Pilot clients who identified as White. Additionally, approximately 20% of clients who identified as female and African American or Black had to change childcare plans to attend their hearing.



## RTC Pilot Client Goals and Goals Achieved

During the intake/interview process, LASO staff ask clients what their goals are for the case. Generally, only clients who receive extensive service complete the full intake/interview process and have stated goals recorded. Stout’s evaluation is centered on client goals that were achieved or not achieved for clients receiving extensive service. For RTC Pilot cases closed between June 1, 2023 and June 5, 2024 where the client received extensive service, LASO achieved approximately 95% of all clients’ case goals.<sup>16</sup> Stout did not observe a meaningful difference in the percentage of goals achieved between RTC Pilot clients in Oklahoma County and Tulsa County.

Client Goal	Frequency Goal Was Achieved	# of RTC Pilot Clients with Goal <sup>17</sup>	% of RTC Pilot Clients with Goal <sup>18</sup>
Prevent eviction judgment	94%	269	50%
Secure additional time to move	98%	229	42%
Prevent involuntary move	94%	219	42%

While RTC Pilot clients identified as disproportionately female, African American or Black, or Hispanic compared to Oklahoma’s overall population, the goals achieved by LASO for RTC Pilot clients did not differ materially based on gender, race, or ethnicity.

RTC Pilot clients may have/state multiple goals for their case. For example, they may want to prevent an eviction judgment and secure additional time to move. Between June 1, 2023 and June 5, 2024, the proportion of closed cases by the number of goals was:

Number of Goals	Percentage of Cases
1	37%
2	20%
3	22%
4	15%
5	5%
6	1%

Of RTC Pilot cases closed between June 1, 2023 and June 5, 2024, approximately 63% of clients had multiple goals for their case. The 5 most common combination of client goals were:

- Prevent eviction judgment and prevent involuntary move
- Prevent involuntary move and secure rent assistance
- Prevent eviction judgment and secure rent assistance
- Prevent eviction judgment and secure additional time to move
- Prevent involuntary move and secure additional time to move

## Goals and Goals Achieved by Presence of Children in Household

<sup>16</sup> Based on goals the 3 most frequently stated client goals.

<sup>17</sup> Clients can have more than 1 goal for their case.

<sup>18</sup> Total will be greater than 100% because clients can have more than 1 goal for their case.



Approximately 39% of RTC Pilot client households had at least 1 child in the home. Of RTC Pilot client households with at least 1 child in the home, the average number of children in the household was 2. The impact of housing instability on children’s physical and mental health, education, and social well-being has been thoroughly researched and documented. Understanding how RTC Pilot is assisting households with children can be helpful in evaluating impact.

LASO attorneys were able to assist with preventing an involuntary move, preventing an eviction judgment, and securing time to move more frequently for RTC Pilot households with children compared to those without children. The table below shows client goals, the frequency of the goal being achieved, the number of clients with the goal, and the percent of clients with that goal by the presence of children in the household for RTC Pilot cases closed between June 1, 2023 and June 5, 2024.

<b>Clients without Children in the Household</b>			
Client Goal	Frequency Goal Was Achieved	# of RTC Pilot Clients with Goal <sup>19</sup>	% of RTC Pilot Clients with Goal <sup>20</sup>
Prevent eviction judgment	89%	144	47%
Prevent involuntary move	93%	112	37%
Secure additional time to move	97%	133	43%
<b>Clients with At Least 1 Child in the Household</b>			
Client Goal	Frequency Goal Was Achieved	# of RTC Pilot Clients with Goal <sup>21</sup>	% of RTC Pilot Clients with Goal <sup>22</sup>
Prevent eviction judgment	98%	125	53%
Prevent involuntary move	100%	100	46%
Secure additional time to move	92%	96	41%

### Analysis of Eviction Filing Data

Stout analyzed detailed docket information to develop a deeper understanding of eviction filings in Oklahoma County and Tulsa County. The analyses included, but were not limited to, annual filing trends, plaintiff and defendant legal representation, and by housing type (private v. housing authorities). Legal Services Corporation (LSC) shared with Stout monthly exports of docket data it collects from Oklahoma County and Tulsa County. Stout appreciates LSC’s partnership and willingness to share the court docket data it is collecting, which enabled the analyses presented in this section.

### Number of Eviction Filings

<sup>19</sup> Clients can have more than 1 goal for their case.

<sup>20</sup> Total will be greater than 100% because clients can have more than 1 goal for their case.

<sup>21</sup> Clients can have more than 1 goal for their case.

<sup>22</sup> Total will be greater than 100% because clients can have more than 1 goal for their case.

Between 2016 and 2019, there was an average of approximately 14,500 eviction filings annually in both Oklahoma County and Tulsa County (separately).<sup>23</sup> In 2020 and 2021, there was a significant decrease in the number of eviction filings in Oklahoma County and Tulsa County as a result of pandemic-related eviction moratoria and tenant protections.

The number of eviction filings in 2022 and 2023 in Oklahoma County and Tulsa County differed significantly. In Tulsa County, annual eviction filings have not returned to pre-pandemic levels, with approximately 12,500 eviction filings in 2022 and approximately 13,700 in 2023. In Oklahoma County, annual eviction filings have exceeded pre-pandemic levels by approximately 27%. LASO attorneys in Oklahoma County indicated that they believe the increase in annual eviction filings in Oklahoma County is related to the expiration of pandemic-era rent assistance and the recent increase in Oklahoma City's population. Oklahoma City was 1 of 14 cities in the United States where the population increased by more than 100,000 residents between the 2010 and 2020 Censuses.<sup>24</sup>

In 2024 (through April), there were approximately 5,700 eviction filings in Oklahoma County, and approximately 4,100 eviction filings in Tulsa County. Figure 33 shows these annual filing trends for Oklahoma County and Tulsa County. Figure 34 shows eviction filings by month since January 2016.

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<sup>23</sup> According to data from the 2022 American Community Survey, there were approximately 136,104 renter households in Oklahoma County and 109,937 renter households in Tulsa County.

<sup>24</sup> Aston, Alexia. "Oklahoma City lands in top 20 of largest US cities by population: New census data." *The Oklahoman*. May 2024.

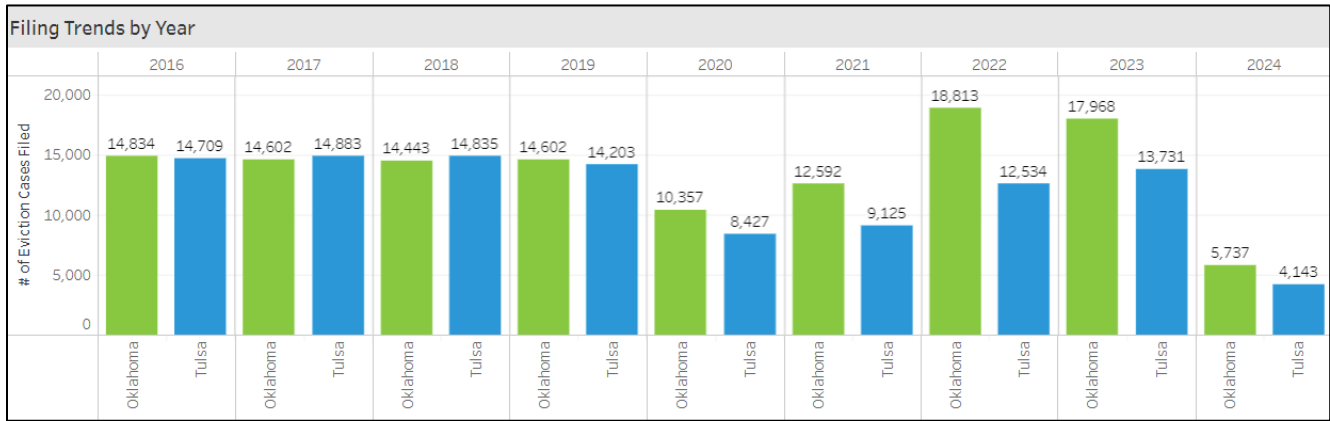


Figure 33

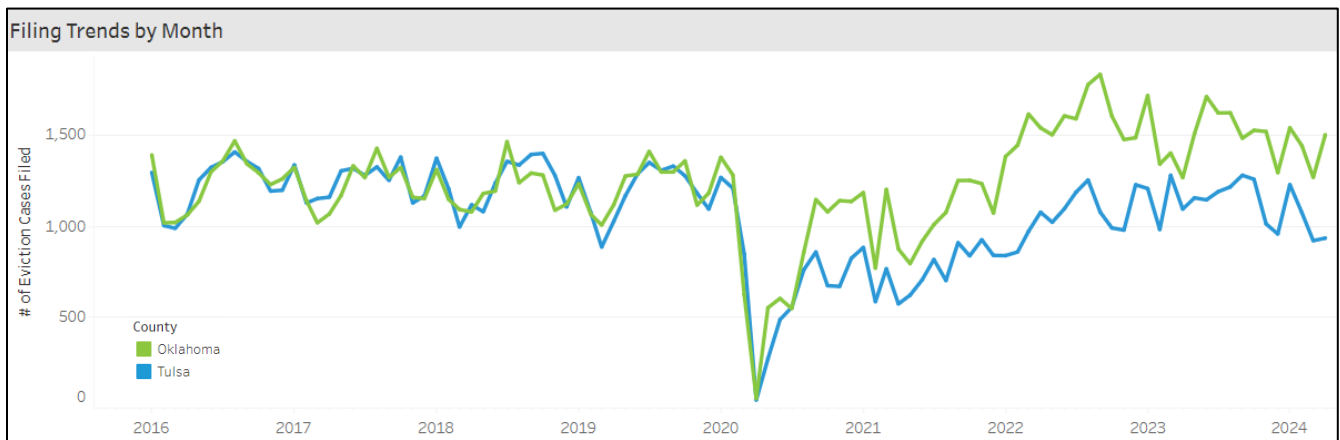


Figure 34

Stout also analyzed trends of eviction filings by housing authorities in Oklahoma and Tulsa County. In 2023, there were 131 eviction filings by the housing authority in Oklahoma County and 54 eviction filings by the housing authority in Tulsa County. Figure 35 shows the annual number of eviction filings by housing authorities in Oklahoma County and Tulsa County since 2016.

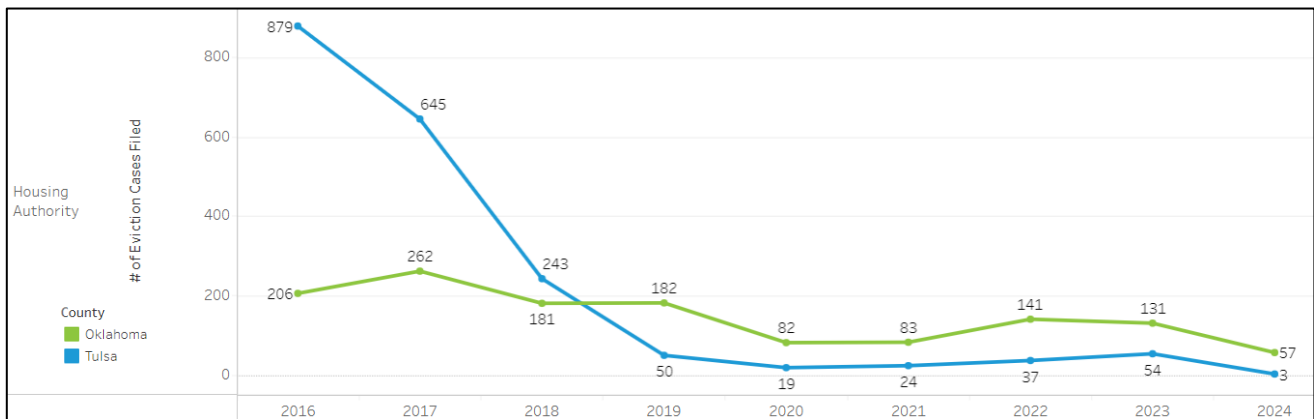


Figure 35

Stout learned from LASO that a contributing factor to the significant decrease in filings by the Tulsa Housing Authority (THA) was a change in leadership and strategy related to eviction filings. Prior to the change in leadership, each THA site manager filed evictions, and after the change in leadership, all eviction filings were initiated through THA's in-house counsel.

Stout has learned during its work in other jurisdictions that many housing authorities across the country developed new programs and policies to prevent the filing of evictions for the non-payment of rent – a practice that began at the height of the pandemic and has remained. For example, housing authorities in New York City, Cleveland, South Carolina, and Milwaukee have created programs and adopted policies aimed at keeping residents in their homes by connecting them to services and working with them to develop plans for the prompt payment of rent. Recognizing that their residents are often experiencing a variety of challenging circumstances (e.g., mental/physical health issues within their household, unstable employment, children with special needs, issues with receiving public benefits), many housing authorities have social workers or navigators on staff to assist residents and ensure they stay housed, when possible. The U.S. Department of Housing and Urban Development (HUD) has been supportive of housing authorities' strategies to avoid eviction filings for the non-payment of rent. HUD developed a variety of best practices documents and toolkits for housing authorities to use when seeking to prevent evictions and increase stability among their residents.<sup>25</sup> Additionally, HUD announced in May 2022 the availability of \$20 million in grants for its Eviction Protection Grant Program which doubled the amount initially allocated in November 2021.<sup>26</sup>

### Party Representation Rates in Oklahoma Eviction Filings

From 2016-2019, approximately 80% of plaintiffs (i.e., landlords) were represented in eviction filings in Tulsa County, and approximately 35% of plaintiffs were represented in eviction filings in Oklahoma County.<sup>27</sup> During the same period, less than 1% of defendants (i.e., tenants) were

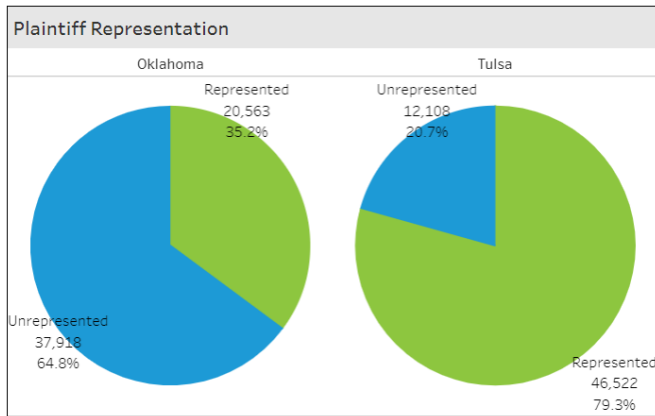
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<sup>25</sup> See [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/covid\\_19\\_resources#2](https://www.hud.gov/program_offices/public_indian_housing/covid_19_resources#2).

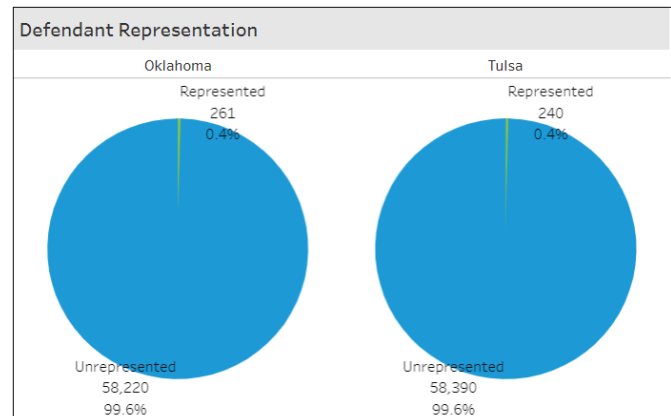
<sup>26</sup> "HUD Expands Eviction Protection and Diversion Program with Additional \$20 Million." HUD No. 22-091 Press Release. May 9, 2022.

<sup>27</sup> Stout understands from LASO attorneys the primary factor contributing to the significant difference in the percentage of plaintiffs represented in Tulsa County and Oklahoma County is how evictions are filed. In Tulsa County, a statutory "Affidavit" is used to initiate an eviction action, and in Oklahoma County, a "Petition" is used to initiate an eviction action. In Tulsa County, the "Affidavit" in eviction proceedings is used in the same manner as an "Affidavit" is used to commence a small claims action. In Oklahoma County, the "Petition" is used to commence eviction proceedings in the same manner as a general civil action. The use of an "Affidavit" instead of a "Petition" enables the "full service" eviction firms such as Tulsa Evictions LLC and Asset Recovery Management to serve tenants, file cases, and provide an attorney for the hearing without engaging in the unauthorized practice of law. In Oklahoma County, the preparation of a petition by a non-attorney could be interpreted as the unauthorized practice of law. Additionally, LASO attorneys shared that the full service eviction firms often charge their rental property owner clients a price per case and use economies of scale to provide the aforementioned services at a relatively low price.

represented in eviction filings in both counties (separately). Figures 36 and 37 shows these metrics.

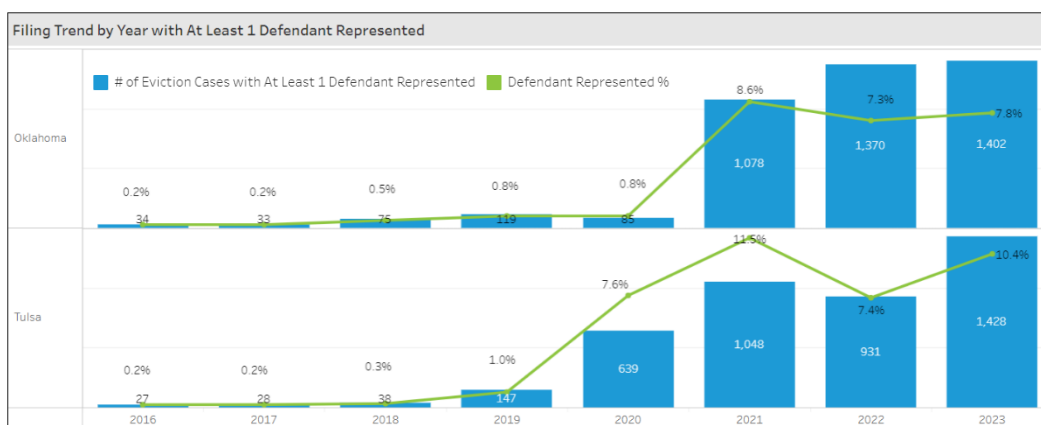


**Figure 36**



**Figure 37**

Figure 38 shows the annual number and percentage of eviction cases in Oklahoma County and Tulsa County with at least 1 defendant represented. The blue bars show the annual number of eviction filings with defendant legal representation, and the green line shows the percentage of annual eviction filings with defendant legal representation. From 2016-2019, defendants were represented in an average of 0.4% of eviction filings in Oklahoma County and Tulsa County. The percentage of cases where at least 1 defendant was represented increased significantly in Oklahoma County in 2021 and in Tulsa County in 2020. From 2019 to 2023, there has been an approximately 11-fold increase in the number of defendants represented in Oklahoma County and an approximately 9-fold increase in Tulsa County. The estimated percentages of case where at least 1 defendant was represented in 2024 (through February<sup>28</sup>) is approximately 8% in Oklahoma County and 13% in Tulsa County.



**Figure 38**

<sup>28</sup> Docket data does not always reflect representation by legal counsel in the same month that the eviction is filed, which results in timing delays related to the defendant legal representation rate. For this reason, Stout is presenting the defendant legal representation rate for 2024 through February 2024.

## **Section IV-Qualitative Evaluation Findings**

## Rental Property Owner Legal Counsel Perspectives

In each of Stout's independent evaluations related to housing ecosystems (including eviction), it seeks to engage with and solicit feedback from rental property owners, their legal counsel, and property managers within the jurisdiction. Stout works to incorporate their perspectives into the evaluation and considers their feedback when recommending potential refinements to eviction right to counsel programs. LASO connected Stout with several attorneys who represent rental property owners to learn from their experiences with the RTC Pilot in Oklahoma County and Tulsa County. The plaintiff attorneys with whom Stout engaged represented large corporate rental property owners and small "mom and pop" rental property owners. Feedback about the RTC Pilot from plaintiffs' counsel in Oklahoma County and Tulsa County (consistent with Stout's engagement with rental property owners and their counsel throughout the country) centered on several key themes:

- Plaintiff legal counsel appreciates the benefits of tenant legal representation.
  - Plaintiff attorneys expressed that tenant legal representation enables tenants to know what their options are, have their rights exercised, and to know how the eviction process works. They also indicated that when a tenant is represented, there is a higher likelihood of cases being resolved amicably between the parties.
- When a tenant is represented, cases are generally resolved more efficiently and effectively.
  - One plaintiff attorney shared, "I always want the other side represented.", and they indicated that they prefer to communicate with someone who understands landlord-tenant law.
  - Another plaintiff attorney communicated that some tenant attorneys engage in "gamesmanship" and deploy "delay tactics", which can disincentive rental property owners and their counsel to negotiate settlements.
- Sustained rent assistance and processes for identifying cases where there are no legal defenses could result in rental property owners being more willing to negotiate repayment plans for longer move out periods.

## Local Stakeholder Engagement

Throughout 2022 and 2023, Stout engaged with a variety of Oklahoma County and Tulsa County stakeholders with experience and expertise interacting with the local rental housing and eviction ecosystems or serving clients or residents who may have interacted with the eviction ecosystems. The purpose of these meetings was to learn from local stakeholders who have different perspectives and experiences with the eviction process or who have observed the impact of evictions on Oklahoma County and Tulsa County residents and rental property owners. Stout met with representatives from:

- Community Cares
- Heartline, Inc. (operator of 2-1-1 and United Way Partner)
- Homeless Alliance
- Hope Community Services

- Housing Solutions Tulsa
- Mental Health Association of Oklahoma
- Oklahoma Housing Finance Agency
- Shelterwell

The stakeholders shared their unique perspectives, and many discussed the importance of assistance for tenants both during and before the eviction process and the value of complementary programs, such as sustainable rent assistance. Two stakeholders shared the importance of education for rental property owners, particularly for out-of-state investors who have been increasingly purchasing properties post-pandemic. There was a consistent recognition among stakeholders that eviction right to counsel is a crucial component of the local eviction ecosystems but it will not create more affordable housing in Oklahoma City and Tulsa. One stakeholder shared, “Right to counsel in eviction court really has to be a part of our response or we are not going to make the bridge from now until new affordable housing developments are online.”

Social services providers and non-profit organizations shared examples of responses and consequences that can be required and experienced after a household is displaced, which included emergency shelter, stays in hotels or motels or living unsheltered, physical and mental health care, and the perpetuation of generational poverty. A representative from a non-profit organization that provided case management services shared a summary of the impacts they have observed in their community, “People are dealing with their mental health, stress, trauma, and some with substance abuse issues... Having that support through Legal Aid has allowed them to not end up on the street. To have that support, to help clients understand what their rights are is incredibly helpful in keeping people in their homes, finding alternative housing, and having the confidence to go to court.”

### Examples of Client Experiences

Throughout the RTC Pilot, LASO collected client stories illustrating the impact of the program’s services. Below are qualitative examples of how the RTC Pilot is assisting Oklahoma County and Tulsa County residents.

“I assisted a client who had been unlawfully sued for thousands of dollars of Tulsa Housing Authority’s (THA) portion of the rent multiple times despite my client paying her portion of the rent on time every month. I successfully negotiated with opposing counsel to have the case dismissed, then communicated with THA to get the oversight corrected, which led to THA making a back payment of more than \$8,000 to the landlord and putting an end to the repeated unlawful eviction filings on my client.”

“This client was a domestic violence victim who moved into her unit to be free from her abuser. She is also legally blind. She lived alone in her apartment and had issues feeling safe, even when her door was locked. Throughout her tenancy, she had a broken air conditioning unit and numerous security issues due to unaddressed break-ins within the apartment complex. Because her landlord did not fix her central air conditioning, but provided a window unit (that was vastly insufficient to cool her 2 bedroom apartment), she was left with a window that could not lock or even fully close. The air conditioning unit required the window to be open at all times, and my client placed a piece of wood or cardboard in the window to fill the gap left by the air conditioning



unit. The window could not lock, and my client could not maintain a reasonable sense of privacy or security. After a string of break-ins within the complex, I was able to draft an emergency termination letter to help my client break her lease on account of the insufficient window unit and the numerous safety concerns. My client was able to move and mailed the key back to her apartment complex without any known issues.”

“A Forcible Entry and Detainer action was filed by the Landlord against Client for non-payment of rent. Upon researching the Forcible Entry and Detainer filed against Client, I determined that the opposing party was not the proper party to bring the action due to not being a registered entity with the Oklahoma Secretary of State. If Client had not contacted LASO for assistance, then status of the entity would likely have not been discovered by Client and the matter would have proceeded the date that the hearing was originally scheduled. Prior to contacting LASO, Client had attempted to work with Landlord and set up a payment plan, but Landlord rejected those attempts by Client.”

“A veteran client with a Section 8 voucher was being evicted for less than \$500. We were able to reduce some fees owed and enter a repayment plan that keep the client housed and maintained their voucher.”

“Our representation resulted in a negotiated settlement that allowed the client to move to a more sustainable situation and transfer their voucher.”

# **Section V-Preliminary Estimate of Fiscal Impacts**

The impacts and costs of eviction to states, cities, counties, and municipalities are significant and multi-dimensional. Substantial reporting has documented the negative impact that evictions have on individuals, families, businesses, and communities. While many of these impacts are not yet quantifiable, clear fiscal costs or economic impacts of disruptive displacement do exist. This section details preliminary estimates of fiscal impact that the RTC Pilot is having on publicly funded systems in Oklahoma and Tulsa Counties. These preliminary estimates of fiscal impacts provide insight into how representation in eviction cases could mitigate these costs or assist in redirecting the funds to other efforts undertaken by local governments.

Additionally, it is important to consider the economic impacts to key stakeholders in the eviction process, including rental property owners. Rental property owners Stout has engaged with throughout the country have explained the potential economic impacts and costs that they experience when filing evictions, which many use as a measure of last resort. The economic impacts and costs they communicate include but are not limited to attorney fees, filing fees, and other court costs; the time and costs associated with tenant screening and due diligence; costs of repair and maintenance to units needing to be re-rented; and the economic impact of tenants not paying rent as their eviction is being litigated.

It is important to appreciate that the RTC Pilot, as is the case with other eviction rights to counsel Stout has evaluated, is primarily assisting tenants with substantive legal issues, often challenging personal circumstances, serious consequences that could arise from disruptive displacement (such as unsheltered homelessness), and a variety of complex disputes with the rental property owner. RTC Pilot, like other eviction right to counsel programs Stout has evaluated, rarely see clients that do not have these issues and complications with their cases and circumstances, representing a subset of all instances of delinquency and eviction filings (a subset of typically the most serious and severe cases). This is important context when considering potential fiscal impacts as well as the potential impacts of an eviction right to counsel for other stakeholders, including rental property owners, courts, and social service providers.

Stout relied on client interview data from LASO to develop these estimates. Client circumstances and case characteristics often vary. Because of this variation, not all interview questions are applicable to all RTC Pilot clients and therefore are not asked to all clients. While the goal is to ask all RTC Pilot clients all questions applicable to their circumstance and case, LASO staff exercise discretion during the interview process. There may be interview questions not asked based on a client's lived experiences, comfort level with certain topics, and/or having to recount traumatic experiences. A primary data element for Stout's preliminary fiscal impact calculations is the how RTC Pilot clients answered the interview question, "If you have to move, where could your household stay?" Answers to this question inform the degree to which clients would need assistance from publicly funded social safety net systems in Oklahoma and Tulsa Counties and the likelihood of other fiscal impacts (e.g., economic value lost due to out-migration).

Stout used the percentage of RTC Pilot clients LASO assisted in achieving their goals (for the 3 most frequently cited goals) as the basis for the percentage of RTC Pilot clients who likely avoided disruptive displacement through RTC Pilot. Using this data, Stout estimates LASO assisted in avoiding disruptive displacement for approximately 95% of RTC Pilot clients between

August 1, 2022 and June 5, 2024.<sup>29</sup> Stout uses the phrase “disruptive displacement” to capture outcomes of cases beyond “winning” and “losing.” For example, there may be circumstances where tenants did not have a formal eviction order issued against them and therefore were not displaced but have still experienced disruption in their lives because of the eviction filing, such as entering a negotiated settlement with unrealistic payment terms resulting in additional financial strain. Additionally, there may be circumstances where a tenant loses possession of their home but was granted an extra 30 days to vacate. In this situation, disruptive displacement may have been avoided because of the additional time to find alternative, suitable housing.

### Estimated Total Preliminary Fiscal Impacts

Stout estimated that Oklahoma County and Tulsa County likely realized economic benefits of \$6.3 million between August 1, 2022 and June 5, 2024 as a result of the RTC Pilot. Of the \$2.4 million the United States Department of Housing and Urban Development (HUD) granted LASO to fund an eviction diversion program, approximately \$860,000 has been spent.<sup>30</sup> For every \$1 spent on the RTC Pilot, Oklahoma County and Tulsa County likely realized at least \$7.37 in fiscal benefits.<sup>31</sup> In its evaluations and cost-benefit analyses (pre- and post-legislation) of eviction right to counsel programs throughout the country, Stout has found the estimated dollar value of a right to counsel generally ranges from \$2.76 to \$4.80.

The estimated quantifiable benefits were related to:

- Cost savings related to housing social safety net responses - \$1.7 million
- Economic value preserved by retaining residency in Oklahoma -\$1.2 million
- Reduction in crimes related to lack of shelter - \$740,000
- Cost savings related to increased educational attainment - \$720,000
- Cost savings related to responding to unsheltered homelessness - \$710,000
- Cost savings related to employment stability - \$470,000
- Sustained education funding for children in Oklahoma schools - \$420,000
- Cost savings related to criminalizing homelessness - \$160,000
- Cost savings related to Medicaid spending on health care - \$130,000

Stout’s preliminary estimate of fiscal impact is likely significantly understated. Included in the calculation are benefits of the RTC Pilot that can be quantified based on currently available data. However, Oklahoma County and Tulsa County would likely realize additional benefits that are not currently quantifiable based on available data.

These benefits that are not currently quantifiable include but are not limited to:

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<sup>29</sup> RTC Pilot began serving Tulsa County residents in August 2022 and Oklahoma County residents in June 2023. It is important to note that Stout does not calculate a fiscal impact associated with every RTC Pilot client who avoided disruptive displacement. The fiscal impacts are calculated for RTC Pilot clients who would have been expected to require a social safety net response to their disruptive displacement but for the RTC Pilot.

<sup>30</sup> “HUD Expands Eviction Prevention and Diversion Program with Additional \$20 Million.” US Department of Housing and Urban Development.

<sup>31</sup> Stout understands that the funding LASO has used for the RTC Pilot is a portion of a larger \$2.4 million grant it received from HUD. Using the total funding received of \$2.4 million, Stout estimates the return on investment to be approximately \$2.63 for every dollar invested.

- The juvenile justice costs, and child welfare costs associated with children experiencing homelessness
- The tax benefits to the state associated with increased consumer spending
- The negative impact of eviction on tenants' credit score, ability to re-rent, and the potential loss of a subsidized housing voucher
- The cost of mental health care
- Certain additional costs associated with homelessness, such as additional law enforcement
- The cost of family, community, and neighborhood instability
- Preservation of financial and personal assets
- A reduction, over time, of the number of eviction cases filed resulting in improved use of Oklahoma County and Tulsa County District Court resources.

### Estimated Fiscal Impacts Related to Homelessness/Housing Social Safety Net Responses

While homelessness may not always be experienced immediately following an eviction, eviction remains a leading cause of homelessness. According to data from the 2024 Point-in-Time Counts, there were 1,838 people experiencing homelessness in Oklahoma City<sup>32</sup> (an increase of 402 people from 2023), and 1,427 people experiencing homelessness in Tulsa (an increase of 294 people from 2023).<sup>33</sup>

Based on data collected during the interview process, approximately 14% of RTC Pilot clients in Oklahoma City and 18% of RTC Pilot Clients in Tulsa who completed the interview process indicated that if they had to move, they would move to emergency shelter.<sup>34</sup> The estimated cost for an emergency shelter response for these client households would have been \$6,615 per household per year in Oklahoma County<sup>35</sup> and \$6,450 per household per year in Tulsa County<sup>36</sup> if they were unable to avoid disruptive displacement. Stout estimates LASO assisted clients in avoiding disruptive displacement for approximately 95% of RTC Pilot clients from August 1, 2022 through June 5, 2024, which likely resulted in housing social safety net response costs avoided of \$1.5 million to Oklahoma County and Tulsa County (for the approximately 16% of RTC Pilot clients, on average, who indicated they would enter emergency shelter).

A portion of the households that may have required a housing social safety net response if not for the RTC Pilot would also likely need a second housing social safety net response. According to data collected by the Continuum of Care in Oklahoma County and Tulsa County,

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<sup>32</sup> "Oklahoma City releases annual 2024 Point in Time Count." City of Oklahoma City and Key to Home Partnership. May 2024.

<sup>33</sup> Point-in-Time Count Data published by Housing Solutions Tulsa.

<sup>34</sup> The estimated 18% is based on Stout's extrapolation methodology to distribute answers of "nowhere to go" among other categories. Data from Housing Solutions Tulsa indicates that between 13% and 19% of surveyed individuals experiencing homelessness living in emergency shelters cited eviction as the reason for their homelessness.

<sup>35</sup> Estimated using "The Cost of Homelessness in Oklahoma City April 1, 2009 to March 31, 2010" from Spangler & Associates, Oklahoma City Point in Time Count 2024, and data from the U.S. Housing and Urban Development on Continuum of Care Grants and Performance Profile Reports.

<sup>36</sup> Estimated using City of Tulsa estimates for the annual cost and capacity of an emergency shelter; <https://www.cityoftulsa.org/media/23094/rfp-24-904a-low-barrier-shelter-operator.pdf>, and U.S. Housing and Urban Development Continuum of Care Performance Profile Reports.

approximately 16% of households that exit emergency shelter will return to homelessness after exiting and require an additional social safety net response in both Tulsa County and Oklahoma County.<sup>37</sup> Using this metric, Stout estimates that potential cost savings related to second uses of housing social safety net programs of approximately \$240,000.

The total estimated fiscal impact to Oklahoma County and Tulsa County related to people avoiding experiencing homelessness and requiring a housing social safety net response is \$1.7 million – an estimated \$1.5 million related to the first housing social safety net response and an estimated \$240,000 related to the second housing social safety net response.

### Retained Economic Value by Minimizing Out-Migration

Approximately 105 RTC Pilot client households indicated that if they had to move, they would move in with friends or family who lived outside of their current county. In jurisdictions where Stout is or has conducted eviction right to counsel evaluations, approximately 3% of clients indicate they would move out of the jurisdiction if they were forced to move. RTC Pilot clients in Oklahoma County (6%) and Tulsa County (8%) indicated they would move out of the jurisdiction more frequently than Stout has observed in other jurisdictions. Approximately 95% of clients avoided disruptive displacement, resulting in approximately 100 households staying in their county as a result of RTC Pilot. Using this metric and an estimated \$12,000 in economic value (e.g., federal funding, state and local tax revenue, dollars spent in state and local economies) per person,<sup>38</sup> Stout estimates that Oklahoma County and Tulsa County have likely retained \$1.2 million in economic value from August 1, 2022 through June 5, 2024.

### Estimated Annual Criminal Justice Fiscal Impacts Related to Lack of Shelter Crimes

Research has demonstrated that higher rates of eviction correspond to higher rates of vehicle theft and forced entry.<sup>39</sup> Fewer evictions were shown to result in a decrease in “rough sleep crimes” where the primary motivation is accessing shelter.<sup>40</sup> Using client goals achieved metrics, Stout estimates there could have been 20 forcible entries and 106 vehicle thefts that may have been avoided due to the RTC Pilot.

There is significant academic research estimating the societal cost of crime, from which a range of criminal justice cost per crime calculations have been created. The public costs associated with a vehicle theft was calculated to be approximately \$3,900 (\$5,700 in 2024 dollars) and a burglary to be approximately \$4,100 (\$6,000 in 2024 dollars).<sup>41</sup> Applying these costs to the

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<sup>37</sup> U.S. Housing and Urban Development Continuum of Care Performance Profile Reports.

<sup>38</sup> Estimated by Stout using data from: (1) Aguilar, Louis. "Detroit population continues to decline, according to Census estimate." Bridge Michigan. May 2020. (2) "State and Local Expenditures." Urban Institute. 2018. Referencing State & Local Government Finance Data Query System and Data from U.S. Census Bureau, Annual Survey of State and Local Government Finances, Volume 4. 2020. (3) Present value of investments that cities and states have been willing to make to attract new residents.

<sup>39</sup> Falcone, Stefano. "Forcing Out, Breaking In: Do Evictions Increase Crime." July 2022. See also Semenza, D. C., Stansfield, R., Grosholz, J. M., & Link, N. W. "Eviction and Crime: A Neighborhood Analysis in Philadelphia." Crime & Delinquency. August 2022.

<sup>40</sup> Ibid. See Table B.1.

<sup>41</sup> McCollister KE, French MT, Fang H. The Cost of Crime to Society: New Crime-Specific Estimates for Policy and Program Evaluation. Drug Alcohol Depend. April 2010. Criminal justice costs include police protection costs,

forcible entries and vehicle thefts avoided due to RTC Pilot, results in an estimated fiscal impact of \$740,000 to Oklahoma County and Tulsa County.<sup>42</sup>

While Stout calculated the fiscal impacts of fewer forcible entries and vehicle thefts, the actual societal cost-of-crime fiscal impacts is likely much higher. Research has indicated that eviction is associated with a number of other crimes<sup>43</sup> and gun violence<sup>44</sup>, each of which has its own public costs.<sup>45</sup> However, these studies do not currently offer guidance on the magnitude of cost or include methodologies or the necessary data to quantify the public costs.

### Estimated Educational Attainment Fiscal Impacts

School-aged children who experience homelessness face significant mental and physical health challenges that prevent students from focusing on their education.<sup>46</sup> These challenges can result in students experiencing homelessness becoming chronically absent from school.<sup>47</sup> After just one year of chronic absenteeism, students are significantly less likely to complete high school.<sup>48</sup>

Research has demonstrated that not completing high school has a significant impact on an individual's future income.<sup>49</sup> Additionally, the relationship between higher levels of education and lower likelihood of welfare program utilization have also been identified.<sup>50</sup> Graduation from high school and college have been shown to significantly decrease the likelihood of the future need for cash and housing assistance,<sup>51</sup> applying for and utilizing Supplemental Nutrition Assistance Program benefits,<sup>52</sup> and being enrolled in Medicaid.<sup>53</sup>

Stout estimated the annual reduction in welfare benefits spending due to increased educational attainment resulting from the RTC Pilot increasing housing stability of children in Oklahoma County and Tulsa County. Stout estimates that increased educational attainment could result in

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legal and adjudication costs, and correctional costs. Stout used the Bureau of Labor Statistics Consumer Price Index Inflation Calculator to adjust the dollar amounts to 2024 dollars. <https://data.bls.gov/cgi-bin/cpicalc.pl>.

<sup>42</sup> Current research only calculates the cost of burglary, however for a crime to be considered a burglary, there must be forcible entry. Federal Bureau of Investigation. Uniform Crime Report, Burglary.

<sup>43</sup> Semenza, D. C., Stansfield, R., Grosholz, J. M., & Link, N. W. "Eviction and Crime: A Neighborhood Analysis in Philadelphia." *Crime & Delinquency*. August 2022.

<sup>44</sup> Gaston, Melanie. "The Impact of Eviction on Neighborhood Gun Violence." Rutgers, State University of New Jersey. May 2021.

<sup>45</sup> McCollister KE, French MT, Fang H. The Cost of Crime to Society: New Crime-Specific Estimates for Policy and Program Evaluation. *Drug Alcohol Depend*. April 2010.

<sup>46</sup> Bishop, Joseph. "Our Children Can't Wait: The Urgency of Reinventing Education Policy in America"

<sup>47</sup> "Chronic Absenteeism Among Students Experiencing Homelessness in America." National Center for Homeless Education. 2022.

<sup>48</sup> "Research Brief: Chronic Absenteeism." University of Utah, Utah Education Policy Center. 2012.

<sup>49</sup> Tamborini, et al. "Education and Lifetime Earnings in the United States." *Demography*. 2016.

<sup>50</sup> Cliff, Aiden. "The Relationship Between Education and Welfare Dependency." *The Brown Journal of Philosophy, Politics & Economics*.

<sup>51</sup> Waldfoegel, J, et al. "Public Assistance Programs: How Much Could be Saved with Improved Education?" Working Paper for Education Symposium, Teacher's College, Columbia University. 2005.

<sup>52</sup> Rank, M and Hirschl, T. "The Likelihood of Using Food Stamps During the Adult Years." *Journal of Nutrition and Behavior*. 2005.

<sup>53</sup> Muennig, P. "Health Returns to Educational Interventions." Columbia University. 2005.



approximately \$10,000 less welfare spending per year per individual in Oklahoma.<sup>54</sup> Applying this to the estimated 72 children likely would have not completed high school but for the RTC Pilot results in approximately \$720,000 in reduced social safety net benefits spending in Oklahoma County and Tulsa County annually.

### Estimated Fiscal Impacts Related to Responding to Unsheltered Homelessness

Data from the 2023 Oklahoma City and Tulsa Point-in-Time studies indicated 448 and 438 individuals, respectively, were experiencing unsheltered homelessness.<sup>55</sup> Responding to unsheltered homelessness can result in municipal costs related to encampment cleaning, first responders, and social services.<sup>56</sup>

In 2010, the City of Oklahoma commissioned a study to determine the cost of homelessness to the city. The study found that Oklahoma City spent \$27.8 million on services for individuals experiencing homelessness, with significant resources deployed to providing services to those experiencing unsheltered homelessness.<sup>57</sup> These costs included law enforcement, emergency medical services, crisis centers, and encampment cleanups.<sup>58</sup> Encampment cleanups alone have an average cost of \$5,000 to \$6,000 and could be as high as \$17,000.<sup>59</sup> In 2023, Tulsa spent approximately \$1 million responding to unsheltered encampments.<sup>60</sup> Based on 2010 study and 2023 U.S. Housing and Urban Development data, Stout estimates the per household cost of responding to unsheltered homelessness is an estimated \$3,600 in Oklahoma County and Tulsa County.<sup>61</sup>

Stout estimates that 56 individuals in Oklahoma County and 220 individuals in Tulsa County likely avoided experiencing unsheltered homelessness resulting from disruptive displacement due to RTC Pilot. Applying the approximately \$3,600 Oklahoma City and Tulsa spend per person experiencing unsheltered homelessness results in approximately \$710,000 in cost savings to Oklahoma County and Tulsa County as a result of the RTC Pilot.

### Estimated Fiscal Impacts of Increased Economic Activity Due to Employment Stability

Research has demonstrated the impact of eviction on employment stability, particularly the increased likelihood of a person experiencing job loss after being evicted. Stout estimates approximately 15% would likely have experienced job loss because of disruptive displacement

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<sup>54</sup> Stout estimated per household social safety net benefits expenditures for individuals who do not complete high school in Oklahoma and Tulsa Counties using per household state and federal welfare expenditures by level of educational attainment.

<sup>55</sup> <https://www.okc.gov/home/showpublisheddocument/36248/638235661725130000> and <https://www.housingsolutionstulsa.org/reports-data/pit-data/>

<sup>56</sup> Chimowitz, Hannah and Ruege, Adam. "The Costs and Harms of Homelessness." Community Solutions.

<sup>57</sup> Spangler & Associates, Inc. "The Cost of Homelessness in Oklahoma City April 1, 2009 to March 31, 2010." Produced for the Oklahoma City Planning Department.

<sup>58</sup> Ibid.

<sup>59</sup> Stanish, Erika, "Homeless Camps in City Disappear; Citywide Cleanup Comes at a Cost." Fox 25. February 2020.

<sup>60</sup> <https://www.tulsacouncil.org/3htaskforce>.

<sup>61</sup> This cost includes a variety of housing social safety net responses that could include emergency shelter, transitional housing, rapid rehousing, street outreach and mental health services. Not every household that experiences unsheltered homelessness will utilize the same resources.



caused by eviction. When individuals experience job loss and lose income, they could become eligible for social safety net benefits.

Stout estimated the reduction in social safety net expenditures due to decreased job loss associated with eviction as a result of the RTC Pilot. Stout estimates that the average low-income household whose head-of-household experiences unemployment receives \$2,400 in social safety net benefits during the period of unemployment.<sup>62</sup> This results in approximately \$470,000 in decreased social safety net benefits spending in Oklahoma County and Tulsa County as a result of the RTC Pilot.

### Retained Federal and State Funding for Public Schools

Housing instability not only impacts several facets of students' education like test scores, level of educational attainment, and likelihood of graduating, but also the school system as a whole. Because Oklahoma schools are allocated federal funding based on the number of students enrolled, when students leave their school district, funding is lost.

Approximately 6% of RTC Pilot clients in Oklahoma City and 8% of RTC Pilot clients in Tulsa County indicated that if they had to move, they would move in with friends or family who lived outside of their current county. Approximately 39% RTC Pilot client households have children with an average of 2 children per household and approximately 95% avoided disruptive displacement through the RTC Pilot. Stout estimates that 9 and 70 children may have migrated out of Oklahoma County and Tulsa County to live with friends or family but for legal representation through RTC Pilot.

Oklahoma City Public Schools receives approximately \$1,400 in federal funding and \$4,300 in state funding per student enrolled and Tulsa Public Schools receives approximately \$1,200 in federal funding and \$4,000 in state funding per student enrolled.<sup>63</sup> Stout estimates approximately \$420,000 in retained federal and state funding for Oklahoma County and Tulsa County public schools as a result of the RTC Pilot.

### Estimated Fiscal Impact of Criminalizing Homelessness

Individuals experiencing homelessness are more likely to interact with police, be fined for quality-of-life crimes, and be arrested compared to housed individuals.<sup>64</sup> A study on homelessness in Minnesota found that 12% of adults experiencing homelessness had been incarcerated within the past year.<sup>65</sup> A similar study conducted in New York City found that 23% of emergency shelter

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<sup>62</sup> Stout estimated per household social safety net benefits expenditure due to unemployment in Oklahoma County and Tulsa County using per household state and federal welfare expenditures. Not every individual will be approved for every social safety net benefit program and eligibility for programs vary.

<sup>63</sup> Estimated using data from Summary of Public Elementary-Secondary School System Finances by State for Fiscal Year 2021 compiled by the United States Census Bureau.

<sup>64</sup> Speigman, Richard, Green, Rex S. "Homeless and Non-Homeless Arrestees: Distinctions in Prevalence and in Sociodemographic, Drug Use, and Arrest Characteristics Across DUF Sites." National Institute of Justice. 1999. See also Herring, Chris. "Complaint-Oriented Policing: Regulating Homelessness in Public Space." American Sociological Association. 2019; Bailey, Madeline, Crew, Erica, Reeve, Madz. "No Access to Justice: Breaking the Cycle of Homelessness and Jail." Vera Institute of Justice. 2020; Zakrisson, Tanya, Hamel, Paul, Hwang, Stephen. "Homeless People's Trust and Interactions with Police and Paramedics." Journal of Urban Health. 2004.

<sup>65</sup> "Overview of Homelessness in Minnesota 2006." Wilder Research. 2007.

residents had been incarcerated within the past 2 years.<sup>66</sup> Stout used the 12% metric identified in the Minnesota study, given that it is on an annual basis, to estimate that approximately 12% of individuals who could have experienced homelessness could have also experienced incarceration but for RTC Pilot.

The cost of one night in jail is \$66<sup>67</sup> and \$63<sup>68</sup> in Oklahoma County and Tulsa County, respectively. Data from the Bureau of Justice Statistics indicates that the average jail-stay for an individual convicted of a misdemeanor offense is approximately 33 days.<sup>69</sup> Using this data, Stout estimates that as a result of the RTC Pilot, Oklahoma County and Tulsa County have realized fiscal impacts of approximately \$160,000 related to costs associated with criminalizing people experiencing homelessness.

### Medicaid-funded Health Care Cost Savings

A significant body of research has documented the connection between health and housing, and recent research has examined the connection between eviction filing rates and mortality rates.<sup>70</sup> People experiencing homelessness, including those experiencing homelessness because of eviction or disruptive displacement, often utilize in-patient and emergency room care more frequently than people who are stably housed. Stout found in its independent evaluation of Cook County's (Chicago) Early Resolution Program, approximately 41% of clients facing eviction indicated that if they were not able to effectively resolve their case, they would likely experience increased stress and health concerns.

Approximately 42% of clients indicated that if they had to move, they would likely experience homelessness in some form.<sup>71</sup> Using utilization rates of in-patient and emergency room care for people experiencing homelessness, average cost data, Medicaid enrollment, and the estimated portion of Medicaid funded by local governments in Oklahoma, Stout estimates that Oklahoma County and Tulsa County saved approximately \$130,000 in additional Medicaid costs from August 1, 2022 through June 5, 2024 as a result of the RTC Pilot.

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<sup>66</sup> Metraux, Stephen, Caterina, Roman, Cho, Richard. "Incarceration and Homelessness." US Department of Veterans Affairs. 2008.

<sup>67</sup> "ODOC Continues to Guard Taxpayers' Dollars." Oklahoma Department of Corrections. April 11, 2024.

<sup>68</sup> "Court: DOC Must Pay County Jails 'Actual Daily Cost' for Holding State Inmates, But Questions Remain." NonDoc. October 10, 2023. <https://nondoc.com/2023/10/10/oklahoma-supreme-court-ruling-actual-daily-cost-county-jails/>

<sup>69</sup> Zheng, Zhen. "Jail Inmates in 2021 – Statistical Tables." Bureau of Justice Statistics. December 2022.

<sup>70</sup> Rao, Shreya et al. "Association of US County-Level Eviction Rates and All-Cause Mortality." National Library of Medicine. November 2022. The researchers analyzed 2016 eviction data for nearly 700 counties and found that eviction rates were significantly associated with all-cause mortality with the strongest associations observed in counties with the highest proportion of Black and female residents. All-cause mortality increased by approximately 9 deaths per 100,000 residents for every 1% increase in eviction rates.

<sup>71</sup> The 41% includes RTC Pilot clients who indicated that they would need to enter emergency shelter, live in a hotel/motel, or live unsheltered or on the street and was calculated using a methodology to allocate pro rata the "nowhere to go" responses.

## **Section VI-Conclusion**

Since the RTC Pilot began in August 2022 in 2 Tulsa County zip codes and in June 2023 in 2 Oklahoma County zip codes, LASO has assisted 1,824 tenant households containing 3,749 individuals. For RTC Pilot cases closed between June 1, 2023 and June 5, 2024 where the client received extensive service, LASO achieved approximately 95% of all clients' case goals.

LASO's significant investment in expanded data collection during the client intake and interview process enabled a deeper understanding of client and case characteristics as well as the potential fiscal impacts that Oklahoma County and Tulsa County may have realized as a result of the RTC Pilot.

LASO is the first civil legal services organization Stout was engaged by that collected data to demonstrate: (1) the frequency with which clients experienced homelessness as a result of a past eviction and (2) systemic barriers that clients may be experiencing when trying to attend their hearings (e.g., needed to miss work, change childcare plans). Approximately 27% of RTC Pilot clients had reported that they had experienced homelessness due to a past eviction. Approximately 40% of clients indicated they had to miss work *or* miss or reschedule a medical appointment *or* change childcare plans to attend their hearing. Approximately 27% of clients stated that they had a medical condition that made it difficult for them to be present at their hearing.

The estimated potential fiscal impact to Oklahoma County and Tulsa County resulting from the RTC Pilot was approximately \$6.3 million. For every \$1 spent on the RTC Pilot, Oklahoma County and Tulsa County likely realized at least \$7.37 in fiscal benefits. Stout understands that the funding LASO has used for the RTC Pilot is a portion of a larger \$2.4 million grant it received from HUD. Using the total funding received of \$2.4 million, Stout estimates the return on investment to be approximately \$2.63 for every dollar invested. In its evaluations and cost-benefit analyses (pre- and post-legislation) of eviction right to counsel programs throughout the country, Stout has found the estimated dollar value of a right to counsel generally ranges from \$2.76 to \$4.80.

Stout's independent evaluation also included engagement of attorneys representing rental property owners. Feedback about the RTC Pilot from plaintiffs' counsel was (consistent with Stout's engagement with rental property owners and their counsel throughout the country) centered on several key themes: (1) plaintiff legal counsel appreciates the importance of tenant legal representation; (2) when a tenant is represented, cases are generally resolved more efficiently and effectively; and (3) sustained rent assistance and processes for identifying cases where there are no legal defenses could result in rental property owners being more willing to negotiate repayment plans for longer move out periods.

Stout's conclusions are based on information received to date. Stout reserves the right to change those conclusions should additional information be provided.

# **Appendix A-Stout's Profile and Qualifications**

Stout Risius Ross, LLC (Stout) is a global investment bank and advisory firm specializing in corporate finance, valuation, financial disputes, and investigations. In addition to these services, Stout's professionals have expertise in strategy consulting involving a variety of socioeconomic issues, including issues of or related to access to justice and the needs of low-income individuals and communities.

Under the direction of Neil Steinkamp, who leads Stout's Transformative Change Consulting practice, Stout is a recognized leader in the civil legal services community and offers the following services:

- Economic impact assessments and policy research for civil legal services initiatives
- Strategy consulting and action plan development for issues relating to access to justice
- Non-profit budget development, review, and recommendations
- Cost-benefit and impact analyses for non-profit initiatives and activities
- Data-driven program evaluation and implementation
- Dispute consulting and damages analyses for low-income individuals.

Neil Steinkamp is a Managing Director at Stout and a well-recognized expert and consultant on a range of strategic, corporate, and financial issues for businesses, non-profit organizations and community leaders and their advisors. Neil has extensive experience in the development of strategic plans, impact analyses, data evaluation, and organizational change. His work often includes assessments of data reporting, data collection processes, the interpretation or understanding of structured and unstructured data, the review of documents and databases, the development of iterative process improvement strategies, the creation of data monitoring platforms to facilitate sustained incremental change toward a particular outcome and creating collaborative environments. Mr. Steinkamp also has premier experiencing with housing related issues, including eviction. He has authored numerous economic impact studies on providing low-income tenants with attorneys in eviction proceedings, one of which assisted in the passing of New York City's historic right to counsel law. Mr. Steinkamp also currently serves as the court-appointed Independent Data Analyst in *Baez v. New York City Housing Authority* overseeing NYCHA's compliance with the timely remediation of mold and leak work orders.

In mid-2020, Stout developed innovative analyses of tenant household instability caused by the COVID-19 pandemic, the estimated rental debt owed, and estimates of how that instability could result in an unprecedented number of eviction filings in states throughout the country. Stout's research and analyses have been cited in local and national publications, including, but not limited to, The New York Times, The Washington Post, CNBC, Reuters, Forbes, Politico, and Bloomberg, and was referenced in the Centers for Disease Control and Prevention September 4, 2020 Order enacting a nationwide eviction moratorium. Stout also maintains an [Eviction Right to Counsel Resource Center](#) which includes Stout's eviction cost-benefit analyses as well as a compilation of resources related to the eviction process, housing instability, racial bias, the impacts and economic costs of eviction, and draft and enacted legislation.

Stout has been engaged by more than 50 non-profit organizations serving low-income communities across the United States. These engagements often included program or public policy evaluations, return on investment analyses, and strategic action planning.

Over the past 10 years, Stout has developed premier expertise in analyzing data from and evaluating the impact of eviction-related programs, including but not limited to eviction rights to counsel, eviction diversion initiatives (pre- and post-filing), eviction prevention and defense programs, emergency rental assistance, expanded legal representation, and access to brief services. Stout has provided eviction-related consulting services or assistance in nearly 40 jurisdictions:

- Alaska
- Atlanta
- Baltimore
- Boston
- Chattanooga
- Chicago (Cook County)
- Cleveland
- Columbus (Ohio)
- Connecticut
- Delaware
- Dayton
- Detroit
- Fort Wayne
- Grand Rapids
- Harris County (Texas)
- Indianapolis
- Kings County (Brooklyn, NYC)
- Lansing
- Las Vegas
- Los Angeles (city and county)
- Maryland (statewide)
- Miami-Dade
- Milwaukee County
- Nashville
- Newark
- New Orleans
- New York City
- New York State (outside of New York City)
- Oakland County (Michigan)
- Pennsylvania (statewide)
- Philadelphia
- Portland (Oregon)
- Rhode Island
- South Carolina
- St. Petersburg
- Suffolk County (New York)
- Toledo
- Washington, DC

Stout is currently serving as the evaluator of eviction right to counsels in Connecticut, Cleveland, Dayton, Maryland, Milwaukee, and Nashville. Stout has conducted eviction right to counsel fiscal return on investment analyses and independent expert reports for advocates, coalitions, bar associations or government agencies in Baltimore, Delaware, Detroit, Newark, Pennsylvania, New York City, Philadelphia, Los Angeles, and New York (outside of New York City) and is currently conducting a cost-benefit analysis of an eviction right to counsel in South Carolina. Following the release of Stout's reports in Baltimore, New York City, Philadelphia, and Detroit eviction right to counsel legislation was enacted. In these engagements, Stout worked closely with funders/potential funders, legal services organizations, rental property owners, academics studying housing and eviction, government agencies and the continuum of care, non-profits serving low-income residents, community organizers, and impacted residents.