# Learning from Emergency Rental Assistance Programs

# Lessons from Fifteen Case Studies

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The NYU Furman Center advances research and debate on housing, neighborhoods, and urban policy. Established in 1995, it is a joint center of the New York University School of Law and the Wagner Graduate School of Public Service. More information can be found at **furmancenter.org** and **@FurmanCenterNYU**.



The Housing Initiative at Penn (HIP) is an initiative based out of PennPraxis at the University of Pennsylvania. HIP advances housing policy at the local, state, and national levels through research and civic partnerships. Learn more at **housing initiative.org** and **@HIatPenn**.



The National Low Income Housing Coalition (NLIHC) is a national nonprofit dedicated solely to achieving socially just public policy that ensures people with the lowest incomes in the U.S. have decent, accessible, affordable homes. Our main areas of activity include affordable housing research; policy analysis and advocacy; organizing, mobilization, and capacity-building; and communications and education. Visit www.nlihc.org for more information.

The U.S. Department of Treasury Emergency Rental Assistance program, as established by the most recently passed coronavirus relief package, includes \$25 billion in rental assistance, which can cover an eligible household's rent and utilities for a maximum of 15 months, including past due and future payments. At least 35 programs, nearly half of which are statewide, are already accepting applicants. Another 400 state and local jurisdictions and nearly 240 tribal governments, are either ramping up their existing rental assistance programs to get this unprecedented volume of funds out the door or preparing to implement rental assistance for the first time.

This moment represents a critical opportunity to build on lessons learned from the local COVID-19 rental assistance programs rolled out across the U.S. in 2020. In January 2021, the Housing Initiative at Penn (HIP), the National Low Income Housing Coalition (NLIHC), and the NYU Furman Center released the results of a survey of 220 COVID-19 rental assistance programs. The survey helped us understand key characteristics of these programs and explore how certain characteristics correlated with programs' ability to efficiently distribute funds. It could not tell the story of how each program evolved over time, and the rich learning that occurred in each jurisdiction. For that reason, we followed up with a subset of 15 rental assistance programs representing jurisdictions ranging from small and rural to large and urban for in-depth structured interviews. This report focuses on the key challenges these program administrators discussed, the innovative strategies they used to address these challenges, and the lessons current and future program administrators can take away.

## Case Study Programs and Sites

In selecting case studies, our goal was to capture as broad a spectrum of program types and contexts as possible. We excluded state-level programs in order to focus on programs operating at the city, county, or regional level. We then selected two programs serving rural jurisdictions, with one being a new program and the other being an expansion of an existing one; four programs serving either a small city or a medium-sized county in a metropolitan area (ranging in population from 80,000 to 100,000), again representing a mix of new and expanded programs; three programs serving large counties (ranging from 600,000 to 2.2 million residents), including two new programs and one expanded program; and finally, six programs serving large cities of up to 2.7 million residents, including four new programs and two expansions of existing programs.

**Table 1. Case Study Sites Descriptive Statistics** 

Table 1. Case Study Si	ites Descrip	Julive Sta	LUSLICS								
Program	Population	% Unemployment Rate (county)	% Black	% Hispanic	Poverty Rate	Vacancy Rate	% Homeownership Rate	% Units in Small Buildings	Median Rent	Median Household Income	Median Rent as % of Income
Chicago, IL	2,709,534	14.1%	29.2%	28.8%	18.4%	5.8%	49.4%	45.0%	\$1,112	\$58,247	29.5%
King County, WA	2,195,502	10.0%	6.3%	9.7%	8.9%	3.3%	61.4%	32.3%	\$1,606	\$94,974	28.1%
Phoenix, AZ	1,633,017	8.7%	6.7%	42.6%	18.0%	5.5%	55.8%	49.1%	\$1,053	\$57,459	29.2%
City of San Diego, CA	1,409,573	11.7%	6.0%	30.3%	12.8%	4.3%	48.6%	41.5%	\$1,695	\$79,673	32.1%
Allegheny County, PA	1,221,744	12.0%	12.7%	2.1%	11.6%	5.3%	69.5%	53.9%	\$890	\$61,043	27.5%
Metro Atlanta, GA	751,218	9.7%	26.7%	13.0%	9.1%	5.1%	66.3%	44.0%	\$1,202	\$77,932	28.1%
Boston, MA	684,379	14.8%	22.7%	19.8%	18.9%	3.0%	37.2%	45.6%	\$1,620	\$71,115	30.2%
Nashville, TN	663,750	11.0%	27.4%	10.5%	15.1%	7.2%	56.1%	40.5%	\$1,100	\$59,828	28.8%
Louisville, KY	617,790	8.5%	23.3%	5.6%	15.9%	7.2%	62.8%	56.3%	\$846	\$53,436	28.5%
St. Lucie County, FL	312,947	10.1%	19.3%	19.0%	13.3%	10.3%	70.8%	71.1%	\$1,185	\$52,322	33.7%
City of Tallahassee, FL	191,279	7.0%	34.5%	6.7%	26.4%	7.0%	40.4%	45.4%	\$1,023	\$45,734	36.2%
Richfield, Bloomington, and Edina, MN	173,141	8.2%	7.7%	8.8%	7.0%	3.5%	70.1%	22.4%	\$1,194	\$52,070	26.7%
City of Napa, CA	79,074	11.0%	0.6%	40.5%	8.0%	4.4%	57.0%	60.3%	\$1,700	\$84,043	32.1%
Klamath and Lake Counties, OR	74,758	9.2%	0.6%	12.5%	19.4%	4.1%	64.3%	71.7%	\$776	\$30,570	29.5%
Parkersburg, WV	30,021	10.9%	3.1%	0.9%	25.2%	6.0%	61.5%	69.2%	\$674	\$35,778	32.1%

<sup>\*</sup>Average monthly unemployment from March-August 2020 provided by Bureau of Labor Statistics. All other data provided by 2015-2019 American Community Survey.

The case study sites represent a cross section of housing markets, as illustrated in Table 1. Unemployment rates, while high across the nation due to the pandemic, were on average highest in the jurisdictions in our sample with over a million residents (11.3%) and lowest in jurisdictions with fewer than 300,000 (9.3%). These sites vary demographically, some being very ethnically diverse (such as Chicago, Illinois and Phoenix, Arizona) while others are more homogenous (such as Parkersburg, West Virginia). Some markets were

strong with low vacancy rates and high rents going into the pandemic (such as San Diego, California), and others were softer (such as St. Lucie County, Florida). Finally, renter-ship rates varied widely, from predominantly renter cities such as Boston and Tallahassee, to high-homeownership jurisdictions with smaller residential buildings, such as St. Lucie County. Despite these substantial differences in market context, many of the same lessons were learned across sites.

Table 2. Case Study Program Characteristics

	PROGRA	AM STRUC	TURE		FUNDING	STREAM		WI PARTIC		LAND CONCES	
Program	Multiple phases or programs	Locally administered state program	Partnered with other organizations or nonprofits	CRF	CDBG-CV	Non-CARES Act government funds	Philanthropic funds	Initiating applicant*	Receiving party	Agreement not to evict	Agreement to forgive arrears
Chicago, IL	Х		Х	Х		Х		Т	Т		
King County, WA	Х	Х	х	Х		Х		T&L	L	Х	Х
Phoenix, AZ			х	х				Т	L	Х	Х
City of San Diego, CA			Х	Х	Х	Х		Т	L		
Allegheny County, PA	Х	X	х	х				Т	L	Х	
Metro Atlanta, GA			х	Х		Х	Х	L	L	Х	Х
Boston, MA	Х		х		Х	х		Т	L	Х	
Nashville, TN	Х		Х	Х			Х	Т	L	Х	
Louisville, KY	Х		х	Х				T&L	L	Х	
St. Lucie County, FL				Х				Т	Т		
City of Tallahassee, FL	Х				Х			Т	L	Х	Х
Richfield, Bloomington, and Edina, MN	Х	Х	Х	Х		х		Т	L	Х	
City of Napa, CA		х				х		Т	L		
Klamath and Lake Counties, OR	Х	Х	х	Х			Х	Т	L		
Parkersburg, WV			Х		Х			Т	L		

<sup>&</sup>quot;T" stands for tenant and "L" for landlord

As highlighted in **our previous report**, rent relief programs take many forms. The wide variety of jurisdictions we interviewed included a diverse set of program structures, as shown in Table 2. Case study programs varied in terms of how many iterations or phases of rent relief they had undergone; of the fifteen case studies, five had already implemented multiple iterations of their programs by the time of their interviews, often using different funding sources and incorporating lessons learned from previous iterations. The most common source of funding was the CARES Act Coronavirus Relief Fund (CRF), but these funds were often supplemented with local or philanthropic funds. Four programs used CARES Act Community Development Block Grant (CDBG-CV) funding, which was more restrictive than CRF. Another four programs operated multiple rental assistance programs simultaneously, for example, a landlord assistance program and a tenant assistance lottery, or two separate programs in neighboring jurisdictions. Programs varied in terms of whether the state had shaped any of the local program's requirements or infrastructure; and based on who administered which aspects of the program, whether it be the local government, a nonprofit, or a network of multiple actors. Finally, programs varied in how they interacted with tenants and landlords. While most of our case study programs had tenants apply and then cut checks to their landlords, two (Chicago and St. Lucie County) paid assistance directly to tenants and three (Metro Atlanta, King County, and Louisville) invited landlords to apply on behalf of eligible tenants.

# **2.** Methods

After selecting 15 case studies based on the analysis detailed above, we conducted hour-long interviews with one or more program administrators for each program. In many cases we followed up with a second half-hour interview to ensure we completed the full interview protocol. The protocol included broad questions related to eligibility and documentation requirements, outreach, intake, monitoring, and infrastructure and capacity. We also encouraged interviewees to provide additional program materials, such as website links, brochures, and FAQs.

We developed a detailed rubric that we then applied to each interview in order to identify which challenges, strategies, and general lessons learned interviewees mentioned for each category. The rubric included over 60 items that we compared across all 15 sites. We left space for any additional themes or findings that did not fit within those items. This exercise allowed us to identify patterns and themes that were then grouped into six key lesson areas. Finally, we revisited each interview transcript to pull out examples that illustrated these themes particularly well. One clear overarching theme that applied to all sites was that administrators needed to adjust programs over time as challenges inevitably arose, even with well-crafted programs. These modifications proved critical to serving households and represent valuable lessons learned.

# **3.** Findings

All 15 case study sites implemented emergency rental assistance programs in 2020; many implemented multiple programs or phases, as discussed previously. Nearly all of the sites are also gearing up to administer the new round of federal emergency rental assistance provided by the U.S. Treasury. As a result, all of the interviewees had insights to share about aspects of their programs that had evolved over the course of implementation, or about changes they were planning to implement in the future.

Our report focuses on these lessons learned, grouped into six categories (Table 3). The first five categories include increasing tenant take-up; targeting vulnerable communities; engaging landlords; boosting program efficiency; and partnering with nonprofits. The sixth lesson area is not necessarily for program administrators, but for funders, including the federal government, and state or local legislatures. It underlines the need for clearer, more consistent, and more flexible guidelines associated with the funding sources for rental assistance programs. We discuss each of these lessons and strategies in detail in the following section.

Table 3. Summary of Lessons Learned

Lesson Area	Sub-Category	Strategies
Increasing Tenant Take-Up	Increasing Documentation Flexibility and Support	Allowing self-certification
		Increasing types of documentation allowed
		Allowing documents to be submitted in more formats
		Gathering documentation on behalf of applicants
	Streamlining Tenant Engagement	Changing the sequence of the application to limit tenant follow-ups
		Streamlining the online application to force tenant responses and reduce duplicate applications
		Using a variety of methods to get in touch with tenants, e.g. text messages
Targeting Vulnerable Groups	Designing a Program around Underserved Groups	Using demographic and spatial criteria to select recipients
		Shaping eligibility and documentation criteria around the target group
		Partnering with community organizations to enroll groups that face language or other barriers
	Tracking Tenant Characteristics	Implementing a dashboard or other tracking mechanism
		Surveying or interviewing tenants or landlords
		Using gathered information to adjust program design
	Reaching Vulnerable Populations	Using a variety of outreach methods, such as in-person events and multilingual media
		Tapping critical intervention points such as courts shelters, and other social service providers

Lesson Area	Sub-Category	Strategies		
Engaging Landlords	Adjusting the Stringency of Landlord Requirements	Increasing the amount of assistance to landlords to make requirements palatable		
		Waiving certain requirements or disassociating them from the program		
	Increasing Landlord Outreach	Outreach through landlord associations and groups		
		Increasing support to landlords by developing tools or meeting with them one-on-one  Combining program outreach with moratorium and tenant rights awareness		
	Serving Tenants whose Landlords Do Not Participate	Creating a direct-to-tenant assistance alternative		
Boosting Efficiency	Building Up Capacity and Infrastructure	Partnering with nonprofits		
	Reassigning Staff, Hiring Temp Workers, or Recruiting Volunteers	Reassigning staff, hiring temp workers, or recruiting volunteers		
	Developing an Efficient Application Review Process	Moving from a case management model to an assembly line model		
		Increasing staff capacity at choke points		
	Developing an Electronic Workflow and Unique ID for Each Applicant	Developing an electronic workflow and unique ID for each applicant		
	Implementing a Landlord-Facing Program	Enrolling tenants in bulk by developing a landlord-facing application process		
Effectively Partnering with Nonprofits	Developing an Efficient Network	Creating opportunities for partners to learn from one another		
		Creating a simple referral system so that higher-capacity nonprofits can pick up slack		
	Addressing Reimbursement Challenges	Contracting with lower-capacity nonprofits purely for outreach		
The Need for Clear Guidelines and Flexible Funds	Managing Unclear, Shifting, or Overly Stringent Funding Requirements	Creatively combining multiple streams of funding to supplement more restricted funding sources		
		Implementing small pilots of flexible programs		

### **Lessons Learned**

# 1. Increasing Tenant Take-Up

#### **Documentation Challenges**

Eleven of the participating programs identified gathering documentation as a point in the application process where applicants tended to drop out (Table 4). Interviewees described the difficulty of verifying income for tenants paid in cash, those who had volatile incomes, and those living on Social Security benefits (many Social Security offices were closed due to the pandemic). Two interviewees noted the difficulty applicants faced even in providing a current lease since smaller and more informal landlords often neglected to renew their leases. Proving a COVID-19-related hardship was often difficult as well: residents who had to give up income in order to take care of children at home because their daycare closed couldn't necessarily provide a document demonstrating this.

Multiple interviewees (seven in total) described following up with tenants after their initial application as a major challenge, and a point at which many applicants simply dropped out. Two program administrators realized that cellphone minutes often run out for low-income households before the end of the month, making contact more difficult. Lack of familiarity with email was another barrier, especially for seniors; one program helped applicants set up Gmail accounts just so that they could correspond with them. In one case, applicants applied via a centralized portal that shared their contact information with a wide variety of nonprofit organizations for intake. As a result, applicants did not recognize the number of the organization when it tried to contact them.

Table 4. Points at Which Applicants Tended to Drop Out

Drop-Out Point	Number of Programs
Gathering documentation	11
Getting in contact with the applica	nt 7
Engaging the applicant's tenant or	landlord 5
Completing the initial intake form	1

### Increasing Documentation Flexibility and Support

In response to these challenges, an overwhelming number of programs (10 out of 15) modified their documentation requirements to make them less burdensome, both for applicants to gather and for administrators to process (see Table 5). Another two programs said they would reduce documentation requirements in a future iteration.

Many of the modifications involved allowing applicants to self-certify income or COVID-19-related hardships, rather than documenting them. One program administrator noted that of the ten non-profits the jurisdiction subcontracted with for intake services, one had insisted on requiring income documentation rather than self-certification and ended up processing only 50% of the anticipated number of applications; by contrast, the more flexible nonprofits all met their targets. In the guidance for its Emergency Rental Assistance program, the U.S. Treasury explicitly allows programs to use self-attestation for demonstrating COVID-related hardships, housing instability, income, and amount of back rent owed.

Another common program modification was to accept more *kinds* of documentation, and in more formats, to make the application process easier. For example, one administrator mentioned that a simple text message showing that an applicant's gig had been canceled could suffice as proof of COVID-19-related income loss, given the dominance of the gig economy in that jurisdiction. Four programs gave applicants more freedom to upload photos of documents, rather than scans, and to use

electronic signatures rather than wet signatures. Finally, three programs discussed adopting other modifications such as reaching out to landlords and utility companies or logging into employer accounts to gather documentation on behalf of applicants. Program administrators who perceived themselves unable to simplify their application process due to federal or state requirements placed on their funding expressed frustration. One interviewee noted that these requirements "were cumbersome, and it would take quite a bit of resources to qualify somebody for a program that's temporary. And that is an impediment I felt was significant...these programs need to respond quickly to vulnerable populations...sometimes it feels like we're asking for things that we don't really need."

Six interviewees described increasing support to help applicants navigate the application. This support took the form of hiring additional bilingual staff to assist applicants with limited English proficiency; providing coaching over the phone in a variety of languages; and giving program staff dedicated work cell phones that they could use to text applicants. One program described developing communication materials that more clearly communicated the application process and how to gather the necessary documentation. Three programs introduced a drop-off window or other socially distanced in-person option to allow applicants with limited computer access to receive and submit hard copies of the application, especially given the unreliability of the postal system during the pandemic.

Table 5. Changes Made to Address Issues with the Application Process

Change Number of Pro			
Modified documentation requirement (fewer documents required or more d		10	
Increased support to help applicants navigate the application		6	
Redesigned or improved the applicati	on platform	3	
Added new ways to access or complet	e the application	3	
Changed the eligibility criteria for the	program	2	
Changed the sequence of the applicat	ion	2	

#### **Streamlining Tenant Engagement**

In order to address the difficulty of getting in touch with applicants, some programs embraced text messaging (cited by a few interviewees as the most effective way to reach applicants) and one went so far as to knock on tenants' doors. Others streamlined tenant engagement by changing the sequence of the application or redesigning the application platform (see Table 4).

Two large urban programs moved away from a model that involved doing a short initial screening and then following up with tenants to gather documentation. Many of those who had completed the screening were nonresponsive, and it was time-consuming to attempt multiple contacts with each applicant. Instead, these programs developed more extensive online applications that required documentation upfront, which reduced the number of applicants but sped up the process. Two other programs discussed implementing online applications that could not be submitted until all documents had been uploaded. A fifth program discovered the value of adopting an online application system that would allow applicants to log back in and submit additional information, rather than having to follow up with applicants via email. More generally, text messages were cited by a few interviewees as the most effective way to reach applicants.

Both of these strategies—reducing application requirements and limiting the need for tenant follow-up—helped programs spend program funds more quickly and serve a greater number of people. In some ways, these strategies also increased the ability of programs to serve vulnerable populations; for instance, by reducing some documentation requirements, programs lowered barriers for populations that have greater difficulty documenting their income or providing identification. (For more information on strategies to advance racial equity in emergency rental assistance programs, see our previous report). And by speeding up the process, these programs made it more likely that assistance would reach a household in time to prevent an eviction or forced move. At the same time, increased efficiency could mean that fewer efforts were made to contact a given household, or that applicants faced a higher barrier to entry when they were required to provide documentation up front. In addition, increased efficiency could increase the risk of fraud. One interviewee mentioned that program staff suspected that the program was "paying for things for people that could have potentially afforded to pay for some of their bills on their own" but that this represented a small percentage of applicants, and that the urgency of overall need justified the risk. Another interviewee learned that a program participant had in fact defrauded their program, yet still felt that overly onerous documentation requirements were the greater danger.

### Targeting Vulnerable Populations and Monitoring Program Outcomes

### Designing a Program Around Underserved Groups

A handful of jurisdictions intentionally geared their programs to reach households they recognized to be especially vulnerable to housing insecurity. For example, one jurisdiction ensured that noncitizens, and especially undocumented residents, would be able to participate in their rental assistance program by shaping their eligibility criteria and documentation requirements around that group. They reduced identification requirements and set an income-eligibility threshold that matched the incomes of workers in the food services and hospitality industries, but they also made college students ineligible. Another program targeted apartment buildings in racially concentrated areas of poverty for outreach. A third jurisdiction created two tracks to enroll tenants in their program: one being an online tenant application open to the general public and the other drawing on a network of small organizations serving immigrant, refugee, and other minority groups, which could reach and enroll tenants who would be less likely to apply online.

#### **Tracking Tenant Characteristics**

An important distinction of these programs is that, in addition to prioritizing certain groups, they actively monitored the demographics of participating households in order to ensure these priorities were realized. Two programs went so far as to partner with academic centers to track and evaluate participation through geospatial dashboards, surveys, and other analytic tools. Monitoring allowed administrators to make informed decisions about which aspects of their programs were successful, and which might need adjustment in order to effectively reach vulnerable groups. One program administrator explained: "We're looking at how many people made it through each step [of our application] by race, ethnicity, age, gender, geography, etcetera, to try to see if there are any patterns and any bottlenecks for specific groups of people. We're also taking a look by provider to see if there are...individual providers that perform better or worse...for specific subpopulations." Another program used ZIP Code, COVID-19 incidence rate, and applicant ethnicity data to inform their outreach strategy and decided to switch to an approach that relied more heavily on community-based organizations to reach neighborhoods with high rates of COVID-19.

#### Other Strategies to Reach Vulnerable Populations

Even jurisdictions that did not shape their programs around vulnerable communities often adopted one or more strategies to engage residents who face language or digital literacy barriers or are otherwise disconnected from public programs (see Table 6). The most common approach was to distribute information about the rental assistance programs to community organizations trusted in hard-to-reach communities, or to contract with these organizations directly to conduct outreach. Three programs took advantage of multilingual media and one program went so far as to hold rental assistance registration drives at apartment buildings in underserved communities.

Table 6. Strategies to Reach Underserved Groups

Strategy Number of Pro		ms
Distributing information about the p community organizations	program to	6
Contracting with trusted community for outreach	y organizations	5
Using targeted media, such as Span newspapers	ish-language	3
Hosting in-person events in underse	erved communities	1

Many programs also took advantage of existing services to reach households at particular risk for housing instability (see Table 7). A common approach (used by seven programs) was to work with municipal eviction courts either to provide program information to all households with an eviction hearing or to intervene directly in eviction cases by providing mediation and rental assistance to defendants in the courthouse. Another strategy was to distribute program information or conduct intake at shelters, food pantries, housing counseling offices, and other services with which distressed renters might interact. Finally, two programs were able to refer tenants to rental assistance via a general municipal hotline such as 211.

Table 7. Critical Points of Intervention to Reach Distressed Renters

Critical Point of Intervention	Number of Progre	ams
Outreach in eviction or housing co	urt	7
Outreach via housing counselors o	r legal aid providers	3
Outreach via a hotline		2
Outreach in homeless shelters or f	ood pantries	2

# **3.** Engaging Landlords

### Reported Challenges with Landlord Participation

Engaging landlords was cited as a challenge in 11 interviews. Several interviewees mentioned that it was difficult to get in touch with landlords—which was a necessary component for the vast majority of programs (14 out of 15). Tenants sometimes provided incorrect contact information for their landlords, in some cases because they seldom had contact with their landlord or were only familiar with their property manager. Several administrators speculated that some landlords were hesitant to participate in a government program and share a W-9 or other identifying information for fear of repercussions (this barrier was mentioned in five interviews, as noted in Table 8). In four cases, interviewees suggested that a subset of landlords may have found program requirements unreasonable, for example, requirements to waive fees or forgive back rent. Two interviewees believed that a minority of landlords simply preferred to evict tenants rather than accept assistance, either because the landlord and tenant did not have a good relationship, or because the landlord could easily find another tenant in a hot housing market. Finally, interviewees pointed out that many landlords face the same barriers that low-income tenants do—they are affected by the digital divide, are uncomfortable with online applications, and do not keep formal documentation, such as ledgers or accounts receivable.

Table 8. Reported Reasons for Lack of Landlord Participation

Challenge	Number of Programs
Landlords were slow in completing a providing documentation	oplication or 5
Landlords were unwilling to provide a other identifying information	a W-9 or 5
Landlords did not trust their tenants	or vice versa 5
Landlords were non-responsive	4
Landlords found program requiremen	nts unreasonable 4

#### Adjusting the Stringency of Landlord Requirements

Programs addressed the challenge of landlord participation in a variety of ways. One strategy was to adjust the stringency of landlord requirements, which was mentioned by three interviewees. One program, for example, initially required landlords to forgive any back rent in excess of three months in order to receive rental assistance for those three months. Some landlords, upon realizing the magnitude of forgiveness required, backed out of the program. Later, when federal funding guidance was clarified, the program extended aid to cover six months. Landlords still had to forgive a significant amount of debt, but they were more willing to participate, especially as the pandemic dragged on and the odds of recovering those arrears diminished. Another program waived the requirement to suspend evictions for certain landlords, and the third replaced an explicit no-evict requirement with a clause in the tenant's award letter stating that the program believed that tenant to be protected from eviction under the CDC moratorium, which the tenant could show to a magistrate in the event their landlord tried to evict them.

#### **Increasing Landlord Outreach**

Another strategy was to increase outreach to landlords and create tools that simplified landlord participation. One program sent intake personnel to meet with small landlords in coffee shops to walk them through the required documentation. Another program created an Excel workbook that landlords could use to calculate rental arrears for eligible tenants. Several programs conducted outreach through apartment associations and other landlord groups. One program administrator, a nonprofit landlord in its own right, relied on existing connections with other landlords to spread the word and increase uptake. Notably, three programs combined outreach to landlords with outreach about eviction moratoria and tenants' rights or discussed plans to do so in the future. One program administrator, having noticed that some participating landlords were harassing tenants with 72-hours-to-evacuate notices during an active eviction moratorium, worked

with a legal aid organization to develop a flyer about the moratorium and "sent it in every single rent payment check [which the program paid to landlords] for a month."

#### Serving Tenants Whose Landlords Do Not Participate

Finally, a few programs developed workarounds to serve tenants whose landlords proved impossible to reach, or who explicitly refused to participate. Two programs raised philanthropic funds and used them to make payments directly to tenants. While programs must make efforts to reach out to landlords under the Emergency Rental Assistance program, the U.S. Treasury explicitly allows programs to make payments directly to the tenant in as few as 10 calendar days if landlords do not participate. A third program provided relocation assistance (a security deposit and several months' rent) in the event that a landlord insisted on eviction.

Two programs provided rental assistance payments directly to tenants for all participants, potentially relieving the need to engage landlords at all. One of these programs nevertheless required the landlords of participating tenants to certify rental arrears, leading to many of the same challenges that other programs faced. The interviewee for the other program reported that landlords were appreciative of the program despite not being asked to participate in any way, and that they were aware of no landlord complaints that participating tenants had not paid their rent during the month(s) they received the assistance.

# **4. Boosting Efficiency**

#### **Building Capacity and Infrastructure**

Eight of the jurisdictions we interviewed did not operate any form of rental assistance program prior to the pandemic, and as such had to quickly build up the capacity and infrastructure to distribute thousands, sometimes millions, of dollars to tenants and landlords. All of the remaining seven programs, while somewhat more experienced, reported that they also had to increase their capacity in order to deliver a program on the scale, and meet the deadlines, demanded by federal funding. A common strategy embraced by both small and large jurisdictions was to partner with community-based or nonprofit organizations, be it for outreach, intake, processing payments, administration and tracking, or for a combination of these reasons (see Table 9). Few implementing governments or nonprofits had the resources to hire additional permanent staff, so they instead reassigned existing staff from other initiatives (such as after-school programs shuttered due to the pandemic), hired temporary staff, or—in one case—recruited volunteers from other branches of local government, such as the library system. One program, which proved unable to increase staff capacity, has been able to serve only a small share of those who have applied for assistance. Finally, many programs quickly built new online application platforms or electronic systems for reviewing documentation.

Table 9. Strategies Used to Increase Capacity

Table 3. Strategies Oseu to	Table 9. Strategies Osed to increase capacity					
Strategy	Number of Progra	ms				
Partner with community-based of for specific aspects of program	or nonprofit organizations	7				
Hire temp staff		5				
Build new technology		5				
Reassign existing staff		5				
Partner with a nonprofit to admi	nister the program	3				
Hire permanent staff		2				
Recruit volunteers		1				
Buy new technology		1				

### Developing an Efficient Application Review Process

Another key area of program learning was embracing an "assembly line" approach to processing applications. Jurisdictions that had provided some form of rental assistance prior to the pandemic, or agencies that had a longstanding social service orientation, sometimes had to make a concerted effort to shift away from a case management model, in which one manager oversaw a given applicant from start to finish. One program administrator explained how, two months into their rental assistance program, they abandoned the case management model because it had created a waitlist of thousands of applicants. They switched to assigning staff to specific steps in the application process, including initial screening, gathering documentation, engaging landlords, and processing payments. Whenever a bottleneck occurred, the program would "throw additional staff at that choke point." Applicants were encouraged to remember their unique ID, so that staff could quickly track down their application at any point. As shown in Table 8, other interviewees discussed implementing electronic workflows, so that staff could collaborate on application processing remotely, purchasing DocuSign technology, which was found to be expensive but effective, and hiring additional staff to manage phone triage. In all, six interviewees described moving to a more streamlined, "assembly line" review process.

Another group of six interviewees made deliberate choices about how to sequence the application process (i.e., when to ask for documentation and at what point to engage landlords) in order to increase processing efficiency. One strategy already discussed was to ask for more documentation up front, rather than reaching back out to tenants pursuant to an initial screening. Another program described abandoning a model their state housing finance agency had developed, which had tenants and landlords submit applications simultaneously via an online portal, and then relied on the administrator to match tenants with landlords. This created significant challenges, since tenants did not always list their landlord's name correctly.

The program instead moved to processing tenants completely before reaching out to their landlords to provide their agreement and W-9 form.

#### Implementing a Landlord-Facing Program

Three jurisdictions increased efficiency by embracing a landlord-facing program instead of, or in addition to, a tenant-facing program. By enrolling one landlord, they could serve all eligible tenants in a given apartment building, allowing for bulk processing and fewer checks. The jurisdictions implementing this method learned important lessons, including not to rely on the landlords themselves to collect eligibility data from tenants, because the relationship between tenant and landlord was sometimes strained. It is worth noting that this approach led to an emphasis on *large* landlords, potentially at the expense of the small landlords that also needed assistance. One interviewee acknowledged this possibility and noted that they were only comfortable using this approach because they knew of other effective programs in their jurisdiction that served tenants with smaller landlords. Yet all three interviewees whose programs were landlord-facing agreed on the importance of working with landlords, not just with tenants—they felt that a healthy rental market relied just as much on the stability of landlords as on the wellbeing of tenants.

# Effectively Partnering with Nonprofits Developing an Efficient Network

The majority of programs in our sample (12 out of 15) relied on nonprofit organizations for some aspect of the program, whether it was outreach, intake, or overall administration. Several interviewees (some of whom represented nonprofits themselves) discussed strategies for maximizing the efficacy of nonprofit partners. These included

conducting frequent "learning circles," so that all partners could discuss concerns and share advice; asking the nonprofits themselves what kind of program would take advantage of their strengths and afford them sufficient flexibility to implement the program in their own way; and ensuring consistent messaging, so that none of the applicants were given information that turned out to be inaccurate. An extreme example was a program in which a large nonprofit oversaw more than fifty partner nonprofits. In order to manage this network, the lead nonprofit enabled all of the subcontracted nonprofits to use a central data system and led weekly calls so that all of the partners could work through the queue of applicants together, applying funds where needed. If one organization had a larger backlog of applicants or was running low on funds, it could simply enter a referral into the shared database, and the applicant and all their information would be transferred to another entity with more capacity.

### Addressing Reimbursement Challenges

One challenge mentioned by two interviewees was the rigidity of the reimbursement structure. Funding restrictions required some jurisdictions to reimburse nonprofit partners for the rental assistance they provided, rather than distributing those funds upfront. This constrained these jurisdictions to working with higher-capacity nonprofits that had large enough reserves to wait for reimbursement; it also created delays when a given nonprofit was able to expend funds more quickly than anticipated and its contract had to be amended. One program addressed this challenge in part by relying on smaller, lower-capacity nonprofits embedded in vulnerable communities solely for outreach. Another program similarly earmarked funds for churches and other small community-based organizations, many of which had no experience providing rental assistance but could reach vulnerable groups and overcome language barriers. This program created a central portal which would allow these lowercapacity organizations to enter applicants into the system, at which point a high-capacity nonprofit from elsewhere in the network would take over.

# The Need for Clear Guidelines and Flexible Funds

An almost universal topic of concern among our interviewees was the lack of clear and consistent guidelines dictating the use of federal funds for rental assistance, and the overly restrictive nature of those guidelines once finalized. Nine interviewees addressed this topic at length. Multiple program administrators described vague and shifting guidance as their "biggest challenge," because it forced them to constantly reevaluate, and sometimes even revoke, aspects of their program design. For example, one program promised assistance with water bills and later found out that such assistance was not covered by the funding source; the program administrator had to ask the local jurisdiction to provide general funds to cover water assistance. One program expressed frustration about having implemented overly strict documentation requirements, only to discover later that these requirements could be waived. Another jurisdiction moved from providing rental assistance to providing relocation assistance for homeless residents, to subsidizing home repairs, and back to rental assistance as multiple waves of funding, each with shifting guidance, repeatedly limited whom they could serve. Most concerningly, a program in a rural jurisdiction delayed its program for multiple months waiting for the federal government to issue final guidance, meaning that households who might have received rental assistance throughout the summer of 2020 did not receive any until at least seven months into the pandemic. An interviewee pointed out that the ever-changing guidance not only frustrated program administrators, it also created challenges for some applicants who became used to a certain process and then struggled to adjust to a new one.

Some jurisdictions in our sample took risks and implemented more flexible programs, even though they might later run afoul of federal funding guidelines. Those jurisdictions willing to take more risks were often large jurisdictions that had local or philanthropic funding with few strings attached, which they could use to pilot a rental assistance program. If this pilot demonstrated a high level of need for rental assistance and proved effective in meeting some of that need, the more flexible model gained credibility and political support. Some jurisdictions were also able to use local funds to supplement funding subject to federal and

state requirements, for example to cover the gapbetween the standard rental assistance payment determined by state legislation and the full rent. Some may simply have been more confident in their ability to absorb the consequences of a federal audit. But even administrators of large programs in urban jurisdictions stressed the need for funding streams with fewer constraints. One such interviewee noted that their program relied on braided funding sources, and that when each source imposed its own demands, the program became exhausting to implement, if not ineffective.

### Conclusion

We concluded each interview by asking administrators to provide a key piece of advice they would offer to other programs (Table 10). In large part, responses mirrored the "lessons learned" described in this report. However, one piece of advice that stood out was the importance of flexibility in both funding requirements and in the programs themselves. Many of our interviewees had overcome shifting federal and state guidelines, as well as very limited administrative funding, to implement mid-course corrections that improved the efficiency and reach of their programs. As one program administrator explained, "There's random things that come up... We assumed that utility assistance would be water, gas, and electric. But what if somebody heats their house with a wood stove? We're trying to anticipate all the little things that could come down the road...but also being flexible...being able to adapt to the evolving needs, I guess, of the program."

Several program administrators mentioned a desire for more flexibility to adjust the amount or type of assistance based on households' needs. One interviewee described how state-level requirements limited the assistance to past-due bills. Applicants who knew they would not be able to pay their current bill were not eligible for assistance. Another interviewee was frustrated by a state-level requirement that capped assistance significantly short of average monthly rent in their locality. In all, four program administrators either increased the amount of assistance possible per household or said they would make this change in a future iteration. By contrast, no interviewees expressed wishing that they had reduced the amount of assistance in order to serve more people. In the words of one interviewee, increasing the amount of assistance was worth it "to make [recipients] completely whole rather than just piecemealing it."

The reality is, there is no one-size-fits-all approach to providing rent relief, but our interviews with 15 different administrators revealed clear patterns in the lessons learned about program design and implementation, despite significant variation in local context.

One theme that underlies all of these findings is the importance of considering racial and ethnic equity in the design and implementing rent relief programs. The COVID-19 pandemic has disproportionately impacted communities of color, and without explicit attention to equity, programs may under-serve renters of color. As we outline in **our earlier report**, there are many strategies programs can take to ensure greater equity in funding availability, outreach, and program participation. To be sure, efforts to advance racial equity will not be sufficient to fully counter the pre-existing inequities that have characterized U.S. housing markets, but they can foster a more equitable distribution of this critical emergency rental assistance.

Table 10. Advice Offered by Program Administrators

Strategy	Number of Prograi	ns
Importance of flexible funding and/or flequirements for applicants	exible	5
Importance of program simplicity		3
Importance of partnerships with comm nonprofits	unity-based	3
Importance of partnerships with high-c	apacity nonprofits	3
Importance of data and program evalua	ition	3
Importance of engaging landlords		3
Importance of supporting applicants thapplication process	roughout the	2

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HOUSING CRISIS RESEARCH COLLABORATIVE

The Housing Crisis Research Collaborative aims to address the longstanding inequities in access to safe, stable, and affordable rental housing that have been laid bare by the COVID-19 pandemic. We provide policymakers at all levels of government with the data and analysis they need to design, implement, and evaluate more equitable and effective rental housing and community development responses to pandemic and the ongoing rental housing affordability crisis. For more visit: housingcrisisresearch.org