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# Community Redevelopment Legal Assistance: Overall Evaluation

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## Contents

Overview and Key Findings .....	3
The Community Redevelopment Legal Assistance Program.....	3
Key Learnings and Challenges .....	3
Project Elements and Evaluation Approach .....	5
Theory of Change .....	5
Evaluation Methodology .....	6
Justice Zone Communities .....	7
CRLA Activities and Achievements.....	14
Policy and Systemic Change .....	21
Secondary Data on Change in the Justice Zones.....	23
Learnings and Challenges.....	27
Evaluation Limitations .....	37
Conclusion.....	37
Appendix .....	39
CLRA Planned Activities- Baseline Interviews. ....	39
Legal Services .....	39
Technical Assistance .....	45

## Overview and Key Findings

### The Community Redevelopment Legal Assistance Program

The Community Redevelopment Legal Assistance (CRLA) program was an initiative funded by the Pennsylvania Interest on Lawyers' Trust Accounts (IOLTA) Board to bring legal services and technical expertise into communities across the Commonwealth most affected by foreclosure. CRLA was staffed by Cindy Daley, an attorney at Regional Housing Legal Services (RHLS) who has worked on community development throughout Pennsylvania in both policy advocacy and client service. The CRLA program worked in areas called Justice Zones that are selected through review of quantitative data on foreclosure (shown by the count of Act 91 intent to foreclose notices) and other indicators of community needs and qualitative data that includes conversations with local stakeholders, community needs assessments, and the presence of strong local community groups with a demonstrated record of success. The primary goals of CRLA were to stabilize communities, stabilize residents in their homes, and fight blight – with an understanding that these issues are interrelated. About 250 municipalities across Pennsylvania were considered for inclusion in CRLA and five were ultimately selected: Northern Schuylkill County, Northwest Philadelphia, Scranton, New Castle, and Norristown-Pottstown.

### Key Learnings and Challenges

Looking across the five Justices zones, several thematic learnings emerged, as well as a set of common challenges:

*Learning #1:* Increasing legal services organizations' reach into the Justice Zones through in-person staffing and building relationships with strong, trusted local organizations resulted in many more legal service cases completed in the Justice Zones. Providers also established credibility with local officials, like the local Magisterial District Court and code officials, who were also sources for referrals

*Learning #2:* Conducting extensive outreach activities also increased legal service cases in the Justice Zones, created new capabilities for legal services organizations, and increased the effectiveness of cross-organization coordination. CRLA funding supported a diverse array of outreach strategies, including presentations and sharing fliers at existing community events, clinics on specific legal issues, and online education and training.

*Learning #3:* CRLA encouraged and created the staff capacity for legal service organizations to work together on difficult issues they could not resolve alone. During the grant period unique issues arose in several Justice Zones that required the legal services organizations to work together with local officials and social service groups for systemic change.

*Learning #4:* Many communities and community-based organizations lack the technical and legal knowledge needed to move catalytic projects forward. CRLA brought needed technical and legal assistance to impactful projects that were otherwise stalled. Several projects moved forward that will advance goals of CRLA including new subsidized housing and enhanced community amenities that will support prosperity.

*Learning #5:* RHLS's role directing the program was critical to connecting legal services with strong local partners and in identifying opportunities for CRLA to help with impactful projects.

*Learning #6:* Staffing multiple legal services organizations on CRLA projects allowed specialized statewide or regional organizations like PULP to train local legal service providers on routine cases, freeing more specialized legal services to take non-routine cases and to work on systemic change.

*Learning #7:* Communities are networks, and strong community organizations connect legal service organizations to a particular community's residents and their needs. CRLA elevated community voices that are sometimes not heard in community revitalization work, allowing for more comprehensive network building.

*Learning #8:* Developing flexible networks led by legal service organizations helps communities access resources during times of crisis.

*Challenge #1:* The targeted populations of many of the Justice Zone were difficult to reach; there was no single central place or platform to reach people, and some communities were insular. Because of that, outreach work required substantial time and experimentation.

*Challenge #2:* Despite the positive impact of relationships and outreach during the CRLA period, legal services organizations would benefit from additional, ongoing resources to build and maintain those activities because they are time consuming.

*Challenge #3:* Catalytic projects take a long time and involve some risk. Many require multi-year efforts and shifts in strategy over time. Assistance to organizations doesn't always yield success.

*Challenge #4:* The legal service organizations tried to create a 'single point of entry' for referrals but found that clients continued to reach out to the legal service organizations individually for needed services. Ongoing outreach may be necessary to build and reinforce community knowledge.

## Project Elements and Evaluation Approach

### Theory of Change

CRLA's goal was to promote stability in communities impacted by foreclosure. The core dimensions of community that CRLA was intended to address were sufficient housing options, opportunities for prosperity, safety, amenities, and the physical appearance of buildings. Housing options that could meet the needs of residents included both market rate and subsidized units, opportunities for homeownership and rental housing, and supportive housing. Opportunities for prosperity included access to living wage jobs, education events, and healthcare. At a community level, amenities like commercial spaces, cultural activities, and parks and recreational areas are necessary to keep existing residents and attract new ones. Well maintained properties and public spaces, and the absence of blight and vacancy, also support a stable community.

CRLA included many planned activities to increase the amount of quality homes in Justice Zone communities. First, CRLA would provide legal services to low-income households facing housing stability challenges including foreclosure, eviction, utility shutoffs or money judgments, or loss of subsidized housing. CRLA would also improve the physical condition of Justice Zone housing through access to weatherization, energy efficiency, and home modification programs. Finally, CRLA would increase the supply of affordable housing, including through RHLS representation and counseling of subsidized housing developers.

The second core dimension of CRLA was increasing household income and prosperity. CRLA would directly increase household income through access to living wage jobs via expungement of criminal records, establishing or preserving work eligibility for immigrants, and creating new jobs in commercial spaces. Household income would be preserved through preventing utility judgments and obtaining affordable payment plans for delinquent utility payments, reduced federal tax liability or avoidance of federal tax judgments, reduced utility payments from home weatherization, and reduced back rent amounts from representation in Landlord-Tenant matters.

Finally, CRLA's design included activities to stabilize the Justice Zones through improved physical appearance and transformative projects. Blighted properties could become new affordable homes. Home repairs and adaptive modifications for residents with asthma would reduce blight. Reducing blight would both improve the appearance

of the Justice Zones and reduce crime, which has been linked to blight.<sup>1</sup> Large, transformative projects would also remove blighting influences and create new or improved assets for Justice Zone communities with increased space for commercial activities and community gatherings.

## Evaluation Methodology

This evaluation uses a mixed methods approach of interviews with program staff and participants, analysis of data collected by the program staff, and review of publicly available administrative data.

### Interviews

Reinvestment Fund interviewed CRLA legal and other service providers before Justice Zone activities began to learn about the program goals, activities, anticipated challenges, and planned achievements. We again interviewed service providers after their activities concluded to learn about what outcomes were achieved, what barriers were encountered, how relationships developed among CRLA-funded groups with other community organizations, what lessons they learned, and how participating in CRLA built new capacities. Interview subjects were asked open-ended questions to gather their perspectives and understandings of CRLA activities and encourage interview subjects to share what aspects of CRLA were most important to them. Interviewers would follow questions with prompts or follow-up questions to fully understand the interview subjects' perspectives on the evaluation questions. Two Reinvestment Fund staff members participated in most interviews, one primarily asking questions while the other took notes or asked follow-up questions. Interviews allowed for a richer data collection that elucidated the themes and learnings from the program.

### LegalServer

CRLA legal services organizations provided the data they collected in the LegalServer application for the years they participated in CRLA activities and a year before that period as a baseline comparison. LegalServer is the primary data collection tool for Pennsylvania legal service organizations. It allows organizations to track the number of cases, the type of case (e.g., Landlord-Tenant, Public Benefits, etc.), outcomes achieved (e.g., foreclosure prevented, income increased, etc.), outreach events, number of attendees at those events, and some geographic data about client locations. In some cases, the Justice Zones did not align exactly with the geographic level available in LegalServer, and those instances are noted in the individual Justice

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<sup>1</sup> See e.g., Branas, Charles, et. al. *Citywide Cluster Randomized Trial to Restore Blighted Vacant Land and Its Effects on Violence, Crime, and Fear*. *Biological Sciences*. February 26, 2018 (stating, "standardized processes for the restoration of vacant urban land were experimentally tested on a citywide scale and found to significantly reduce gun violence, crime, and fear").

Zone evaluations. Generally, however, the LegalServer data allows us to observe trends in the number of cases served, outcomes for those cases, and how the number of outreaches and outreach attendees changed from before the program through its conclusion.

### *Administrative data*

We used data from the American Community Survey (ACS) capturing the five-year period before CRLA activities began and the most recent five-year estimates to assess change in the Justice Zone communities during the program period. These data detail local incomes, homeownership, poverty levels, housing values (as estimated by homeowners), age of housing, share of vacant housing units, and unemployment. Justice Zone data is shown in the context of the county and state. These data show how the Justice Zone characteristics have changed and how those changes compare to the county and state (although see “Evaluation Limitations” below for important caveats about what can be learned from changes in the ACS data).

Taken together, these qualitative and quantitative data sources show much about the context, activities, and outcomes from CRLA.

## Justice Zone Communities

As described below, the five Justice Zones represent a diverse selection of Pennsylvania communities, but all face shared challenges related to housing and community stability.

### *Northern Schuylkill County*

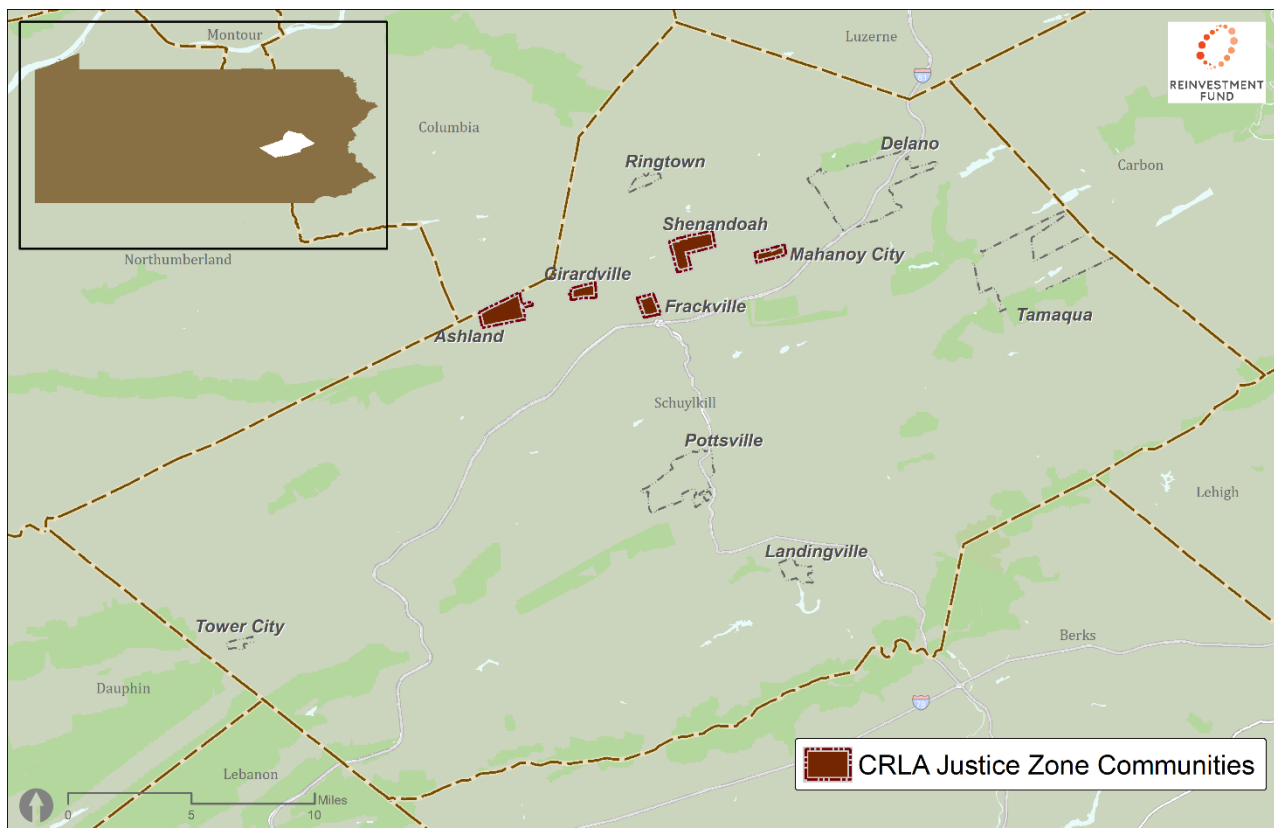
The Northern Schuylkill Justice Zone is comprised of five boroughs in Schuylkill County: Ashland, Frackville, Girardville, Mahanoy City, and Shenandoah, which are located just north of I-81 close to the border with Columbia County. The boroughs have populations between 1,000 and 5,000 in a part of the state historically known for coal mining and later manufacturing.<sup>2</sup> The area was selected because of income and housing challenges faced by residents and because of the participation of a local community organization, Schuylkill Community Action [SCA], that has a history of successfully organizing and connecting Schuylkill County residents with resources along with undertaking small scale housing developments and administering home repair and weatherization programs. Income challenges for residents include lack of stable employment opportunities and housing and utility cost burdens, and those issues in turn created housing and community stability challenges like eviction and foreclosure, utility delinquencies and liens, and blight.

When planning the mix of activities to conduct in the CRLA Justice Zone, RHLS relied on a community needs assessment conducted by SCA in 2015 that detailed the most important

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<sup>2</sup> See e.g., Borough of Shenandoah, “History”, available at: <https://shenandoahpa.org/history.htm> (accessed 6/1/2022).

issues for Schuylkill County<sup>3</sup> and data from the ACS. Housing needs included home repairs, home weatherization, homeless assistance, and assistance paying rent. Income management issues included utility assistance and assistance managing bills and expenses. Data from the ACS also showed that unemployment, low incomes, and housing conditions are pressing issues within the boroughs. The unemployment rate in the five boroughs ranged from 9.1% in Frackville to 18.7% in Shenandoah in the 2015-2019 ACS. The five boroughs had median household incomes between 10% and 40% below the county median income, and 25% to 50% below the income of the typical Pennsylvania household. Over time these issues have led to longer term housing concerns as well, including poor conditions, blight, and a need for home weatherization. Schuylkill County had a high concentration of vacant homes according to the ACS, at 14.6% of all housing units compared to 11.1% across Pennsylvania. In the five boroughs the vacancy rate ranged from 15.5% in Frackville to 32.5% in Shenandoah. Other issues noted in the needs assessment include lack of access to affordable healthcare and fresh food.



Map One: Location of Five Boroughs within Schuylkill County (inset: location of Schuylkill County within Pennsylvania)

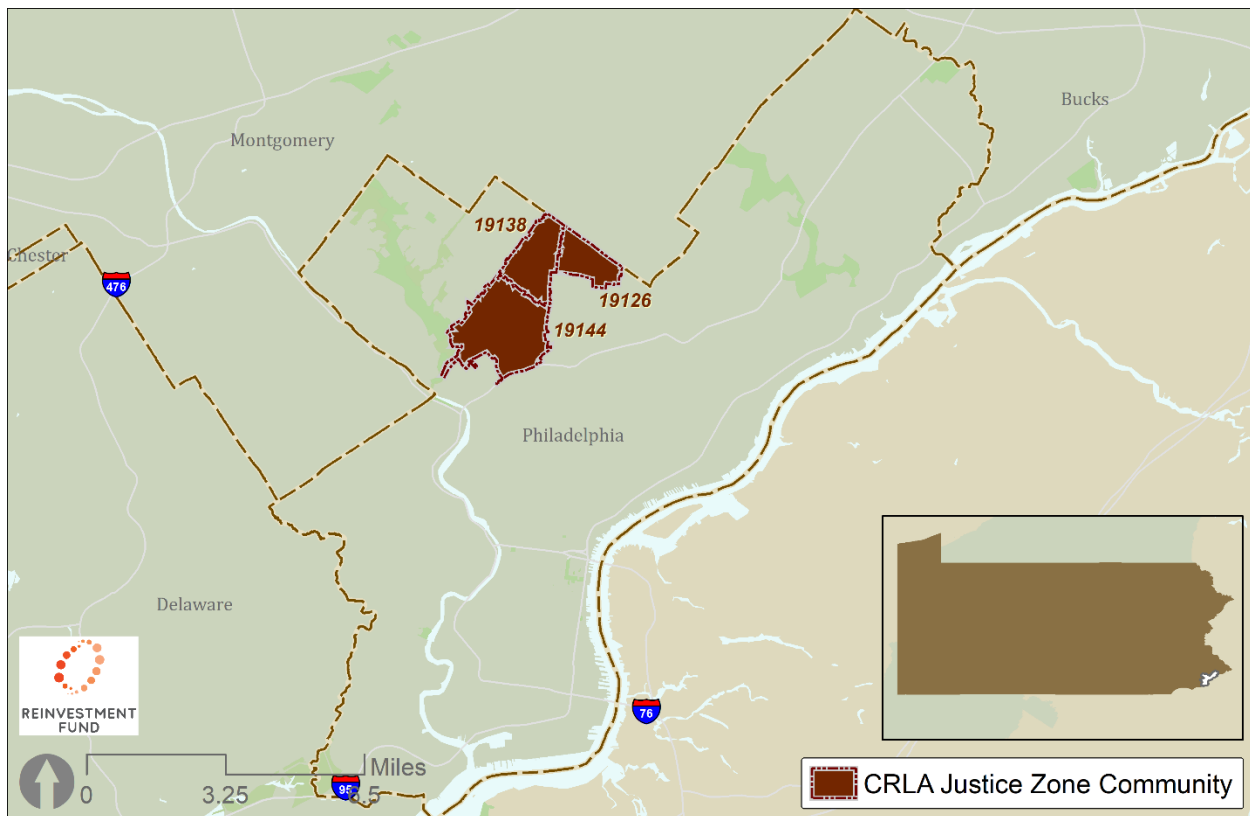
<sup>3</sup> SCA's community needs analysis surveyed over 1,000 residents, 43 service providers, and 46 other stakeholders from across the county. The survey found that four of the top ten issues identified by respondents were housing issues, and two of the top ten were income management issues. SCA, "2015 Schuylkill Community Action Needs Assessment." March 2015. Available at: <https://schuylkillcommunityaction.com/wp-content/uploads/NeedsAssessment2015.pdf> (accessed 6/1/2022).



## *Northwest Philadelphia*

The Northwest Philadelphia Justice Zone is comprised of three zip codes and corresponding neighborhoods in Philadelphia: 19126 (East Oak Lane), 19138 (West Oak Lane), and 19144 (Germantown). The area collectively had a population of about 90,000 residents, who were majority Black, with high rates of poverty (from 21% in East Oak Lane to 34% in Germantown) and high rates of vacant housing (from 13% in East Oak Lane to 22% in Germantown). At the time the area was selected for CRLA in 2018, the population had been declining, but the ACS shows the area is growing again, especially Germantown (+8% population since 2011-2015). The Justice Zone was selected for CRLA because residents had both housing and income challenges: housing stability issues like mortgage and property tax foreclosure, reverse mortgages, and eviction; utility delinquencies and water shut offs; and barriers to employment for returning citizens. RHLS created a community needs assessment that detailed these pressing issues for the Justice Zone with a variety of data sources, including the American Community Survey, legislative findings, and reports from local research groups, and with findings from a set of interviews with social service providers, legal services, housing developers, and local elected officials' staff.

Legal services identified that service requests for help with property tax foreclosures were rapidly increasing in the Justice Zone from 2015 through 2017, and that Justice Zone residents requested help with income tax and unemployment compensation issues more frequently than residents from other areas of Philadelphia. Both Community Legal Services (CLS) and Philadelphia Legal Assistance (PLA) identified preventing utility shut offs and assisting with utility delinquencies as needs for residents of the Justice Zone. Service providers and elected officials' staff identified a shortage of affordable rental homes in good repair in the Justice Zone. Other top issues were evictions, property tax delinquencies, trouble paying utility bills, tangled titles and estate planning, abandoned properties, and expungement of criminal records. Tying all of these issues together were residents' need for assistance overcoming barriers to employment and income, and with housing security and quality issues that result from inadequate income to cover various housing costs.



Map Two: Location of Northwest Philadelphia Justice Zone in Philadelphia and Pennsylvania

### *New Castle*

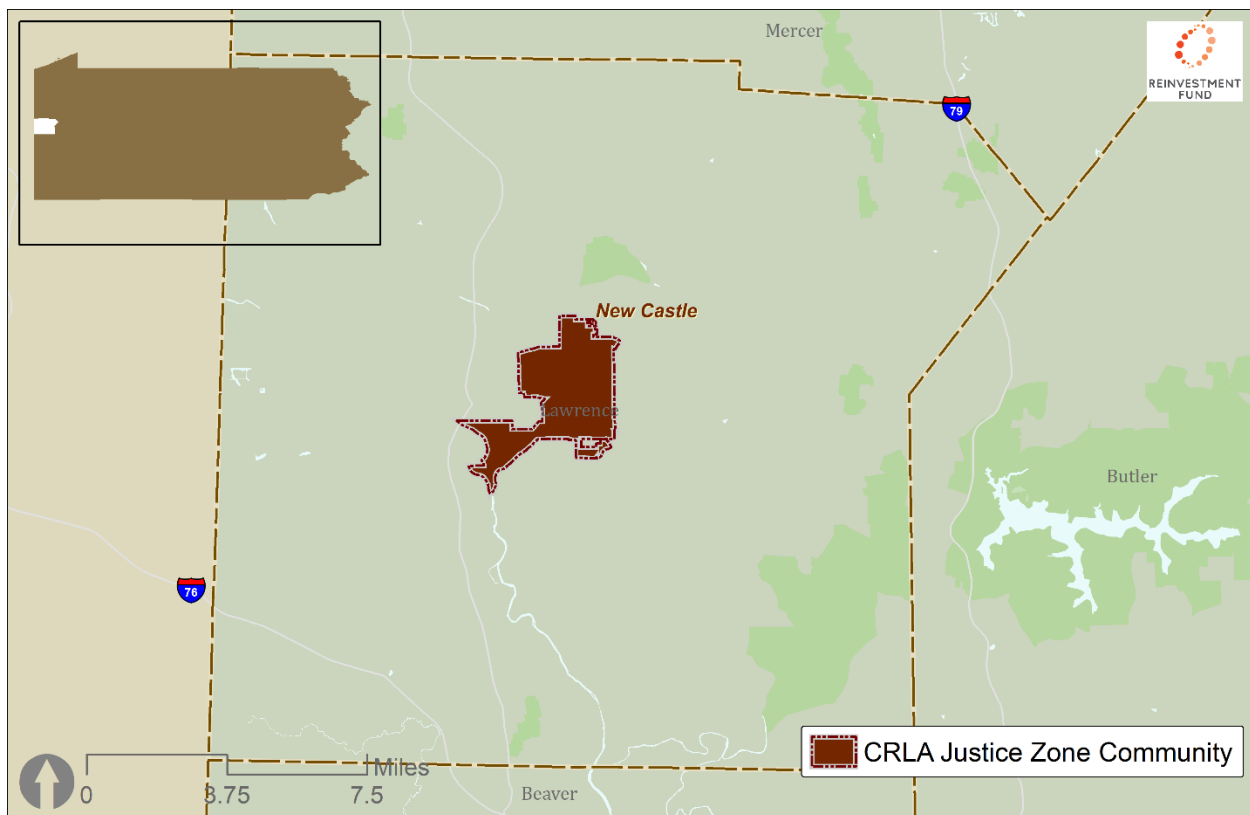
The New Castle Justice Zone (Justice Zone) has higher poverty and unemployment rates than across Lawrence County, and lower homeownership rates. The most cited community need in Lawrence County Community Action Partnership's 2019 Community Needs Analysis<sup>4</sup> was the shortage of quality and affordable homes. Housing costs were a particular problem for renters; over 60% of New Castle's renter households were cost burdened as of the 2012-2016 ACS (i.e., spent more than 30% of their income on housing costs). Housing vacancy and blight are related issues, with vacancy rates over 16% in many New Castle census tracts and about three in four of the County Tax Claim Bureau's repository properties located in New Castle. Low property values further complicate the housing condition problem because banks are reluctant to make loans for those properties, and therefore accessing capital to reinvest in the area is challenging.

In New Castle, housing cost challenges sometimes led to housing stability problems like mortgage foreclosures, evictions, property tax delinquency, and utility payment delinquency. New Castle had a high rate of Act 91 notices (i.e., intent to foreclose) from 2014 through 2016. Lawrence County had an eviction filing rate of 7.1% in 2016,<sup>5</sup> compared to 3.8% in neighboring

<sup>4</sup> Available at: <https://lccap.org/wp-content/uploads/2019/03/2019-LCCAP-Community-Assessment.pdf> (accessed July 28, 2023).

<sup>5</sup> Data from: <https://evictionlab.org/> (accessed July 28, 2023).

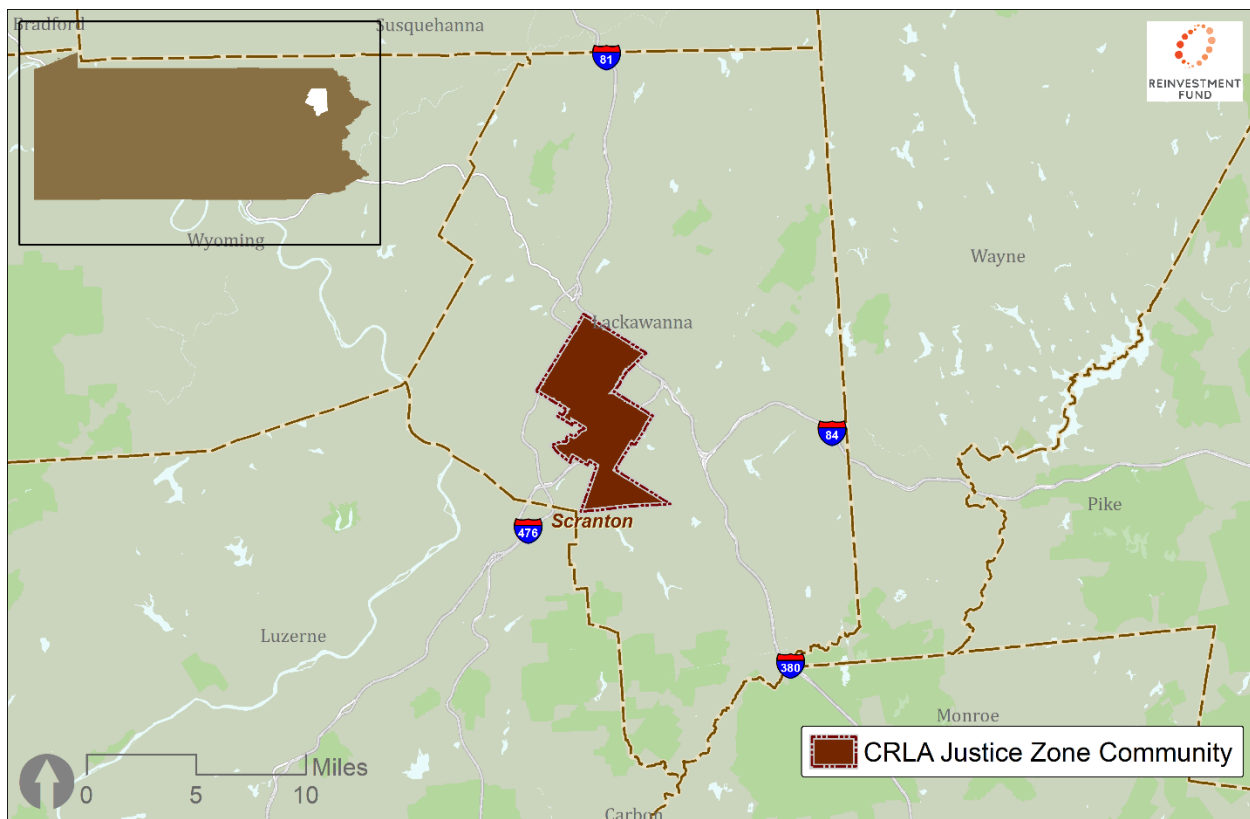
Butler County and 6.7% in Allegheny County (which contains Pittsburgh). New Castle residents also had high rates of property tax delinquency and utility payment delinquency as evidenced by the volume of LIHEAP cash and crisis grants.



Map Three: Location of New Castle Justice Zone in Lawrence County and Pennsylvania

### Scranton

The Scranton Justice Zone was the fourth selected for CRLA activities. RHLS interviewed 17 community leaders and reviewed data and expert reports about the most pressing needs in the Scranton Justice Zone. This analysis identified housing quality and affordability, vacant and blighted properties, and housing stability as the priority issues. Incomes for Scranton residents were low, with a \$40,608 median household income in the 2015-2019 ACS compared to \$52,821 in Lackawanna County as a whole and \$61,744 across Pennsylvania. The share of people in poverty was high, at 26.7% compared to 14.7% in Lackawanna County as a whole and 12.4% across Pennsylvania. Because of low incomes, Scranton residents often struggled with their housing costs. About 7,600 Scranton renters (48%) paid more than 30% of their income on housing costs, and 25% of homeowners were also cost burdened (3,800). Scranton had a high share of older homes, with almost two-third (64%) built before 1950 compared to 46% across the county and 34% across the state. Older homes and population loss have led to housing vacancy and blight. Low incomes and housing cost burden can also lead to mortgage or property tax foreclosure, or eviction.

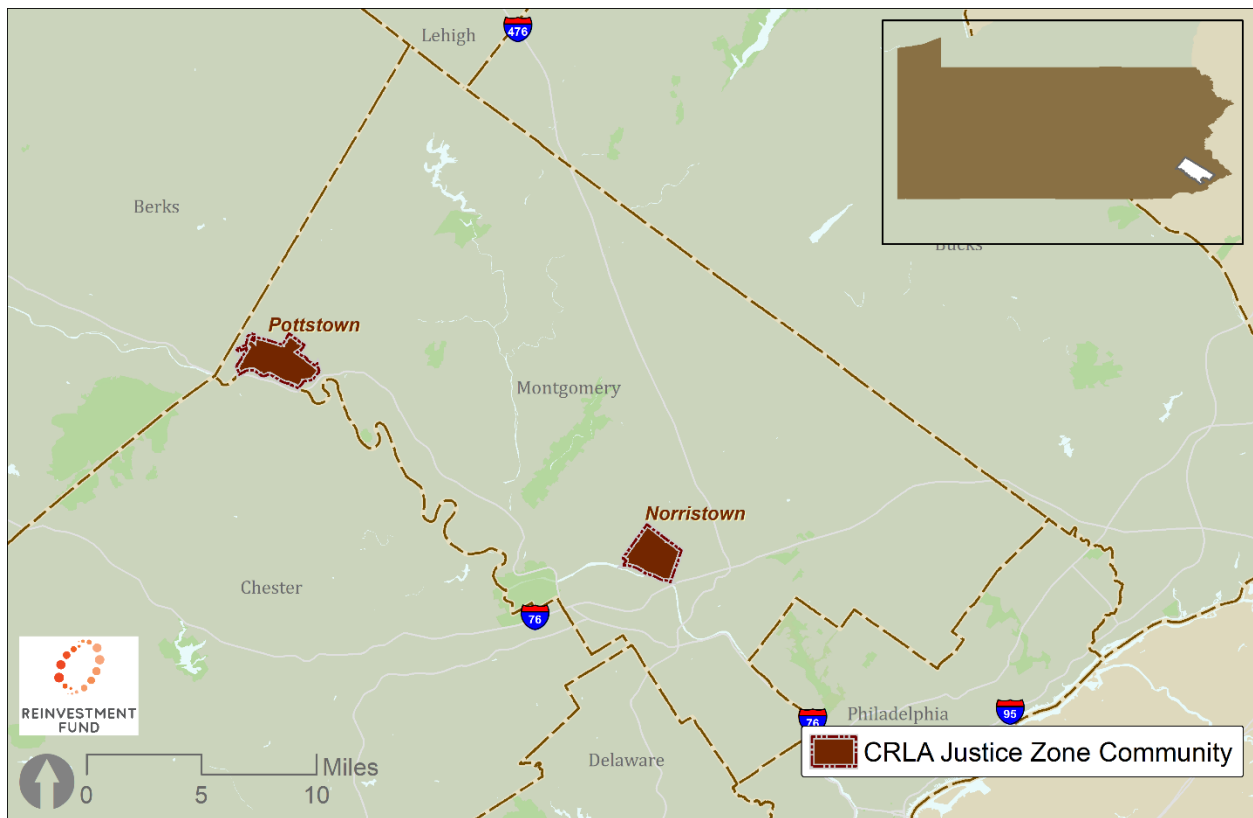


Map Four: Location of Scranton Justice Zone in Lackawanna County and Pennsylvania

### *Norristown-Pottstown*

The Norristown-Pottstown Justice Zone is comprised of two municipalities located along the Schuylkill River with combined populations of about 59,000 residents. RHLS's analysis identified housing quality and affordability, vacant and blighted properties, housing stability, the needs of the immigrant and Latino communities, and issues facing people with criminal records as the priority issues. The Norristown-Pottstown Justice Zone was approved at the end of 2019, and activities began in early 2020. This is therefore the sole Justice Zone where there was little time for CRLA service providers to establish relationships with the community before the onset of the COVID pandemic.

Incomes in Norristown and Pottstown were about half of those for the entirety of Montgomery County, at \$48,414 and \$50,331 respectively compared to \$91,546 in the county as a whole and \$61,744 across Pennsylvania. The share of people in poverty is high, with 19.5% of Norristown residents in poverty and 18.8% of Pottstown residents compared to 5.9% in Montgomery County as a whole and 12.0% across Pennsylvania. The Justice Zone communities have a high share of older homes, with 47% of Norristown homes and 54% of Pottstown homes built before 1950 compared to 24% across the county and 33% across the state.



Map Five: Location of Norristown-Pottstown Justice Zone in Montgomery County and Pennsylvania

## CRLA Activities and Achievements

In each of the Justice Zones, CRLA funding supported a variety of legal services; technical assistance; and community education events that helped residents remain in their homes, preserve or increase their incomes; and remediate blight or reinvest in the local built environment (among other activities). The constellation of activities and the resulting outputs and outcomes achieved for residents and communities varied between the Justice Zones and are detailed in individual evaluation reports for each Justice Zone. Here we note highlights of the work done in each Justice Zone and refer the reader to the individual evaluation reports for further details.

### *Schuylkill County*

- Mid-Penn increased the number of housing related cases, landlord-tenant cases, and cases overall in the Justice Zone from before CRLA activities. In 2016, Mid-Penn helped 71 households in the Justice Zone with legal services. In 2019, the first full year of the program, Mid-Penn served 86 households in the Justice Zone (a 21% increase).
- Mid-Penn's housing-related caseload in the Justice Zone grew from 31 cases in 2016 to 43 in 2019 (a 39% increase), accounting for 80% of their overall service increase during this period. Housing cases were widespread, with increases in four of the five boroughs.
- The overall number of Landlord-Tenant cases taken in the Justice Zone by Mid-Penn increased from 26 to 43 (a 65% increase).
- Prior to CRLA, PULP had not taken any cases in the Justice Zone communities. During CRLA, PULP served 19 cases in the Justice Zone.
- PULP also handled 85 hotline cases in Schuylkill County during CRLA (although breakout for the Justice Zone was not available for these cases), a 40% increase from the year before CRLA began.
- SCA weatherized and repaired 15 homes in the Justice Zone in 2018 and 2019. The homes had been on the "deferred list" for the Weatherization Assistance Program (WAP) because of health and safety violations that disqualified them from WAP work. Through CRLA, SCA created a new home repair program specifically to address deferred properties in the Justice Zone. The program primarily benefitted elderly homeowners, who have fixed incomes and are thus vulnerable to rapid utility costs increases.
- CRLA built expertise and relationships across the Five Boroughs by providing training to Municipal officials and staff people. In 2020, Chris Gulotta, consultant and principal in The Gulotta Group, and Mid-Penn presented a series of four trainings for municipal officials, including Mayors, Borough Council-members, and code enforcement officers. The trainings focused on code enforcement tools and funding resources that are right-sized for small municipalities in rural areas.

- Construction of the Center for Education, Business, and the Arts (CEBA) is close to fully funded, and the nonprofit community organization/developer represented by RHLS has selected an architect. The organization expects an early 2024 groundbreaking. Even though the Justice Zone work has ended, the Gulotta Group, originally engaged with CRLA funds, will continue providing technical assistance to the organization as the construction phase of the project begins. They told Reinvestment Fund that working with Chris Gulotta had greatly built their capacity as an organization, such that they were confident they would be able to work on further anchor projects like CEBA in the future.
- RHLS engaged the Green and Healthy Homes Initiative (GHHI) to provide technical assistance to another RHLS client and Lehigh Valley Health Network (LVHN) in developing a home repair program to reduce asthma in the Justice Zone. LVHN is providing a community health worker who will assess local homes for how housing condition affects residents with asthma. The nonprofit client organization is doing a complete inspection for other home repair and energy efficiency interventions. The organization expects to rehab 15 homes based on those assessments.

#### *Philadelphia*

- CLS generated many more cases in the Justice Zone after CRLA outreach and activities compared to the year before. Homeownership cases immediately increased from 60 to 137 (128% increase) in 2018 and remained elevated until the onset of the pandemic. Energy cases in the Justice Zone also more than doubled from 2017 to 2018 (from 29 to 60) and continued to increase to 134 (a 362% increase from the 2017 baseline).
- CLS increased its caseload in all three Justice Zone neighborhoods. Cases in the Oak Lanes picked up right away, with a 159% increase in cases in West Oak Lane and a 133% increase in East Oak Lane from 2017 to 2018. In Germantown, cases increased more slowly but were up 124% from the 2017 baseline by 2019.
- PLA steadily increased the number of cases they served in the Justice Zone each year, with a particularly large surge in Unemployment Compensation in 2021 to 89 cases. That was 61 more cases compared to the baseline year of 2018 (a 218% increase). Tax cases also grew from 5 in 2018 to 13 in 2022.
- The Public Interest Law Center (PILC) conducted extensive outreach and education activities with Justice Zone community members, service providers, and employers about the employment rights of returning citizens and other residents with criminal records. PILC also used a variety of communication methods to reach broader audiences beyond those that could attend education sessions, including writing several Op-Eds for newspapers, using social media to spread information and host online events, and creating a website<sup>6</sup> with information for job seekers about their rights.

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<sup>6</sup> <https://pubintlaw.org/cases-and-projects/know-your-rights-as-a-job-applicant-with-a-criminal-record-in-pennsylvania/> (accessed December 7, 2022).

- RHLS continues to represent a senior center in Germantown in the process of purchasing an existing 70-unit LIHTC building at the end of its affordability period and creating a new partnership with a for-profit entity. The purchase and new LIHTC funding will extend the affordability period for another 40 years with subsidized rents so the current residents can remain and access the client's programming and services. The project also led to more RHLS work in Germantown. One RHLS attorney told us, "We have a lot more business in Germantown than we've ever had ... because of the [CRLA] grant we focused on [Germantown] – met more people and worked with more groups."
- RHLS assisted a church in East Oak Lane in creating a CDC and developing an affordable senior apartment building. RHLS helped the church form the legal entity, and consider a 9% LIHTC credit application. The project stalled because of community opposition during the zoning process – the community was concerned about how the project will affect the availability of parking in the area. RHLS closed the case.
- RHLS helped a subsidiary of a church in West Oak Lane complete a 50-unit senior LIHTC apartment building on land that the church owned. The church saw a need for affordable senior housing in the neighborhood because there are many residents aged 65 or older, a high poverty rate, and a high rate of residents paying 30% or more of their incomes on housing (i.e., cost burdened households). The client is partnering with a for-profit management company which has focused on hiring locals to staff the building, furthering CRLA's goal of increasing residents' incomes.
- RHLS represented an organization that supports homeless youth in acquired a vacant building for 12 housing units and ground floor space for services. RHLS helped the client navigate zoning issues and a change in architects, and represents the organization in drafting, reviewing and negotiating transactional documents. The project will result in 12 units that homeless youth can live in rent free and receive self-sufficiency services. The building is on one of Germantown's major commercial corridors and the rehabilitated design has a historical aesthetic that will improve the appearance of the corridor.
- RHLS helped a long-standing nonprofit housing provider that manages 58 scattered site subsidized rental units restructure to transition the units to management by a national organization. That organization will improve the units, maintain them as transitional and supportive housing, and reinvest in the properties (specifically building new kitchens and bathrooms and making structural repairs). The units are occupied by victims of domestic violence, people recovering from substance abuse, and people with physical or behavioral health disabilities. The residents will also receive services that will help them connect to employment and obtain steady income. The renovations will prevent the transferred buildings and properties from descending into blight and improve the appearance of the neighborhood.
- RHLS is helping the nonprofit owner of a large community facility in Germantown with technical assistance and legal representation to preserve 128 single room occupancy



units as well as their facility that provides a fitness center, pool, and spaces for community programming and events.

### *New Castle*

- NLS increased the number of cases they represented in New Castle in many of the focus areas of CRLA activities from the year before CRLA funding through the end of CRLA activities, including Landlord/Tenant, Unemployment Compensation, and Bankruptcy/Debtor Relief cases. NLS' Landlord/Tenant cases more than doubled, and NLS represented 255 tenants in New Castle. NLS represented low-income New Castle residents in more employment cases, including Unemployment Compensation, Employment Discrimination, Employee Rights, and Other Employment cases. Overall NLS averaged over 166 cases per year in New Castle over the life of CRLA, a 45% increase in the number of cases served compared to the year before CRLA began in New Castle.
- NLS also greatly increased the number of clinics, community education sessions, and outreaches they provided in New Castle. These events included clinics for tenants where they could ask questions about Landlord/Tenant law and write letters to their landlord about issues like the habitability of the unit. The outreach events were often very well attended. The two events in the year before CRLA began had 19 total attendees, while during CRLA there were sometimes many more attendees at a single event. Some particularly well-attended outreaches included the N.O.W. Project's Drive Thru Food Giveaway (198 participants), Lawrence County CareerLink One-Year Anniversary Open House (39 attendees), and a Butler County Housing Summit (75 attendees).
- PULP was more active in New Castle during their 17 months of CRLA-funded activity than previously. PULP increased the number of cases in New Castle from one before CRLA to four in their year of CRLA activities. They also referred two cases to other organizations in New Castle (compared to none before CRLA).
- PULP conducted two community events with five attendees, two provider trainings for NLS staff with a total of 23 attendees and one event with New Castle utilities FirstEnergy and CLEAResult with 17 attendees. They had not conducted community events or provider trainings in New Castle before CRLA.
- PULP also created materials for residents about how to resolve issues with the utilities, in English and Spanish. This proved particularly important when many Puerto Rican families moved to New Castle in the aftermath of Hurricane Maria.<sup>7</sup>
- RHLS helped a social service provider for disabled residents that had a community development arm with legal advice and funding strategies for a variety of activities to revitalize a neighborhood in New Castle's Lower East Side and the commercial corridor that bordered it. These projects included renovation of a mixed-use building that will create nine new affordable apartments and will anchor the neighborhood's commercial strip, development of 17 new homes in the neighborhood (including one home that will

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<sup>7</sup> See "New Castle welcomes new families." *New Castle News*. Available at: [https://www.ncnewsonline.com/news/local\\_news/new-castle-welcomes-new-families/article\\_44f06386-a0c7-5873-b400-c8aadb9ca976.html](https://www.ncnewsonline.com/news/local_news/new-castle-welcomes-new-families/article_44f06386-a0c7-5873-b400-c8aadb9ca976.html) (accessed July 28, 2023).

be used as transitional housing for people leaving nursing homes or facing emergencies) and creating walking and bike trails to that will connect the neighborhood with Downtown New Castle.

#### *Scranton.*

- NPLS saw a sharp increase in the number of extended representation cases in the Justice Zone from the first year of activities (FY 2019-2020) to the second (FY 2020-2021), increasing from 10 cases to 51. Cases with brief services (4 to 30) and in which NPLS provided advice (33 to 89) also increased. Despite COVID, NPLS continued to increase extended representation cases in FY 2021-2022.
- NPLS also increased the number of positive outcomes for tenants in evictions cases each year. The number of prevented evictions increased more than four-fold from FY2019-2020 to FY 2022-2023. In FY 2021-2022 NPLS also helped several clients overcome illegal charges, enforce their rights under their lease, enforce their right to decent, habitable housing, and preserve their housing.
- NPLS recognized emerging needs with the onset of the pandemic, including a large increase in the share of Scranton households seeking help with evictions, habitability issues, and housing affordability. They proposed and successfully created a Lawyer for the Day (LFTD) in one Magisterial District Court courtroom where tenants were often facing eviction pro se, and with Lackawanna Pro Bono (LPB), helped establish an LFTD program in Common Pleas Court – which may be the only such program in the state. The Lawyer for the Day provides limited representation for income-eligible tenants and can also connect tenants to other resources.
- During their CRLA work, LPB increased their case numbers, reached many more members of the community through outreach and volunteer attorneys through Continuing Legal Education (CLE) trainings, and made significant changes to how tenants are represented. In the year before CRLA, LPB referred 9 Landlord/Tenant cases to volunteer pro bono attorneys, conducted 2 outreach events, and presented once at a community education event. LPB increased the average number of Landlord/Tenant cases referred to 15 per year, conducted an average of 4 outreach events per year, presented at 8 community education sessions per year, and created a total of 4 provider trainings. LPB educated households at risk of eviction about Landlord/Tenant law during United Neighborhood Centers' budget classes and reached approximately 100 people through those education programs. The CLE programs primarily related to representing low-income people in Landlord/Tenant cases, and one also included related substantive legal topics. These were attended by approximately 120 attorneys.
- LPB also worked on two initiatives to change Landlord/Tenant procedures.
  - The first was a mediation program. Lackawanna County applied for and received a Housing Alliance grant to help start a program in Scranton and pay a coordinator.

- The second initiative was the Lawyer for the Afternoon for Landlord/Tenant cases appealed from the Magistrate to Common Pleas Court (mentioned above).
- CJP closed 14 cases in the Scranton Justice Zone June 2021 through June of 2022, primarily related to immigration, language access, and public benefits.
- They also held 12 outreach events that were attended by approximately 225 people, and 2 community education events with Keystone Mission, a day shelter for homeless Scranton residents, with approximately 20 attendees. In those education events CJP covered legal issues related to employment and housing.
- Over the seventeen months PULP worked in Scranton they advised on 15 hotline cases about utility issues. They conducted five community trainings: three with social service organizations with 40 attendees in total and two virtually with 3 total attendees. PULP also created materials about utility programs in multiple languages, which they gave to partners to distribute to clients.
- RHLS advised an organization that provides supportive services to people with disabilities through a rental assistance demonstration pilot program to help people with intellectual disabilities be independent in the community. The program provided a \$200 rental subsidy per month – less than a Housing Choice Voucher but enough to meet the affordability gap for clients on SSI. RHLS helped the client think through the legal issues such as to whether the assistance counts as income, would it reduce SSI benefits, and the contract related to the program. The program has been successful, and the client is thinking through other opportunities for housing for disabled people, such as LIHTC, with RHLS assistance.
- RHLS assisted a Scranton-based, nonprofit organization with an application to PHFA's mixed use community revitalization fund, but the application was not selected. The client and RHLS met with PHFA to learn how to better position applications in the future so they will be more likely to receive funding.
- RHLS helped the staff of a nonprofit housing developer and property manager for a small affordable rental development understand how the transaction to purchase the LIHTC building they are managing would be structured and how to view debt structure. In the end, the owner sold the building to another non-profit, but the client is now better informed about LIHTC properties and could be ready for future opportunities in Scranton.

#### *Norristown-Pottstown.*

- LASP increased the volume of CRLA eligible cases they represented in Norristown and Pottstown by almost 45% from the year before CRLA to the last year of CRLA activities (from 323 cases in 2019 to 469 cases in 2022). LASP saw particularly large increases from 2019 to 2022 in landlord/tenant cases (207 to 296 [43%]), mortgage foreclosure cases (9 to 17 [89%]), and subsidized housing cases (61 to 75 [23%]). LASP also served many Unemployment Compensation cases (from 0 in 2019 to 56 in 2021) other employment

cases (from 0 in 2019 to 14 in 2021) and other public benefit (e.g., TANF, Food Stamps – SNAP, SSDI, SSI, etc.) cases (from 0 in 2019 to 24 in 2021).

- Outreach was a particular focus for LASP, and throughout CRLA LASP greatly increased the number of people they reached in the Justice Zone, including making significant contacts with service providers and training service providers' staff. In the first full year of CRLA activities, LASP roughly doubled the number of outreach events (from 21 to 39) in the Justice Zone and more than tripled the number of people reached in those events (372 to 1,168) despite the onset of the pandemic during that year. LASP also went from no provider trainings in the year before CRLA to conducting multiple provider trainings each month in 2021. LASP conducted 29 Provider Trainings reaching 313 people in 2021, including 3 CLEs for Montgomery County Public Defenders (MCPD) on the collateral consequences of conviction and expedited pardon procedures, 3 meetings with the Montgomery County Prothonotary's office on court access issues, a presentation to Montgomery County's Veterans Court team about LASP's services, and a meeting with the Youth Workforce Career Counselor at Montgomery County's Intermediate Unit.
- LASP set up the expansion of the EPIC program to a new Magisterial District Court in Norristown while the eviction moratorium was in place. LASP worked with the Court to plan for how eviction cases would proceed when the moratorium expired – both LASP and the Court anticipated that eviction filing volume would be very high after the moratorium.
- Prior to CRLA, CJP had not worked in Norristown and Pottstown, but over the course of CRLA they steadily grew their case work from 8 cases in fiscal year 2021 to 52 cases in fiscal year 2022 to 61 cases in fiscal year 2023. The number of immigration cases increased from 4 to 38 to 51, with asylum applications, Special Immigrant Juvenile Status, obtaining citizenship or green cards, U-Visas, and Deferred Action for Childhood Arrivals renewals as the most common immigration issues CJP helped residents with. They also helped in 10 Landlord-Tenant cases in each of fiscal years 2022 and 2023.
- PULP increased the number of cases in the Justice Zone from 3 hotline cases in the year before CRLA activities to 18 hotline cases in the two years of CRLA activities. PULP also referred 42 cases to other organizations (compared to 0 before CRLA) and had 17 case consultations (also compared to 0 before CRLA).
- PULP conducted eight community education events in the Justice Zone, including several legal aid clinics (both virtually early in the pandemic then in-person in 2023) with new partners like the Norristown Hospitality Center, Montgomery County Department of Health and Human Services, the Salvation Army, and Christ Episcopal Church. They also conducted 5 provider trainings, including for the Emergency Rent and Utility Coalition's staff, Montgomery County Connections' staff, and for a group of multifamily housing providers. The legal clinics were held in conjunction with LASP and CJP.
- RHLS represented a developer of single- and multifamily housing during a pilot transfer of a tax-delinquent, vacant, and city-owned property from the Pottstown Land Bank.

RHLS negotiated the transfer on behalf of the client. The client is currently rehabilitating the property and will sell it as a deed restricted affordable home for a household at or below 80% of Area Median Income. The client hopes that this transaction can be a roadmap that is replicated with the Land Bank in the future.

- RHLS also assisted a Norristown-based social service agency that needed to expand their space with purchasing a building from a local church. RHLS worked on a variety of documents for the transaction, including a sales agreement and construction contracts. The client completed the transaction and had a groundbreaking ceremony for renovations to the building in June 2023.
- At the conclusion of the grant period, LASP reported that they were continuing to work together with CJP and PULP to assist residents of a homeless encampment in Norristown. Local officials had planned to clear the camp with no plan for what would happen to residents' belongings or where residents would go. The encampment came about because of a large increase in the unhoused community in Norristown in part due to the loss of a subsidized housing development in Hurricane Ida. The CRLA partners were working with both local officials and utilities (the encampment was located on the property of a local utility) to plan to humanely move residents to other housing and transfer their belongings to their new residences. LASP highlighted that this work would not have been possible without CRLA funding and relationships.

## Policy and Systemic Change

### *RHLS Policy Work*

#### FHA Loan Modifications

Philadelphia homeowners with FHA mortgages were not able to get loan modifications from the Pennsylvania Housing Finance Agency (PHFA), which services many FHA loans, if they had other unsubordinated liens on the property such as utility liens. RHLS convened meetings with consumer advocates, PHFA, and the City of Philadelphia to discuss how to resolve this issue. This was an important issue in the Justice Zone because the rates of FHA lending there were very high in the past 10 years.

The City's Water Department created a program to forgive debt for lower income homeowners who are in foreclosure or in a loan modification program if the total of water and real estate debt does not exceed \$10,000. This will help many homeowners avoid foreclosure and reduce the likelihood of resulting vacant properties and blight.

#### Rent to own / Installment Land Contract Law

Rent-to-own contracts (also called lease purchases and installment sales) are agreements where a certain portion of the tenant-purchaser's monthly payments are applied to the purchase of the house. After several years the tenant-purchaser may be able to acquire title.

These contracts often have few protections for the tenant-purchaser however, and the tenant-purchaser usually has the responsibilities of owning the property (such as maintenance and repairs). Rent-to-own contracts are often abused<sup>8</sup>: the landlord finds a technical reason to evict the tenant-purchaser, keeping all that the tenant-purchaser has paid along with the improvements to the property, or refuses to sell the property after payments were made.

CLS has represented many clients stuck in bad rent-to-own agreements. CLS asked RHLS to help in its effort to strengthen the protections available to rent-to-own purchasers. CLS also drafted legislation to expand protections in the Installment Land Contract Law to the whole state. (The law only applies to Philadelphia and Allegheny Counties.) RHLS and CLS met with the PA Dept. of Banking and Securities (DOBS) to discuss regulatory changes DOBS could make to provide more protection for tenant-purchasers. For example, CLS and RHLS advocated for DOBS to clarify the Act 6 regulations on foreclosures to make clear that they cover rent-to-own agreements, and that landlord-sellers must provide Act 6 notices. Unfortunately, these meetings ceased when COVID hit and CLS was consumed by more urgent matters and client representations.

#### LIHTC Tenants' Guide

Tenants often know little about the rules and protections for LIHTC housing, and there was little information available to help them learn. RHLS developed a guide for LIHTC tenants and trained tenants and social service groups that work with tenants on LIHTC and how to use the guide. RHLS printed 1,000 copies in English and 500 in Spanish and posted the guide on the RHLS website. As of January 22, 2024, the English guide had been viewed 1,982 times and the Spanish language guide 632 times. RHLS has presented the training six times, including to legal aid groups, on NLIHC's Tenant Talk Live, for a statewide webinar, and to social services providers especially in the Justice Zone.

#### Covid Forbearance & HEMAP

While COVID-related mortgage foreclosure moratoriums were in place, RHLS worked to secure financial assistance for homeowners who were behind on their mortgages. Mortgage forbearances and delinquencies in Pennsylvania increased rapidly after the onset of the pandemic.<sup>9</sup> The Homeowners' Emergency Assistance Program (HEMAP), the Commonwealth's program to protect homeowners from foreclosure, did not have adequate funds to meet this surge. Covid Relief Fund (CRF) money for in the CARES Act was flexible funding that could be used to keep people stably housed, and RHLS sought to direct that money to bolster HEMAP or

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<sup>8</sup> For a recent example, see, "Hundreds of Pa. renters were misled about rent-to-own agreements. A judge ordered they be given their homes.", Philadelphia Inquirer. November 30, 2021. Available at: <https://www.inquirer.com/real-estate/housing/rent-to-own-contract-attorney-general-pa-lawsuit-installment-land-20211130.html> (accessed December 7, 2022).

<sup>9</sup> According to the Federal Reserve Bank of Atlanta's Mortgage Analytics and Performance Dashboard, the combined rate of mortgage forbearances and delinquencies in Pennsylvania peaked in June 2020 at 11.9% of all outstanding mortgages. See <https://www.atlantafed.org/center-for-housing-and-policy/data-and-tools/mortgage-analytics-and-performance-dashboard> (accessed December 7, 2022).

fund a new foreclosure prevention program. RHLS and CLS worked with the General Assembly and PHFA to make them aware of the challenges local legal aid programs faced in preventing foreclosure. This work resulted in dollars set aside for homeowners – first as the Pennsylvania Mortgage Assistance Program (PMAP), which was established with \$25 million in CRF funds. Despite RHLS’ recommendations, there were limits placed on the amount a homeowner could access through PMAP and legal services were not funded to connect homeowners with PMAP, and in the end less than \$50 million was spent towards housing security for Pennsylvania households, including \$10 million for foreclosure prevention. Congress again funded foreclosure prevention in 2021 with the Homeowner Assistance Fund (HAF). RHLS advocated with the General Assembly to establish HAF at PHFA and with no restrictions imposed on top of those that Congress had written. RHLS then advocated with PHFA to use some HAF money for legal services, as allowed by Congress. That advocacy was successful: PHFA funded legal services for HAF representations. This was critical because Congress required no less than 60% of HAF program funds to go to ‘socially disadvantaged individuals’,<sup>10</sup> and legal services are an important vehicle for reaching this population, assisting with completing applications for HAF assistance, resolving problems and building trust in the program.

This policy work will have lasting impact on how Pennsylvania distributes housing stability funds, and the role of legal services in reaching the most in-need households. Pennsylvania is now a model for how state funding to legal services helps reach homeowners who might otherwise not be aware of state programs or might not trust these programs because of the presence of rescue scams in their neighborhood. PHFA and legal services now have a strong relationship, which is important because Congress increasingly relies on housing finance agencies to distribute housing stability funds, rather than local housing authorities or governments.

## Secondary Data on Change in the Justice Zones

Examining secondary data on how the Justice Zone communities have changed from before CRLA until the most recent available data can show how these communities are trending. The ACS tracks key indicators of community wellbeing across the country in five-year periods (individual years are combined for statistical stability). The data includes household incomes, poverty rates, home values (as reported by homeowners), age of the housing stock, share of vacant housing units, and unemployment rates. Comparing those trends to statewide trends can provide some idea of how the community compares to broader trends, but must be taken with the caution given that the Justice Zone communities were selected because of the impacts of foreclosure and other indicators of distress that distinguished them from the Commonwealth generally.

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<sup>10</sup> The US Department of the Treasury’s definition of *socially disadvantaged individual* can be found in the HAF guidance: <https://home.treasury.gov/system/files/136/HAF-Guidance.pdf> (accessed December 7, 2022).



	Northern Schuylkill	Scranton	New Castle	Philadelphia	Norristown - Pottstown
Med. Household Income	Improved, Exceeds State	Improved, Lags State	Improved, Lags State	Improved, Exceeds State	Improved, Exceeds State
Med. Home Value	Improved, Lags State	Improved, Lags State	Improved, Lags State	Improved, Exceeds State	Improved, Lags State
% Poverty	Improved, Exceeds State	Improved, Exceeds State	Improved, Lags State	Improved, Lags State	Improved, Exceeds State
% Built Before 1950	Worsened, Lags State	Improved, Exceeds State	Improved, Lags State	Improved, Exceeds State	Improved, Exceeds State
% Vacant Housing Units	Worsened, Lags State	Worsened, Lags State	Improved, Exceeds State	Improved, Exceeds State	Improved, Exceeds State
% Unemployment	Improved, Exceeds State	Improved, Lags State	Worsened, Lags State	Improved, Lags State	Improved, Exceeds State

Table One: Change in Demographic Characteristics from 2013/2017 ACS – 2017/2021 ACS

The Justice Zones are each trending in a positive direction in the typical household income, poverty rate, and median home value, and exceeded statewide trends in many cases. Most of the Justice Zones have experienced a reduction in vacant housing units and the share of homes that are older (indicating a strengthening market). The Northern Schuylkill Justice Zone is the one area that did not show positive changes in the built environment indicators. Unemployment was generally down across the Justice Zones, except for in New Castle. The Philadelphia and Montgomery County Justice Zones showed positive changes on all indicators, exceeding the statewide trends on most of the demographics data. Together the changes in the data indicate positive trends for the Justice Zone communities.

*Table Series: Change on Selected Indicators in the Justice Zones and Pennsylvania, ACS 2013/2017-2017/2021*

*Community Change Data: Schuylkill County*

	Northern Schuylkill				Pennsylvania		
	2013/2017	2017/2021	% Change		2013/2017	2017/2021	Change
Med. Household Income	\$33,624	\$46,250	37.6%	Med. Household Income	\$56,951	\$67,587	18.7%
Med. Home Value	\$40,538	\$46,530	14.8%	Med. Home Value	\$170,500	\$197,300	15.7%
% Poverty	29.4%	25.8%	-12.2%	% Poverty	12.7%	11.4%	-9.9%
% Built Before 1950	77.7%	80.0%	3.0%	% Built Before 1950	34.2%	32.8%	-4.0%
% Vacant Housing Units	29.0%	31.4%	8.0%	% Vacant Housing Units	11.4%	10.1%	-11.3%
% Unemployment	15.0%	9.1%	-39.6%	% Unemployment	6.5%	5.5%	-14.8%



The five boroughs of the Schuylkill County Justice Zone collectively experienced a large increase in the typical income of area households and a decline in the poverty rate from before CRLA activities to the most recent ACS five-year data. Incomes increased at about twice the rate as incomes across Pennsylvania. Home values also increased in this period, although housing vacancy and the share of older homes increased.

*Community Change Data: Philadelphia*

	Philadelphia					Pennsylvania		
	2013/2017	2017/2021	Change			2013/2017	2017/2021	Change
Med. Household Income	\$34,096	\$43,003	26.1%		Med. Household Income	\$56,951	\$67,587	18.7%
Med. Home Value	\$127,636	\$153,751	20.5%		Med. Home Value	\$170,500	\$197,300	15.7%
% Poverty	25.7%	23.8%	-7.4%		% Poverty	12.7%	11.4%	-9.9%
% Built Before 1950	67.9%	62.4%	-8.1%		% Built Before 1950	34.2%	32.8%	-4.0%
% Vacant Housing Units	18.0%	11.4%	-36.8%		% Vacant Housing Units	11.4%	10.1%	-11.3%
% Unemployment	14.0%	12.5%	-10.9%		% Unemployment	6.5%	5.5%	-14.8%

The Philadelphia Justice Zone shows several signs of positive change since before CRLA activities began. Incomes and home values have increased by more than is typical across Pennsylvania. The built environment has improved - the share of vacant housing units and of older homes have greatly decreased. Both poverty and unemployment are down, albeit not to the same extent as across the Commonwealth.

*Community Change Data: New Castle*

	New Castle					Pennsylvania		
	2013/2017	2017/2021	Change			2013/2017	2017/2021	Change
Med. Household Income	\$31,044	\$36,595	17.9%		Med. Household Income	\$56,951	\$67,587	18.7%
Med. Home Value	\$62,000	\$64,600	4.2%		Med. Home Value	\$170,500	\$197,300	15.7%
% Poverty	26.1%	25.3%	-3.0%		% Poverty	12.7%	11.4%	-9.9%
% Built Before 1950	62.5%	61.6%	-1.5%		% Built Before 1950	34.2%	32.8%	-4.0%
% Vacant Housing Units	15.6%	13.0%	-16.8%		% Vacant Housing Units	11.4%	10.1%	-11.3%
% Unemployment	9.7%	13.8%	42.8%		% Unemployment	6.5%	5.5%	-14.8%

The New Castle Justice Zone has largely experienced positive changes since before CRLA activities began, although not to the same extent as Pennsylvania as a whole. Incomes have increased in this Justice Zone at about the same rate as Pennsylvania, and residential vacancy has decreased more than across the state. Poverty, older homes, and home values all moved in a positive direction but not to the same extent as the state. One notable concerning trend is the increase in unemployment in New Castle, although more recent data indicates this may be due to a pandemic spike in unemployment that was particularly impactful in New Castle and that unemployment declined to below the long-term average after the ACS sampling period.<sup>11</sup>

*Community Change Data: Scranton*

	Scranton					Pennsylvania		
	2013/2017	2017/2021	Change			2013/2017	2017/2021	Change
Med. Household Income	\$38,683	\$44,161	14.2%		Med. Household Income	\$56,951	\$67,587	18.7%
Med. Home Value	\$104,800	\$112,600	7.4%		Med. Home Value	\$170,500	\$197,300	15.7%
% Poverty	21.9%	18.7%	-14.6%		% Poverty	12.7%	11.4%	-9.9%
% Built Before 1950	65.7%	61.8%	-6.0%		% Built Before 1950	34.2%	32.8%	-4.0%
% Vacant Housing Units	14.6%	14.7%	0.3%		% Vacant Housing Units	11.4%	10.1%	-11.3%
% Unemployment	6.3%	5.8%	-7.9%		% Unemployment	6.5%	5.5%	-14.8%

<sup>11</sup> See “New Castle, PA Unemployment Rate”. Y-Charts. Available at: [https://ycharts.com/indicators/new\\_castle\\_pa\\_unemployment\\_rate](https://ycharts.com/indicators/new_castle_pa_unemployment_rate) (accessed January 8, 2024).

Two notable positive changes for the Scranton Justice Zone were the large decrease in the poverty rate and in the share of older homes. Scranton experienced increases in the typical household income and home value over the examined time frame, although at slower rates of increase than the state as a whole. Despite those positive changes the share of vacant housing units has remained steady in Scranton while decreasing in the other Justice Zones and statewide.

#### *Community Change Data: Norristown-Pottstown*

	Norristown - Pottstown					Pennsylvania		
	2013/2017	2017/2021	Change			2013/2017	2017/2021	Change
Med. Household Income	\$45,262	\$54,313	20.0%		Med. Household Income	\$56,951	\$67,587	18.7%
Med. Home Value	\$142,342	\$154,468	8.5%		Med. Home Value	\$170,500	\$197,300	15.7%
% Poverty	21.4%	16.2%	-24.2%		% Poverty	12.7%	11.4%	-9.9%
% Built Before 1950	52.2%	47.0%	-9.9%		% Built Before 1950	34.2%	32.8%	-4.0%
% Vacant Housing Units	12.4%	10.5%	-15.8%		% Vacant Housing Units	11.4%	10.1%	-11.3%
% Unemployment	8.5%	6.1%	-27.4%		% Unemployment	6.5%	5.5%	-14.8%

The Norristown-Pottstown Justice Zone experienced the most comprehensive positive changes of the five. Each of the indicators changed in a positive direction, and five of six exceeded changes statewide. The reductions in poverty and unemployment were much larger than the statewide trend, with poverty declining by 24% in the Justice Zone compared to 10% statewide and unemployment declining by 27% compared to 15% statewide. Norristown-Pottstown also saw changes in the built environment with a 10% reduction in the share of older homes and a 16% reduction in residential vacancy.

## Learnings and Challenges

*Learning #1: Increasing legal services organizations' reach into the Justice Zones through in-person staffing and building relationships with strong, trusted local organizations resulted in many more legal service cases completed in the Justice Zones.*

CRLA was designed to bring legal services into the Justice Zone communities through staffing and relationships with local organizations. CRLA funded legal services to either establish

offices or staff attorneys in the Justice Zones in Schuylkill County, Scranton, and Norristown. In Schuylkill County, Mid-Penn opened an office in the Justice Zone and hired an attorney from the area. The attorney was already familiar with the community which made generating referrals and navigating the local legal system easier. Staff established credibility with local officials, like the local Magisterial District Court and code officials, who were also sources for referrals. In Montgomery County, CJP staffed a bilingual attorney at ACLAMO's Norristown office, which resulted in a large increase in legal services cases including Spanish speaking clients. Norristown has a large Spanish-speaking population, and connecting with this community was vital for building awareness and trust in CRLA-funded services. Before CRLA, LASP and ACLAMO did not have a strong working relationship and LASP struggled to reach the Spanish-speaking community. The initial focus of LASP's work in Norristown was to build that relationship so they could better connect with Spanish-speakers. CRLA also funded a NPLS office in Scranton so residents could receive in-person legal services. NPLS increased their case numbers in Scranton which resulted in an many more Justice Zone cases with extended representation. In Philadelphia, CRLA did not fund an office in the Justice Zone but the organizations worked with a Zone-based partner for in-person clinics. CRLA enabled each organization to serve more clients than they would have, and to establish connections and awareness that promise to keep the momentum going after CRLA.

Building relationships with strong local community organizations was another way that CRLA brought legal services into the Justice Zones. Before CRLA activities began, RHLS met with and interviewed local experts to learn about the most pressing issues for households in the area and which organizations were working on those issues, and to build relationships between the program and the community. RHLS found that often the legal service organizations did not have existing relationships with community groups or the community broadly, and RHLS made introductions between legal service providers and community groups. The connections became central to CRLA because the community groups would work with the legal service providers on outreach, refer clients to them, and inform the legal service providers about emerging issues in the Justice Zones. RHLS also found that legal services attorneys noted that working with local service providers was particularly rewarding because they normally don't have the opportunity to work with those groups in their day-to-day work and because together they could provide overlapping services that were better able to resolve clients' fundamental challenges than either of their services alone.

In Philadelphia, PLA made connections with PA CareerLink Philadelphia, Northwest (CareerLink NW) to coordinate on clients referred to CareerLink NW for unemployment compensation services by Pennsylvania's Department of Labor and Industry (PA L&I). PLA trained the staff at CareerLink NW on how to triage the unemployment compensation appeals process and made a direct contact with staff at PA L&I so their clients could get their claims before PA L&I staff in a timely manner, which is crucial for unemployed clients who need their benefits to pay for housing and other costs. PLA expanded a pre-existing relationship with Crossroads Women's Center (CWC) that helped PLA clients access the Covid era Child Tax Credit

(CTC) payments. This was an important new benefit<sup>12</sup>: Social Security Supplemental Security Income (SSI) recipients previously could not receive the CTC because the CTC had an employment requirement and SSI recipients generally do not file a tax return. CWC was very helpful to PLA in informing Justice Zone residents about the CTC benefit and how to receive it during the early part of the pandemic when outreach was challenging.

In New Castle, NLS was successful in forming relationships with groups that touch housing condition issues. They worked with the City of New Castle code enforcement department and sewer authority and received case referrals from both groups. NLS formed referral relationships with Blueprint Housing, Disability Options Network, and Lawrence County Community Action Partnership during CRLA, all of which are trusted leaders on housing stability in New Castle. NLS also acted as legal sounding board for these agencies – they could ask NLS for legal information for their clients. These groups are the first line of advice for residents and their housing counselors and case workers can help with smaller problems or be proactive to prevent eviction or foreclosure cases that would require NLS representation.

In Schuylkill County there were several examples of legal services working with community organizations. PULP assisted the Schuylkill County Housing Authority to access energy efficiency and weatherization programming for their properties. This will help residents and has changed the relationship between PULP and the Housing Authority from adversarial to collaborative. Mid-Penn and SCA worked together on utility payment delinquencies, including a case in which an elderly client from Ashland was facing an electricity shut-off due to a payment delinquency from a period of incarceration. The shutoff would have violated his lease in public housing and resulted in an eviction. Mid-Penn referred him to SCA, who negotiated the utility down from an initial requirement of a lump sum of several hundred dollars to a twenty dollar-a-month payment agreement. His housing was preserved, and his finances stabilized by this outcome. In another case Mid-Penn worked with local social services to find housing for a mentally disabled client by filing an eviction appeal that delayed eviction long enough for social services to secure new housing for the client.

*Learning #2: Conducting extensive outreach activities also increased legal service cases in the Justice Zones, created new capabilities for legal services organizations, and increased the effectiveness of cross-organization coordination.*

A diverse range of outreach activities also built connections between CRLA legal service providers and the Justice Zone communities. These included outreaches at community events to

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<sup>12</sup> Census data on child poverty shows the expansion of the Child Tax Credit reduced child poverty by 2.1 million children. See Burns, Kalee, Liana Fox, and Danielle Wilson. “Expansions to Child Tax Credit Contributed to 46% Decline in Child Poverty Since 2020.” *Census.gov*. Available at: <https://www.census.gov/library/stories/2022/09/record-drop-in-child-poverty.html> (accessed December 22, 2022), but Congress chose not to renew the expanded Child Tax Credit. See Luhby, Tami. “Child tax credit enhancement fails to make it into federal spending bill.” *cnn.com*. Available at: <https://www.cnn.com/2022/12/20/politics/child-tax-credit-spending-bill/index.html>. (accessed December 22, 2022).

spread information and awareness about CRLA legal services, clinics to provide legal services directly to residents, and education events with local organizations to help them identify residents in need of legal services and update them about COVID-related legal changes.

In Schuylkill County, legal service organizations found that participating in existing community events can be more effective than hosting their own, one-off events. Mid-Penn and PULP found that participating in community events like the Kielbasa Festival worked better than hosting their own events. Joining events in each borough worked better than advertising events across the boroughs and hoping residents would travel outside of their home borough.

In New Castle, NLS also used a “meet people where they are” outreach strategy – at food distribution events, covid vaccine sites, in homebuyer classes, and more. They presented information, distributed flyers, and offered question and answer sessions. Several of these activities were in coordination with partner organizations. This broad and varied outreach enabled NLS to grow their caseload substantially in the Justice Zone, while remaining responsive to the various needs of New Castle residents.

In our exit interview (10/27/2022), CLS emphasized that “it was nice to be able to prioritize outreach because [we] get asked a lot but don’t always have the capacity.” They plan to have each of their units conduct outreach in the future and have shared best practices they learned from CRLA outreach with other units. In our interview they highlighted learnings including how many staff and volunteers to bring, what equipment they need, what resources they need from partners, how to organize the space, how to advertise, and how to recruit service providers (like the utilities) to show up and help clients in person. They are planning a clinic with a similar model with the utilities in another Philadelphia neighborhood soon.

Through trial and error in outreach, adaptation led to more successful events, especially when partnering with strong local groups in the Justice Zone. When we interviewed LASP after their CRLA work concluded (8/9/2023), they highlighted that the pivot to online outreach during the pandemic successfully resulted in a “dramatically increased” number of direct representations of Justice Zone residents, and that building relationships with CRLA legal services organizations and Justice Zone service providers prepared the groups collectively to respond to new issues in the Justice Zone as those arose.

Several legal service groups plan to continue these activities with lessons learned from CRLA. LASP has obtained a grant to continue outreach work in Norristown. CLS is in talks with a funder about further supporting the Energy Unit’s outreach to communities throughout Philadelphia. NLS has developed their onsite intake during outreaches with laptops and Wi-Fi hotspots funded by CRLA, which has increased the number of contacts at their outreaches that become clients. CRLA has therefore changed the day-to-day way that many of the legal services organizations contact clients by building their capacities and experience in reaching out to clients in their communities rather than relying on clients contacting legal services.

*Learning #3: CRLA encouraged and created the staff capacity for legal service organizations to work together on difficult issues they could not resolve alone.*

During the CRLA period, unique issues arose in several Justice Zones that required the legal services organizations to work together with local officials and social service groups for systemic change. In Scranton, several of the CRLA-funded groups began participating in the Lackawanna Housing Coalition meetings. These conversations helped spread information about legal changes and new programs during the pandemic. The groups also responded together to the issue of Emergency Rental Assistance Program (ERAP) applications that were at risk of being tossed out by a contractor. Having an active network working together at the time of the pandemic was critical for renters in the Justice Zone to access ERAP and alternative dispute resolution.

In our exit interviews for the Norristown-Pottstown Justice Zone (CJP on 8/1/2023, LASP on 8/9/2023, PULP on 9/5/2023), the organizations highlighted how important their relationships built during CRLA were to responding when a homeless encampment in Norristown was threatened. Together they were able to work with the Borough of Norristown and the local utility who owns the land where the encampment was located. They were able to connect all of the groups involved in decision making about the encampment because LASP and CJP had built relationships with the Borough and PULP with the utility. Before CRLA, the legal service organizations did not work together on these issues and PULP (who had the key relationship with the utility) likely would not have been notified about the issue.

In each of these cases, the legal service organizations were able to shepherd the situation to a better result because of the relationships they built through CRLA. These include relationships between the legal service organizations and with local officials and local social service organizations.

*Learning #4: Many communities and community-based organizations lack the technical and legal knowledge needed to move catalytic projects forward. CRLA brought needed technical and legal assistance to impactful projects that were otherwise stalled.*

RHLS identified key projects in several of the Justice Zones that had stalled or were in the early planning phases because local groups did not have the technical knowledge, experience, and legal expertise. In Schuylkill County the five boroughs have active local groups that have visions on how to improve their community but are not experienced in obtaining available state or federal resources and need technical assistance to complete that vision. Connecting local groups with experienced technical services providers and consultants like The Gullotta Group and Green & Healthy Homes Initiative (GHHI) can both accomplish transformative projects and build local capacity for future efforts. Transformative projects like the Center for Education, Business, and the Arts (CEBA) in Shenandoah and the asthma home remediation project required many conversations with local groups to identify those opportunities, find funding, and select the right people to provide the technical assistance to accomplish these projects. RHLS' role conducting outreach with local groups and identifying technical assistance providers was therefore necessary to connect these local opportunities to the necessary resources needed from outside of the Justice Zone communities.

In New Castle, RHLS provided legal and technical assistance to two organizations seeking to increase the supply of quality affordable housing while meeting community needs and advancing stability more generally. RHLS helped NC-1 accomplish several complex undertakings that the organization could not have accomplished on its own. Not all of the efforts RHLS supported achieved their original goals – including the exploration of CHDO designation for NC-1 and the project envisioned by NC-2. Because of the complicated nature of these types of revitalization projects, the funding environment, and the capacity and priorities of the local nonprofits, it is not always possible to know at the outset which projects will succeed. The ability to make informed decisions regarding how or whether to move forward, based on the assistance of experts like those at RHLS, can also help the long-term success of organizations that always need to balance their priorities.

In Philadelphia, RHLS' legal representation work in the Justice Zone communities is on pace to create or preserve at least 318 affordable housing units, reduce blight, and create new spaces for needed community services. RHLS' legal representation in the Justice Zone communities directly addressed some of the priority issues identified in the *Needs Analysis*. RHLS expanded quality and affordable housing opportunities through helping clients create and preserve affordable units, remediated blight in the built environment by assisting clients in building or rehabilitating 20 buildings (pending several ongoing representations) and creating spaces where seniors or homeless youth can live and also receive needed services. These developments will have long-term impact on the Justice Zone communities through 40-year affordability periods for those utilizing LIHTC and replacing vacant buildings and lots with rehabilitated properties or newly built construction. Besides these accomplishments, CRLA funding enabled RHLS to keep representing clients on efforts that have the potential for further affordable housing development and blight remediation. Many of the projects were designed to bring jobs and income to Justice Zone residents and to help longtime Germantown residents remain in the neighborhood as market pressure increases.

*Learning #5: RHLS's role directing the program was critical to connecting legal services with strong local partners and in identifying opportunities for CRLA to help with impactful projects.*

The importance of the choices made in program design, the work of identifying appropriate service providers for the Justice Zone, and the building of relationships with local stakeholders all show that the 'quarterback' role RHLS performed is necessary to successful implementation of a project like CRLA that involves a diverse set of actors and communities. This role is also necessary to share information between service providers so the program can adapt to community needs and opportunities as those come up. If CRLA had only funded direct legal services those activities could have run into barriers without clear paths forward.

This role also enabled CRLA to develop system changes that require many conversations with stakeholders over a long period of time. Programs like the Landlord/Tenant mediation program and Lawyer for an Afternoon in Scranton require identifying the right people to engage



and building support for those programs over time. LPB and NPLS were successful in advocating for changes to how many Landlord/Tenant cases proceed in Scranton and in implementing new avenues for tenants to be represented in those cases. Those changes took years to come about and were the consequence of many discussions between LPB or NPLS and Judges, the Housing Authority, and many other stakeholders. System reform efforts require advocates who are able to persistently work for changes.

*Learning #6: Staffing multiple legal services organizations on CRLA projects allowed specialized statewide or regional organizations like PULP to train local legal service providers on routine cases, freeing more specialized legal services to take non-routine cases and to work on systemic change.*

In Montgomery County, PULP discussed how their relationships with LASP allowed them to put their time to best use because they could refer clients to the legal services that were most appropriate for them. For example, PULP trained LASP to work on routine utility assistance cases, and this freed PULP to instead work on more complicated cases. PULP also worked with LASP to add questions to LASP's intake process that helped direct clients to the best legal services for their issues. The referral relationships between the CRLA legal services groups therefore enabled clients to access the best legal services for them and enabled the legal services organizations to use their time more effectively.

In Scranton, NPLS took more extended representations in Landlord-Tenant cases in part because LPB trained volunteer attorneys on representing tenants for single hearings. The result was more evictions prevented, illegal charges removed, and more enforcement of the tenants' right to habitable housing each year. NPLS and LPB together worked to create the only Lawyer for the Day program in a Common Pleas Court in Pennsylvania.

*Learning #7: Communities are networks, and strong community organizations connect legal service organizations to a particular community's residents and their needs. CRLA elevated community voices that are sometimes not heard in community revitalization work, allowing for more comprehensive network building.*

A core principle of CRLA was to support community organizations in the Justice Zones that have shown creative approaches to solving issues in their communities but may not have all the resources they need to meet their plans. Communities like the five boroughs of Schuylkill County have active local groups like Sch-2 that have visions on how to improve their community but have limited resources to pursue available state or federal resources and need technical assistance. Sch-2 had envisioned a transformational economic development project but the process of building a multi-use hub was complex and costly. Technical assistance and legal assistance provided through CRLA were critical to the group's ability to advance the project.

RHLS worked with NC-1 on a variety of issues that are centered around NC-1's work revitalizing the Lower East Side neighborhood of New Castle. The impacts of these projects

include more people with disabilities in secure, accessible housing, blight removed from the area, and significant investments in the commercial corridor and infrastructure of the Lower East Side neighborhood that will connect that neighborhood with Downtown New Castle and make the area accessible for disabled residents. NC-1 is a capable organization with many ideas for revitalizing the area, and their relationships built with RHLS and NLS will help enact those plans and help area residents with housing security issues.

In our exit interview (7/21/2021), PILC described the largest success of CRLA as bringing Center City lawyers into communities and being intentional about getting resources into those zip codes. They described Philadelphia as a city that “functions on connections,” and CRLA created or grew those between citywide legal service providers and service providers that work in the Justice Zone communities. For PILC, CRLA got them thinking about who they could bring to Justice Zone events. For example, PILC asked a CLS lawyer who was expert in pandemic-related job benefits to attend a Face-to-Face clinic with them.

*Learning #8: Developing flexible networks led by legal service organizations helps communities access resources during times of crisis.*

In several Justice Zones, CRLA legal services organizations were key to bringing pandemic-related resources to the community. In Scranton, the legal service organizations together were key to reforming the ERAP process and unlocking that assistance for Lackawanna renters (see Learning 3 above for more information). NLS conducted many online community education events about mortgage foreclosure prevention, utility shutoff law during the pandemic, and FCC emergency broadband benefits. RHLS worked statewide to ensure that homeowners who had arrears that exceeded the cap amount for the Homeowner Assistance Fund could access enough support to clear their delinquent mortgage and utility payments (the cap was later increased).

In Philadelphia, the CRLA legal services organizations responded to the pandemic in two phases. In the beginning of the pandemic, they focused on creating a digital presence for CRLA that would continue the momentum from pre-pandemic outreach. Together, they created an email list of Justice Zone service providers and distributed information about legal services, online events, and pandemic assistance programs that is still in use today.

The CRLA legal service organizations in Philadelphia also pivoted the types of legal services they provided in the Justice Zone because of pandemic-related moratoriums on tax and mortgage foreclosures and utility shut-offs. PLA received many more cases for unemployment compensation and for help with the Economic Impact Payments and Child Tax Credit. PILC used the recently launched “Know Your Rights” website as an alternative way to distribute information about pandemic related legal changes. CLS brought their Debt and Consumer Rights unit into CRLA to help residents with bankruptcy and debtor counseling.

*Challenge #1: The targeted populations of many of the Justice Zones were difficult to reach; there was no single central place or platform to reach people, and some communities were insular. Because of that, outreach work required substantial time and experimentation.*

A challenge for legal service provision in the Northern Schuylkill County Justice Zone was that the communities are small and insular. There are about 15,000 people across the five boroughs, and both residents and administrators of one borough have little interaction with residents and administrators of the other boroughs. Therefore, it was difficult to find locations for outreach where a significant number of residents had legal issues and were also income eligible.

In Northwest Philadelphia, outreach was challenging because there is no central hub for the three neighborhoods. Beginning outreach work was therefore time consuming and required some trial and error. The legal service organizations had to develop outreach materials, including education materials, flyers, and pamphlets to distribute at events. In the beginning of CRLA activities it wasn't clear which local organizations in the Justice Zone could draw people to events, so the legal service organizations sometimes spent time arranging an event and related materials only to have poor turnout. Traveling to the Justice Zone from their Center City offices was time consuming and estimating the correct number of staff and hours to dedicate to an event was challenging. One attorney questioned the cost-benefit of outreach to generate referrals from a particular part of Philadelphia when their unit already had more clients than they could serve, and that time could have instead been spent doing case work.

*Challenge #2: Despite the positive impact of relationship building and outreach during the CRLA period, legal services organizations would benefit from additional, ongoing resources to build and maintain those activities because they are time consuming.*

Several of the legal services initial approaches to outreach required some trial and error and alternate approaches before yielding stronger number of attendees and referrals. This was in part learning about what worked in particular communities but also that most of the legal services had limited outreach experience and had to learn what worked well for them. For example, in Schuylkill County CRLA funded legal services initially tried to host their own events but found that residents of one borough were not likely to attend events in another borough and that joining community events was more productive than hosting their own. In Philadelphia, the legal service organizations worked with several community organizations on outreach events before identifying which organizations were the best partners to drive attendance and referrals. They also spent time developing outreach materials that they did not have when CRLA began, such as education materials, flyers, and pamphlets to distribute at events.

*Challenge #3: Catalytic projects take a long time and involve some risk. Many require multi-year efforts and shifts in strategy over time. Assistance to organizations doesn't always yield success*

Projects like CEBA and the asthma project in Schuylkill County each are multi-year, multi-phase efforts that can have issues like funding difficulties, increases in the original project scope (a.k.a. “scope creep”), timeline extensions or delays, and maintaining community support until the projects are completed. The Germantown community facility and housing renovation also is a multi-phase project that requires diverse funding sources and technical advice through the contracting and construction processes.

RHLS representations can take a long time, often extending beyond the CRLA timeframe. While RHLS was already known to a few of the Philadelphia CRLA clients, most were new and gave RHLS an opportunity to work with community residents to refine their visions and chart paths forward. However, community empowerment and affordable housing development are long-term endeavors and many projects have not yet come to fruition. While a few are complete as of the time of writing, many are only now moving forward after years of planning, negotiations, and seeking funding commitments. Other projects are waiting for outside entities like the Philadelphia Redevelopment Authority (PRA) or PHFA to act. But while these projects could not be finished within the CRLA timeframe, RHLS is committed to seeing them through and to continuing to work in the Justice Zones.

Assistance to organizations doesn't always yield success in particular projects but contributes to more informed actions and the potential for future success. Some of the clients assisted by RHLS did not go forward with the initially planned project. Through RHLS’ advice, however, those clients gained capacity to better position themselves for future funding or housing acquisition opportunities. For example, Scranton housing groups that consulted with RHLS are therefore more likely to successfully build or preserve affordable housing there in the future.

*Challenge #4: The legal service organizations tried to create a ‘single point of entry’ for referrals but found that clients continued to reach out to the legal service organizations individually for needed services.*

In Philadelphia, the legal service organizations planned that intake for CRLA would include screening clients for the range of services available across each of the legal service organizations. They did initially work on this system, but both CLS and PLA already have well-established intake systems and found those were the best method for bringing in clients. At CLS the Homeownership Unit already receives referrals through PLA’s Save Your Home Philly Hotline, and that did not change during CRLA, while the Energy Unit has its own internal intake within CLS.

CRLA did lead to more referrals across organizations, and those referrals led to clients being placed with the legal service organizations that best suited their legal needs rather than the first they approached. Both PILC and PLA attributed this to staff in each organization gaining

more familiarity with the other groups through CRLA, and said they will continue to refer clients to the other legal groups for services. CRLA therefore did build the capacity for more referrals across the legal service organizations, although not in the way originally designed.

## Evaluation Limitations

Although there is much that can be learned from the information collected for this evaluation, data limitations and program design prevent us from drawing conclusions about whether CRLA caused the effects we observe on a community level. The Justice Zones were selected based on some objective factors, such as data on housing security and resident demographics, but also on subjective factors like the presence of strong community groups that could result in some selection bias. The selection process also limited us from finding comparable communities and comparing how those may have changed over the same period. External factors, most notably the COVID pandemic but also the foreclosure and eviction moratoriums and other policy responses to the pandemic, make it difficult to attribute changes in the Justice Zones to CRLA (or any single program). The most direct data source available to us is LegalServer, which is designed for reporting as much as for tracking data for program evaluation and could have limits based on how consistently or completely users entered the data. The ACS data is a composite of five years that includes some time before CRLA and also includes some years while program activities were ongoing, and therefore may understate the changes in the Justice Zones from before CRLA to now.

Despite these limitations, there is much that future community development and legal service providers can learn from CRLA. CRLA service providers willingly participated in extensive interviews before and after program activities and were forthcoming in their reflections on the program. Although causal links between CRLA activities and community impacts cannot be definitively established, we can say with confidence that CRLA has had many positive impacts on the Justice Zone communities.

## Conclusion

CRLA brought legal services into five very different Pennsylvania communities affected by foreclosure with the goal of stabilizing those communities through stabilizing the households living within them. Much was accomplished towards that goal including households improving their housing or income in a variety of ways. Several transformative projects that improve the supply of affordable housing and built environment of the Justice Zones are underway or complete. Many Justice Zones also have better access to legal services through new relationships and outreach activities by the legal service organizations in the Justice Zone communities and through new legal procedures like Lawyer for the Day programs in Magisterial District Justice and Common Pleas Courts. Perhaps most importantly, the relationship between

these communities and the legal services that work in them has changed from legal services passively waiting for clients to arrive at their door to actively engaging these communities through their own outreach efforts, relationships formed with local officials and social service providers, and staffing in the Justice Zone communities going forward.

The evidence shows that the Justice Zones are generally trending in positive directions despite the challenges detailed in the CRLA *Needs Analyses* and the COVID pandemic. We cannot say with certainty that this is a result of CRLA generally or for any given Justice Zone, but it is reasonable to infer that these activities have had positive impacts that are part of the observed trends. Further, many of CRLA's impacts are still ongoing and will contribute to the positive momentum in these communities in the future, including a number of statewide programs RHLS worked to create that will result in investments in the Justice Zones. CRLA's purview was to stabilize communities, and the evidence shows that these communities are moving in a better direction.

CRLA also leaves a rich qualitative record of lessons learned and challenges faced in bringing legal services directly into Pennsylvania communities. An early challenge was when Mid-Penn had difficulty hiring an attorney to staff an office in the five boroughs, but like other challenges, the program found ways to deliver legal services and technical assistance to the communities despite facing difficulties. The adaptability of the legal service organizations and CRLA's focus on funding outreach activities helped the legal service groups engage in some trial and error, and build networks with local groups that proved robust to the challenges CRLA encountered, including disruptions from the pandemic. Several of the legal services organizations have obtained funding to continue outreach in the Justice Zones and continue to work with social service providers in those areas to best serve their mutual clients. Another important takeaway from CRLA's flexible funding model is that funding could support technical assistance that was needed to implement important projects at the intersection of the built environment, health, and the local economy. Hiring experienced practitioners to help local organizations both restarted stalled projects and built the capacity of the local groups.

We can therefore confidently say that these communities are stronger for having had the CRLA program. They are also better positioned going forward because of the stronger connections with legal services forged through CRLA and the transformative projects that are still ongoing as of the time of writing. Many local organizations have built their capabilities through CRLA and their relationships with legal services. These investments, too, will pay future dividends for the Justice Zone communities.

## Appendix

### CLRA Planned Activities- Baseline Interviews.

#### Legal Services

##### *Mid-Penn Legal Services (Mid-Penn) 5/9/2018*

Mid-Penn provides free civil legal services to low-income Pennsylvanians in 18 Central Pennsylvania counties.<sup>13</sup> Mid-Penn was engaged to provide legal services to Justice Zone residents that would help them with immediate housing security challenges like eviction, foreclosure, and utility delinquency. Mid-Penn planned to open an office in Shenandoah and hire an attorney to staff that office so residents could access legal services locally.

##### *Community Legal Services (CLS) 10/18/2018*

CLS provides free legal services to low-income Philadelphians, works on changing policy to benefit their clients, and provides community education and social work.<sup>14</sup> Two units of CLS – Energy and Homeownership and Consumer Rights – joined the CRLA effort to work with Justice Zone residents on utility delinquencies and shut offs, property tax liens and sales, and tangled titles. The Energy Unit had compared the location of water shutoffs in Philadelphia to where they were receiving clients from and found that both East and West Oak Lane were areas with high numbers of shutoffs but few client referrals. They planned to educate residents about their available services, assist with obtaining payment agreements and relief programs, prevent or remediate shut offs, and prevent sheriff sales. The Homeownership and Consumer Rights Unit similarly planned to assist clients in getting title to their property and resolving Tangled Title issues<sup>15</sup>, entering payment agreements and preventing property tax sales. Through CRLA they were able to extend their Tangle Title representations through completion of the Probate process; previously they could only go far enough through Probate to establish an ownership right the City would recognize for program eligibility. After the COVID pandemic began, the CLS' Debt and Consumer Rights Unit also joined the CRLA work in the Justice Zone to represent residents in bankruptcy and consumer credit cases.

##### *Philadelphia Legal Assistance (PLA) 10/4/2018*

PLA is a Philadelphia-based legal services organization that provides accessible, creative and high-quality legal assistance to enforce and protects their clients' rights.<sup>16</sup> PLA also had two units working on CRLA activities – the Unemployment and Tax Units. The Unemployment Unit's

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<sup>13</sup> See "About Us". <https://www.midpenn.org/who-we-are/>. (Accessed January 9, 2024).

<sup>14</sup> See "About CLS". [clsphila.org](https://clsphila.org). (Accessed December 7, 2022).

<sup>15</sup> A "Tangled Title" occurs when a person with a legal claim to a property (most often through inheritance) is not the record owner of the property. Lacking record ownership can affect the client's ability to access assistance programs, make payment agreements with the City or utilities for back due property taxes or utility arrearages, and obtain a mortgage.

<sup>16</sup> See "About". [philalegal.org](https://philalegal.org). (Accessed December 7, 2022).



focus was serving residents in Unemployment Compensation claim cases, including representing clients at hearings, helping with overpayment assessments, and advising on procedural issues. The Unemployment Unit would also provide education to community organizations about what residents should do when they lose a job and bring students from local law schools to events in the Justice Zone to help serve more clients. PLA also intended to sustain incomes for area households with tax services, including obtaining refunds or avoiding tax liabilities and finding alternatives to collections.

*Public Interest Law Center (PILC) 3/27/2019*

PILC focuses on impact litigation, community education, advocacy, and organizing to advance the civil, social, and economic rights of communities in the Philadelphia region.<sup>17</sup> PILC's focus was on employment for Justice Zone returning citizens through community education about the rights of returning citizens and employer education and advocacy to increase employment opportunities. PILC also wrote Op-Eds in several local publications about re-entry and CRLA more generally to inform the public about re-entry and CRLA and increase the visibility of the program.

*Neighborhood Legal Services (NLS) 12/18/2019*

NLS represents low-income people who live in four western Pennsylvania counties in civil legal matters to promote self-sufficiency through protecting clients' livelihoods, housing, and safety.<sup>18</sup> NLS had five attorneys located in New Castle when CRLA activities began. They intended to work on a variety of housing issues; including eviction, rent-to-own agreements, mortgage foreclosure defense, and rental habitability issues; and also on household income through representing residents in employment issues and assisting clients obtaining or keeping a housing subsidy.

NLS envisioned extensive outreach as part of their CRLA activities. They planned education sessions about the basics of renters' rights at the New Castle library. Part of the session would be showing tenants how to use a website that generated a letter to their landlord about repair issues. The hope with these trainings was that NLS would reach clients before they were in eviction proceedings and proactively address habitability issues. Another planned approach to habitability issues was to collaborate with the City of New Castle's code enforcement department for referrals of habitability clients. NLS also planned to work proactively with the Housing Authority's attorney to settle eviction matters before a hearing potentially through the launch of an eviction mediation program, providing earlier notice to tenants, and connecting tenants to supportive services. NLS saw preserving subsidy as vital for low-income people in Lawrence County because there is very little alternative affordable housing available, and they believed early intervention could prevent evictions from subsidized units. Another planned outreach was to a group of Lawrence County housing service providers.

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<sup>17</sup> See "About Us". *pubintl.org*. (Accessed December 7, 2022).

<sup>18</sup> See "About Us" Neighborhood Legal Services. Available at: <https://nlsa.us/about-us/>. (Accessed July 28, 2023).



NLS also revised their intake process to include a short survey that would screen for other legal issues in addition to those that client brought to NLS. For example, a client could come to NLS about an eviction case and the screening could reveal that they had lost a benefit that NLS could appeal and restore their income.

In April 2021, after CRLA activities were underway, RHLS told NLS about 412 Food Rescue and created a plan to distribute food at Lawrence County Housing Authority sites in New Castle while providing legal information. NLS connected with 412 Food Rescue, a Pittsburgh-based group, which collected extra food (primarily fresh food) from local supermarkets and distributed that food throughout Southwest Pennsylvania. NLS hoped that 412 Food Rescue would connect them with local food stores for surplus food to distribute at the public housing sites. NLS would pass out materials about their services with the food and give a brief presentation on legal issues like the eviction process or utility shutoffs at the same time.

#### *North Penn Legal Services (NPLS) 12/20/2019*

NPLS provides free legal services to low-income residents of Northeastern Pennsylvania.<sup>19</sup> In our discussion before CRLA activities began, NPLS highlighted how CRLA funding would enable them to offer additional services to clients and build an in-person presence in the Justice Zone. They believed this work would result in many more clients from Scranton, the ability to resolve multiple, interrelated issues for NPLS clients, preservation of clients' housing, and sustain household income for clients. Through CRLA funding, NPLS would open an office in Scranton (NPLS's Pittston office serves both Luzerne and Lackawanna Counties). Active outreach at community events was also a focus of planned activities, including events at Scranton food pantries and the Lackawanna County Housing Coalition Meeting. NPLS and LPB would re-establish a referrals relationship and together create CLE trainings for pro bono representation in Landlord/Tenant cases.

Through CRLA funding, NPLS would be able to work on what they termed "extended service cases" in Scranton, in which the client has multiple legal issues, such as an eviction related to loss of welfare income and access to medical care. They mentioned consumer debt and related foreclosure issues as another example of potential extended service work. NPLS described extended service cases as potentially more impactful in stabilizing Justice Zone households' housing because of opportunity to address the underlying fundamental issues like income, housing condition, or medical care that can lead to loss of quality housing. NPLS noted specifically that they would represent tenants in appeals of Landlord/Tenant cases to Common Pleas for the first time.

At the time of the baseline interview, NPLS was already in discussions with LPB about both CLE trainings for pro bono attorneys and coordinating intake and referrals. They had already begun outreach in the Justice Zone, and described events as well attended with many attendees who were interested in NPLS representation. They had also already connected with a

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<sup>19</sup> See "Mission & History". <https://www.nplspa.org/who-we-are/mission.html>. (Accessed July 20, 2023).

NeighborWorks group in West Scranton and were coordinating an event with them. NPLS also saw the monthly Housing Coalition meetings as a way to monitor housing policy issues in Scranton and connect with other housing focused groups.

#### *Lackawanna Pro Bono (LPB) 12/20/2019*

LPB connects low-income Lackawanna residents in need of representation in civil legal matters to private attorneys looking for pro bono opportunities.<sup>20</sup> With CRLA support LBP would offer trainings to current and new volunteer attorneys. They would also advocate with the Court for systemic change in the Landlord/Tenant process. LPB also planned extensive outreach in the community.

Before CRLA activities began in Lackawanna County LPB anticipated a focus on creating a set of CLE trainings for pro bono attorneys who would represent Justice Zone residents with a variety of Landlord/Tenant issues. Their plan was to first launch a series of CLE trainings with NPLS that would train volunteer attorneys on the basics of how to represent tenants, then a further set of CLEs that would cover specific topics for Landlord/Tenant cases like public housing, utilities, warranty of habitability, fair housing, and domestic violence.

LPB planned the creation of an “emergency squad” of pro bono attorneys who would be on call for emergency hearings (i.e., a hearing on short notice) or phone advice for tenants. This was intended as a pilot program in which the Court would have a list of volunteer attorneys to contract in those situations, or when there was an unrepresented tenant with a habitability issue or who was close to an appeal filing deadline.

LPB would conduct active outreach, both in conjunction with NPLS and on their own, including at existing community events like a holiday food giveaway. They had already met with NPLS on strengthening the referral relationship between the two groups, including streamlining intake and creating a system where LPB’s volunteer attorneys could send questions about their cases to NPLS.

#### *Community Justice Project (CJP) 6/8/2021*

CJP works to protect the civil rights of low-income Pennsylvanians.<sup>21</sup> CJP planned to provide multiple services to immigrant clients in the Scranton and Norristown-Pottstown Justice Zones. CRLA would bridge a funding gap so that CJP could continue to fund a paralegal in Scranton who had extensive contacts within immigrant communities. In Norristown-Pottstown, where CJP had not previously focused its work, CRLA would support expanded services. Services would include work with immigrants who are survivors of domestic violence on Violence Against Women Act (VAWA) visa applications and with qualifying residents on Deferred Action for Childhood Arrivals (DACA) cases. CJP planned increased outreach in Scranton’s Spanish speaking community, as well as to the Justice Zone’s Congolese and Bhutanese communities. In

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<sup>20</sup> See “Mission”. <https://lackawannaprobono.org/wordpress/who-we-are/>. (Accessed July 20, 2023).

<sup>21</sup> See “Our Mission”. <https://www.communityjusticeproject.org/who-we-are/our-mission/>. (Accessed January 9, 2024).

Norristown and Pottstown, CJP's plan was to build relationships in the Latino and immigrant communities and offer an array of services, including eviction prevention and homeownership advice, in addition to immigration work.

At the time of the baseline interview, CJP was losing funding in Scranton for immigration work where they represent mostly undocumented survivors of domestic violence with U Visas under the Violence Against Women Act. CJP described these visas as life changing for recipients and their families because the U Visa puts the entire family on a path to citizenship, and can mean family reunification of members who are still in their home country. CRLA funding would help CJP continue outreach and services in Scranton that CJP had established with a paralegal who was also a licensed social worker and could help clients through crises related to the trauma from domestic abuse.

CJP's plans for expanded services included increasing the use of public benefits by undocumented residents and educating both the residents and the Housing Authority on their rights to section 8 and public housing. Altogether, these services could help clients increase their incomes through better access to employment, reduced housing costs, and improved access to medical care.

#### *Legal Aid of Southeast Pennsylvania (LASP) 8/25/2020*

LASP provides free legal services to low-income and vulnerable residents of Southeastern Pennsylvania.<sup>22</sup> In our discussion early in CRLA activities, LASP highlighted how CRLA funding would enable them to expand outreach in the Justice Zone, provide more housing and public benefits assistance to clients, and connect with Spanish speakers. They had routinely conducted in-person outreach in the area before the pandemic, but during CRLA they planned many online outreach events and new relationships with groups like the Norristown School District that would generate more referrals of Justice Zone residents. LASP had also begun data-driven outreach activities. They had web scraped<sup>23</sup> contact information for people who would become eligible for expedited pardons of low-level marijuana offenses due to a change in state policy,<sup>24</sup> and planned to use that data to send mailers to eligible Justice Zone residents to notify them about the new policy. LASP planned to work remotely with law student interns who could help Justice Zone residents with these expungement cases. Prior to CRLA, LASP was already participating in the Eviction Prevention and Intervention Coalition (EPIC) program that provides volunteer attorneys for tenants in a Norristown Magisterial District Judge Court (MJD). With CRLA funding covering LASP staff time for referrals and case support to the volunteer attorneys

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<sup>22</sup> See "Mission". <https://www.lasp.org/mission>. (Accessed November 17, 2023).

<sup>23</sup> "Web Scraping" refers to collecting data from websites typically automated through a computer program. Web scraping allows for creating structured datasets out of information contained across many web pages. See Mertz, David. *Cleaning Data for Effective Data Science*. "Chapter 3 Repurposing Data Sources: Web Scraping" starting at page 136. Packt Publishing, 2021.

<sup>24</sup> See "PA Marijuana Pardon Project Launched in Effort to Quickly Pardon Pennsylvanians from Marijuana Convictions." *Pennsylvania Legal Aid Network*. September 9, 2022. Available at: <https://palegalaid.net/news/pa-marijuana-pardon-project-launched-effort-quickly-pardon-pennsylvanians-marijuana> (accessed November 17, 2023).

as well as direct representation in Landlord-Tenant cases, LASP could expand to additional courtrooms. LASP also conducted Continuing Legal Education trainings for in-house counsel at Merck & Co. so those attorneys could take pro bono case referrals.

A second focus for LASP during CRLA was building relationships with social service organizations and government officials in the Justice Zone. LASP hired a Spanish speaking attorney to build their relationship with ACLAMO and conduct Spanish-language outreach in the Justice Zone. The attorney also reached out to the Norristown School District – where 40% of the students have Spanish speaking parents. Through these relationships LASP and CRLA learned that there was a need for immigration legal services in the Justice Zone (see more about CRLA-funded immigration services below). LASP planned a referral relationship with Your Way Home (YWH), a social service organization that helps Montgomery County residents gain and keep affordable housing, for EPIC cases and other legal services for YWH's clients. LASP worked with the Public Defenders' Office and CareerLink on expungement clinics that would help Justice Zone residents get and keep employment.

*Pennsylvania Utility Law Project (PULP) 5/9/2018 regarding Northern Schuylkill County; 8/21/21 regarding New Castle, Scranton, and Norristown-Pottstown*

PULP “provides information, assistance, and advice about residential utility and energy matters affecting low-income consumers.”<sup>25</sup> PULP worked in four of the five Justice Zones, excluding the Northwest Philadelphia Justice Zone where CLS handles energy and utility matters. They planned to work with legal services and other social service groups to educate residents about utility issues. They planned to train other legal service organizations on representing clients with routine utility legal issues and provide technical assistance on those issues. PULP would also represent clients with utility law issues – and hoped to take more challenging or novel cases once the other legal service organizations were trained on routine cases. PULP further planned to develop resource materials explaining consumers' utility rights and providing information about utility assistance resources in both English and Spanish.

*Regional Housing Legal Services (RHLS) Reinvestment Fund conducted interviews with various RHLS staff members at the beginning of discrete projects throughout CRLA period.*

RHLS employs unique expertise in affordable, sustainable housing, community and economic development, utility matters, preservation of home ownership, and policy to help create sustainable communities for lower-income Pennsylvanians.<sup>26</sup> RHLS represented organizations working on the physical condition of low income family homes or creating and preserving subsidized housing throughout the Justice Zones.

In Schuylkill County, representations included helping the Sch-3 form a subsidiary, aiding Sch-1 in creating a program to repair houses that had been deferred from the Weatherization program because of their poor condition, working with Sch-1 to develop a program to

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<sup>25</sup> See “Who We Are”. <https://www.rhls.org/utilities/pulp/>. (Accessed January 9, 2024).

<sup>26</sup> See “About RHLS”. [rhls.org](https://www.rhls.org/). (accessed December 7, 2022).

remediate and repair the homes of asthma sufferers, and representing Sch-2 on the development of a business incubator and community facility.

In Philadelphia, RHLS planned to represent clients who would create or preserve quality affordable housing opportunities and clients remediating blight in the Justice Zone. RHLS would provide a range of legal assistance to complete affordable housing projects – advising on corporate form, negotiating with partners or in a real estate transaction, drafting documents, and sometimes revising project documents when entering later in a project that has stalled. RHLS also proposed to assist CDCs that would acquire and develop vacant properties.

In New Castle, RHLS represented a nonprofit organization that planned to rehabilitate homes or build new homes that would be accessible to people with disabilities. The new and rehabbed homes would replace blighted properties and improve the area's appearance. They also wanted to improve the Lower East Side neighborhood generally so that people moving into the homes could build equity and the neighborhood would have infrastructure that was accessible to people with disabilities.

Later the client also sought RHLS' legal assistance with a development of a large, mixed-use building that would include Low Income Housing Tax Credit subsidized rental units. The building would include two floors of commercial space and a mix of two- and three-bedrooms apartments that are all accessible for people with disabilities. The building would be an anchor for a commercial corridor that links the Lower East Side neighborhood with downtown New Castle, and the hope was that an active commercial space would revitalize the whole corridor.

## Technical Assistance

### *The Gulotta Group 3/21/21*

Chris Gulotta of The Gulotta Group, LLC, is a community development and housing expert who was previously Executive Director of the Redevelopment and Housing Authorities of Cumberland County (which also serve Perry County). Mr. Gulotta was contracted to conduct a series of four trainings for municipal officials (like mayors, borough councilmembers, and code officials) in the five boroughs of the Northern Schuylkill Justice Zone about laws and tools they could use to fight blight. The goal was to teach these officials how to match their code enforcement resources and activities to the severity of the property and to the tools available in small, rural municipalities. For example, using ticketing for code violations as a first step in compliance and how code enforcement staff can prepare for Magisterial District Court hearings. The trainings engaged participants to build relationships between officials from different boroughs, because often owners of problem properties have properties in several boroughs, and to build relationships between officials and Mid-Penn for referrals.

Chris Gulotta was also engaged to work with Sch-2, a RHLS client, to re-envision a stalled economic development project. Sch-2 intended to build the Innovation and Event Center (later renamed the Center for Education, Business and Arts [CEBA]) as a 37,000 square foot space with a business incubator, commercial kitchen, and visual arts space, but had not obtained enough

funding to start the project or commitments from businesses to occupy the center once constructed. Mr. Gulotta was brought in to right size the project for available funding opportunities, help Sch-2 obtain funding and business commitments, and guide DSI through the construction process. The project has the potential to be a game changer for Shenandoah and the region: the building will replace a blighting vacant lot, the businesses will provide needed employment opportunities and incubate new businesses, especially for young people, and create an event space that the region currently lacks.

*Green & Healthy Homes Initiative (GHHI) 10/5/2020*

In 2020 RHLS contracted with GHHI to further the asthma home remediation and repair program being developed by Sch-1 and LVHN with assistance from RHLS. GHHI addresses health equity by providing technical assistance to promote healthy and energy efficient homes. This CRLA partnership would help Justice Zone residents with asthma by remediating housing conditions that exacerbate the condition, making additional needed repairs, and hiring a community health worker who can educate asthma sufferers on self-care and conditions in their homes. Better asthma management can result in reduced medical care utilization and fewer emergency and hospital visits, for an overall reduction in cost of care. Other outcomes would be more regular school or work attendance. LVHN would refer patients to the program.

*Kauffman Consulting 8/24/2022*

Bob Kauffman is a real estate consultant and contractor who was president of a citywide housing developer and has consulted on many housing and construction projects in Philadelphia, including for Low Income Housing Tax Credit (LIHTC) projects. He is helping Ph-8 with pre-development tasks to preserve over a hundred units of housing for very low-income individuals and renovate the community spaces so that those would provide more sustainable revenue for Ph-8 and secure the housing and community facilities for the Germantown community.