PRIORITIZATION IN EMERGENCY RENTAL ASSISTANCE PROGRAMS:

A FRAMEWORK OF STRATEGIES, POLICIES, AND PROCEDURES TO BETTER SERVE PRIORITY POPULATIONS

APRIL 2021

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NATIONAL LOW INCOME
HOUSING COALITION

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INTRODUCTION

The COVID-19 public health crisis and its accompanying economic fallout have disproportionately impacted renters with low incomes, hitting Black and Latino/a people hardest. Researchers estimate that as of January 2021, over 10 million renters were behind on their rent and owed approximately $57 billion in rental arrears.[1] Though unemployment trends are slowly improving, as of March 2021, 9.6% of Black and 7.9% of Latino/a individuals were unemployed compared to 6% of the general population.[2] Similarly, renters of color were more likely to be behind on their rent as of March: 22% of Black renters, 20% of Latino/a renters, and 19% of Asian renters were behind on their rent compared to 9% of white renters.[3] Among renters who were behind on their rent, 42% anticipate being evicted from their homes in the next two months despite an ongoing national eviction moratorium. Black, Latino/a and Native American people have also been disproportionately likely to get sick and die from COVID-19.[4]
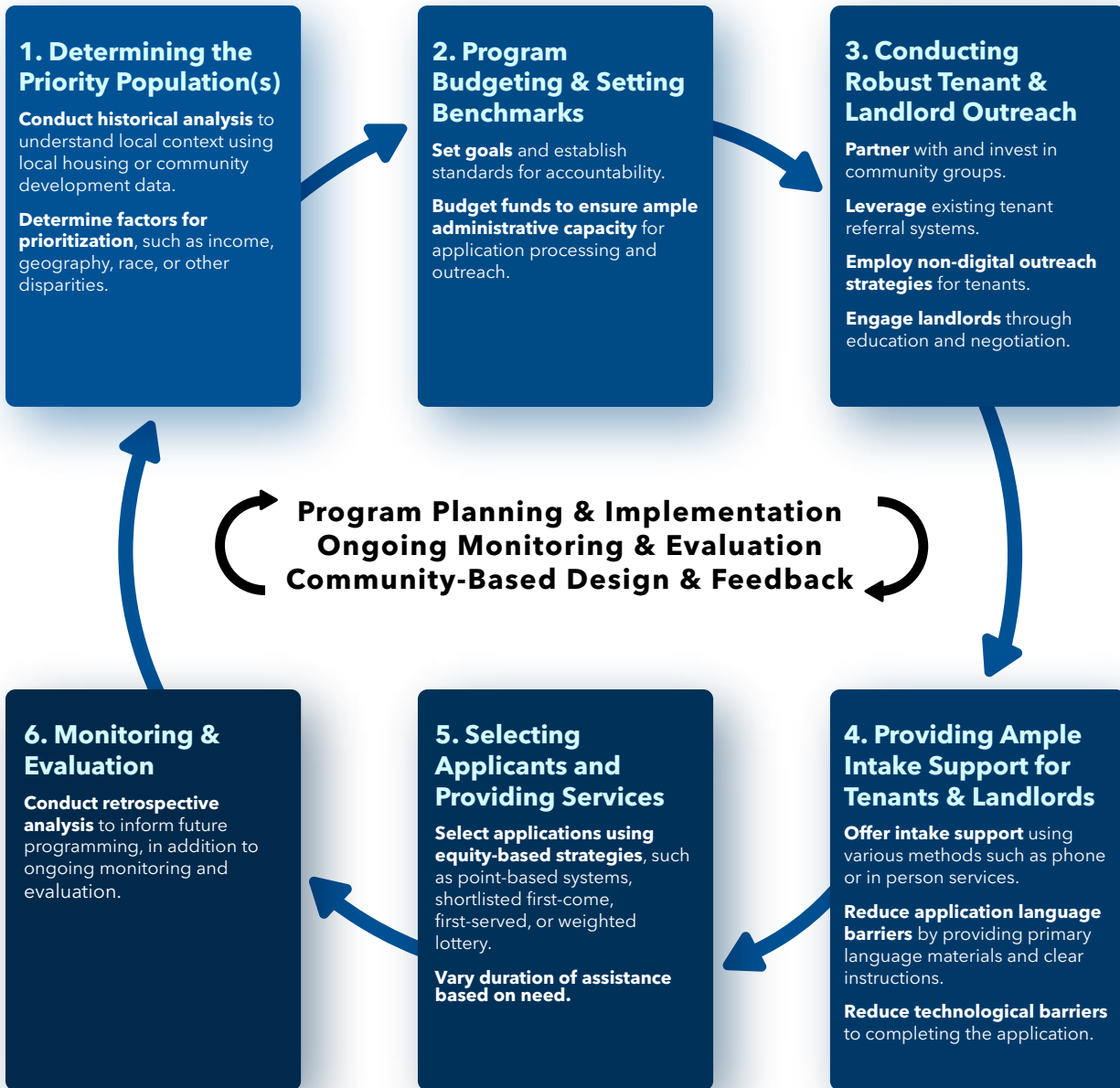
The COVID-19 relief package signed into law in December 2020 included $25 billion in urgently needed emergency rental assistance for tenants with low incomes and established the Emergency Rental Assistance program (ERA) administered by the U.S. Department of the Treasury. The "American Rescue Plan Act," enacted in March 2021, provides an additional $21.55 billion for ERA for a grand total of $46.55 billion in emergency rental assistance. The available funding is unprecedented in scale, but program administrators may nevertheless find that demand for assistance outstrips the supply. States, localities, territories, and tribal entities responsible for distributing much-needed emergency rental assistance to tenants and their landlords must, therefore, do so equitably and with significant consideration for those most impacted by COVID-19 and at greatest risk of housing instability – in particular, Black and Latino/a renters.

By statute, households are eligible under the Treasury ERA Program if (1) one or more individuals qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship directly or indirectly due to the pandemic; (2) the household can demonstrate a risk of homelessness or housing instability; and (3) household income is at or below 80% of their area median income (AMI). The statute adds that administering entities must prioritize household with incomes below 50% of AMI or with members who have been unemployed for 90 days or more; administrators can incorporate additional criteria to prioritize applicants. Neither the statute nor guidance from the U.S. Department of the Treasury have addressed how programs might implement prioritization of specified populations.

Of the 500+ emergency rental assistance programs created prior to the December package and in rapid response to COVID-19, a previous NLIHC study found that fewer than 70 were designed to prioritize certain applicants beyond the general eligibility requirements.[5] Upon follow up with some of these program administrators, we found that programs varied in how and which stages they prioritized their specified priority populations.

Prioritization is commonly thought of as happening only in the applicant selection process. However, with careful planning and investment of time and resources, it can and should happen during every stage of emergency rental assistance administration. Furthermore, clarifying a program's goal and prioritized population can help to focus resources and administrative capacity and make programs operate more efficiently.

This research brief introduces a framework for how emergency rental assistance programs can incorporate strategies, policies, and procedures that embed equity and give priority at every step of the program process to renters most impacted by COVID-19 and at greatest risk of housing instability, particularly Black and Latino/a/a renters. The report outlines key decision points and actionable strategies for prioritizing populations following the graphic below: (1) determining the priority population(s); (2) program budgeting & setting benchmarks; (3) conducting robust tenant & landlord outreach; (4) providing ample intake support for tenants & landlords; (5) selecting applicants and providing services; and (6) monitoring and evaluation. In order to maximize how many people in the priority population(s) receive support, program administrators must center the priority population(s) at each step of program planning and evaluation.

1. Determining the Priority Population(s)

Conduct historical analysis to understand local context using local housing or community development data.

Determine factors for prioritization, such as income, geography, race, or other disparities.

2. Program Budgeting & Setting Benchmarks

Set goals and establish standards for accountability.

Budget funds to ensure ample administrative capacity for application processing and outreach.

3. Conducting Robust Tenant & Landlord Outreach

Partner with and invest in community groups.

Leverage existing tenant referral systems.

Employ non-digital outreach strategies for tenants.

Engage landlords through education and negotiation.

**Program Planning & Implementation
Ongoing Monitoring & Evaluation
Community-Based Design & Feedback**

6. Monitoring & Evaluation

Conduct retrospective analysis to inform future programming, in addition to ongoing monitoring and evaluation.

5. Selecting Applicants and Providing Services

Select applications using equity-based strategies, such as point-based systems, shortlisted first-come, first-served, or weighted lottery.

Vary duration of assistance based on need.

4. Providing Ample Intake Support for Tenants & Landlords

Offer intake support using various methods such as phone or in person services.

Reduce application language barriers by providing primary language materials and clear instructions.

Reduce technological barriers to completing the application.

> **"** Administrators should engage with community members, tenants' rights organizations, and trusted community groups and nonprofits to learn more about how local housing policies have impacted Black, Indigenous, and other community members of color and how the local ERA program can best support them.

1. DETERMINING THE PRIORITY POPULATION(S)

The first step in program prioritization is identifying the priority population(s). It is critical to determine the priority population(s) during the program planning phase in order to intentionally design a program that best serves that population. This section compiles resources for program administrators to determine their priority populations using available quantitative data and historical analysis. Once the priority population(s) have been determined, administrators can then develop strategies, policies, and procedures that will increase the number of people within those groups who both apply for and receive financial assistance.

CENTERING RACIAL EQUITY AND PARTICIPATORY PROCESSES

Programs should utilize publicly available data and resources to center racial equity in ERA program design and integrate community-based participatory processes. By designing programs that prioritize people who have been historically discriminated against, excluded, and displaced, administrators can begin to repair the community's trust in local government, state agencies, and public housing authorities. The cumulative impact of chattel slavery, segregation, and racist housing and urban policies on the Black community, as well as our nation's long history of excluding Native, Asian, and immigrant communities from federal housing programs has profoundly shaped which groups disproportionately experience extremely low incomes, housing insecurity, and homelessness. Program administrators should examine their jurisdictions' histories to understand how racist policies have resulted in disinvested neighborhoods and racial disparities in housing locally. Administrators should also engage with community members, tenants' rights organizations, and trusted community groups and nonprofits to learn more about how local housing policies have impacted Black, Indigenous, and other community members of color and how the local ERA program can best support them.

Partnering with people in the prioritized population to co-design programs is crucial. Administrators soliciting input and feedback from people in the prioritized population need to also adequately compensate them for their time and expertise. Administrators can also reach out to direct service organizations that are led by and for prioritized populations, tenants' rights organizations, and community groups to develop the ERA program together. One potential model that administrators could borrow is the Resident Advisory Board (RAB), a group of residents that advise the local public housing authority (PHA) on its five-year plan. All PHAs are required to have at least one RAB.

RESOURCES:

- **The Framework for an Equitable COVID-19 Response** engaged historically marginalized communities to create population-specific briefs on policy priorities amid COVID-19.

- **Timeline of 100 Years of Racist Housing Policy**: This timeline outlines a history of racist land-use and housing policies from 1865 through 2019.

- **Mapping Inequality – Redlining in New Deal America**: The Digital Scholarship Lab at the University of Richmond developed an interactive map that captures the history of redlining in cities across the United States.

- **Segregated by Design**: This short film, a condensed version of Richard Rothstein's book *The Color of Law*, explains how federal, state, and local policies segregated neighborhoods nationwide.

- **4th World Movement Guidelines**: These guidelines provide information on how to create long-term, sustained partnerships with people with lived experiences. These processes are exemplified in their Hidden Dimensions of Poverty project.

PRIORITIZATION BY INCOME

As mentioned previously, Treasury ERA program administrators must prioritize households with very low incomes (50% AMI or less) or households in which a member has been unemployed for 90 days or more.

Program administrators may also want to further target households with extremely low incomes or households that are severely housing cost-burdened, those spending more than 50% of their incomes on their housing. People of color are much more likely than white people to have extremely low incomes: 20% of Black households, 18% of American Indian or Alaska Native households, 14% of Latino/a households, and 10% of Asian households are extremely low-income renters, compared to 6% of white non-Latino/a households.[6]

The Department of Housing and Urban Development (HUD) calculates AMI as a percentage of median income by metropolitan region or county, adjusted by household size. AMIs for metropolitan areas may include an economically diverse set of neighborhoods: wealthy suburbs and neighborhoods in one county of the region can skew the AMI for renters with low incomes that predominantly live in the urban core or another low-income part of an area. Thus, administrators should use income thresholds for the most specific geographic area available.

PRIORITIZATION BY OTHER HOUSING-RELATED FACTORS

Program administrators should consider a variety of housing-related data, COVID-19 data, and other relevant data in identifying geographic areas for prioritization, such as share of renter-households, rate of severely housing cost-burdened renters, rates of evictions and eviction filings, incidence rate of COVID-19, death rate due to COVID-19, unemployment rates, and more.

Program administrators can use household characteristics and neighborhood data to prioritize households with high needs without requiring extensive additional information from applicants. For example, program administrators can map indicators of housing instability and demographics to identify ZIP codes or census tracts where renters are most at risk of housing instability. Programs may then use the identified geographies as an additional prioritization factor.

Some program administrators create composite indicators, also called an index, by weighting several data variables of interest together at the ZIP code or census tract level and map the composite indicators out to identify communities of greater need. Program administrators may also use preexisting indices, such as the CDC Social Vulnerability Index, which identifies communities that most likely need support in the case of emergency events, or the Urban Institute Emergency Rental Assistance Prioritization Index, which identifies communities with the greatest risks of housing instability.

Even when local data are not available, program administrators can create priority groups based on characteristics or identities that have been documented to increase an applicant's likelihood of being evicted. Researchers have found that having children is the single greatest predictor of whether someone will be evicted,[7] and, disproportionately, these parents are Black and Latina mothers who spend 50% or more of their income on rent.[8] In addition, our nation's limited enforcement of civil rights legislation continues to enable segregation, pushing Black, Brown, and immigrant communities into neighborhoods where the public sector has consistently failed to make investments.

RESOURCES:

- **American Community Survey**: The American Community Survey has data on select characteristics of housing and housing cost burden, which details the number and percentage of households who spend more than 30 to 50% of their incomes on rent. This data can be further disaggregated by geographic level and demographic characteristics.

- **The Eviction Lab Map & Data**: The Eviction Lab at Princeton University records data on rates of evictions and eviction filings for states and counties across the United States. These data can be used to identify areas that are at high risk of eviction or housing instability. The Eviction Lab also produced a report on racial and gender disparities among evicted renters nationwide.

- **The CDC COVID Data Tracker**: The COVID data tracker has maps and charts tracking cases, deaths, vaccinations, and trends of COVID-19 in the United States. This tool can be used to locate your community and find county-level data for these data points and more. Information is updated daily.

- **The Urban Institute's Emergency Rental Assistance Priority Index**: The Index includes an interactive map that enables administrators to prioritize rental assistance in the counties and census tracts disparately impacted by eviction and homelessness. The Index assigns each census tract a percentile score that indicates the tract's risk of housing stability compared to other tracts within the state. This percentile score is made up of three subindexes that measure the share of households in every census tract who were likely to experience housing instability pre-pandemic, are vulnerable to COVID-19 infection or related job loss, and experience inequities because of racist housing and land-use policies that have historically prevented Black, Latino/a, and Indigenous populations from building wealth. The Urban Institute recommends using this tool in conjunction with a community-based approach which could include analysis of local datasets and partnering with groups that are disproportionately impacted by eviction and homelessness.

EXAMPLES:

- **Oregon Housing and Community Services** is planning to use the Urban Institute data to prioritize applications for individuals in census tracts at the highest risk of housing instability, assigning points based on the quartile that each census tract's percentile score falls under. A census tract scoring between the 75th and 100th percentile will receive 10 points, a tract in the 50th to 74th percentile will receive 8 points, and so on. These scores will be paired with prioritization based on the number of months delinquent, household size, and households that experienced displacement due to the 2020 Oregon wildfires.

- **Communicating to California Renters: Understanding the Geography of Needs**: The California Governor's Office of Planning and Research produced a series of maps to help program administrators identify and communicate with housing cost-burdened renters at risk of eviction. These maps disaggregate county-specific data on rent-burdened households by unemployment status, race and ethnicity, and linguistic isolation—all using data sourced from the U.S. Census Bureau.

- **San Diego County** is prioritizing renters with low incomes who live in areas that experience health inequities using the Healthy Places Index.

CONSIDERATIONS FOR ELIGIBILITY CRITERIA AND DOCUMENTATION REQUIREMENTS

Program administrators should be aware that documentation requirements designed to ensure that programs benefit only those with the greatest need can perversely deter members of the priority population(s) from applying. Asking for a Social Security number is prohibitive to people who are undocumented. Asking applicants for source documentation for income discourages people who are unemployed, paid in cash, or unbanked from applying. Requiring that applicants provide a lease excludes people without formal leases with landlords. Programs allowing for self-attestation and promoting that with tenants can lower barriers in the application process and ensure that the tenants with the greatest need are included in the applicant pool.

2. PROGRAM BUDGETING AND SETTING BENCHMARKS

Program administrators can show their commitment to serving the priority population(s) by being intentional and transparent about their program's goals and budgetary decisions. By establishing goals and concrete benchmarks, programs can track and monitor their progress toward meeting the needs of the priority population(s) in real time. Budgetary decisions determine program design, including a program's capacity to conduct intensive outreach, provide support services, and develop partnerships with locally embedded community groups.

SET GOALS AND ESTABLISH STANDARDS FOR ACCOUNTABILITY

Setting goals is an important step in intentionally prioritizing targeted populations: goals provide the foundation from which programs can establish standards for measuring their effectiveness and success.

Programs should actively engage members of the priority population(s) in the process of determining a primary goal, as these decisions drive multiple aspects of program design. For example, a program intending to reduce evictions may focus its efforts on diverting eviction cases in court, paying rental arrears, arranging legal services and mediation, and negotiating non-eviction clauses in landlord-tenant agreements. A program with a mission to support housing stability may focus its efforts on paying future rent, extending leases, and connecting tenants with other benefits to boost overall financial stability.

However, goals are frequently too broad and may lack the specificity required to ensure programs stay on track in serving the targeted population. Establishing specific standards for accountability and continuous evaluation helps ensure the targeted population is prioritized as intended. The U.S. Treasury Department requires programs to track program indicators by race, ethnicity, and income levels, and programs can establish their own performance benchmarks using required program data. For example, programs may establish that 50% of households served by the program must have extremely low incomes or that the share of Black households served must at least be proportional to the share of Black households in the community.

Once programs set specific benchmarks and goals, they need to identify the data necessary to measure these goals and methods for data collection. Applicant data will largely be collected through the rental assistance application, including indicators required by the U.S. Department of Treasury. Other programmatic data relevant to measuring the success of the program may include the average time to complete an application, landlord uptake of the program, or tenant reception of the program. Program administrators may reach out to local universities for additional capacity to create protocols for data collection and conduct an evaluation afterwards.

Programs should share their progress towards established goals and benchmarks with the public to ensure transparency and maintain program accountability. Some programs have live trackers, while others produce one-page interim progress reports or charts. Tracking progress on goals and benchmarks are integral to monitoring and evaluation. Though this report separates monitoring and evaluation into its own phase (see Section 6), monitoring and evaluation are ongoing processes that start with setting goals and benchmarks. These processes should continually provide contemporaneous feedback on how program planning and implementation are going and should ultimately conclude with an outcome evaluation after the program has ended.

> "Monitoring and evaluation are ongoing processes that start with setting goals and benchmarks. These processes should continually provide contemporaneous feedback on how program planning and implementation are going.

EXAMPLES:

- The **State of Washington** Eviction Rent Assistance Program required that the share of households being served by the program be proportional to the populations of color living in poverty in each county. County-level grantees reported their progress regularly, and grantees who were not on track to meeting their benchmarks by the time they spent 50% of their funds were required to submit a plan to the State on how they would address the gap.

- The **City of Tacoma, Washington** devoted 45% of its rental assistance program funds to community agencies serving primarily households of color on a referral basis; the City distributed the remaining 55% through lottery to general program applicants.

BUDGET FUNDS TO ENSURE AMPLE ADMINISTRATIVE CAPACITY

Emergency rental assistance programs require significant administrative capacity and infrastructure to run smoothly, but administrators can use only a limited share of the programs' budget on such costs. The U.S. Treasury Department recently clarified that the 10% cap on administrative spending in the December COVID-19 relief package is separate from the 10% cap on housing stability services. In other words, programs may use up to 10% of the 90% of funds reserved for direct financial assistance for administrative costs and up to 10% of the 10% of funds reserved for housing stability services for administrative costs. The American Rescue Plan includes a slightly higher cap on administrative funding at 15%. If needed, programs may use other local, state, federal, or even philanthropic funding streams to boost administrative capacity.

Administrators need to invest their resources wisely on several key aspects, including: adequate staff to review and process applications, maintain consistent communication with tenants and landlords, and

support people struggling with the application process; infrastructure and technology to support application review and processing workflows for staff and provide user-friendly online portals for tenants and landlords; adequate funding to partner with and increase the capacity of community groups administering the program; capacity to solicit feedback from key stakeholders, with appropriate compensation for people with lived experiences; and program evaluation.

3. CONDUCTING ROBUST TENANT AND LANDLORD OUTREACH

Outreach strategies should geographically target the priority population(s) and may include conducting outreach through existing referral systems, trusted community partners, or even door-to-door knocking. Program administrators also need to engage directly with landlords to ensure that priority applicants receive timely assistance.

PARTNER WITH AND INVEST IN COMMUNITY GROUPS

Administrators should partner with community groups, such as grassroot organizations, nonprofits, churches, and neighborhood groups, to implement emergency rental assistance programs to expand the program's potential applicant pool. Community partners' roles and responsibilities will vary depending on their capacity and may include reaching out to tenants, providing intake support, reviewing applications, reaching out to landlords, processing payments, or implementing multiple facets of the program. Community groups are uniquely situated to provide tenant and landlord outreach as they have pre-existing relationships and trust from community members.

EXAMPLES:

- The **State of Washington** required grantees to partner with "by and for" organizations whose primary missions and histories are serving a specific community and are substantially controlled by individuals from the community they serve. Many of these groups have not historically worked in or been invited into the housing space before, but their ties to their communities were hugely impactful in ensuring that the program served historically marginalized populations. These collaborations on the emergency rental assistance program have formed the foundation for future partnerships.

- The **State of Wisconsin** is partnering with United Migrant Opportunity Services to administer the Treasury Emergency Rental Assistance program and to reach migrant workers and diverse underserved populations.

- The **State of Oregon** worked with the Oregon Human Development Corporation to reach agricultural workers statewide in its CARES Act-funded Oregon COVID Rent Relief Program.

LEVERAGE EXISTING TENANT REFERRAL SYSTEMS

Programs should consider using existing assistance networks and systems to refer priority populations to the program. For example, programs prioritizing those most at risk of homelessness should consider partnering with their local Continuum of Care (CoC) or other homeless service providers to refer individuals contacting these organizations to the rental assistance programs. Programs prioritizing those most at risk of eviction may partner with Legal Aid or local courts to know when eviction filings occur and to intervene before households are evicted. Program administrators can also establish referral systems to connect applicants to other public benefits and services they may be eligible for, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Medicaid, or tenant/landlord mediation services.

- **New Orleans, Louisiana** is receiving court filings to reach those with the highest likelihood of eviction and is also receiving referrals through their CoC, local housing authority, and the city's 311 number.

- **Orange County, North Carolina** has also partnered with their CoC to receive referrals through their existing Coordinated Entry system. This partnership has helped the program target households with the highest needs; over 75% of rental assistance funds in Orange County have gone to households earning less than 30% of AMI.

EMPLOY NON-DIGITAL OUTREACH STRATEGIES FOR TENANTS

Programs should carefully consider how prioritized populations typically consume media and information. Programs using primarily social media and mainstream news outlets to inform the public of available rental assistance may better reach digitally-savvy, English-speaking populations. To reach some priority populations, programs need to use their preferred news and information outlets. For example, Spanish-speaking populations may prefer consuming news from Spanish-language radio, news channels, and newspapers, or trust information coming from leaders within their community. If their targeted populations tend to live in specific neighborhoods, programs may also want to implement on-the-ground canvassing-type strategies, going door-to-door to share information, handing out flyers, or dropping off application packets.

EXAMPLES:

- The **Neighborhood Engagement Office** of **New Orleans, Louisiana** is sending staff to priority neighborhoods to talk with community members about rental assistance. They are also posting and handing out flyers in these neighborhoods.

ENGAGE LANDLORDS THROUGH EDUCATION AND NEGOTIATION

According to the Joint Center for Housing Studies, over half of renters who are likely to have experienced a loss in wages or unemployment due to the pandemic live in single-family and small multifamily rentals with 2–4 units.[9] Landlords of single-family and small multifamily rentals tend to be individual investors or "mom and pop" landlords.[10] Small landlords may lack familiarity with such programs and need more individualized education about how emergency rental assistance works, what the process looks like, and where to initiate or complete their portion of an application for assistance. Larger landlords may have prior experience with federal housing programs, but likely still need significant education and messaging that participating in their community's ERA Program is their best option. In negotiating with landlords, administrators may leverage the ongoing CDC eviction moratorium, other local tenant protections at play in their states and localities, and the low likelihood of recouping rental arrears through eviction combined with associated legal fees incurred. They may also find that the opportunity for payment of future rent from ERA programs and for paying for multiple units of eligible tenants can help persuade landlords.

EXAMPLES

- In **King County, Washington**, administrators found that a large share of renters with very low incomes and working in industries impacted by COVID-19 tended to live in large apartment complexes in certain ZIP codes, a unique feature of their community's housing market. Administrators reached out to landlords of these buildings and actively engaged them. In exchange for bulk payment for all eligible tenants and their arrears, landlords agreed to waive late fees, not terminate or refuse to renew leases through the end of the following year, and not evict tenants for nonpayment of rent paid by the program.

4. PROVIDING AMPLE INTAKE SUPPORT FOR TENANTS AND LANDLORDS

Application support services increase the inflow of applicants from the prioritized population(s) and decrease barriers for both tenants and landlords applying to the program. Tenants and their landlords may have limited digital literacy, low access to technology, or prefer non-English languages as their primary language. Application support services bridge those gaps by providing intake support. This may include partnering with trusted organizations to help tenants and landlords complete applications, providing one-on-one assistance and follow-up, offering applications in different languages, and providing different methods for applicants to complete applications (e.g., online, over the phone, or on paper).

OFFER INTAKE SUPPORT USING VARIOUS METHODS

Many tenants need additional support to fill out their application for emergency rental assistance. Application systems available online may be challenging to understand without additional assistance over the phone or in person (physically distanced and with appropriate PPE). For example, tenants who are undocumented or living in informal rental arrangements may have questions about how the application process affects their situations. They may also need additional assistance collecting necessary documentation. Programs should offer additional support to tenants in filling out their applications to help them understand how the application process works and to answer questions.

LEVERAGE COMMUNITY-BASED PARTNERSHIPS

Community-based partners can answer specific questions about the application, help tenants and landlords complete the application, and provide primary language support. Community-based partnerships are particularly important when working with prioritized populations who may lack trust or confidence in government. Direct support from these organizations can make prioritized populations feel more comfortable by working closely with them, answering questions and providing guidance, which can mitigate confusion and increase their likelihood of applying. Landlords may be wary of participating for a variety of reasons. Some landlords may be reluctant to participate because they are renting out illegal rental units. Some landlords may be undocumented and need additional support to understand how the program affects them.

> " Community-based partnerships are particularly important when working with prioritized populations who may lack trust or confidence in government. Direct support from these organizations can make prioritized populations feel more comfortable by working closely with them, answering questions and providing guidance, mitigating confusion and increasing their likelihood of applying.

EXAMPLES:

- The **Santa Clara County Homelessness Prevention System in California** worked with a network of grassroot community groups to conduct targeted outreach and provide intake support to tenants and landlords. Community groups adopted several ad hoc strategies to support tenants in completing their applications, including application delivery to tenants' doorsteps and outdoor "home" visits to help fill out forms or capture photos of documents. Many landlords were also immigrants themselves and were wary of the tax and legal consequences of accepting assistance, including fear of potential ICE raids based on information needed for tax purposes. Community groups developed relationships with these landlords and offered support through the application process, explaining what would be required of the landlords, what the process looked like, and the overall benefits of the rental assistance program.

REDUCE LANGUAGE BARRIERS TO COMPLETING THE APPLICATION

Administrators should ensure that applications use plain language that tenants can understand easily. Program administrators need to assess local language needs and have linguistically appropriate resources available for all priority populations and their landlords. Doing so will help decide which languages the program should provide application materials in for both tenants and landlords. Materials should be translated by qualified translators – Google Translate is inadequate and can result in serious errors.[11] Furthermore, some English words may lack an appropriate translation or may have a different interpretation based on cultural values and understanding. Thus, programs should also have multi-lingual support staff or contracted services so that non-English speakers can receive one-on-one application support.

EXAMPLES:

- **King County, Washington** provided its 2020 application in 28 languages, and 18% of applicants completed an application in a language other than English.

- **Charlotte, North Carolina** provides its online application in Spanish and English, but works with a translation service so that applicants can complete the application over the phone in the language of their choice.

- The **State of Minnesota** provided its application and related materials in English, Spanish, Somali, and Hmong and used a language hotline so that applicants of all languages could access application support.

- The **Center for Pan Asian Community Services** works with rental assistance programs across the State of Georgia to help tenants apply; its staff speaks over 15 languages.

REDUCE TECHNOLOGICAL BARRIERS TO COMPLETING THE APPLICATION

COVID-19 has also highlighted the country's significant digital divide – the differential access that certain individuals and groups have to computers and internet. The digital divide disproportionately impacts certain populations, including residents with low incomes, racial and ethnic minorities, and older residents.[12] To overcome the digital divide and ensure applications are accessible to prioritized populations and their landlords, programs should offer the application in a variety of ways. Programs should offer a hotline for tenant and landlord applicants to complete their application over the phone. Programs may also consider offering options for applicants to mail in applications, or to pick them up and drop them off at designated drop boxes. They should also make online applications mobile friendly, designed to use a minimum of data, and tested on a range of devices including older ones. Common software for Emergency Rental Assistance programs, such as Neighborly, often include this functionality.

> " The digital divide disproportionately impacts residents with low incomes, racial and ethnic minorities, and older residents. To overcome the digital divide and ensure applications are accessible, programs should offer the application in a variety of ways.

EXAMPLES:

- **Wilmington, North Carolina's** Eviction Prevention Program used a dedicated mailbox in front of their building where people could take a blank paper application, complete it, and return in in the same mailbox. A program administrator notes the mailbox has seen a lot of activity and has proven very useful as an alternative to the online application.

- **Baldwin County, Alabama** has an Emergency Rental Assistance Program Hotline, which can be used by individuals who are unable to access the online application or who experience technical difficulties.

5. SELECTING APPLICANTS AND PROVIDING SERVICES

Strategies that aim to maximize the number of priority households who apply to the program are integral to reaching prioritized population(s). Administrators need to also embed equity into the selection processes used to determine the order by which members of the eligible population receive financial support and the amount received. This section summarizes strategies related to application selection and differential service provision to expedite service and funding for priority households.

SELECT APPLICATIONS USING EQUITY-BASED STRATEGIES

Research indicates that most programs select applicants on a first-come, first-served basis or by a randomized lottery[13]. Both of these selection methods, however, have the potential to disadvantage or exclude priority households. This section details how administrators can embed equity into their selection processes by creating two separate pools of eligible applicants: those from the priority population and those from the general population.

Points-Based Systems

Using a points-based system, administrators assign each applicant points based on a set of characteristics or identities. Then, applicants with the greatest number of points are assisted first. As it relates to Emergency Rental Assistance programs, administrators often overlay the first-come, first-served or lottery selection methods with a points-based system to separate out priority applications from the general pool of eligible applicants. Points-based systems recognize that every applicant has intersecting identities that could compound their risk of housing insecurity.

Administrators implementing a points-based system need to have a holistic understanding of who in their community is at the greatest risk of housing insecurity before determining which characteristics or identities are assigned points (see Section 1). If a characteristic or identity that should be prioritized did not make it on the list, it might lead to delayed assistance for those households.

EXAMPLES:

- **Tarrant County, Texas** is assigning points to determine the order in which applications are processed. As detailed in their FAQ, applicants with current eviction cases receive 5 points, applicants unemployed for 90 days or more receive 5 points, and applicants with incomes below 50% of AMI receive 10 points. Other applications that do not receive any points under these criteria but otherwise meet eligibility requirements will be reviewed after all prioritized applications.

Shortlisted First-Come, First-Served

Programs that use the first-come, first-served method select eligible applicants in the same order in which they apply. This method can disadvantage people who do not have stable access to the internet or face language barriers. These disadvantages are less of a concern for programs that received enough federal dollars to meet the needs of renters fully, but a modified first-come, first-served approach can allow programs to serve prioritized populations more quickly without straining administrative capacity.

To prioritize applicants using the shortlisted first-come, first-served method, administrators can flag all applications from priority households that come in during the application window. Programs then serve these flagged applications using the first-come, first-served model, but separately from general population applications. For example, some programs earmark funds to be used specifically for shortlisted households to ensure there is enough available funding to meet the full needs of the priority population. Other programs merge selection processes, shortlisting prioritized applications to be selected first-come, first-served, while directing non-prioritized applications through a lottery system.

- **New Orleans, Louisiana** set aside 30% of its funding for neighborhoods at a high risk for eviction. These neighborhoods were identified using previous eviction patterns and data from local courts on individuals who have received an eviction filing from their landlord.

- **Los Angeles County, California** created and assigned an area deprivation index to every ZIP code in the county in the first iteration of its emergency rental assistance program. Administrators then prioritized ZIP codes that scored high on the index, publishing the list on their website. Applications that included a mailing address within one of the priority ZIP codes were shortlisted for assistance on a first-come, first-served basis, while all other eligible applicants were selected to receive assistance by randomized lottery.

Weighted Lottery

In a simple lottery, eligible applicants are chosen to receive assistance at random after a set application window. This method mitigates some of the disadvantages that come with the first-come, first-served method, but choosing applicants at random does not guarantee that the population(s) with the greatest need receive rental assistance.

Weighting applications prior to conducting a lottery can help ensure that those from priority households receive assistance. In this design, applications weighted the highest or assigned the greatest number of points are generally selected first. It is important for administrators using this method to select applicants in phases to provide timely assistance. Short, recurring selection windows create consistency for the applicant, the landlord, and the program administrators.

EXAMPLES:

- In **Austin, Texas**, applications are selected every Friday at noon, with highest priority groups drawn first. Before selection, administrators divide eligible applicants into four separate groups and assign points (0-3) based on the applicant's level of need. Applicants within the first group, which consists of households with incomes less than 30% of AMI and where a member has been unemployed for 90+ days, are randomly selected to receive assistance first, with the other priority groups to follow. The city is transparent about who makes up the priority population(s), publishing informational videos like this one to educate renter households on their eligibility.

VARY DURATION OF ASSISTANCE BASED ON NEED

Though little research exists on differential rental arrears across demographic groups, other data – such as unemployment duration – suggest that COVID-19 has caused a disproportionate financial hardship for Black, Latino/a, and low-income renters. This prolonged hardship may mean that priority populations are further behind on their rent. As a result, they may require additional months of future rent or a greater amount of funding per month to ensure housing stability. Programs can alter service delivery, including program duration and funding allocation, to make sure prioritized households receive the assistance needed to remain stably housed.

Several programs listed below offer examples for how administrators can design programs to assist priority households for a longer duration of time. Though these examples emphasize differential services based on applicants' incomes, programs may also provide differential services based on other indicators, such as ZIP code, presence of children, or whether the household has an active eviction filing.

EXAMPLES:

- The **State of Michigan's** COVID Emergency Rental Assistance Program, funded through the U.S. Treasury Department and administered by the Michigan State Housing Department, offers longer arrearage payments for those with lower incomes. Renters with incomes of 0% to 50% of AMI can receive up to 12 months of rental assistance, while those with incomes of 50% to 80% of AMI can receive up to 10 months of assistance. In both cases, up to 3 months of this funding can be used for future rent, so this configuration effectively covers two additional months of assistance for those in lower income bracket.

- **San Antonio, Texas's** Emergency Housing Assistance Program allows applicants to receive 9 months of assistance if they have incomes below 50% of AMI, and 6 months of assistance if they have incomes between 51% and 80% of AMI.

6. MONITORING AND EVALUATION

Ongoing evaluation is critical to assess whether the program is meeting its previously established goals and benchmarks for serving prioritized populations and ensuring equity. Process evaluations assess progress, areas for improvement, and potential solutions. Outcome evaluations or retrospective analysis can be done once the program concludes to assess how the program worked overall and to make policy and procedural changes for future programming.

Policies and programs designed with intentions to reach prioritized populations may not produce their intended results. For this reason, evaluations are essential to identifying areas for improvement in each step of the program model. The Government Alliance on Race & Equity (GARE) has produced tools to help administrators design evaluations with an equity framework, such as the Racial Equity Toolkit: An Opportunity to Operationalize Equity and Racial Equity: Getting to Results. These tools help administrators answer questions such as: 1) How will you ensure accountability, communicate, and evaluate results, 2) What are the community indicators that would measure the desired result, and 3) What do the data tell us?

Recent research from the Housing Initiative at Penn, the NYU Furman Center, and the National Low Income Housing Coalition offers actionable ways for program administrators to advance racial equity in ERA programs. Their report, *Advancing Racial Equity in Emergency Rental Assistance Programs*, suggests collecting process-related data to continually assess how the program is operating and whether real-time corrections are needed.[14] The report also suggests collecting data on (1) program outreach, including who receives outreach and the type of outreach; (2) application data, including who submits applications, who starts but does not submit applications, and who submits incomplete applications; (3) participation, including who drops out of the process and reasons people are deemed ineligible; (4) assistance, including who receives assistance, amount of funding received, and duration of assistance; and (5) landlord compliance, including whether landlords are adhering to terms of the program.[15] This type of data will help inform which program phase(s) need more support or capacity, and which program phase(s) are reaching or surpassing their goals.

CONDUCT REAL-TIME EVALUATION OF PROGRAM PROGRESS, MAKING CORRECTIONS AS NEEDED

Ongoing analysis allows programs to assess whether procedures worked as intended, if households from the priority population(s) are applying, and what successes or challenges there are in serving the prioritized population. Real-time evaluation allows programs to amplify the successful parts of their programming, while correcting areas where barriers exist. GARE notes that the usefulness of data collection and analysis is dependent on the transparency of the data and regular data analysis.[16]

> " Real-time evaluation allows programs to amplify the successful parts of their programming, while correcting areas where barriers exist. Programs can use program dashboards to provide transparent, regular data analysis, inform program corrections, and communicate program progress.

Several programs make their process data publicly available through the use of program dashboards. These dashboards offer examples of transparent, regular data analysis that can inform program corrections and communicate program progress. Further, they can provide examples of the type of data programs could collect and how to present this data effectively. Importantly, this data should capture data specific to the identified prioritized populations to assess how well the program is serving these individuals.

- **San Antonio, Texas's** COVID-19 Emergency Housing Assistance Program Dashboard provides data on the number of applications received, processed, and in progress, along with data on how much funding has been expended, the average assistance per person, and average assistance per household. This interactive dashboard also allows users to examine data across geography, demographics, and months.

- **Alexandria, Virginia's** COVID-19 Emergency Rent Relief Dashboard provides high-level data on the number of applicants, number of applicants awarded funds, and total funds awarded along with a map of census tracts and the share of funding awarded within those areas. The dashboard also contains information on trends of funding awarded over time, preferred contact languages, and demographic information.

- **Dallas, Texas's** Rental/Mortgage Assistance Programs Dashboard has high-level information about the number of applications processed and amount awarded by funding source. The dashboard also features the number of ineligible applicants and reasons why they were deemed not eligible, which could help administrators assess whether individuals were falling through the cracks or identify flaws in their application process. Also included is a map of the number of assisted households by ZIP code.

CONDUCT RETROSPECTIVE ANALYSIS TO INFORM FUTURE PROGRAMMING

Retrospective analysis and outcome evaluations that follow a program's completion can assess how successful the program was in meeting its previously established goals. This type of evaluation can also identify shortfalls and successes to apply in future iterations of rental assistance programming. Importantly, retrospective analysis can help programs understand which strategies encouraged participation from the priority population(s) and which program inhibited/discouraged participation from the priority population(s). This type of analysis can be done by analyzing programmatic data collected throughout the program's lifespan but may also include additional data collection and evaluation efforts, such as tenant and landlord surveys, interviews, or focus groups.

EXAMPLE:

- **King County, WA** recently released a report on its Eviction Prevention and Rental Assistance Program that provides a template for how programs can conduct a retrospective analysis. From the beginning, King County's program set a target that 58% of households served would be Black, Indigenous and people of color (BIPOC). To do this, administrators prioritized ZIP codes with high COVID-19 impacts, collaborated with trusted community-based organizations, and provided applications in 28 languages. The program's retrospective analysis shows that these methods were largely effective, as BIPOC households made up 76% of households who received assistance. Through administrative data and surveys with tenants, King County also identified several areas for improvement to be implemented in the next round of rental assistance funding. For example, Asian, American Indian/Alaska Native, and Native Hawaiian/Pacific Islander households were served at a relatively low rate compared to other races and ethnicities. As a result, the King County Department of Community and Human Services (DCHS) is partnering with more community-based organizations that explicitly serve these populations. Program administrators also determined that it was taking too long for some renters to receive their assistance, causing them to take out payday loans or go into credit card debt. To mitigate this, the program is contracting with a service to distribute funds more quickly.

7. CONCLUSION

COVID-19 has only exacerbated a pre-existing affordable housing crisis. Prior to the pandemic, over 7.7 million renters with extremely low incomes were spending more than half of their incomes on housing costs, and 567,000 individuals were experiencing homelessness on the streets or in shelters.[17] Due to historic structural inequality, including racist land-use policies, economic exploitation, and lasting discrimination, people of color bear the brunt of the affordable housing crisis and are more likely to be housing cost-burdened or to experience homelessness. As more funds are funneled to states and localities to provide urgently needed rental assistance, it is critical for programs to embed equitable processes that ensure households most in need of assistance, particularly households of color, receive ample funding to maintain housing stability.

The framework outlined in this report serves as a starting point for how program administrators can begin and continue to integrate prioritization methods into their ERA programs. Program administrators can and should further apply strategies outlined in this report to long term housing programs. While it is vital for current program administrators to embed prioritization and equity into housing-relief measures to mitigate increased inequality, only long term solutions to affordable housing that center racial equity can begin to address structural inequality.

ENDNOTES

1   Parrott, J. and Zandi, M. (2021, January). _Averting an Eviction Crisis._ Moody's Analytics.

2   U.S. Bureau of Labor Statistics. (2021). _Employment Situation – March 2021_. Washington, DC: U.S. Bureau of Labor Statistics.

3   U.S. Census Bureau. Household Pulse Survey Week 27 (March 17-29) Data Tables.

4   U.S. Department of Health and Human Services. (2020, October 30). _Disparities in rates of COVID-19 infection, hospitalization, and death by race and ethnicity_. Washington, DC: U.S. Department of Health and Human Services.

5   National Low Income Housing Coalition. (2021). NLIHC COVID-19 Rental Assistance Database. Washington, DC: National Low Income Housing Coalition.

6   Aurand, A. et al. (2021, March). The Gap: A Shortage of Affordable and Available Homes 2020. Washington, DC: National Low Income Housing Coalition.

7   Desmond, M. et al. (2013, Septemer). _Evicting Children_. Oxford, UK: Social Forces.

8   Hepburn, P. et al. (2020, December 6). Racial and Gender Disparities among Evicted Americans. Princeton, NJ: Eviction Lab.

9   Airgood-Obrycki, W. and Hermann, A. (2020, May 26). _COVID-19 Rent Shortfalls in Small Buildings._ Cambridge, MA: Joint Center for Housing Studies.

10   Airgood-Obrycki, W. and Hermann, A. (2020, May 26). _COVID-19 Rent Shortfalls in Small Buildings._ Cambridge, MA: Joint Center for Housing Studies.

11   Moreno, S. (2021, January 14). Virginia uses Google Translate for COVID vaccine information. Here's how that magnifies language barriers, misinformation. _Richmond Times Dispatch._

12   Barton, J. (2018.) Preparing Workers for the Expanding Digital Economy from Investing in America's Workforce: Improving Outcomes for Workers and Employers, 251-266. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research.

13   Yae. R. et al. (2020, October). _Emergency Rental Assistance Programs in Response to COVID-19_. Washington, DC: National Low Income Housing Coalition.

14   Gould Ellen, I. et al. (2021, March). _Advancing Racial Equity in Emergency Rental Assistance Programs_. The Housing Initiative at Penn, NYU Furman Center, and the National Low Income Housing Coalition.

15   Gould Ellen, I. et al. (2021, March). _Advancing Racial Equity in Emergency Rental Assistance Programs_. The Housing Initiative at Penn, NYU Furman Center, and the National Low Income Housing Coalition.

16   Bernabei, E. (2017, July.) _Racial Equity: Getting to Results_. Local and Regional Government Alliance on Race & Equity.

17   Aurand, A. et al. (2020). _Out of Reach: The High Cost of Housing_. Washington, DC: National Low Income Housing Coalition.