

FILED OFFICE OF THE CITY CLERK OAKLAND

2014 DEC -4 PM 2: 20

AGENDA REPORT

TO: HENRY L. GARDNER

INTERIM CITY ADMINISTRATOR

FROM: Michele Byrd

SUBJECT: Annual Report of the Rent Adjustment

Program for Fiscal Year 2013-2014

DATE: October 31, 2014

City Administrator

Approval

Date

12-1-14

COUNCIL DISTRICT: City-Wide

RECOMMENDATION

Staff recommends that the City Council accept:

The Annual Report of the Rent Adjustment Program for Fiscal Year 2013-2014

EXECUTIVE SUMMARY

A report on Rent Board expenditures is required each fiscal year by Oakland Municipal Code (OMC) Section 8.22.500.A. As mandated by the City Council, this report provides information on the expenditures related to the Rent Adjustment Program and the utilization of the funds raised through collection of the Rent Program Service Fee.

BACKGROUND/LEGISLATIVE HISTORY

The Oakland City Council first adopted a Residential Rent Adjustment Program as an alternative to strict Rent Control in 1980 by Ordinance. The Ordinance has been modified several times since. The current version of the Ordinance became effective in January 2007. The Rent Adjustment Ordinance is codified as OMC Chapter 8.22. The City Council and the Rent Board also adopt Regulations that govern the operation of the Residential Rent Adjustment Program. In addition, the Residential Rent Adjustment Program is responsible for adjudicating certain disputes that arise under the Just Cause for Eviction Ordinance (Measure EE).

OUTCOME FOR FISCAL YEAR 2011-2012

Public Contact

The Rent Adjustment Program (RAP) functions as a resource for Oakland landlords and tenants. Staff provides information about and referrals for many varied rental housing situations and problems. Public inquiries from Oakland residents include questions about Rent Adjustment, Just Cause for Eviction, security deposits, and other processes mandated by state and local law. During FY 13-14, staff met with 2,120 members of the public and provided information and referrals in person. This is a 27% increase from 1,673 in FY 12-13. Staff responded to an estimated 13,200 phone inquiries, a 67% increase from 8,781 in FY 12-13. Staff also responded to about 955 email inquiries, a 79% increase from the 165 received last fiscal year. Staff received and responded to eleven complaints from members of the public about the quality of public contact.

The Business License Tax Section addressed public inquiries about billing of the Rental Property Service Fee and continues to require temporary staffing in addition to all assigned program staff to answer the many calls received regarding the billing.

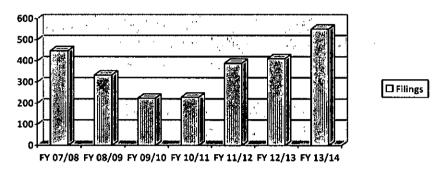
Petitions, Ellis Act and Citatian Applications

The number of petitions and applications filed in FY 12-13 increased by 34.1% (from 411 to 551) when compared with 5.7% in FY 12-13. The RAP processed 540 Rent Adjustment Petitions, five Ellis Act applications, and six administrative citations. Staff believes that the number of petitions filed continues to be high due to the overall improvement in economic conditions, and to former homeowners being driven into the rental market due to foreclosures.

Table 1 shows a three year decline beginning in FY 08-09. Petitions and applications filed in FY 13-14 are greater than the number of filings from FY 07-08

Date: October 31, 2014

Table I Trends in Petitions and Applications filed July 2007 - June 2014



Shown on Table 2 are the types of claims made by Rent Adjustment petitioners, both landlords and tenants, on the petitions filed during FY 13-14. Often, more than one claim is made on a single petition, so the total number of claims is greater than the number of petitions filed. The chart indicates the number of claims alleged in petitions and the percentages shown indicate the proportion of all petitions filed that alleged each claim. Again, because more than one claim can be alleged on a single petition, the percentages total to more than 100%.

Table 2

The state of the s	#OFCLAIMS FUED	% OF
CLAIM ALLEGED	IN PETITIONS	FILED
A A A A A A A A A A A A A A A A A A A	FY 12-13	FY 12-13
Unjustified increase	298	55.2%
Decreased or inadequate housing services	258	47.8%
No RAP notice with rent increase	132	24.4%
No RAP notice at beginning of tenancy	134	24.8%
No summary of justification for increase	52	10.4%
Two increases within 12 months	33	6.1%
Landlord request for certificate of		
exemption	50	10.8%
Landlord request for prior-approval of	·	
increase	11	2.0%
Improper increase under Civil Code§1954.		
et seq.	20	3.7%
Landlord request for extension of time to		
complete repairs	7	.01%

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Landlord justifications for increases greater than the annual CPI adjustment include capital improvements, increased operating and maintenance expenses (housing service costs), debt service¹, casualty losses (uninsured repairs), and recapture of deferred annual increases (banking). In most cases, these petitions require a hearing to determine the validity of the landlord's justification and to verify the amount of the increase. Most of the petitions (55%) alleged an unjustified rent increase.

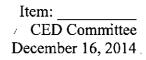
A claim for decreaseth or inadequate housing services was the second most common complaint (48% of petitions). Tenants can allege a loss of any service the landlord is obligated to provide by law or by contract. Data on what services are allegedly "lost" is not collected by the program. However, in staff's experionce, the lost services most commonly alleged have been: rodent and insect infestation; water leaking through roofs and windows; inoperative appliances, often furnaces or boilers and stoves; deteriorated carpet or flooring; unit in need of painting; and mold problems.

Property owners are required to provide their tenants with a form notice of tenant's rights under Rent Adjustment,² together with information about application of the Smoking Ordinanee to the particular property ("RAP Notice"). Property owners' failure to provide a RAP notice to tenants at the beginning of the tenancy was claimed in 25% of the petitions filed. Failure to provide the RAP notice with the notice of rent increase was claimed in 24% of petitions filed.

Landlords are also required by Ordinance to provide a summary of the justifications for a rent increase upon a written request from their tenant. Failure to provide a summary is a basis to invalidate the increase. The number of petitions alleging failure to provide a summary was 10%, unchanged from the prior fiscal year.

Landlords are allowed to increase the rent by an annual amount calculated from the CPI statistics issued by the US Department of Labor. If a landlord has a justification for a greater increase allowed by the Ordinance, she/he can raise it to a greater amount without pre-approval by the RAP. However, a small number of landlords (2.0% of petitions) sought prior-approval due to their particular circumstances. Petitions for a certificate that a particular unit or property is exempt from Rent Adjustment comprised 11% of the petitions filed.

² OMC §8.22.060.



¹ Effective April 1, 2014, debt service was eliminated as a justification for rent increnses. Debt service would only apply to properties on which the owner made a bona-fide, arms –length offer to purchase on or before on or before April 1, 2014.

Petition Processing

The average time from petition filing through staff decision for petitions filed in FY 13-14 was 105 days, a slight increase compared with 100 days in FY 12-13.

During FY 13-14 the Rent Adjustment Program, including the Board, resolved 419 cases. There are 123 petitions and 46 appeals that could not be resolved by June 30, 2014. Table 3 shows how the cases were resolved. Tenants ("T" on the chart) prevailed in 47% of the cases, landlords ("LL" on the chart) in 25% of the cases. The cases resolved in favor of tenants increased slightly from 45% in FY 12-13 to 47% in FY 13-14. The number of cases resolved in favor of landlords decreased from 41% in FY 12-13 to 25%. in FY 13-14

Table 3

			· Pending	φ · · · · · · · · · · · · · · · · · · ·	,
			Petitions	, ,	, 1
Final Decisions	Number	% of Total	&Appeals	LL	T
None	169	28.8%	169	N/A	N/A
Administrative		-			
Decision	50	× 8.5%		. 23	27
Appeal Decision	39	6.6%		15	22
Hearing Decision	219	37.2%		78	141
Involuntary Dismissal	20	3.4%		19	1
Remand Decision	2	0.3%			2
Settlement Agreement	8	1.4%			8
Voluntary Dismissal	81	13.8%	,	9	72
TOTAL	588	100.0%	169	144	273
			28.8%	34 4%	65.2%

Appeals to the Rent Board

During FY 13-14, 83 appeals were filed, which represents a 47% increase from the previous fiscal year.

The Rent Board resolved 39 appeals from Staff Decisions. This number includes two appeals filed in the prior fiscal year (not included on Table 3), but heard and decided by the Board after July 1, 2013. There are 46 appeals pending that could not be resolved before June 30, 2014. The appeals rate for the 289 staff decisions issued during FY 13-14 was 29%, which is well above the historical average of 16%.

Eviction Notices and Evictions

The Just Cause for Eviction Ordinance requires that a copy of every eviction notice served to residents of a covered unit be filed with the RAP within 10 days of service. The RAP received approximately 10,910 eviction notices during FY 13-14, a decrease from FY 12-13's 13,394.

Adam Byer of the Alameda County Superior Court graciously prepared an estimate of Oakland evictions again this year. He reports that there were approximately 3,153 limited jurisdiction unlawful detainer filings in fiscal year 2013/14 (July 1, 2013 through June 30, 2014) where the disputed property is in the City of Oakland. This represents a slight 1.9% decrease from the 3,222 eviction actions estimated for FY 12-13.

Applications Pursuant to the Ellis Act and Administrative Citations

In FY 13-14, there were five Ellis Act filings, as compared to zero Ellis Act filings in FY 12-13.

There were six administrative citation cases, with one citation penalty issued in the amount of \$100. The violation was remedied and the citation penalty was paid.

Litigation in Court

Although litigation is conducted by the City Attorney's Office, RAP staff also participates. Preparation of administrative records, answering correspondence and inquiries from the parties, receiving service of process, consultations with the attorney assigned to the case, and the occasional need to appear in Court all involve RAP staff. The City Attorney's Office handled a number of cases involving the Rent Program during the last fiscal year:

Administrative Writs. During this fiscal year, City Attorney staff handled four administrative writs. These were all appeals from Rent Board decisions.:

Murry v. Rent Board (landlord writ)

Regan v. Rent Board (landlord writ)

Michelsen v. Rent Board (landlord writ)

Marker v. Rent Board (tenant writ)

Another administrative writ was filed in July 2014 (Baragano v. Rent Board (tenant writ)), but some preliminary work was done in the reporting fiscal year.

Rent Board

During FY 13-14, the Rent Board and Rent Board Standing Committee had public meeting and discussions regarding the following:

- Deferred maintenance
- Seismic retrofits

The discussions are on-going; the Board did not take any action on these issues by the end of the fiscal year.

Agenda Reports

Agenda reports recommending amendments to Debt Service and Capital Improvement Regulations was presented to the City Council, which resulted in the following:

- On April 1, 2014, the City Council voted to eliminate debt service as a justification for a rent increase
- On May 6, 2014, the City Council voted to amend the Rent Ordinance and regulations to
 1) allow a 10% maximum limit on all rent increases; 2) allow maximum of 30% on rent
 increase over a 5-year period; 3) require enhanced noticing for all capital improvements;
 4) allow 70% of capital improvement costs to be passed through to tenants; and 5)
 owners would face administrative penalties and interest for any overcharge in rent after
 capital improvement rent increases expire.

Low Income Client Representation Program

The low-income representation program resumed operations in July 2008 pursuant to Resolution No. 81218 C.M.S. approved by City Council April 15, 2008. The group of agencies providing the direct representation services includes Centro Legal de la Raza, the Alameda County Bar Association Volunteer Legal Services Corporation and Bay Area Legal Aid. Operations under the grant contract began in July 1, 2008.

The contract that began in FY 08-09 ended June 30, 2013. Pursuant to Resolution No. 84706, a new contract effective July 1, 2013 was executed. The scope of services in the new contract is outlined below.

Tenant Representation

Centro Legal de la Raza (CLR) is the sole contractor for tenant services. The contract provides \$90,000 to provide direct services to tenants.

The goals of the contract are to:

- Do outreach to 15,000 tenants
- Screen 800 tenants for eligibility for RAP issues
- Provide limited scope services to 400 tenants regarding RAP issues
- Provide extensive services to 60 tenants
- Accept 50 cases for representation
- Make 25 appearances before RAP and/or Rent Board

During FY 13-14, contractors provided limited scope services 454 tenants, exceeding the contract goal by 11%. 80 tenants were provided extensive services for RAP issues, exceeding the contract goal by 13%. There were 30 appearances at Rent Adjustment, exceeding the contract goal by 1%. 56 cases were accepted for representation, exceeding the contract goal by 1%.

In March 2014, CLR began conducting RAP clinics at the Housing Assistance Center (HAC). These clinics have continued to take place each Monday from 2:00 p.m. to 4:30 p.m. The assigned CLR housing attorney works in conjunction with the RAP Program Analyst to assess the needs of tenants who come to the HAC for assistance.

Because of the success of the clinics, Staff is currently in discussions with CLR to expand clinic hours.

CLR conducted outreach to 32,404 tenants during FY 13-13 far exceeding the contract goal of 15,000. This was accomplished by conducting the RAP clinics, advertising in newsletters, making television appearances, giving radio interviews, and making presentations to various organizations that serve tenants (*See Attachment A*).

Landlord Representation

From the inception of the low-income client representation program, the Alameda County Bar Association was subcontracted to provide services to low-income landlords. However, the Bar Association withdrew their participation before the new contract was executed.

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In December, 2013, a Request for Qualifications (RFQ) was issued to identify qualified candidates with knowledge and experience in Oakland's Rent laws to provide consultation and representation to low-income landlords.

Two agencies participated in the pre-proposal conference (the Rental Housing Association, and the Unity Council) held on December 19, 2013. Although both agencies were assured that the scope of services could be amended, no proposals were submitted.

Although no contract has been in place for low-income landlords since July 1, 2013, Rent Adjustment staff continues to make appointments with landlords to answer questions and explain the Ordinance. In addition, landlords are referred for legal advice regarding lease and eviction issues to the Alameda County Bar Association, where landlords can have a half hour consultation with a lawyer for \$35.00. For landlords age 60 and over, the consultation is free.

Because the RAP has been unable to provide services to landlords under the current eligibility requirements of the Low-Income Client Representation Program, a report will be presented to the City Council requesting that alternative criterion for etigibility is approved for the landlord portion of the contract in order to successfully deliver services to landlords who need assistance.

ANALYSIS

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Factors contributing to the increasing number of petitions include:

- overall rents in Oakland skyrocketing to unprecedented levels, in part due to tenants moving to Oakland from San Francisco, where rents are higher;
- landlords passing through more capital improvement rent increases.³

These trends, coupled with the changes to the Rent Ordinance effective August 1, 2014, recruitments for additional staff is being pursued. On-call personnel will continue to be utilized as needed for the Rent Adjustment Program to meets its responsibilities.

Outreach efforts, including informational workshops for tenants, landlords, and non-profit agencies that work with tenant and landlords, need to be conducted during the next fiscal year.

A more complete analysis of how the recent changes to the Rent Ordinance have impacted the operations of the RAP will be presented in the annual report for FY 14-15.

³ An analysis of capital improvement rent increases will be presented in the FY 14-15 Annual Report.

PUBLIC OUTREACH/INTEREST

In FY 13-14, Rent Adjustment Staff participated in the following outreach activities:

- **September 14, 2013**: Roberto Costa answered questions from the public and distributed Rent Adjustment informational brochures at the 2013 Oakland Housing Fair
- September 21, 2013: Barbara Kong-Brown answered questions from the public and distributed Rent Adjustment informational brochures at the 2013 Oakland Housing Fair
- September 2013: Barbara Kong Brown and Jean Casey (from Housing Assistance Center) distributed information about Rent Adjustment and the Housing Assistance Center at East Bay Rental Housing Association annual Expo.
- November 19, 2013: Barbara Kong-Brown spoke at Lady's Auxiliary luncheon to landlords regarding possible changes to Capital Improvement Regulations
- April 18, 2014: Barbara Kong-Brown and Stephen Kasdin conducted annual training for tenant advocates, Centro Legal de la Raza
- June 9, 2014: Bus Shelter posters informing landlords and tenants about changes in the Rent Ordinance placed in 25 locations in Oakland
- June 18, 2014: One Page Oakland Tribune advertising the existence of the Rent Adjustment Program and the changes to the Rent Ordinance effective August 1, 2014
- June 27, 2014: 25,000 Brochures and inserts with new Rent Ordinance information distributed to 350 outlets throughout the City, including laundry mats, cafes, and retail outlets
- June 30, 2014: Brochures and inserts with new Rent Ordinance information distributed to all Oakland library branches

COORDINATION

Centro Legal de la Raza, conducts public outreach for the Rent Adjustment Program and conducts weekly on-site counseling for tenants at the Housing Assistance Center).

Informational flyers have been distributed to recipients of CDBG funds. CDBG recipients publicize the Rent Adjustment Program, by both mailings and community programs.

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The Rent Adjustment Program continues to coordinate with the City Attorney's office and with the Housing Assistance Center.

COST SUMMARY/IMPLICATIONS

Source of Funding

The Rental Property Service Fee was established on February 5, 2002 by Ordinance No. 12399 C.M.S. to fund the Rent Adjustment Program. The Fee funds the operation of the Rent Adjustment and Just Cause for Eviction programs almost exclusively. The fee amount was increased by \$6 to \$30 per unit per year by the City Council beginning in FY 07-08. The only other income to the program is from Ellis application fees and copying charges⁴ that have a minimal impact on the Rent Adjustment budget.

Table 4 shows budgeted and actual fee revenue from FY 03-04 to the present, which includes the transferred funds, shown in Oracle.

Table 4
Rent Program Revenue (Oracle)

Fiscal Year	Budgeted Revenue	Actual , Revenue
FY03-04	1,400,000.00	1,194,469 09
FY04-05	1,300,000 00	1,884,900 25
FY05-06	1,542,529.00	1,744,214.54
FY06-07	1,839,221 00	1,595,438 90
FY07-08	1,957,000.00	2,175,237 99
FY08-09	1,957,000.00	1,725,342.32
FY09-10	1,890,990.00	2,079,992.00
FY10-11	1,890,990.00	1,925,731.00
FY11-12	1,800,000.00	1,973,823.00
FY12-13	1,800,000 00	2,043,340.24
FY13-14	1,950,000.00	2,810,653 84
Total	19,327,730.00	21,153,142.94

⁴ These total less than \$2,500 for FY 13-14.

Expenditures

A complete list of the program expenditures for FY 13-14 is shown below. The largest expenditures are personnel costs. The budgeted expenditures include unspent but designated funds for hiring a Program Analyst II, and for the low-income representation grant.

Table 5

Department	Budget	Expenditures	Balance
City Administrator Salary and Benefits	173,336.00	191,2-3.00	(17,867,00)
City Attorney Salary and Benefits	348,415.00	346,718.00	1,697.00
Finance & Management Salary and Benefits	277,382.00	299,238.00	(21,856.00)
Rent Adjustment Program DHDD Salary and Benefits	1,268,635.00	1,251,326.00	17,309.00
Operation & Maintenance:			
Temporary Personnel	5,000	190.00	4,810.00
Low-Income Representation	100,000	88.976.00	11,024.00
Minor Computer Software	11,010.00	59.00	10,951.00
Printing, Advertising & Promotion	21,215.00	19,720.00	1,495.00
Band and Credit Card Fees	7.857.00	7,943.00	(86.00)
Postage and Mailing	6,139.00	6,869.00	(721)
Miscellaneous Operating	45,701	23,158.00	22,543.00
Subtotal O & M	196,922.00	146,906.00	50,016.00
DHCD Total	1,465,557.00	1,398.232.00	67,325.00
Program Total Budget & Expenditures	2,264,690	2,235,391.00	29,299.00
Program Reserve Funds	734,966		

Program Budget

Below is the Adopted Budget for FY 13-14

Table 6

Rent Adjustment Program FY 13-14 Adopted Budget

<u>Department</u>	<u>Budget</u>
DHCD – Rent Adjustment Program:	
Salaries	778,388
Benefits	535,259
Low-Income Representation Grant	100,000
Operations & Maintenance (O & M)	15,496
Subtotal	1,429,143
City Attorney: Salary & Benefits Finance & Management Agency: Salaries & Benefits Operations & Maintenance (O & M) Subtotal	367,437 462,277 10,460 472,687
Grand Total	2,269,267
Orang Total	2,209,201

Staff

Below is a list of all the authorized staff charged to the Rent Adjustment Project (restricted revenue) on June 30, 2013:

Rent Adjustment Program:	
Program Manager	(1.00)
Program Analyst II	(2.00)
Program-Analyst III	(1.00)
Hearing Officer	(2.00)
Senior Hearing Officer	(1.00)
Administrative Assistant I	(2.00)
ASM 1	(0.15)
Account Clerk III	(0.11)
Finance & Management Agenc	y:
Manager, Revenue	(0.10)
Revenue Supervisor	(0.50)
Revenue Assistant	(2.00)
Cashier	(1.00)

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City Attorney Office (2 FTE)

Deputy City Attorney (0.90)

Legal Admin. Asst. (1.00)

Total FTE

14.76

FISCAL IMPACT

This report is informational only and proposes no changes to the Rent Adjustment Program or its fees. Therefore, it has no fiscal impact.

SUSTAINABLE OPPORTUNITIES

Pursuant to City Council Resolution No. 74678 C.M.S., adopted December 1, 1998, staff encourages property owners to operate sustainable projects. Stabilizing Oakland's existing residential tenancies will continue to stabilize neighborhoods. The rental regulation programs address the "3 E's" of sustainability by:

Economic:

- Preserving the affordable housing inventory for families, seniors, and disabled people in Oakland.
- Mitigating the adverse economic pressure on surrounding neighborhoods caused by new housing development

Environmental:

- Preventing social disruption of established neighborhoods with rental housing.
- Mitigating any adverse environmental impacts resulting from development of new and existing rental housing

Social Equity:

- Improving the landscape and climate of Oakland's neighborhoods by encouraging longer-term tenancies in rental housing.
- Aiding low-income families to save money to become homeowners.

CEQA

This report is not a project under CEQA.

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For questions regarding this report, please contact Connie Taylor, Program Manager, 238-6246.

Respectfully submitted,

Michele Byrd, Director

Housing and Community Development

Prepared by:

Connie Taylor, Program Manager

Rent Adjustment Program

Housing and Community Development

Attachment A: Centro Legal de la Raza RAP Outreach 2013-2014

Date	Event/Location	
7/1/2013	Latina Center	10
7/1/2013	Familias Unidas	10
7/1/2013	W O M A N Inc.	10
	La Casa de las Madres	10
7/1/2013	La Casa de las Madres La Clinica de la Raza	
7/1/2013		10
7/2/2013	ECHO	10
7/2/2013	Alameda County Homeless Action Center	10
7/2/2013		10
7/2/2013	STAND	10
7/2/2013	Building Futures	110
7/2/2013	A Safe Place	10
7/3/2013	E Oakland Comm Project, Transitional Housing	10
7/3/2013	Emergency Shelter Program	10
7/3/2013	SAVE .	10
7/3/2013	CORA	10
7/3/2013	Marın Abused Women's Services	10
7/3/2013	The Women's Building	10
7/18/2013	Fruitvale Farmer's Market	27
7/27/2013	Naturalization Fair	100
7/29/2013	WIC	10
7/29/2013 /	La Clinica de la Raza	10
8/5/2013	email to Mexican Consulate	1
8/17/2013	Hayward Naturalization Fair	100
8/24/2013	Laborer's Union Picnic outreach	200
9/4/13-9/6/13	Livermore outreach multiple trips	100
9/10/13-9/11/13	Livermore outreach multiple trips	100
9/11/2013	Lionel Wilson College Prep Presentation at resource information night for the parents at the school	35
9/11/2013	Lionel Wilson College Prep Presentation at resource information night for the parents at the school	13
9/13/2013	Erica Zarco	1
9/14/2013	Livermore Naturalization	100
9/25/2013	Presentation to Day Laborers re Centro services with cases involving rent increases	65

10/16/2013	outreach at La Red community conference	2
12/18/2013	Street Level community fair	15
12//8/2013	Street Level community fair	15
Jan-14	Just Cause Newsletter ad	10,000 00
3/3/2014	RAP clinic	4
3/18/2014	presentation to Ruby's Place regarding Centro services	10
3/24/2014	RAP clinic	25 fliers
3/25/2014	Hayward Eden Church Multipractice Clinic	50
3/28/2014	East Bay Community Law Center	25
3/28/2014	Eviction Defense Center - presentation	25
3/28/2014	Oakland Tenant's Union - presentation	25
3/28/2014	Cause Justa West Oakland	31
3/28/2014	Causa Justa East Oakland	31
4/7/2014	RAP clinic	5
4/14/2014	RAP clinic	7
4/21/2014	RAP clinic	5
4/28/2014	RAP člinic	5
4/23/2014	Street Level presentation	8
4/23/2014	emailed the inspections unit of code compliance with copies of the fliers	1
4/25/2014	email to Cleveland Heights Neighorbood Group listserv RE RAP Clinic	787
4/1/2014	Centro interview with Bay Area Focus - CBS* *reached television audience up to 25,000 people	
5/12/2014	RAP clinic	5
5/19/2014	RAP clinic	6
5/1/2014	KPFA radio housing announcement	20,300
6/2/2014	RAP clinic	5
6/9/2014	RAP clinic	6
6/16/2014	RAP clinic	4
6/23/2014	RAP clinic	6
6/30/2014	RAP clinic	4
	TOTAL OUTREACH*	32,404.00

^{*}Does not include television audience