



December 8, 2021

The Honorable Janet Yellen
Secretary
U.S. Department of the Treasury
Washington, D.C.

To Secretary Yellen,

On behalf of the National Low Income Housing Coalition (NLIHC), the NLIHC End Rental Arrears to Stop Evictions (ERASE) cohort, and the NLIHC-led Disaster Housing Recovery Coalition (DHRC), I write to urge the U.S. Department of the Treasury to release demographic and other key applicant data for each grantee distributing emergency rental assistance (ERA) and to encourage local data-sharing between ERA program administrators and advocates. While the Consolidated Appropriations Act of 2021 requires Treasury to collect and report quarterly data on the distribution of ERA, the agency has only released partial quarterly data. All data metrics reported quarterly should be released at the grantee-level for more granular program-level analysis. Advocates in communities across the country are struggling to obtain critical program data, particularly data that would allow a greater analysis of the demographics of those being served by ERA programs and relationships between ERA and eviction patterns, neighborhood racial characteristics, and program elements. Timely access to these data is critical to identifying needed mid-course corrections and to ensuring greater racial equity, preventing evictions, and improving program delivery.

The DHRC includes more than 850 local, state, and national organizations focused on ensuring the lowest-income and most marginalized people have stable, affordable homes while they work to recover after a disaster. During the pandemic, the DHRC mobilized to lead a national effort to prioritize the health and safety of low-income renters and people experiencing homelessness.

The ERASE Cohort includes 36 state and local nonprofit partners working together to conduct on-the-ground partnership development, capacity-building, outreach and education, and systems-change work to support ERA funds reaching renters with the greatest need for assistance, especially Black, Indigenous, and people of color (BIPOC) and other marginalized people and communities, and to build support for long-term housing solutions.

Release Full Quarterly ERA Data in a Timely Manner

Treasury must commit to releasing all quarterly ERA program data disaggregated by grantee, including all data elements broken down by demographics. The authorizing statute requires Treasury, in consultation with HUD, to publish quarterly reports on ERA program outcomes. As outlined by the Consolidated Appropriations Act of 2021, these outcomes include: the acceptance rate of applicants for assistance; the type or types of assistance provided to each eligible household; the average amount of funding provided per eligible household receiving assistance; household income level and; the average number of monthly rental or utility payments that were covered by the funding amount that a household received.

These metrics must be disaggregated by gender, race, and ethnicity. This data is needed to analyze the racial breakdown of ERA distribution by grantee and is key to evaluating potential racial disparities in the distribution of ERA funds.

Thus far, Treasury has only released national aggregate data for Quarter 1 and Quarter 2 on the number of applications submitted, households assisted by income, and households assisted by assistance type. Not releasing full and complete quarterly reports by grantee hampers advocates' efforts to identify needed improvements to program design, ensure proper oversight, evaluate potential racial disparities in the distribution of funds, and address barriers in design and implementation as they arise.

Release Participant-Level Data for Statistical Research

As directed by the statute, full and unredacted data should be made available for statistical research purposes. Access to the Participant Household Payment Data File would allow researchers to examine the relationship between ERA distribution and key program characteristics. These data can be used to evaluate whether program elements, such as self-attestation or direct-to-tenant assistance, correlate with overall ERA distribution and funds distributed to high-need communities. Researchers, advocates, and policymakers can use this analysis to better understand gaps in program design and identify ERA best practices.

Treasury should adjust its reporting requirements to ensure demographic data can be disaggregated by the smallest geography possible by requiring ERA programs to report race, ethnicity, and gender through the Participant Household Payment Data File. Treasury should aggregate and release this data publicly by the smallest geographic level possible, such as census tract or block group, to protect personally identifiable information. Further, the Department of the Treasury must create a process for sharing disaggregated, participant-level data with researchers and academic institutions to analyze the relationship between ERA payments and eviction patterns, both historical and during the pandemic, and identify opportunities for policy improvements.

Encourage Data-Sharing at a Local Level

Without timely access to public data released by Treasury, state and local advocacy groups must rely on data from ERA program administrators, which is often inaccessible to them. Treasury should encourage grantees to form data-sharing agreements with local advocacy groups to ensure advocates have the information needed to hold ERA programs accountable and improve the distribution of aid.

Thank you for your attention and consideration. For more information or to discuss further, please contact me (dyentel@nlihc.org) or NLIHC Vice President of Public Policy Sarah Saadian (ssaadian@nlihc.org).

Sincerely,



Diane Yentel
President and CEO
National Low Income Housing Coalition