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MEMO

TO: Senate chairs and minority leads of committees to which SF 1298 has been referred

House of Representatives chairs and minority leads of committees to which HF 917 has been referred.

FROM: Christian Larson, LBO Director

DATE: September 29, 2023

SUBJECT: Local Impact Note Request: SF 1298 (Oumou Verbeten) – Tenants’ Rights

Enclosed is the local impact note for SF 1298-2E (Oumou Verbeten) – Tenants’ Rights, requested by Senator Eric Pratt, as the ranking minority member of the Senate Finance Committee.

The Legislative Budget Office (LBO) is charged with coordinating the development of local impact notes under Minnesota Statute 3.987. Local impact notes focus on the impact of proposed legislation on political subdivisions, understood to include local entities such as cities, townships, counties, and school districts.

The local impact note provides a summary of the bill, a description of the methodology used in the development of the note, and analysis developed by the LBO regarding the fiscal impact of SF 1298 on local units of government. The local impact note is available electronically on the [LBO website](#).

If you or your staff have any questions about the local impact note process, please contact LBO Coordinator, Kathryn Ho, at 651-297-7146.

cc: Senate Fiscal Staff
House Fiscal Staff
LBO Staff

Committee leadership receiving a copy of Local Impact Note:

Senator Liz Boldon
Senator Nick Frentz
Senator Ron Latz
Senator Warren Limmer
Senator Eric Lucero
Senator John Marty
Senator Clare Oumou Verbeten
Senator Lindsey Port
Senator Eric Pratt

Representative Esther Agbaje
Representative Jamie Becker-Finn
Representative Heather Edelson
Representative Cedrick Frazier
Representative Pat Garofalo
Representative Michael Howard
Representative Brian Johnson
Representative Liz Olson
Representative Peggy Scott

Local Impact Note

2023-2024 Legislative Session
Minnesota Legislative Budget Office

Senate File 1298-2E – Tenants’ Rights

Authors: Oumou Verbeten; Boldon; Mohamed; Pha
Date: September 29, 2023

Local Fiscal Impact	FY2024	FY2025	FY2026	FY2027
Total Estimated Range of Costs Per Fiscal Year	\$93,000 to \$207,000	\$102,000 to \$226,000	\$102,000 to \$226,000	\$102,000 to \$226,000

Executive Summary

Senate File 1298-2E is a collection of tenants’ rights bills drafted in the 2023 legislative session. SF 1298-2E, Section 15 provides a right to counsel for defendants in public housing eviction actions when certain allegations are at issue and the defendant is financially unable to obtain counsel. The right to counsel section was the only portion of the legislation identified as having a fiscal impact to local units of government. To trigger the court-appointed counsel, the eviction action must allege breach of lease under Minn. Stat § 504B.171 (2022) or Minn. Stat. § 504B.285 (2022). Public housing eviction actions that allege non-payment only, under Minn. Stat. § 504B.291 (2022), are excluded.¹

Eviction actions alleging non-payment only are filed in greater numbers than any other type of eviction action. Filings for breach of lease and the tenants eligible for the right to counsel in this legislation are a small percentage of all eviction filings in the state. A 2016 report by the Minneapolis Innovation Team found that 93 percent of eviction filings are non-payment actions without other allegations.² The right to counsel applies only to public housing tenants, reducing the number of eligible tenants further.

Based on 2018–2022 data from local government entities and a literature review of reports and studies on right to counsel programs nationwide, the local fiscal impact to counties for SF 1298 is estimated to range between \$93,000 to \$207,000 in fiscal year (FY) 2024 and \$102,000 to \$226,000 in FY2025 and beyond. The LBO’s estimated impact range is a result of determining an estimated number of hours of attorney work per case times, a well-established contracted attorney rate, and an estimated cost per case found in the literature review. The estimated impact is broken down to demonstrate per county impact in the Analysis section.

The unknowns that could influence actual impact are the courts’ interpretation of the statute, the lack of information on expunged cases, the complexity level of each eligible case, and each county’s ability to establish an attorney compensation method. The Legislative Budget Office

(LBO) based the estimates upon full representation for eligible public housing tenants. Full representation is defined in the Methodology section using various data sources including Minneapolis' data following the implementation of the city ordinance on a comparable right to counsel program and literature review of right to counsel programs in other states. Full representation legal services include settlement discussions and court appearances with the tenant.³

Bill Description

This local impact note uses the language from SF 1298-2E as the basis for the analysis. This language was incorporated into SF 2909, the Public Safety and Finance Policy omnibus bill that was passed during the 2023 Minnesota legislative session. SF 1298-2E, Sec. 15 creates Minn. Stat. § 504B.268 (2023). The section provides for a right to counsel in certain public housing eviction actions. The right to counsel language was determined to have a fiscal impact to local units of government.

The complaint shall inform defendants of the right to court-appointed counsel and, if the defendant is determined to be financially unable to obtain counsel, the court shall ask defendants who are facing eviction when there is an alleged breach of lease under § 504B.171 or § 504B.285 if they want court-appointed counsel and explain the benefits of having counsel pursuant to § 504B.268 subd. 1.

The qualifications established for court-appointed counsel under § 504B.268 subd. 2 include: (1) minimum of two years' experience with public housing evictions, (2) training in handling public housing evictions, or (3) supervised by an attorney who meets qualifications specified in (1) and (2).

The chief judge of the judicial district is to consult with public housing attorneys, legal aid attorneys, and members of the private bar in the district on an annual basis to determine the compensation rate for court-appointed attorney fees and costs, which shall not exceed \$5,000, pursuant to § 504B.268 subd. 3. The chief judge has discretion to award costs over the \$5,000 limit if determined necessary to provide fair compensation and for reimbursement of reasonable expenses.

Public housing tenants will have the right to counsel beginning August 1, 2023.

Methodology

The LBO examined the legislation to identify any direct local fiscal impact and determined the counties will bear the cost for public housing tenants' right to counsel. The LBO sent a request to the bill author for information on the policy goals, intent and scope, performance standards, and if there were other sources of revenue for the right to counsel. The LBO received and reviewed responses from the bill author.

The LBO gathered data from local entities with similar right to counsel programs and consulted with, requested, and received data from the City of Minneapolis and Hennepin County. The LBO reviewed right to counsel fiscal notes completed by the Minnesota Judicial Branch as well as incorporated information from fiscal notes that discussed attorney contract rates drafted by Minnesota's Public Defense Board.

The LBO examined primary research sources relating to evictions and reports on right to counsel in eviction action programs nationwide. The LBO studied housing programs with a right to counsel component in the cities of Minneapolis, Baltimore, Cleveland, and the City of New York, as well as programs in the states of Connecticut, Maryland, and Washington.

Local Government Data

Minneapolis established the city's right to counsel program and provided data that included covered individuals, covered proceedings, and types of legal services, as those items are defined in the city ordinance from which we drew comparisons to SF 1298-2E.⁴ The City of Minneapolis provided raw data of evictions filed by Minneapolis Public Housing Authority (MPHA) and number of cases filed since 2018 that allege breach of lease.

Hennepin County's interactive Evictions Dashboard contained percentages of eviction judgments by case types.⁵ The data allowed the LBO to calculate percentages that assisted in creating equations upon which to base impact estimates. The percentages calculated closely corresponded to percentages stated in the literature review of housing and right to counsel programs nationwide.

The LBO validated data from the Minnesota Judicial Branch's right to counsel fiscal notes in previous sessions by corroborating Hennepin County's raw monthly eviction filing data to verify statewide eviction filing numbers. Hennepin County's data did not include expunged cases, so Judicial branch data on expunged case counts were considered in corroborating the yearly totals. To estimate an average number of evictions per fiscal year, the LBO considered the total number of eviction filings in the state of Minnesota for a three-year period (FY2018, FY2019, and FY2022). The LBO used counts from the three years that were least affected by the eviction moratorium. To estimate the percentage of those cases that would be eligible for the right to counsel under the language of SF 1298-2E the LBO accounted for the type of tenants (public housing tenants) and the type of filing.

Literature Review and Data from Other States

After reviewing right to counsel programs in the cities of Baltimore and Cleveland, and the states of Connecticut, Maryland, New York, and Washington, and several research articles, the LBO estimated the number of hours required to handle an eviction case while gaining a thorough understanding of the types of legal services provided. The review also identified that although percentages of non-payment filings far outnumber cases filed for breach of lease or failure to vacate, non-payment cases often contain complex issues in addition to overdue rent. It is unknown how the court will address the non-payment actions when public housing tenants make the court aware of substantive legal issues such as defective housing conditions. Below are synopses of some right to counsel program literature reviewed by the LBO:

Connecticut

The Stout report, an annual evaluation prepared for the Connecticut Bar Foundation, made multiple comparisons to the cost of evictions upon the community's social services and sheltering resources when individuals and families lose their housing versus keeping families housed through representation. The report found that the cost to prevent an eviction through representation was approximately \$2,000.⁶

Maryland

The January 2022 Report of the Maryland Access to Counsel in Evictions Task Force found an average of eight hours per case, acknowledging this was less than found in other jurisdictions where the average time is between 10 and 15 hours.⁷ The report estimated an attorney would handle 244 cases per year, with most being full representation cases. The report noted this is a heavy caseload expectation.⁸

Washington State

The Washington State Office of Civil Legal Aid reported that as the program had only begun in January 2022 it was too early to state a cost per case.⁹ The average attorney time from appointment through resolution of a contested eviction case ranges between 10 and 15 hours. The average time period cited from appointment through case closure was 77 days.¹⁰

Research Articles

Cities – The International Journal of Urban Policy and Planning’s article, “Eviction from Public Housing in the United States” found that 5.8 percent of all eviction filings are by public housing agencies.¹¹ The article emphasized that percentages varied across geographic locations and public housing eviction rates were strongly influenced by local practices.

A research article on a right to counsel in evictions program in the Georgetown Journal on Poverty Law and Policy defined the types of legal assistance provided in eviction actions from the most basic brief advice to full representation.¹² Full representation includes an attorney meeting with the tenant client to understand case specifics, evaluating the merits of the case, making factual inquiries into the legal elements of the case, determining legal issues or defenses,¹³ providing ongoing client counseling, preparing pleadings, motions and settlement agreements, negotiation with the landlord or opposing counsel, discovery, depositions, and appearing in court.¹⁴ Here, the Minnesota right to counsel statute does not provide definitions of covered proceedings or covered legal services so the LBO sought to provide a definition of the anticipated services in the estimate.

Legal Services Corporation Office of Data Governance & Analysis (Office) prepared a data note, “The Effect of State and Local Laws on Evictions,” in which the Office determined a national average of the cost of legal representation per eviction case ranges from \$2,000 to \$2,500.¹⁵ The cost ultimately is dependent on factors such as jurisdiction location and eviction procedural laws.¹⁶

Further information obtained during the literature review is included in the Analysis section.

Analysis

Assumptions

Public housing in Minnesota is owned and managed by public housing authorities throughout the state.¹⁷ Renters in public housing pay 30 percent of their income for rent. Public housing includes housing units owned by a public housing authority (PHA) and project-based vouchers for housing in a specific building with unit assigned if the rental housing is operated by or paid for by a PHA. Private landlords and Section 8 housing are excluded from this definition.¹⁸ Private landlords initiate eviction proceedings for Section 8 housing vouchers and not the PHA.

The standard for the court in determining financial eligibility for court-appointed counsel is Minn. Stat. § 611.17. The author of SF 1298-2E assumed this would be the same standard applied to

determine that a tenant was financially unable to secure counsel. The LBO assumed that tenants who qualify for public housing would meet the eligibility standard under Minn. Stat. § 611.17.

The LBO estimated the percentage of cases brought under § 504B.171 or § 504B.285 where the defendant is a public housing tenant. Specific criteria for the right to counsel is the complaint must allege breach of lease in a public housing action. The LBO was unable to find data that specified the type of allegation by landlord and so the LBO merged data that addressed the right to counsel criteria. The data shows how many evictions the housing authorities filed but doesn't distinguish between non-payment and breach of lease cases. The LBO used Minneapolis' breach of lease filing data and Hennepin County's evictions judgments data to find percentages of breach of lease filings to apply to statewide eviction filings. It is unknown how the court will interpret the right to counsel if it becomes aware that a public housing non-payment only eviction action contains substantive legal issues, affirmative defenses, or procedural deficiencies.

It is unknown if defendants in expunged cases were public housing tenants, if they were represented by counsel, or would have qualified for court-appointed counsel under this legislation. It is also unknown what percentage of these eviction cases may have included the statutory claims under § 504B.171 or § 504B.285. The LBO used the same estimated percentage of qualifying defendants in expunged cases as the percentage used in known cases. Table 1 provides information on expunged case counts.

The enhancements to tenants' rights in other sections of SF 1298-2E create additional procedural requirements for landlords including a 14-day notice period prior to an eviction action being filed with the court. Notices must contain directions on how to seek legal and financial assistance. The LBO noted that the advisement in the notice doesn't specify there is a right to counsel for public housing tenants in certain actions. Once before the court, eligible public housing tenants would be advised of their right to counsel. The LBO assumes that the right to counsel includes full representation.

The analysis below demonstrates there is limited applicability and limited local impact as the right to counsel encompasses a small percentage of eviction filings.

[Analysis and Estimate of Local Costs](#)

This local impact note looks at the potential costs to counties by bringing in inferences from other housing right to counsel programs, both local and out of state, while maintaining the nuances specific only to this legislation.

Number of All Eviction Filings in Minnesota

The Governor's Executive Order 20-14 instituted an eviction moratorium beginning March 23, 2020. The Order remained in effect until a phase out began in August 2021 allowing landlords to file evictions for non-payment if tenants were ineligible for COVID-19 emergency rental assistance in August and September 2021. The final phase of eviction protections applied when eligible tenants had a COVID-19 emergency rental assistance application pending during the period of October 2021 through June 2022. Effective June 1, 2022, all eviction protections ceased. Table 1 provides a count of eviction filings reported by the judicial branch in FY2018-FY2022.¹⁹ Because filings in both FY2020 and FY2021 were impacted by the moratorium's strictest limits on eviction filings, those fiscal years were deemed not representative of filings in

future years and were not used in calculations in the local impact note; however, the data is provided for informational purposes.

Table 1. Minnesota Statewide Eviction Action Filings Reported by the Judicial Branch

Fiscal Year	Total Eviction Filings	Expunged Filings	Expungement Percentage
FY2018	17,780	1,629	9.2%
FY2019	17,617	1,915	10.9%
FY2020*	13,675	2,057	15.0%
FY2021*	2,349	488	20.8%
FY2022	14,984	2,528	16.9%
Total FY2018, FY2019, FY2022	50,381	6,072	12.1%

*Indicates fiscal years not used in estimate calculations.

An analysis of past eviction filings indicates an average of 12.1 percent of all filings were expunged (for years FY2018, FY2019, and FY2022). SF 1298-2E creates added automatic expungement opportunities in the eviction procedural requirements for failure to attach notice to the complaint or summons and other filing or service deficiencies. The City of Minneapolis' statistics and Hennepin County's data do not include expunged cases. The LBO impact estimates use the total filings from the Judicial Branch assuming that public housing actions are represented in the expunged cases in counts similar to their representation in all filings. Figuring the Judicial Branch's totals after accounting for expunged cases as shown in Table 1 allowed the LBO to corroborate Hennepin County's raw data totals.

Determination of Eviction Filings from Public Housing

To determine the percentage of eviction filings in Minnesota that are filed by a public housing authority, both local government data and research data were studied. Table 2 shows the yearly percentages of filings in Hennepin County by MPHA.

Table 2. Percentage of all Hennepin County cases filed by MPHA

Calendar Year	Hennepin County Total Eviction Filings	Minneapolis Public Housing Authority Filings	Public Housing Filings as a Percentage
CY2018	4,249	284	6.7%
CY2019	4,231	268	6.3%
CY2020*	1,090	60	5.4%
CY2021*	704	11	1.6%
CY2022	4,898	138	2.8%
Total CY2018, CY2019, CY2022	13,378	690	5.2%

*Indicates calendar years not used in estimate calculations.

In Calendar Years 2018, 2019, and 2022, 5.2 percent of eviction filings (not including expunged cases) were filed by a public housing authority. The percentage closely corroborated the

findings in a national study from 2006 through 2016 that concluded public housing authorities filed 5.8 percent of all eviction filings nationwide.²⁰

Local Impact Calculations

The average of eviction filings in Minnesota (see table 1) in fiscal years 2018, 2019, and 2022 is 16,794. Using the judicial branch’s statistics allows the inclusion of expunged cases. The average percentage of eviction filings that were filed by MPHA in Hennepin County for calendar years 2018, 2019, and 2022 is 5.2 percent. While the National Low Income Housing Coalition 2022 report found a somewhat higher national average of 5.8 percent the study also noted that percentages were dependent upon local factors. One example of such a factor is that MPHA has a process to handle issues that arise between tenants and the housing authority prior to seeking an eviction. The practice potentially resolves some matters prior to moving in the direction of an eviction filing.

Because the city’s statistics do not include expunged cases, and it is assumed that some of the public housing authority’s cases would be expunged prior to the numbers provided to the city, the LBO used the judicial branch’s total filing data. The city tracks total judgments based upon type so the LBO applied those percentages to case filing numbers assuming that expunged cases would be made up of a similar composition as cases that proceeded through the court process.

To estimate the number of eviction cases filed by public housing authorities in the state of Minnesota each fiscal year the LBO applied the estimated percentage of public housing filings (5.2 percent) to the average number of eviction filings in Minnesota (16,794):

$$5.2 \text{ percent} \times 16,794 = 873$$

It was more difficult to locate data for the type of allegation in the filings. The judicial branch does not track eviction filings according to the statutory claims within the filing. To obtain a percentage of filings that included breach of lease allegations, the LBO looked at data collected by Hennepin County regarding eviction judgments (see Table 3). While this percentage specifically represents cases that end in the tenant being evicted, it provides a useful data point in estimating how many cases might be eligible for court-appointed counsel.

Table 3. Hennepin County Breakdown of Breach of Lease and Failure to Vacate Evictions

Calendar Year	Hennepin County Judgments Resulting in Evictions	Hennepin County Percentage of Eviction Judgments due to Breach of Lease or Failure to Vacate
CY2018	1,371	11%
CY2019	1,359	10%
CY2020*	282	79%
CY2021*	393	73%
CY2022	1,801	18%

* Note: The percentages for calendar years 2020 and 2021 are greatly impacted by the moratorium on non-payment only eviction filings.

The percentages for calendar years 2020 and 2021 are greatly impacted by the moratorium on non-payment only eviction filings. January and February 2020 were both 6 percent failure to vacate and breach of lease actions combined with March 2020 at 36 percent when the moratorium commenced and April 2020 through June 2021 at 100 percent. July 2021 saw the return of non-payment filings and they steadily increased in frequency. During the first six months of CY2022, there were limited eviction protections for non-payment allegations that were phased out by June 2022. The last six months of 2022 averaged 89 percent of judgment evictions due to non-payment.

The evictions judgments data for CY2018, CY2019 and CY2022 indicates an average of 13 percent of all evictions are due to breach of lease. The LBO's local impact estimates account for the percentage of all filings that are filed by a public housing authority and the percentage of those filings that contain the required statutory allegations to compute an estimate of tenant defendants that will be offered court-appointed counsel because of this legislation. Non-payment only filings are excluded although it is noted that public housing tenants who appear before the court may bring forth issues that increase the complexity of those cases to include affirmative legal defenses for non-payment such as retaliation defenses or defective housing conditions. The LBO has no data upon which to evaluate how the courts will handle those non-payment cases.

To estimate the number of public housing actions in Minnesota that may be eligible for court-appointed counsel each fiscal year, the LBO applied the assumed percent of evictions due to breach of lease (10.5 percent) to the estimated number of evictions filed by public housing authorities (873):

$$13 \text{ percent} \times 873 = 113$$

To calculate the potential cost to the counties, the LBO looked at two methods of attorney compensation, hourly and per case. Average time to defend an eviction case varied from eight to 15 hours in the reports reviewed for this local impact note.²¹ For this analysis the LBO estimated 12 hours. If 12 hours per case is multiplied by the estimated 113 cases, the estimated attorney hours per fiscal year are 1,356.

$$113 \times 12 = 1,356$$

The chief judge of each judicial district will determine a rate of compensation to be paid for court-appointed counsel. They will work with public housing attorneys, legal aid attorneys, and members of the private bar to develop a compensation rate for court-appointed counsel that is commensurate with current rates charged by attorneys who contract with the state in other court-appointed counsel situations. It is unknown if qualified attorneys will be difficult to locate in some counties as there are statutory requirements to qualify an attorney. The LBO acknowledges counties will take different approaches to establish a pool of attorneys or connect with county legal services agencies from which to appoint representation.

The research identified two possible cost analysis methods, hourly contract, or cost per case. The LBO calculated both to reach a range of potential costs to counties. Fiscal notes prepared by the Public Defense Board used \$75.00 per hour for the attorney contract rate in 2023.²² The Public Defense Board is well positioned to understand contract rates of attorneys.

The chief judge will have to consider the qualifications of the attorneys within the pool or the attorneys that would be appointed through an organization as all must meet the minimum standards in the legislation. Using the Public Defense Board estimate for the contract attorney rate at \$75.00 per hour, The LBO calculated potential costs to local units of government multiplying the rate times the total hours to defend in eligible public housing cases. The estimate for FY2024 was determined using 11 months to account for the effective date of August 1, 2023.

$$(1,356 \times \$75)/12 \times 11 = \$93,225 \text{ (FY2024)}$$

$$1,356 \times \$75 = \$101,700 \text{ (FY2025-27)}$$

The second approach to calculating the local impact to local units of government is cost per case. The literature review indicated that \$2,000 per case was estimated in other right to counsel programs.²³

We calculated the potential local impact by multiplying the estimated number of eligible public housing eviction filings by \$2,000 to reach an estimated cost based upon per case full representation.

$$(113 \times 2,000)/12 \times 11 = 207,167 \text{ (FY2024)}$$

$$113 \times 2,000 = 226,000 \text{ (FY2025-27)}$$

Using data on eviction by Minnesota county provided by Hennepin County, the LBO broke down the potential cost to counties based on the county's percentage of filings in Table 4.²⁴

Table 4. Statewide Cost Broken Down by County

County	Percent of all Minnesota Eviction Filings	Ongoing Cost of Estimate per County Hourly Contract (Est. \$102,000 per 12 months)	Ongoing Cost of Estimate per County Based on per Case Estimate (Est. \$226,000 per 12 months)
Hennepin	27.7%	\$28,254	\$62,602
Ramsey	18.3%	\$18,666	\$41,358
Dakota	9.7%	\$9,894	\$21,922
Stearns	3.9%	\$3,978	\$8,814
St. Louis	3.4%	\$3,468	\$7,684
Washington	3.1%	\$3,162	\$7,006
Clay	2.5%	\$2,550	\$5,650
Olmstead	2.3%	\$2,346	\$5,198
Remaining 79 MN counties*	29.1%	\$29,682	\$65,766
Total	100%	\$102,000	\$226,000

*Remaining 79 MN counties have less than 2 percent share each.

Conclusion

SF 1298-2E provides a right to counsel for defendants in public housing eviction actions in limited circumstances. Sources including local government entities and nationwide literature review were used to reach the LBO's local impact estimate. The Minnesota statute is limited in comparison to the right to counsel programs researched in two ways. First, the right to counsel is for tenants in public housing, rather than all low-income tenants, and second, the legislation grants the right to counsel to breach of lease actions with a smaller percentage of filings falling into this category. The impact is estimated to be around \$226,000 per fiscal year statewide at the top of the estimated cost range.

There are unknowns related to the number of defendants that will be advised or could request court-appointed counsel based upon the courts' interpretations of the legislation. This note assumes the right to counsel applies to approximately 13 percent (based upon eviction judgment statistics by type of allegation from Hennepin County) of all public housing filings which are estimated to be 5.2 percent of the filings in the state of Minnesota.

There are factors that will influence local impact such as courts' interpretations, expunged cases, and case complexity. The local impact estimate acknowledges the legislation's cost flexibility and considers a median reported number of hours to resolve eviction actions and an average cost per case. The chief judge of each county's judicial district, in consultation with legal professionals in the district's community, determines the compensation rate for court-appointed attorney fees and costs. The ranges estimated in this note are below the established per case maximum in the legislation.

This note assumes that as court-appointed counsel, the attorney performs full representation services for the tenant. The level of complexity of each case is unknown and will be a factor in the number of hours attorneys will spend defending the actions. Alternative methods were presented to illustrate cost estimates using both average hours to defend an action and average cost to defend an action. Either approach reflects minimal local impact to implement and sustain the right to counsel in the limited eviction actions in this legislation.

References

- ¹ Laws of Minnesota 2023, chapter 52, article 19, section 89.
- ² Minneapolis Innovation Team (2016, July) Evictions in Minneapolis, 2.
- ³ Steinberg, Jessica K. (2011), In Pursuit of Justice? Case Outcomes and the Delivery of Unbundled Legal Services, Georgetown Journal on Poverty Law & Policy, Volume 18, 479.
- ⁴ Minneapolis, Minn., Code of Ordinances, Title 7 – Civil Rights, ch.143 (2023).
- ⁵ “Hennepin County Eviction Dashboard,” (2023, June), <https://app.powerbigov.us/view?r=eyJrIjoiYzQ1NDQyYzUtZDY2Zi00OTIxLThiZDgtZGQ3MwYwZjM5NmQ0IiwidCI6IjhhZWZkZjlmLTg3ODAtNDZiZi04ZmI3LTRjOTI0NjUzYThiZS9j>.
- ⁶ “Connecticut Eviction Right to Counsel Annual Independent Evaluation,” Stout for the Connecticut Bar Association, December 30, 2022, 102 https://www.stout.com/-/media/pdf/evictions/stout-2022-independent-evaluation-ct-rtc_final_2022-12-30.pdf.
- ⁷ “Report of the Access to Counsel in Evictions Task Force,” January 2022, 25, [ATC Task Force Report.pdf \(marylandattorneygeneral.gov\)](#).
- ⁸ “Report of the Access to Counsel in Evictions Task Force,” January 2022, 25.
- ⁹ “Report to the Legislature on Implementation of the Appointed Counsel Program for Indigent Tenants in Unlawful Detainer Cases,” July 28, 2022, 2, <https://ocla.wa.gov/wp-content/uploads/2022/07/OCLA-Report-to-the-Legislature-Implementation-of-Indigent-Tenant-Right-to-Counsel-FINAL-7-28-22-.pdf>.
- ¹⁰ “Report to the Legislature on Implementation of the Appointed Counsel Program for Indigent Tenants in Unlawful Detainer Cases,” July 28, 2022, 10.
- ¹¹ Gromis, Ashley, Hendrickson, James R., Desmond, Matthew, Eviction from Public Housing in the United States, Cities – International Journal of Urban Policy and Planning Volume 127, August 2022, 1.
- ¹² Steinberg, In Pursuit of Justice?, 463.
- ¹³ Steinberg, In Pursuit of Justice?, 466.
- ¹⁴ Steinberg, In Pursuit of Justice?, 479.
- ¹⁵ Legal Services Corporation (2023, July) The Effect of State and Local Laws on Evictions, 1, 3.
- ¹⁶ Legal Services Corporation (2023, July) The Effect of State and Local Laws on Evictions, 2.
- ¹⁷ “Public Housing Evictions,” LawHelpMN.org Education for Justice, <https://www.lawhelpmn.org/self-help-library/fact-sheet/public-housing-evictions>.
- ¹⁸ “Minnesota Public Housing Agencies,” Affordable Housing Online, <https://affordablehousingonline.com/housing-authorities/Minnesota>.
- ¹⁹ Staff of MN S. Comm. on Housing, SF 98 (2023) Fiscal Note 1 (January 30, 2023) (on file with committee); State of MN H.R. Comm. on Judiciary Finance and Civil Law, HF 125 (2023) Fiscal Note 1 (January 30, 2023); State of MN Comm. on Housing Finance and Policy; HF 450 (2021) Fiscal Note 1 (February 8, 2021).
- ²⁰ Gromis, Hendrickson, and Desmond, Eviction from Public Housing in the United States, 1
- ²¹ “Report of the Access to Counsel in Evictions Task Force,” January 2022, 25; Report to the Legislature on Implementation of the Appointed Counsel Program for Indigent Tenants in Unlawful Detainer Cases,” July 28, 2022, 10.
- ²² Staff of MN S. Comm. on Judicial and Public Safety, SF 1478 (2023) Fiscal Note 1 (February 27, 2023); State of MN H.R. Comm. on Public Safety and Finance, HF 1406 (2023) Fiscal Note 1 (February 27, 2023).
- ²³ “Connecticut Eviction Right to Counsel Annual Independent Evaluation,” Stout for the Connecticut Bar Association, December 30, 2022, P. 102; Legal Services Corporation (2023, July) The Effect of State and Local Laws on Evictions, 1, 3.
- ²⁴ “Hennepin County Eviction Dashboard,” (2023, June).