

III. ENSURING AN ACCESSIBLE EMERGENCY RENTAL ASSISTANCE PROGRAM

Emergency Rental Assistance:
A Blueprint for a Permanent Program



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EMERGENCY RENTAL ASSISTANCE: A Blueprint for a Permanent Program

2021-2022 NLIHC ERASE TEAM

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Ensuring an Accessible Emergency Rental Assistance Program

The households most in need of emergency rental assistance (ERA) can often face barriers navigating complex application systems and accessing support in time to avoid evictions. They may speak languages other than English, require reasonable accommodations, or lack email addresses, internet access, or access to other technology necessary to complete lengthy applications. They also may struggle to provide the documentation required by ERA programs. Burdensome documentation requirements, limited access to technology, and lack of translation services for ERA applicants can all prevent or delay the disbursement of ERA funding to households, resulting in greater housing instability, reduced equity, and a higher likelihood of eviction.¹

To ensure efficient and equitable access to ERA funds, the U.S. Department of the Treasury (Treasury) regularly updated and released guidance that aimed to reduce barriers for low-income and marginalized renters who were completing applications. Many state and local ERA programs used Treasury guidance to create an accessible, streamlined, and low-barrier ERA application process. By reducing unnecessary barriers in the application process, many program administrators were able to facilitate expedited access to and disbursement of emergency rental assistance to landlords and tenants in need. NLIHC recommends that emergency rental assistance programs be as simple, flexible, and accessible as possible, and that programs center racial equity and justice in their practices. To achieve these goals, permanent state and

local ERA programs, as well as future federal programs, should adhere to the following recommendations:

- ◀ Ensure adequate staff capacity, infrastructure, and partnerships to process applications and distribute funds equitably and efficiently.
- ◀ Prioritize households to advance equity in assistance.
- ◀ Minimize burdensome documentation barriers.
- ◀ Allow programs to provide direct-to-tenant assistance.
- ◀ Streamline application processing through the use of bulk payments to landlords and utility companies.
- ◀ Provide housing navigation services to assist with applications.
- ◀ Improve online application systems and address the technological divide.
- ◀ Ensure language access and provide translation services for non-English speakers.
- ◀ Ensure access for people with disabilities.
- ◀ Guarantee access to members of rural communities.
- ◀ Ensure access to ERA for Native American communities.

In this section, we explore each of these recommendations in detail, relying on examples drawn from ERA programs around the country to show how programs made ERA more accessible.

ENSURING ADEQUATE STAFF CAPACITY, INFRASTRUCTURE, AND PARTNERSHIPS TO PROCESS APPLICATIONS AND DISTRIBUTE FUNDS EQUITABLY AND EFFICIENTLY

ERA was an emergency program intended to be set up quickly in order to meet the crisis that millions of households faced due to the pandemic. However, many ERA programs were set up from scratch, necessitating the building of a new infrastructure where one may not have existed before. ERA programs needed to ensure adequate staffing to accept, review, and process applications and payments; to develop the infrastructure and technology to track applications, policies, and procedures; and to build relationships with other stakeholders, including tenants, community-based organizations, courts, and legal aid providers, to help streamline the disbursement of funds.

Programs needed to be equipped to receive an unprecedented number of ERA applications. They needed to have the capacity to support an application process that often required multiple interactions between tenants, landlords, and program administrators to obtain documentation to complete applications. In several surveys of ERA program administrators administered by NLIHC's research team and partners, 60-68% of respondents cited limited staff capacity as a challenge to the efficient distribution of funds.² However, programs that partnered with nonprofits were less likely to report capacity limitations than those that did not. They were also less likely to report incomplete applications as a challenge.³ Furthermore, programs with nonprofit partnerships had better spending outcomes compared to those without such partnerships.⁴

Building Capacity through Partnerships in Allegheny County, Pennsylvania

In Pennsylvania, expanding capacity through investments in partnerships, staffing, and infrastructure was critical to processing ERA applications equitably and efficiently. The [Allegheny County's COVID-19 Emergency Rental Assistance Program \(ERAP\)](#) contracted with ACTION-Housing, a longstanding housing and community development nonprofit in Pittsburgh, to lead the administration of emergency rental assistance.

Together, Allegheny County and ACTION-Housing developed a five-step program to process applications:

1. Tenants apply for ERA through Allegheny County's ERAP online portal. If a tenant is unable to access the online application, the tenant can call ACTION-Housing's phone hotline to receive application assistance.
2. The local YWCA, also a contractor with ERAP, collects the required documentation from ERA applicants, communicating with tenants when additional documentation is needed. The YWCA also conducts outreach to tenants, landlords, and district court judges to inform them of the availability of funds.
3. Once the YWCA collects all the required application materials from a tenant, the application moves to ACTION-Housing's staff to determine eligibility and provide preliminary approval.
4. After ACTION-Housing preliminarily approves the tenant's application, the Urban League of Greater Pittsburgh, a housing counseling organization, reaches out to the property owner to confirm that the tenant lives on the property and the amount of money owed, requests the landlord's financial documentation (i.e., a W-9 form), and determines how the landlord wants to receive payment.
5. ACTION-Housing staff review the full application, determine final eligibility (addressing any concerns about fraudulent applications), and send payment to tenants and landlords.

ACTION-Housing also subcontracted with 27 community-based organizations (CBOs) to conduct outreach and provide housing navigation assistance in its nine drop-in centers. These organizations helped tenants who lacked computer or internet access at home apply for ERA. In cases where tenants were unable to visit a drop-in center in person, staff would meet them in their homes or in convenient locations to provide assistance and support.

To build trust with CBOs and reduce the administrative burden on program administrators, Allegheny County paid the local organizations a monthly retainer, no matter how many applications they processed. The retainer provided financial support to local organizations that, in some cases, were struggling to stay afloat during the pandemic. The county also trained CBO staff and provided technical assistance to organizations regarding Treasury ERA guidance. In return, CBOs provided in-person application support to renters with the greatest needs.

Allegheny County's efforts to increase and train staff (approximately 80 at the height of the program) through community partnerships played a significant role in distributing rental assistance efficiently and equitably because the increased capacity allowed the program to offer online, phone, and in-person housing navigation assistance to marginalized communities with a diverse set of obstacles and needs. According to Allegheny County's ERAP Dashboard, as of September 29, 2022, 87% of households served had incomes below 50% of the area median income (AMI), 58% of ERA recipients identified as Black, and 71% of recipients identified as female.⁵ The county's ERAP data suggests that it is serving communities with the greatest need before those households are faced with eviction, homelessness, and long-term housing instability.

Employing Administrative Allocation to Build Staff Capacity in the State of Texas

In February 2021, the Texas Department of Housing and Community Affairs (TDHCA) launched the Texas Rent Relief Program, which became the first and only statewide rent and utility assistance program in Texas. TDHCA built its program from scratch, funding it solely through Treasury's federal ERA allocations.

As a large state, Texas received over \$2 billion in ERA from Treasury. Treasury's ERA program capped administrative expenses at 10% and 15% of grantees' ERA1 and ERA2 allocations, respectively, allowing Texas up to approximately \$200-300 million in funding for administrative purposes. TDHCA used its administrative dollars to quickly hire highly qualified staff for its internal team and contract with four external vendors. Internal staff provided program leadership, policy design, anti-fraud and quality control activities, and overall management support, while external vendors provided an online system for application submission and processing, conducted outreach and marketing, provided a call center and customer service, reviewed applications, processed payments to eligible households, and conducted quality assurance.

Initially, TDHCA contracted with one vendor, intending that the vendor would develop a software platform that the program would use to receive and process applications and pay out funds to landlords, tenants, and utility providers. However, due to the capacity required to review and process the large number of applications it was receiving, TDHCA decided to bring on two additional vendors to conduct application eligibility reviews using the same software platform. TDHCA also contracted with a fourth vendor early on to conduct quality assurance and ensure program integrity.

While there were logistical challenges coordinating with multiple vendors, TDHCA believes that hiring additional vendors was key to ramping up capacity and assisting households

in a timely way. At its height, the Texas Rent Relief Program employed a total of nearly 2,800 internal and contracted staff. TDHCA was able to take full advantage of remote work and external vendors, who could hire more quickly, to fully staff this newly launched rental assistance program. The increased staff that the large administrative allocation supported made it possible for the program to build an accessible model and efficiently process applications and distribute funds to help Texans promptly.

From the beginning, TDHCA wanted to create a program that was accessible and equitable for everyone across the state. Due in part to the increased capacity made possible by external vendors and significant administrative funds, Texas Rent Relief was able to provide an application process to tenants and landlords that was accessible online, by phone, and via mail-in paper applications. The program website and applications were available in the five most commonly spoken languages in the state (English, Spanish, Korean, Vietnamese, and Mandarin), and the call center offered staff support to complete applications in English and Spanish (with translation services available for other non-English speakers).

As a result, Texas Rent Relief served households in 250 of 254 counties in the state. As of August 2022, the Texas Rent Relief Program had paid out over \$2 billion in rental and utility assistance to more than 310,000 Texas households, serving more households than any other single program in the country with Treasury ERA funds. Of the households served, 82% were extremely or very low-income (at or below 30% or 50% of AMI, respectively), 24% were Hispanic or Latino, and 50% were Black, suggesting that the Texas program successfully reached the low-income and marginalized renters that the federal government's ERA program was intended to serve.⁶

PRIORITIZING HOUSEHOLDS TO ADVANCE EQUITY IN ASSISTANCE

The need for rental assistance in most places surpassed the amount of funding available. ERA programs most commonly selected applications on a first-come, first-served basis in an attempt to get funding out as quickly as possible. However, using a first-come, first-served system may inadvertently help applicants who face fewer barriers to applying for assistance and disadvantage historically marginalized populations who may have reduced access to information about the programs, language barriers, or no internet access. To overcome this sort of systemic bias, several programs utilized strategies to intentionally prioritize emergency rent assistance for those most in need.

Prioritization requires intentionality and planning before implementation but can be incorporated into program design on an ongoing basis and should not slow administrators down when it comes to implementing emergency rental assistance programs. Furthermore, clarifying a program's goal and prioritized population can help to focus resources and administrative capacity and make programs operate more efficiently.⁷ For example, some ERA programs utilized publicly available data and resources to prioritize census tracts with higher rates of unemployment or COVID-19 infections; others used a points-based system to prioritize applicants in the selection process; and some devoted a portion of rental assistance program funds to community agencies primarily serving households of color on a referral basis.

Administrators typically integrated points-based prioritization systems into their application software, assigning applicants points based on a set of characteristics or identities. Then, applicants with the greatest number of points were assisted first. 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.⁸ For example, the State of Oregon's Emergency Rental Assistance Program (OERAP) used a points-based system based on six housing instability factors to determine which applications would be reviewed and assisted first. The core intention was to utilize objective data to deploy resources to households facing the highest acuity of housing instability. The program used four additional factors along with the two required by Treasury (AMI and unemployment), including household size, number of months behind on rent, whether a household had been impacted by the 2020 wildfires, and whether a household lived within a census tract with a high prevalence of low-income renters at risk of experiencing housing instability and homelessness due to COVID-19.⁹ As of October 2022, about 30% of households served by OERAP were households of color. For comparison, BIPOC individuals make up 14% of the population of Oregon.¹⁰

Other grantees prioritized applicants by partnering with community-based agencies that had pre-existing relationships with specific target populations. In the City of Tacoma, Washington, for example, administrators of a CARES Act-funded emergency rental assistance program partnered with community agencies to ensure a substantial portion of funds reached households of color. To do this, the city set a benchmark that 45% of its rental assistance would be distributed to households of color, explaining that "while we know COVID-19 is affecting all people, we also know that people of color face additional systemic barriers that result in disparate health and economic outcomes."¹¹ Program applicants were selected by lottery, but the city also set aside a portion of funds to serve clients who were referred by community agencies.

MINIMIZING BURDENSOME DOCUMENTATION BARRIERS

Burdensome documentation requirements – such as requiring proof of COVID-19-related hardship, a lease agreement, employer income verification, tax forms, or identification documents like a birth certificate or social security card – can impede the ability of tenants to apply for or successfully complete ERA applications and significantly delay or lengthen application processing times. Such requirements can also lead to or exacerbate social, economic, or racial disparities in ERA access and distribution. A report by the Office of Management and Budget finds that administrative burden – the time and energy spent accessing public benefits – impacts individuals unequally and leads to disproportionate underutilization of public benefits by the communities who need them the most.¹²

Although initial guidance published by Treasury in January 2021 required programs to obtain documentation of an applicant household's income and COVID-19 hardship, subsequent guidance provided greater flexibility in how programs could determine household eligibility in order to minimize barriers.¹³ Treasury's current guidance allows for three such flexible approaches to determining a household's income eligibility: self-attestation, categorical eligibility, and fact-specific proxy. **Self-attestation** allows an applicant to attest to their income, COVID-19-related hardship, housing instability, or amount of rental arrears they owe as an alternative to traditional source-documentation. **Categorical eligibility** allows a household to be deemed eligible if it has been verified as low-income by another local, state, or federal program, such as the Supplemental Nutrition Assistance Program (SNAP), the Temporary Assistance for Needy Families (TANF) program, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Medicaid, or the

Housing Choice Voucher program. **Fact-specific proxy** allows programs to use other facts to infer a household's income eligibility, such as the median income of the household's census tract. By implementing these flexibilities, ERA program administrators have reduced the documentation burdens placed on renter households in crisis.

Allowing greater program flexibilities was a key factor in spending outcomes. A December 2021 study found that the adoption of different forms of self-attestation improved spending outcomes in the summer of 2021, compared to programs that had always used self-attestation or had never used it.¹⁴ State and local program administrators have also indicated that adopting other flexibilities, like categorical eligibility, fact-specific proxy, and direct-to-tenant assistance, has helped provide struggling tenants the relief they need before they are displaced from their homes.

Self-Attestation

Self-attestation was the most common way state and local ERA programs sought to reduce documentation barriers. According to NLIHC's Emergency Rental Assistance Dashboard, by February 2022, half of ERA programs (51%) allowed self-attestation for COVID-19-related hardship, 21% for income verification, 29% for non-traditional income verification, 17% for proof of housing instability, and 12% for proof of rental lease or tenancy.¹⁵

Utilizing Self-Attestation in Oregon and the District of Columbia

Some ERA programs, like Oregon's Emergency Rental Assistance Program (OERAP) and the District of Columbia's STAY (Stronger Together by Assisting You) DC program, allowed applicants to self-attest for all areas of eligibility, including COVID-19-related hardship, income and non-traditional income verification, and proof of housing instability or rental lease.¹⁶ The rates of ERA spending in Oregon and D.C. suggest that adopting this flexibility helped both jurisdictions

reduce application processing times. Oregon and D.C. distributed all their federal ERA1 and ERA2 funds to struggling tenants much sooner than most other jurisdictions, with OERAP exhausting its initial allocations of ERA1 and ERA2 by January 2022 and STAY DC by November 2021.

This accelerated rate of spending was critically important in D.C., because it provided the financial support struggling renters needed before they faced eviction. Eviction filings in the city resumed in September 2021, shortly after the federal eviction moratorium was lifted by the U.S. Supreme Court. According to Housing Counseling Services, Inc, a D.C.-based nonprofit that provides counselors in eviction court hearings, approximately 550 evictions were scheduled between September 2021 and December 2021. About 70% of those evictions were prevented using ERA1, ERA2, or local rental assistance funding.¹⁷ As of June 2022, D.C. had disbursed nearly \$328 million in financial assistance to households and had made nearly 51,000 financial assistance payments.^{18,19}

Due to their accelerated spending and the ongoing needs of low-income renters in their jurisdictions, both the Oregon and D.C. governments received reallocated ERA funds from Treasury and appropriated state and local funds to their programs to continue to deliver vital rental assistance to their residents beyond their ERA allocations. The State of Oregon also allocated an additional \$100 million of the American Rescue Plan's State and Local Fiscal Recovery Funds (SLFRF) to its emergency rental assistance program to continue to meet the needs of struggling renters. As of July 2022, OERAP had paid out over \$390 million to 60,829 households.²⁰

Categorical Eligibility

Guidance from Treasury in the form of Frequently Asked Questions (FAQ) resources has provided several solutions for decreasing documentation burdens, including by allowing income eligibility

determination based on categorical eligibility and fact-specific proxy.²¹ As noted above, categorical eligibility allows a household to be deemed eligible if it has been verified as low-income by another local, state, or federal program, such as SNAP, TANF, WIC, Medicaid, or Housing Choice Vouchers. Although incorporating these flexibilities into ERA policies and procedures decreases the documentation burden for renter households without compromising program integrity, according to NLIHC's tracking, as of February 2022, only 28% of ERA programs had implemented categorical eligibility and less than 6% had implemented fact-specific proxies.²² Programs that have incorporated this flexibility have spent funds more quickly.²³

Using Administrative Data to Reduce Barriers and Promote Efficiency in Philadelphia, Pennsylvania

The Philadelphia Housing Development Corporation (PHDC), the city's ERA program administrator, used several types of public assistance programs to determine whether an ERA applicant was categorically eligible for rental assistance (i.e., whether their income was below 80% of AMI), including Medicaid, Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI), SNAP, and public housing.

PHDC established a data-sharing agreement with the city's Data Management Office (DMO) to utilize DMO data for determining income eligibility among ERA applicants. Following Treasury guidance, PHDC examined public benefits data for people who were receiving public benefits after January 2020. While DMO shared several datasets, the most significant information that was made available related to Medicaid eligibility. PHDC received spreadsheets with Medicaid eligibility data twice per month and would upload the data into its Quick Base system. If a tenant was listed as receiving Medicaid, then the system automatically determined that the tenant household was eligible to receive ERA funds based on their income. The process saved time for staff, reducing the need to review income

documentation and calculate income eligibility. It also allowed for applications that were previously not approved to be subsequently approved and enabled the automatic income-verification of applications that were pending in the system due to the lack of documentation of household income.²⁴

PHDC also partnered with the Philadelphia Housing Authority (PHA), giving the PHA access to tenants' ERA applications so they could conduct the initial review of public housing tenants' ERA applications. This partnership accelerated the application review process for public housing tenants because the agency was able to verify ERA applicants' rent and residency documents, which the ERA program typically requests from landlords in private buildings.

Additionally, when Philadelphia's eviction moratorium was lifted, PHDC partnered with the municipal court to ensure that tenants with emergency rental assistance application facing eviction filing were prioritized for review, approval, and payment. The Department of Public Development matched data from the Landlord Tenant Court docket to tenants in PHDC's ERA program database so the team could assist them with their process and guarantee landlords that arrears would be paid. A court liaison communicated with PHDC staff throughout the day during court proceedings, enabling the team to update reviews and give timely feedback to tenants, landlords, and the judges overseeing their cases.

According to its rental assistance dashboard, Philadelphia had distributed more than \$221 million and made over 30,151 assistance payments by September 16, 2022.²⁵ Approximately 76% of households that received ERA had extremely low incomes (30% of AMI or lower), and 66% of recipients were Black, a significant achievement in a city where Black renters are nearly three times more likely to receive an eviction filing than white renters.²⁶ PHDC's decision to use categorical eligibility to support tenants receiving public benefits likely

contributed to this success.

Fact-Specific Proxy

Treasury added fact-specific proxy to its guidance in May 2021 as an additional method for verifying⁷ income eligibility.²⁷ Fact-specific proxy allows a program to use other facts to infer a household's income eligibility, such as the median income of the household's census tract. For example, programs can identify ZIP codes or census tracts where average incomes fall below 80% of AMI and infer an applicant's income based on their residency in those areas. Applicants simply need to self-attest to their household income if they meet the proxy eligibility criteria. While using census tracts may be one way to establish a fact-specific proxy, NLIHC research emphasizes the importance of testing multiple proxies, so that programs can choose the most effective method for maximizing coverage of potentially eligible households and minimizing coverage of ineligible households. This allows program administrators to reduce documentation barriers faced by tenants while also maintaining program integrity by reducing the risk that funds go to ineligible households.

Through interviews with ERA program administrators, NLIHC researchers found that fact-specific proxy improved application accessibility, decreased application processing times, and increased fund disbursement.²⁸ NLIHC's 2022 report, "[Fact-Specific Proxy in ERA Programs: Key Considerations and Lessons Learned](#)," highlights five statewide programs (in Connecticut, Kentucky, North Carolina, Massachusetts, and South Carolina) and four local programs (in Multnomah County, OR; Phoenix, AZ; Denver, CO; and Tulsa, OK) representing diverse program types, sizes, and geographies that utilized fact-specific proxies to improve the accessibility of their ERA programs for low-income and marginalized renters.

Testing Multiple Proxies to Maximize Impact

in Denver, Colorado

In August 2021, Denver's Emergency Rental Assistance Program, which shares an application portal with the Colorado Emergency Rental Assistance Program, added fact-specific proxy as an income verification option. The city and state administrators identified Qualified Census Tracts (QCTs) from the Low-Income Housing Tax Credit program and Low-Income Communities (LICs) from the New Markets Tax Credit program as the two best options because these proxies were already associated with statutorily enacted programs.²⁹ Although the ERA program began by using QCTs as its fact-specific proxy, the city and a partner organization, COVID-19 Eviction Defense Project (CEDP), quickly determined that by replacing QCTs with LICs as the proxy, they could nearly double the number of census tracts covered by the proxy. (Twenty-eight percent of tracts in Denver were covered using QCTs, while 47% of tracts were covered using LICs.) After making this change, the share of applicants who were income-eligible through the proxy rose from 35% to 74%.³⁰

In interviews conducted by NLIHC, program administrators discussed the programmatic impacts of fact-specific proxies. They observed a decrease in processing times, an increase in fund disbursement, and an increase in application accessibility. Administrators at CEDP – which provides rental assistance and legal services – saw a direct correlation between the use of fact-specific proxy, decreases in processing times, and eviction diversion. Prior to incorporation of the proxy, the application process often involved back-and-forth exchanges with tenants about pay stubs or tax returns. In addition to increased efficiency, Denver administrators noted that by using a more inclusive proxy, they were better able to reduce barriers for low-income BIPOC households, who are among those facing the greatest risk of eviction.³¹

ALLOWING PROGRAMS TO

PROVIDE DIRECT-TO-TENANT ASSISTANCE

Providing rental assistance directly to tenants was critically important for keeping renters with unresponsive or noncooperative landlords stably housed during the pandemic. Treasury guidance explicitly allows and encourages direct-to-tenant assistance (DTA).³² However, some program administrators have expressed apprehension about the flexibility due to concerns over fraud. Other program administrators have chosen not to clearly communicate DTA as an option in public-facing portals and documents, leading to a discrepancy between survey data, which shows that 70% of program administrator respondents have stated their ERA program offers direct-to-tenant assistance,³³ and the information provided on ERA program websites, which has been found by NLIHC to indicate that only 35% of ERA programs provide a direct-to-tenant assistance option.³⁴ As a result, many tenants may be unaware that DTA is an option for them, which may lead some to self-evict rather than requesting direct payment from their ERA program administrator. Thus, it is imperative that programs develop protocols and strategies to distribute rental assistance directly to households before they are displaced or experience homelessness.

Treasury guidance regarding the parameters regulating the provision of direct-to-tenant assistance by programs to applicants changed between ERA1 and ERA2. Under ERA1, grantees could provide assistance directly to tenants only after seeking, but failing to obtain, landlord participation. Under ERA2, programs could provide assistance directly to tenants without first seeking landlord participation. Moreover, under ERA2, grantees that did seek landlord participation were required to provide direct-to-tenant assistance when landlords refused to participate or were non-responsive. Treasury noted that “in cases where a landlord or utility provider does not participate in the program,

the only way to achieve the statutory purpose is to provide assistance directly to the eligible household.”³⁵

DTA is an important tool for ensuring assistance is accessible to tenants in need regardless of a landlord’s ability or willingness to participate in ERA. A national survey conducted with program administrators in April 2021 found that 44% of program administrators identified landlord nonparticipation as a significant challenge.³⁶ In a follow-up survey focused on landlord responsiveness, program administrators indicated that 27% of landlords “often or sometimes refuse to participate” in ERA programs, compared to only 9% of programs reporting this finding for tenants.³⁷

DTA thus improves program accessibility for marginalized tenants, ensuring that qualified tenants are not denied aid simply because their landlord chooses not to engage with a government program. DTA is an innovative feature of ERA – one not seen in traditional rental assistance programs, such as the Housing Choice Voucher program – and has important implications when it comes to ensuring equity and improving the ability of programs to spend funds in a timely way.

Implementing DTA in Louisville, Kentucky

In September 2021, shortly after Treasury released ERA2 guidance, the Louisville ERA program in Louisville, Kentucky, began issuing payments directly to tenants when landlords were uncooperative. The program administrator noted that ERA2 guidance not only encouraged direct-to-tenant assistance (like the ERA1 guidance) but required it.³⁸

In implementing the direct-to-tenant option, the Louisville ERA program would notify the landlord when a tenant applied for ERA, giving the landlord two weeks to respond and confirm their participation in the program. If the landlord did not respond or refused to participate, the program would provide rental assistance directly

to the tenant. Tenants were required to sign an affidavit stating that they would use these direct payments to pay their rent.³⁹

The Louisville ERA program expedited the processing of applications when tenants were to be paid directly. If a landlord stated in court and on the record that they were not accepting rental assistance for any resident as a matter of policy, Louisville Metro would immediately begin categorizing all applications from tenants renting from that landlord as requiring direct-to-tenant payments. This categorization eliminated the necessity of sending future notifications from the program to the landlord and reduced wait time for applicants. When landlords declined to participate in the rental assistance program, a combination of compassionate judges and representation by legal aid attorneys often resulted in a tenant gaining more time to pay or vacate to avoid an eviction.

In 2021, the CDC eviction moratorium and a Kentucky Supreme Court order allowing a stay of an additional two weeks for nonpayment cases also helped prevent evictions in Louisville. The limited time between eviction hearings combined with the volume of rental assistance applications made it difficult to get payments to tenants in such a short window of time. Agencies including the Louisville Urban League and the Coalition for the Homeless both ran programs using ERA funds that supported housing stability by paying a security deposit plus first month's rent when residents were forced to quickly move due to eviction.

STREAMLINING APPLICATION PROCESSING BY MAKING BULK PAYMENTS TO LARGE LANDLORDS AND UTILITY COMPANIES

Several state and local housing partners identified bulk ERA payments to large landlords and utility companies as an essential program innovation for increasing the accessibility of ERA and preventing multiple evictions at once. Under the bulk payment option, Treasury allowed grantees to establish information-sharing agreements with utility providers and landlords with multiple units that would allow them to determine eligibility and combine payments into a single “bulk” payment in order to reduce administrative burden and enhance program integrity.⁴⁰ The Alabama Low Income Housing Coalition reported that the state ERA program's decision to add a bulk application option for Alabama Housing Finance Authority-owned properties and properties in the area covered by the Alabama Rural Coalition for the Homeless (which serves as the Alabama Balance of State Continuum of Care) helped streamline applications and reduce the time it took to process and disburse funds from 30 to 15 days.⁴¹

In addition to streamlining applications and disbursement, bulk payments were sometimes used as an incentive for landlords with multiple units to accept other ERA requirements. For example, in King County, Washington, the ERA program was able to leverage bulk payments to engage landlords, all of whom either accepted 80% of rent owed, waiving the rest, or accepted the equivalent Fair Market Rent. The program was intended specifically for large landlords, with 10 or more tenants. King County found that offering bulk payments for multiple households was an effective method for disbursing payments and forgiving back rent, with the large landlord program serving 64% of all ERA-assisted households.⁴²

Negotiating Bulk Payments in the City of Memphis and Shelby County

According to ERASE cohort members at Neighborhood Preservation, Inc. (NPI), the main community partner subcontracted by Tennessee's Memphis and Shelby County Emergency Rental Assistance Program (MSCERA), bulk payments played a significant role in preventing evictions in the city and county, where the majority of landlords and eviction filers are large-scale property owners. NPI was contracted to support the city and county with eviction settlements by adding staff capacity to the court system. NPI's five on-staff ERA attorneys – hired in March 2021 – were responsible for negotiating individual and bulk settlements with landlord attorneys.

NPI noted that ERA attorneys were able to reach more tenants through bulk settlements, and ERA attorneys and volunteer lawyers were able to build strong relationships with landlords and their attorneys, which allowed them to negotiate large-scale settlements regularly, including with one landlord whose settlement covered more than 600 tenants. The ERA attorneys were very effective in maintaining these relationships and sustaining landlord and landlord attorney involvement in the program. Large landlords and their attorneys would work with the same ERA attorneys each month to negotiate repeat settlements. Because MSCERA only had to process one check for every property manager, bulk settlements were much quicker to process than many individual payments.

Between March 2021 and September 2022, 7,709 tenants were assisted via bulk settlements with landlords, making up approximately 40% of the total rental assistance administered through the program.⁴³ Among tenants facing eviction, 70% of households who received legal representation had their rental arrears paid via bulk settlements, a rate that was only made possible by the ongoing relationships between ERA attorneys and landlord attorneys. NPI and MSCERA were so successful in disbursing ERA funds and preventing evictions that Treasury's Deputy Secretary Wally

Adeyemo visited Memphis in March 2022 as part of the Biden administration's American Rescue Plan "Anniversary Tour." In his speech at an event highlighting the MSCERA program, Deputy Secretary Adeyemo explained that "using funding from the American Rescue Plan, Memphis and Shelby County worked together to stand up a new infrastructure for rental assistance that did not previously exist – a program that is now one of the strongest programs in the country, one that Treasury has used as an example of best practices to share with other grantees."

ENLISTING HOUSING NAVIGATION SERVICES TO ASSIST WITH APPLICATIONS

Housing navigation has proven to be a crucial tool in helping mitigate the difficulties renters face when filling out ERA applications. Applicants have mentioned having trouble completing applications fully and have noted that some application software does not provide updates on applications. Applicants have also observed that there can be a lack of transparency between ERA programs and the tenants and landlords they are meant to serve. Without knowledge of the status of their applications, individuals and families can be wrongfully evicted.

ERA programs should help such households apply for assistance by soliciting housing navigation services from other agencies or contracting with local non-profits. In Illinois, for example, renters can apply for ERA through social service agencies funded by the Illinois Department of Human Services (IDHS). According to ERASE cohort member Housing Action Illinois, the program's decision to work with social service providers and community-based partners to distribute ERA was key to its success in quickly disbursing ERA funding and preventing evictions. In addition to helping tenants apply for ERA and supporting those with limited access to technology, IDHS service providers and housing navigators from

community-based organizations provided feedback to the ERA program on needed policy changes.

Partnering with Social Workers at the Richland Library

South Carolina's Richland Library offers a powerful example of the role community-based organizations and social workers played in assisting vulnerable households through the ERA process. Before ERA, Richland Library's social workers worked closely with Richland County's Department of Government and Community Services to offer in-person assistance to individuals applying for county assistance. When ERA funds became available, the library worked to ensure that those most in need, who often use the library for support, were able to access the program.

Richland Library partnered with the NAACP and South Carolina Legal Services to develop the capacity necessary for the county to help renters with their ERA applications. The library held navigator training events to increase the capacity of staff and assigned social workers to eight different library locations to help people apply for ERA. However, these navigators were not paid through a government agency and relied on philanthropic funding to continue to support ERA applicants. Even without ERA funding, the library played a critical role in ensuring that Richland's ERA program was accessible by serving both urban and rural populations through its library locations. The housing navigators assisted tenants in completing ERA applications, helped tenants upload required documents through the online portal (for example, tenants could text photos of documents to staff, who would then upload them to the portal), and conducted follow-up calls with tenants, landlords, and program administrators to provide and request status updates on applications.

When describing the important role housing navigators played in efficiently and equitably distributing ERA funds, Richland Library Social

Work Director Lee Patterson notes that "having someone navigate local challenges with you, is knowledgeable about the community you live in, and who you can see on a regular basis is important. The library has helped build trust and confidence in the program among tenants and landlords." Social workers were valuable resources for their clients, advocating for them in discussions with the ERA program administrator, so that their clients received the assistance for which they were eligible, including assistance paying for rent and utilities. Social workers would call the Richland County program administrator directly to follow up on pending applications. If a landlord was unresponsive or unwilling to participate in the ERA program, the housing navigators would request that the program provide direct-to-tenant assistance to prevent the household from becoming displaced. In addition to helping tenants apply for ERA, Richland Library social workers also assisted low-income tenants applying for other public assistance benefits, like SNAP, after observing that many people eligible for rental assistance also did not have enough money for food.

Richland Library social workers were also effective in building trust among landlords who were awaiting assistance or skeptical about ERA. Landlords were able to call library staff, who were trusted members of the community, to receive status updates. Using limited philanthropic funding, Richland Library was likewise able to help tenants pay for one month of rent and utilities while ERA applications were being processed. Such stopgap funding helped staff generate goodwill with landlords and the Richland County ERA program, which later offered to allocate ERA2 funding directly to Richland Library to support continued navigation assistance.

IMPROVING ONLINE APPLICATION SYSTEMS AND ADDRESSING THE TECHNOLOGICAL DIVIDE

Online ERA applications were used by many programs to increase access to benefits; however, online-only applications can create challenges for many communities. Low-income people and rural communities have lower access to high-speed internet, which can restrict their access to ERA applications. Approximately 43% of low-income households with annual incomes below \$30,000 do not have broadband services, and 41% of those households do not own a desktop or laptop computer.⁴⁴ In rural areas generally, 72% of residents have access to high-speed internet, but in poverty-stricken rural areas, the share drops to 63%.⁴⁵ While these numbers suggest that internet access is increasing in rural areas, rural residents are less likely to have access to multiple devices to use the internet (~33%) compared to residents in urban (44%) and suburban (43%) areas.⁴⁶ Rural residents are also more likely only to have access to a smartphone instead of a laptop or desktop computer, which can alter their experience completing and tracking the status of their ERA application. Feedback from community partners noted that many low-income renters used their mobile phones to submit online applications which were often difficult to complete because they were not designed to be mobile-friendly. The length of applications and the documentation requirements were the biggest barriers to submitting mobile applications.

In addition to experiencing the effects of this technological divide, some applicants also face a lack of transparency in the application process. Some application portals do not update tenants on the status of their applications, putting them at a higher risk of being evicted. Third-party companies contracted by ERA programs can also create barriers for tenants through

application features (e.g., long applications, complicated language, or the use of required fields). Advocates working with NLIHC have mentioned the need for greater attention to and accountability concerning the technology and software systems underlying the administration of ERA programs.

To further address challenges related to internet access, ERA programs should be required to use ERA funding for in-person navigator assistance, especially for programs that only offer online applications and for renters who cannot access applications online. To address software problems with ERA applications, programs should hold public comment periods or listening sessions to provide tenants and advocates with outlets for voicing their concerns about the ERA application process and program design. Community partners should also have more power to customize ERA programs based on community needs. Tenants from NLIHC's Tenant ERASE listening sessions have suggested that using phone interviews for intake applications would help bridge the technological gap.

Meeting Tenants Where They Are in Connecticut and Clay County, Florida

UniteCT, the Connecticut ERA program, partnered with 13 community organizations to establish UniteCT Resource Centers. As discussed in the "Visible" section of this report, one of the contracted Resource Center partners utilizes technologically equipped buses to bring workforce development engagement throughout the state and offered to volunteer one of the buses to aid UniteCT's efforts. The UniteCT Resource Centers already supported numerous efforts linking tenants to housing stabilization services, providing community education, breaking down barriers to accessing technology, and leading community engagement events. The mobile technology bus was integrated into many of these engagement efforts through the local Resource Centers, which drew on UniteCT funds to help send the bus to statewide communities.⁴⁷ Because the bus was equipped with workstations,

tables, chairs, computers, iPads, and mobile Wi-Fi, volunteers and staff were able to assist tenants and landlords with completing their applications. Tenants and landlords either pre-registered for an appointment or visited the bus without registering on days it was located in their communities. Organizations hosting bus visits included faith-based organizations, schools, town governments, large businesses, and other community partners. Bus visits also often provided communities with opportunities to hold general social service help days for community members, with social service agencies, health centers, utility partners, and other programs setting up tables and tents to help attendees learn more about additional housing stability services that were available. A mobile technology bus like that run by UniteCT offers an especially effective way to increase technological access in rural areas, in other areas with limited access to technology, and among communities with limited knowledge about technology use.

IMPROVING LANGUAGE ACCESS AND ENSURING TRANSLATION SERVICES FOR NON-ENGLISH SPEAKERS

Lack of language access limits the number of individuals who can apply for ERA. ERA programs, advocates, and community-based organizations have worked hard to address this barrier using a variety of strategies, including outreach to low-income communities, the adjustment of applications, and offers of support for those filling out applications. In an early 2021 survey of programs, NLIHC researchers and partners found that 81% of ERA programs conducted outreach in multiple languages.⁴⁸

Making ERA Applications Accessible to Non-English Speakers in Illinois and Texas

The Illinois Housing Development Authority (IHDA), Illinois Department of Human Services (IDHS), City of Chicago, and Cook County ERA programs all made their marketing materials, applications, and website information available in English and Spanish. IHDA also provided FAQ documents in six additional languages (Arabic, Mandarin, Hindi, Polish, Portuguese, and Tagalog).⁴⁹ Likewise, IHDA partnered with over 70 community agencies in 102 counties in Illinois to offer resources in 28 languages, including American Sign Language.⁵⁰ In addition to collaborating with community agencies, IHDA partnered with the Guatemalan, Colombian, Ecuadorian, and Mexican consulates to expand access to ERA to Spanish-speaking communities. Following these additional outreach efforts, “tenants who identified as Hispanic/Latinx accounted for 13.2 percent of approved applications and funding disbursed under the [Illinois Rental Payment Program], compared to 11.7 percent of renter households assisted in 2020.”⁵¹

Likewise, the Texas Department of Housing and Community Affairs’ (TDHCA) ERA program, Texas Rent Relief, made its application, website, FAQs, and marketing materials available in the five most commonly spoken languages in the state (English, Spanish, Korean, simplified Chinese, and Vietnamese). The program also opened a call center that provided customer service directly in English and Spanish and offered a language line to provide callers with interpreters and translators competent in many other languages.

The Role of Nonprofits in Expanding ERA Access to Non-English Speakers: RIHousing and Miami Workers Center

Like those ERA programs that ensured language access, community-based organizations that had worked closely with non-English speaking communities and built trust over time played a large role in ensuring their communities had

access to ERA programs. CBOs were successful in utilizing their networks to convene tenants and government officials and inform ERA programs on best practices that would benefit non-English speakers beyond language translation.

For example, RIHousing in Rhode Island co-hosted a webinar with Providence Mayor Jorge Elorza to provide an overview of the state's ERA program and answer questions in real-time from audience members. RIHousing included an interpreter at this webinar to make sure the information was available to attendees who spoke only Spanish. Additionally, advertising materials and other resources were provided in English and Spanish, with translation into other languages available upon request.

In Florida, the Miami Workers Center (MWC) collaborated with Miami Homes for All, Community Justice Project, and the University of Florida Shimberg Center for Housing Studies to deliver outreach efforts that would target those communities most likely to face high rates of eviction. As part of this effort, the organizations worked to ensure language and technology justice by designing ERA websites, materials, and printed advertisements in multiple languages.⁵²

Increasing Access by Reducing Stigma and Increasing Cultural Competency

Removing stigmatizing language from ERA programs and applications is also a necessary step in enhancing language access. Research by The People Lab at the University of California, Berkeley indicates that when tenants received an ERA mailer with “de-stigmatizing” language, they were 89% more likely to request an ERA application and 40% more likely to complete an ERA application.⁵³ Such de-stigmatizing language provided validation of hardships some tenants were experiencing due to the COVID-19 pandemic. To maximize outreach to non-English speaking communities, ERA programs should also focus on strengthening cultural competence among staff.

The Utah Housing Coalition (UHC), in collaboration with 25 other multicultural community-based organizations, provided culturally competent services to low-income families in Utah. UHC discovered that the communities it served included many refugees, asylum seekers, and undocumented immigrants, and the organization collaborated with members of these groups to provide other members with services in languages of their choice. The steps taken by the Utah Housing Coalition ultimately helped increase access to ERA among members of many different non-English speaking communities in the state. For example, the Coalition supported an initiative to work with community health workers and Spanish speakers to reach out to tenants, offer resources, participate in community events, and approach program design and practice with cultural competence. Program administrators worked closely with their communities through local groups to help expand language access and invested in increasing language access at all levels of government, ensuring that applications, flyers, advertisements, translation services, and other materials were available in many languages.

ENSURING ACCESS FOR PEOPLE WITH DISABILITIES

According to the Center for Budget and Policy Priorities, “more than 4 million people with disabilities – including 1.4 million people ages 62 and older – are in low-income families paying more than half their incomes in rent and utilities”⁵⁴ People with disabilities are at special risk of suffering hardships, such as eviction, food insecurity, and utility shutoffs, that can jeopardize their health and access to services. Moreover, tens of thousands of disabled people continue to live on the streets or in homeless shelters, where they face additional health risks that have been exacerbated by the pandemic.

For these reasons, many ERA programs have developed strategies to ensure accessibility for persons with disabilities. The ERA program in Allegheny County, Pennsylvania, created opportunities for local CBO staff to visit tenants in their homes and provide further access for persons with disabilities, while UniteCT's technology bus (discussed above) was made mobility-accessible. Other state and local programs, like Placer County, California, and Fairfax County, Virginia, posted links at the bottoms of their webpages to ensure applicants were aware of the programs' accessibility policies.

ERA programs should constantly re-examine the extent to which they provide equitable access to people with disabilities, doing so regularly and in partnership with members of the disability community to better address their needs. The Low-Income Housing Coalition of Alabama (LIHCA), for example, addressed the inaccessibility of Alabama's ERA application by working closely with the administrators to update the application website.⁵⁵ Due to LIHCA's ongoing advocacy, the website is now ADA-compliant. The landing page has clearer instructions for tenants and landlords, a link to its accessibility statement, as well as an email address to contact if applicants encounter accessibility barriers on ERA Alabama. The work of LIHCA bridged the gap for individuals with disabilities who needed ERA.

GUARANTEEING ACCESS TO MEMBERS OF RURAL COMMUNITIES

Renters in rural communities have faced unique challenges when it comes to learning about and accessing rental assistance. Natural disasters and a lack of transportation infrastructure often limited ERA outreach to rural communities and made it difficult for some residents to access application assistance. The fact that some ERA programs only offered online applications was also a common barrier to access, since many rural areas are not

covered by broadband.


Many ERA programs serving rural communities received relatively small allocations, making the 10% allowable allocation for administrative costs insufficient for building the infrastructure needed to operate some program. Likewise, larger ERA programs that covered rural areas were often unable to conduct specialized outreach to more isolated areas and frequently offered only one location where staff could provide assistance with applications.

Rural Outreach in Florida and Delaware


In order to improve internet access in rural areas, the Clay County, Florida, ERA program hosted "Coffee and WiFi" events, where program staff brought coffee access to WiFi to community centers across the county and offered community members assistance applying for ERA. Another example comes from Newcastle County, Delaware. Even though the county is the most populous in the state, it still has rural areas with limited access to internet. Because of limited internet access, the program originally received only 500 applications. To improve program accessibility, staff at Housing Alliance Delaware visited places where renters could be found, including barber shops, nail salons, and churches. The Alliance also shared flyers about the program with businesses and asked them to share information about ERA widely. Such practices nearly doubled the number of applications received by the county, increasing the number of people it was able to assist.

ENSURING ACCESS TO ERA FOR NATIVE AMERICAN COMMUNITIES

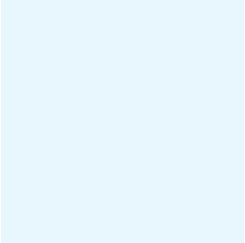
Of the \$25 billion in ERA1 made available by Treasury, \$800 million was initially allocated to Indigenous tribes and Tribally Designated Housing Entities (TDHEs) assisting low-income tribal members and residents of native lands.



Initial research on ERA among tribes and TDHEs highlighted the unique challenges and barriers these grantees faced in quickly setting up programs of the size required and getting funds out the door.⁵⁶ Different patterns of ERA utilization among TDHEs were due in part to the variation in housing needs and rental markets, infrastructure, and ERA allocations that differed from those of non-tribal grantees.



In a series of interviews conducted with NLIHC staff, TDHE administrators highlighted the importance of providing adequate federal guidance early in the implementation process. Several tribes and TDHEs set up targeted rental assistance programs for the first time, and most did not have prior experience in administering a program of ERA's scale. Thus, while changing guidance helped clarify several procedural questions about the program, they emphasized the challenges involved in constantly revising policies and restarting operations.



Nevertheless, ERA provided an unprecedented opportunity for tribes and TDHEs to serve members of their communities. Unlike typical Indian Housing Block Grant (IHBG) funds, ERA allowed tribes and TDHEs to serve tribally affiliated households outside of their service areas. While some found it challenging to build up their capacity to process applications across the country, many used this opportunity to serve off-reservation households who had never been eligible for previous tribal assistance programs. Several programs adopted best practices – like the use of documentation flexibilities – and employed strategic partnerships to minimize

administrative burden and spend down their total allocations. By the end of March 2022, tribal grantees had spent \$411.6 million on financial assistance to households, housing stability services, and administrative expenses – approximately 50% of their total allocation.⁵⁷

Nearly 100 TDHEs have also received reallocated funds totaling over \$27.7 million.⁵⁸ The needs of American Indian and Alaska Native (AIAN) households have been historically understudied, yet analysis conducted by HUD indicates that housing conditions are substantially worse among AIAN households compared to all households in the United States. Six out of 10 AIAN households live in tribal areas and surrounding counties with significant housing needs and challenges.⁵⁹ These households are also more likely to have inadequate facilities like heating and plumbing and face significant overcrowding (defined as more than one person per room) than in non-tribal areas.⁶⁰ Eight percent of AIAN households were overcrowded compared to 3% of households nationally; however, this number is likely much larger due to significant census data limitations among AIAN households. Still more research is needed to understand whether, and, if so, how ERA addressed the unique housing needs of Native American communities. NLIHC, in partnership with United Native American Housing Association, continues to research how TDHEs utilized ERA to address their unique needs and highlight the existing housing and infrastructure challenges Native American communities face.

Recommendations for Model

Programs

Households most in need of emergency rental assistance often face multiple barriers to navigating complex application systems and accessing assistance in time to avoid an eviction. State and local programs must support expedited access to and disbursement of financial support to landlords and tenants by ensuring an accessible, streamlined, and low-barrier ERA application process. As such, the design and implementation of emergency rental assistance programs should be as simple, flexible, and accessible as possible, and programs should support progress toward racial equity and justice. Based on the careful examination of existing ERA programs, NLIHC has found that future ERA programs can increase the accessibility of applications for the lowest-income and most marginalized renters by following these recommendations:

- ◀ Ensure multiple and streamlined ways to apply for assistance. Applications need to be accessible in many different ways, particularly to marginalized populations – including BIPOC communities, people with disabilities, immigrants, people with limited English proficiency, and others – so they have full and equitable access to program resources and opportunities.
- ◀ Make applications available in multiple formats – e.g., online, via mobile phone, by calling a phone number (like 211), and in-person – and accept application submissions during traditional and non-traditional hours.
- ◀ Design application processes to prioritize households with the greatest needs – as opposed to accepting applicants on a first-come, first-served basis.
- ◀ Ensure application materials and resources are available in multiple languages, and partner with culturally competent CBOs to provide non-English speakers with application support.
- ◀ Utilize the maximum allowable administrative cost allowance to support staffing, infrastructure, and technology that will support program implementation and reduce barriers for tenants. Additionally, program administrators should tap into multiple, diverse, and flexible funding sources, such as local, state, federal, or philanthropic funding streams, to bolster their staff and technological capacity and invest in application and review infrastructure, outreach capacity, and community-based organizations administering the programs.
- ◀ Broaden use of self-attestation to document income, housing stability, proof of tenancy, rent owed, and COVID-19-related or other hardships. Programs should allow for self-attestation in all available categories to simplify the application process and reduce burdens on applicants who face the greatest barriers to gathering and submitting documentation.
- ◀ Use categorical eligibility in preference to income documentation or self-attestation. Utilize administrative data to verify categorical eligibility if an applicant is receiving other federal, state, or local government assistance or resources that could serve as fact-based proxies.
- ◀ Use fact-specific proxy to qualify an applicant's income. Programs should test multiple proxies and choose the most effective method for maximizing coverage of potentially eligible households while precluding coverage of ineligible households.
- ◀ Require direct-to-tenant assistance. Allowing payments to go directly to households ensures renters can receive needed assistance, regardless of their landlord's willingness to participate. Direct payments can also help tenants in less formal housing situations.
- ◀ Utilize bulk payments and target outreach and set aside a portion of funds for working with small landlords.
- ◀ Provide housing navigation services. Emergency rental assistance programs should appropriate adequate funding for in-person navigator assistance, especially in areas where renters cannot access applications online, and to support housing stability services such as outreach, housing navigation,

case management, and other services that will assist households – particularly those who are the most marginalized – in accessing and successfully navigating application processes and stabilizing their housing for the long term.

- ◀ Develop strategies in partnership with members of the disability community to ensure applications and assistance are accessible for persons with disabilities and address their needs.
- ◀ Embed data in program design. Implement local protocols and procedures for data and information sharing, for targeting the most marginalized populations, creating referral processes, and sharing income and other documentation needed to support complete and successful applications.
- ◀ Collect, share, and analyze relevant data to support efficient use of funds and to identify needed mid-course corrections in program design.



Accessible

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Looking for more information?

- ◀ For more information on emergency rental assistance, please visit the ERASE [website](#)
- ◀ If you have a question, please contact the ERASE team at eraseproject@nlihc.org



**NATIONAL LOW INCOME
HOUSING COALITION**

ABOUT NLIHC

The National Low Income Housing Coalition is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice.