



ERA1 Closeout

January 2025

[“A wave of evictions is on the horizon. What impact could they have on kids’ education?”](#)

[“A ‘huge wave of evictions’ is possible in January”](#)

[“Why a Historic Eviction Wave Is Bearing Down on the U.S.”](#)

In the Fall 2020, newspaper headlines across the country were predicting unprecedented levels of evictions. The COVID-19 pandemic was raging, and the lost income and increased expenses related to the pandemic were pushing families across the country to fall behind on their rent—many of whom already struggled to make ends meet. At the end of 2020, nearly a fifth of renting households reported being behind on rent. One in six reported that eviction within two months was very likely.

The consequences of an eviction go far beyond the devastating impact of losing one’s home. Evictions interrupt school and work, undermine physical and mental health, and make it more challenging to qualify for housing assistance benefits or to find new housing.¹ As the pandemic destabilized life for many Americans, these risks grew even more serious and the need for timely assistance grew.

“Housing disruption almost always destabilizes an entire family unit. Housing instability is a fundamental risk factor for thousands of households in communities both large and small... Through taking an analytical approach, we have an opportunity to both understand and interrupt housing instability for people in our state. ERA1 funds deployed through ND Rent Help truly showed us what’s possible.”

- State of North Dakota’s ERA1 Final Report Narrative

Yet, for millions of families who could otherwise have lost their homes, the predicted wave of evictions and these consequences that would have accompanied it never materialized.² While there are a multitude of federal policy responses that were critical to this outcome, one of the most important was the Emergency Rental Assistance (ERA1 and ERA2) programs stood up by the U.S. Department of the Treasury (Treasury). Two years have now passed since the conclusion of the ERA1 program. ERA1 alone deployed \$23.6 billion to provide 8 million payments, serving over 3 million households. Further, with the ERA2 program is still ongoing and has served over 3 million households thus far. As of September 30, 2025, the two programs have made a combined total of 16 million payments that equal \$42.8 billion for provision of financial assistance for payment rent, rental arrears, utilities and home energy costs and arrears, and housing stability services to renting households. Looking back, it is critical to understand the factors that led to the programs’ success in helping prevent millions of families from being evicted from their homes.

Altogether, by helping families avoid housing instability and with it lack of access to school and jobs, the ERA programs helped support a more inclusive economic recovery. The ERA programs also provide a blueprint that can inform future emergency housing programs designed to reach low-income renters facing displacement.

1 See, e.g., Matthew Desmond, *Evicted* (New York: 2016), 295-99 (summarizing research on toll of eviction).

2 Peter Hepburn et al., Eviction Lab, “Preliminary Analysis: Eviction Filing Patterns in 2021” (Mar. 8, 2022), <https://evictionlab.org/us-eviction-filing-patterns-2021/>.



Standing Up the Programs

On January 5, 2021, Treasury launched the \$25B ERA1 program established by the Consolidated Appropriations Act of 2021. In March 2021, Congress recognized the need for additional assistance for low-income renters affected by the COVID-19 pandemic and established the \$21.55B ERA2 program through the American Rescue Plan Act. Treasury administered both programs in tandem.⁴

ERA1 grantees had a challenging task at hand.

Treasury successfully distributed ERA1 awards

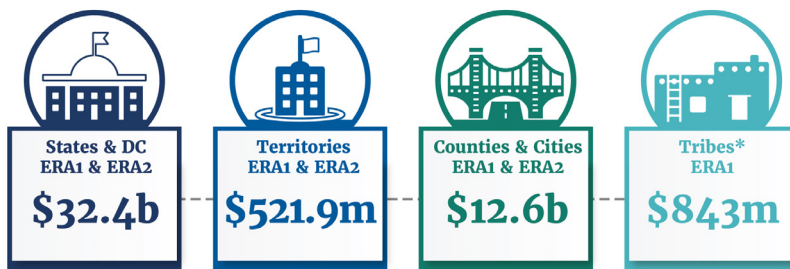
to nearly 700 ERA1 grantees by the end of January 2021. At that point, each of those state, local, Tribal, and territorial government grantees needed to build their program in short order—hiring staff, establishing operational structures and internal controls, creating outreach strategies, and standing up a multi-stakeholder application process (engaging with renters, landlords, and often utility companies). If assistance could not reach renters before the end of the eviction moratoria period, communities could have faced a “tsunami” of evictions across the country. This pushed grantees’ program administrators to move quickly and thoughtfully—all while adjusting to their own challenges associated with working in a pandemic.

Setting Grantees Up for Success

As Treasury disbursed ERA funds to jurisdictions, Treasury’s staff worked to understand the challenges grantees faced in administering local ERA programs. Staff spoke with hundreds of grantees to understand local rental market conditions and also conducted Tribal consultation in order to help develop policies that could support the unique [housing needs in Tribal communities](#). Through this outreach, Treasury fine-tuned guidance for the programs to remove roadblocks and help grantees quickly deliver assistances to communities impacted by the pandemic.

In addition, federal interagency partnerships helped collect and disseminate best practices across jurisdictions implementing ERA programs. Treasury hosted grantee roundtables that highlighted successful implementation strategies and engaged with public and private sector stakeholders to disseminate lessons learned. Further, the White House Eviction Prevention Summit in June 2021 provided opportunities for grantees to share eviction diversion models that require coordination between housing court systems, grantees’ ERA programs, legal aid stakeholders, and bar association. And the Consumer Financial Protection Bureau (CFPB) launched the interagency renter housing

ERA1 & ERA2 Award Disbursements by Type of Jurisdiction³



**Includes Indian Tribes, Tribally Designated Housing Entities, and the Department of Hawaiian Home Lands*

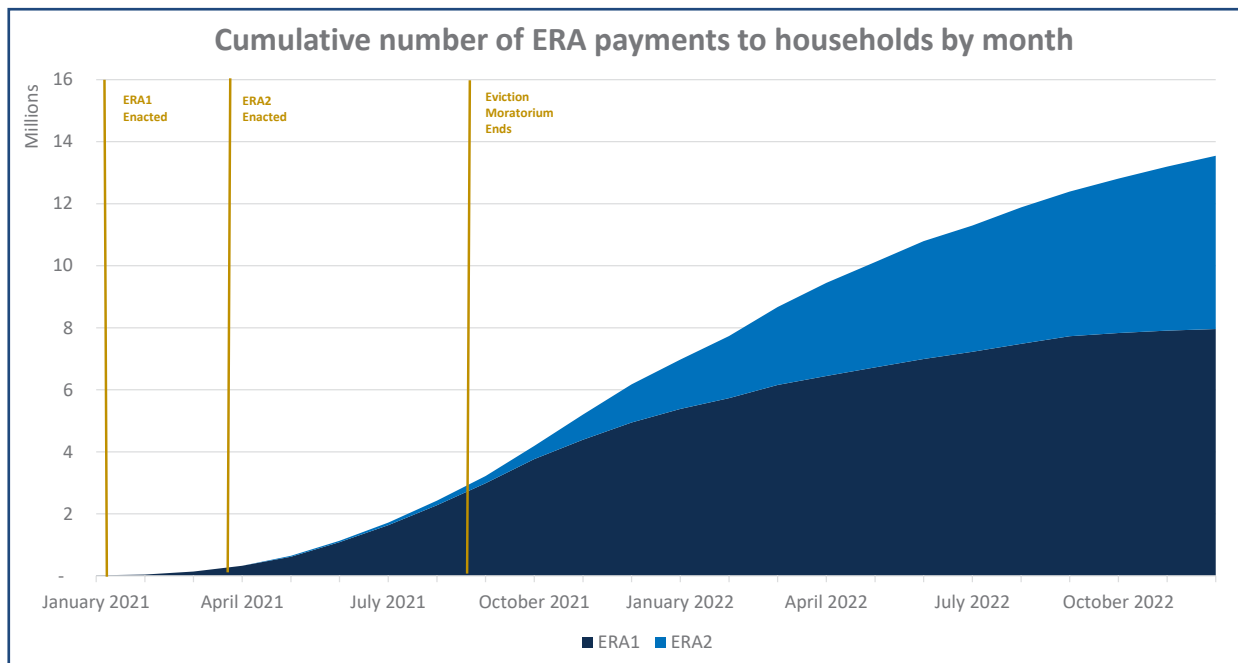
Jefferson County, Alabama established a strong eviction prevention and housing stability infrastructure that did not exist before Treasury’s ERA programs were established. Jefferson County’s District Court judges championed the development of a landlord/tenant meeting which is a partnership among the district courts, local legal aid services, the volunteer lawyers, landlord attorneys, Jefferson County Sheriff’s Office, Jefferson County Department of Community Services, and the community-based organization implementing the ERA program in addition to tenant advocates. Additionally, mediation clinics were implemented, and ERA program information was added to tenants’ seven-day eviction notices.

- See [Building Housing Stability Infrastructure](#)

³ Amount disbursed as of the end of period of performance for ERA1; ERA2 payments disbursed to date 12/20/24. For both ERA1 and 2, includes redirects (upstreams)/ reallocation returns/ reallocation payment; ERA1 does not include closeout returns.

⁴ The period of performance for ERA1 awards ended on September 30, 2022 and in the case of grantees that received reallocated funds, the period of performance ended on December 29, 2022. The period of performance for ERA2 awards will end on September 30, 2025. This report analyzes the Final Reports submitted by ERA1 grantees, representing the first half of these programs’ efforts but incorporates some ERA2 data when appropriate as the two programs were launched in tandem.

portal to help renters find their local ERA program as well as other [self-help tools](#). Through all of this engagement work Treasury published a [series of guidance updates](#) to respond to emerging ERA grantees’ needs and provide clarity to help ERA grantees develop their programs. Further, Treasury published an array of [promising practices](#) highlighting successful program design features that illustrated use of Treasury’s guidance flexibilities in action, and worked closely with community groups, advocates, and other stakeholders to drive their adoption.



By building a “real-time” feedback loop between efforts at the local and federal levels, these efforts cumulatively resulted in an acceleration of grantees’ disbursement of ERA assistance to renter households in the fall of 2021. The timing of this was particularly critical; ERA grantees were in a position to address rental arrears for landlords just as federal and many local eviction moratoria were sunseting.

For renting families, the impact of these efforts were enormous. In conjunction with other policies that the other Federal housing stability policies pursued in response to the pandemic pursued, Treasury’s ERA programs helped to keep more than a million Americans in their homes in 2021 alone.⁵ Moreover, ERA has been successful in reaching communities with the highest risk of eviction, especially providing more assistance to households in census tracts with higher pre-pandemic eviction rates, higher poverty rates, minority households, and shares of renting households with children.⁶

The Indiana Housing & Community Development Authority presented to several regional Realtors associations, as well as landlord groups, and other housing related networks and entities. It has been incredibly efficient to communicate about the ERA programs and their requirements directly to the landlords and property managers. This gave the landlords the opportunity to share information about ERA assistance with their tenants. Providing information to the landlords also helped to appropriately set and maintain landlord expectations for processing times of ERA assistance applications and payment of ERA assistance .

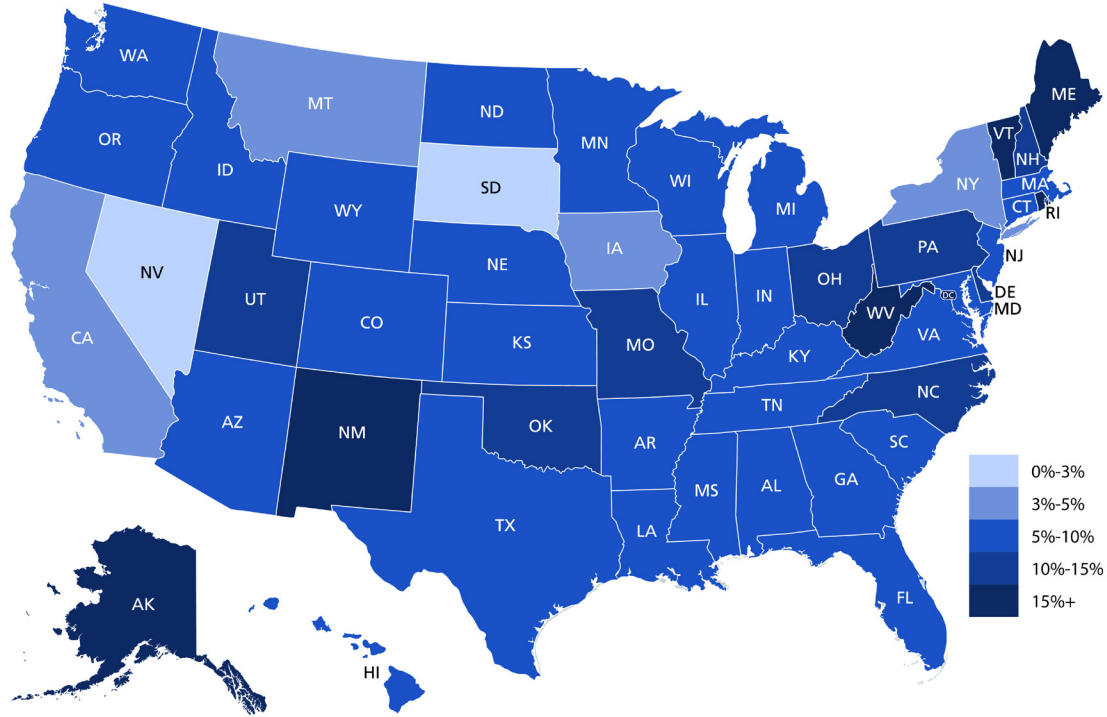
- State of Indiana’s ERA1 Final Report Narrative

Instead of the alarming spike in evictions that many feared, eviction filings remained below their historical averages. Data from the Eviction Lab suggests that evictions remained roughly 23 percent below historic averages in the first full year following the end of the national eviction moratorium.

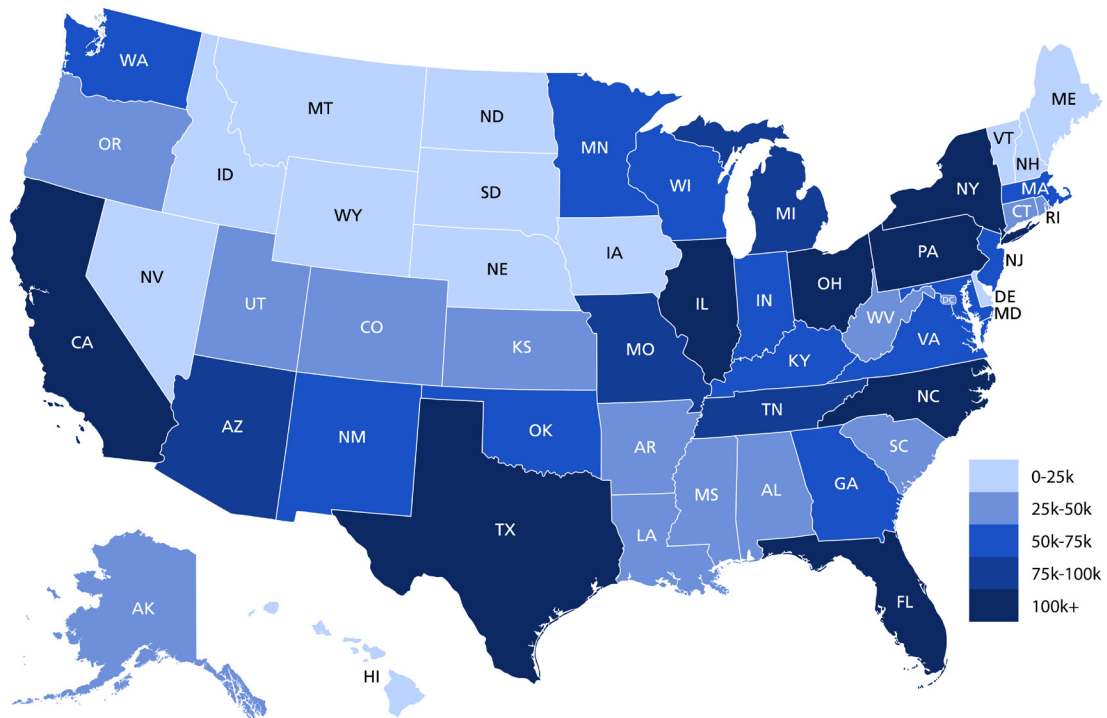
5 Hepburn, Peter et al., Eviction Lab, “Preliminary Analysis: Eviction Filing Patterns in 2021” (Mar. 8, 2022), <https://evictionlab.org/us-eviction-filing-patterns-2021/>.

6 See Figinski, Theodore F., Sydney Keenan, Richard Sweeney, and Erin Troland (2024). “Targeted Relief: Geography and Timing of Emergency Rental Assistance,” Finance and Economics Discussion Series 2024-055. Washington: Board of Governors of the Federal Reserve System, <https://doi.org/10.17016/FEDS.2024.055>. p.22 and General Service Administration/Office of Evaluation Science (2022). “Describing the distribution of Emergency Rental Assistance funds to those who need and qualify for it,” Washington. <https://oes.gsa.gov/projects/era-equity/>

Percentage of renter-occupied households assisted by ERA1⁷



Numer of households assisted by ERA 1



⁷ Developed from Treasury's ERA1 Final Report data and the US Census Bureau, American Community Survey, S2502, 2023 estimate of renter-occupied housing units <https://data.census.gov/table/ACSST1Y2023.S2502>

These two charts demonstrate the distribution of ERA funds across the nation by the number of households assisted and the percentage of renter-occupied households assisted. While larger states served the largest number of households and had the largest overall distribution of funds, the percent of renter households assisted in any given state shows that relative distribution across states was more even. Most states were able to serve between 5-10% of their renter populations with ERA1 funds. A few relatively lower-population states like Alaska, Maine, New Mexico, and Vermont had significantly high per renter numbers for ERA assistance. The state of Alaska implemented their ERA1 award quickly and early in the pandemic by rapidly identifying, reaching, and processing applications for the renter population within its state. Alaska's efforts also included strong coordinated efforts with Tribes within the state, often supporting Tribes with their application processing. The states of Vermont and Maine leaned into a variety of uses for ERA funds, including rehousing programs that helped many low-income households remain stably housed during the pandemic. New Mexico engaged in a purposeful stakeholder engagement effort, partnering with large landlords to develop efficient bulk application processing and assistance payments. They also proactively coordinated with legal aid, court, and landlord attorney stakeholders to build a fulsome eviction diversion program into the housing court system.

Further larger states like California and New York were able to develop multi-prong approaches to leverage the relationships that local communities had with tenants and landlords while also benefitting from economies of scale in application processing. Texas developed a multi-pronged approach, especially leaning into awarding non-profit and local community subrecipients with housing stability services and developing the state's eviction diversion infrastructure within its court systems. Grantees across Texas, like San Antonio, TX, also implemented many innovative approaches to reach households most at risk of displacement.

Looking to the Future

The ERA1 awards have expired and the program has ended, while ERA2 programs are winding down. But for the families that were served by the program, the impact of avoiding displacements due to the pandemic and thus continuing to have access to not just housing, but the health, education, and job possibilities associated with housing stability will last for many years to come. In future economic downturns, policymakers would benefit on noting how strategies implemented for ERA can be used to (1) quickly implement emergency programs to support local needs and (2) support improvements in current assistance programs to further program access to eligible households and (3) enhance efficiencies in the operation of current assistance programs. Doing so may be determinative as to whether a significant number of renter families across the nation can stay in their homes.

The City of San Antonio, TX was intentional in contracting with community organizations to reach target populations. It started contracting with a collaborative of local healthcare organizations, which in turn works with 20 nonprofit grassroots organizations with deep ties to the community. For instance, one of these partners is an organization that provides various support services to domestic workers and has strong ties to the local Spanish-speaking community.

-See [Culturally and Linguistically Competent Outreach](#)

If there is a highlight to the pandemic..., it was to create... and reinforce... the partnerships involving housing throughout the state. The response to the pandemic was not only conducted through... agencies contracted by the state, but by the local jurisdictions, non-profits, housing authorities, and other stakeholders coming together to provide housing stability services across the board for vulnerable Nevadans. These relationships are anticipated to last long after the end of the pandemic emergency.

-State of Nevada's ERA1 Final Report Narrative

**Emergency Rental Assistance (ERA1)
Closeout Report
Appendix
Sample ERA Web Resources**

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1. Background: Promising Practices in Emergency Housing

The U.S. Department of the Treasury (Treasury) has made funding available to assist eligible households with rent, utilities, and other expenses related to housing through the Emergency Rental Assistance (ERA) programs. Treasury made ERA awards directly to states, the District of Columbia, U.S. territories, local governments, Indian Tribes or their Tribally Designated Housing Entities, and the Department of Hawaiian Home Lands. These ERA grantees have some flexibility to develop their rental assistance program to suit the needs of their local community, while complying with requirements outlined in their ERA financial assistance agreement, including the relevant ERA statute, Treasury’s guidance, and other applicable federal laws and regulations.

Treasury has engaged with ERA grantees across the country to identify program strategies that promise to speed up program implementation, more efficiently deliver ERA assistance, enhance program integrity, and improve tenant and landlord access to programs—particularly for vulnerable and harder to reach populations. As grantees across the country built program infrastructure designed to meet the specific needs of their communities, many relied on leveraging local resources, data-driven operational analyses, and incorporating continuous operational improvement strategies into their regular practices.

Treasury developed promising practices based on these engagements and encouraged grantees to consider how these strategies might fit into their ERA programs based on local relationships, infrastructure, and ERA grantees’ resources.⁸ The following are examples of key promising practices used by grantees for the period of performance of their ERA awards.

2. Outreach

2.1 Culturally and Linguistically Competent Outreach

Across the country, Emergency Rental Assistance grantees are identifying strategies to reach communities where residents were disproportionately affected by the COVID-19 pandemic. Providing language access resources to those with limited English proficiency is critical to cutting barriers to program access.⁹ Many ERA grantees are offering support in multiple languages to meet their specific community needs. Treasury has provided resources to grantees to help [expand access to those with limited English proficiency](#).

As [ERA1](#) ends and as [ERA2](#) progresses, Treasury encourages all grantees to evaluate their outreach strategies to ensure that all tenants in need can access ERA funds. Grantees have made great strides through the life of the program to partner with community stakeholders and bring awareness and access for those in need. In addition to rental assistance, ERA can also offer a system of [housing stability](#) and [eviction diversion](#) services. Effective outreach can help tenants connect to these services, avoiding eviction and remaining stably housed.

[FAQ 37](#) addresses promoting access to all eligible households:

“Grantees should address barriers that potentially eligible households may experience in accessing ERA programs, including by providing program documents in multiple languages, by enabling persons with disabilities to access the programs, and by conducting targeted outreach to populations with disproportionately high levels of unemployment or housing instability or that are low income.”

⁸ Treasury recognizes that programs vary according to local circumstances; these examples are intended to help grantees identify opportunities to enhance the effectiveness of their own programs but may not be universally applicable to all grantees. The program information provided herein is intended solely to illuminate “promising practices” that grantees might consider when developing their jurisdiction’s program policies and infrastructure. All such policy development must proceed in accordance with the governing legal authorities and published policy guidance. Nothing herein should be construed as (i) altering these requirements or (ii) confirming that any specific grantee’s program policies or administrative practices have been fully reviewed and found compliant.

⁹ Languages spoken by an individual are considered a characteristic of their national origin and under Title VI of the Civil Rights Act, grantees must provide LEP persons meaningful access to the federally funded programs, services, and activities. Denial of access to a grantee’s federally funded programs, services, and activities because of a person’s LEP status is a form of national origin discrimination prohibited under Title VI of the Civil Rights Act of 1964 and Treasury’s implementing regulations at 31 CFR Part 22.

Advantages to developing a comprehensive outreach strategy:

- Increases awareness of and access to the ERA program.
- Improves access for those with limited English proficiency.
- Increased awareness and access results in decreased evictions and homelessness.
- Increased access to both financial assistance and housing stability services.
- Builds strong partnerships and networks that enable landlord engagement and eviction prevention efforts.
- Builds long term infrastructure to provide comprehensive and tenant-focused services.

Improving access to the ERA program is vital to ensuring that financial assistance is distributed equitably and to all those in need.

Steps to Take:

- **ASSESS** geographic and cultural landscape of your community to determine needs
- **IDENTIFY** targets
- **CREATE** strategy
- **OUTREACH** to identified targets according to your developed strategy.



Considerations

The following is a checklist to use as a guide in the evaluation of outreach strategy:

Assess

- **Have you completed a geographic analysis of where applications are coming from?**
Why this is important? High need areas with little to no ERA participation may indicate lack of awareness of the program.
- **Have you integrated a plan to support for those with limited English proficiency (LEP)?**
Why this is important? Grantees must address the language needs of the limited English proficient (LEP) people they serve. Visit LEP.gov for more information.

Identify

- **Have you identified trusted community based organizations with high levels of cultural and linguistic competencies?**
Why this is important? Community based organizations often have a deep understanding of the community they serve and are trusted by residents. Cultural and linguistic competencies ensure increased access to ERA in your community. This may also apply to trusted organizations that work with landlords and other key stakeholders.
- **Have you identified community partners that serve marginalized populations?**
Why this is important? Partnerships are critical especially when working with immigrant populations, the elderly, domestic violence and human trafficking survivors, and other marginalized communities.
- **Have you partnered with your local government departments, such as homeless services, and relevant to providing supportive services to tenants?**
Why this is important? Local government departments will have access to a variety of different listservs and information. It's also an opportunity to braid financial resources and services.

- **Have you contacted landlord associations?**

Why this is important? Enables landlord engagement and program visibility.

Create

- **Have you made your application accessible through multiple channels?**

Why this is important? Application accessibility accounts for those with or without technology capability – online, in person, and over the phone.

- **Have you developed a marketing strategy with a diverse portfolio of channels to advertise ERA?**

Why this is important? A variety of advertisements i.e. social media, tv, radio, newspaper, mailed postcards, etc., will ensure you are promoting awareness to those harder to reach.

Outreach

- **Have you hosted any events geared toward landlords?**

Why this is important? Enables landlord engagement, promoting awareness of tenant resources available.

- **Have you advertised in public places?**

Why this is important? Posting flyers in public places frequented by renters in the community, such as libraries and grocery stores, may reach those who cannot receive advertisements through radio, tv, or social media.

What's Next

Determine if your community has an established outreach strategy

- Are there ways to evaluate your strategy for equity and effectiveness?
- Are the right people, organizations, or community groups involved to execute your strategy?

Determine if the consideration checklist can be used in your community

- Determine who uses the checklist and how often it is used to evaluate and adjust your strategy
- Are there specific factors that might impact how the considerations are executed?
- Are there other considerations that might bring increased success?

Examples of Using a Diverse Portfolio of Channels

State of Kansas

At program onset, Kansas established an extensive outreach strategy, hiring a marketing agency and working with an internal communications team. Combined efforts include press releases, presentations, social media, commercials, bus ads, billboards, and producing print and digital flyers for tenants and landlords. The communication team distributed flyers with community groups in online webinars, summer food programs, social service agencies, community partners, and libraries. The Executive Director of Kansas Housing Corporation, the ERA grantee for the state of Kansas, participated in podcasts and many community presentations over a several months to talk about the ERA program, providing awareness and access for all eligible households. They have a weekly dashboard that shows where applications are coming from, to identify target outreach areas.

State of Mississippi

The state of Mississippi started its outreach with a press conference held with local media stations as well as Facebook Live, then moving to traditional media methods including radio/tv, but soon realized that many did not have access

to internet to complete the application process. It partnered with a marketing agency and nonprofits across the state to help make the online portal more accessible and help those who were not tech savvy apply. It held rental assistance fairs across the state, typically in high need areas, initially starting with two fairs a week, and then once a month. Its partner non-profit agencies held them whenever necessary to spread awareness and provide access to application materials. At fairs, tenants could complete a paper application, and the partners would walk them through the documentation needed, etc. The state also partnered with energy providers, and tenants could get access to their latest bills which was often a document they forgot at home yet needed to apply for assistance. Other large scale marketing campaign components included billboards, commercial advertising, and “how to” documents. This campaign outreach was two-sided and targeted both landlords and tenants. These efforts were particularly helpful in increasing landlord engagement in the application process.

Hillsborough County, FL

Hillsborough County worked with its internal Communications Department to develop a comprehensive outreach strategy. In addition to regularly advertising through social media and news outlets, Hillsborough County also completed outreach to state representatives, as well as advertising at in-person and virtual county expos and town hall meetings. It reached out to previous rental assistance program recipients and sent them ERA information to promote reapplication opportunities as needed. It also had a local dollar store campaign where ERA information was printed on the back of customer receipts. With the University of South Florida in one of its service neighborhoods, it was a guest for several student radio shows to promote the program to students in need. To help mitigate eviction for tenants, Hillsborough County held webinars for landlords to provide education about ERA, in addition to partnering with nonprofits who went door-to-door in areas with high eviction rates.

Examples of Using Community Based Organizations

City of San Antonio, TX

The City of San Antonio, TX has been intentional in contracting with community organizations to reach target populations. It started contracting with a collaborative of local healthcare organizations, which in turn works with 20 nonprofit grassroots organizations who have deep ties to the community. For instance, one of these partners is an organization that provides various support services to domestic workers and has strong ties to the local Spanish-speaking community. Administrators have noted that nonprofits trained to conduct in-person outreach (while maintaining social distancing health standards) are particularly helpful partners, such as those who have contracted to do census outreach.

State of North Carolina

The State of North Carolina has noted that partnering with communities of trust is a critical part of its outreach efforts. These partners include networks of faith-based organizations in predominately African American communities, as well as coordination with school systems serving high need areas to help identify families who may be in crisis and in need of ERA program support.

Examples of Using Public Spaces

Lancaster County, NE

Lancaster County hired two outreach workers to travel into villages and townships deemed most vulnerable, and help residents apply for the ERA program. Some of their efforts included going into public places such as diners, craft sales, or even informal village gatherings. When summer arrived, outreach workers were able to spread ERA awareness by being present at fireworks stands in rural communities throughout the county. The outreach workers built trust even among landlords, by engaging public spaces, who eventually began to call the program themselves to advocate for their tenant before filing eviction.

Richland County, SC

Richland County has found strong partnerships opportunities with the county's 13 libraries spread out across the county. In addition to providing convenient centers of support to residents, the library system also has a preexisting relationship with local social workers. This network has provided the ERA program administrators an opportunity to train the existing network professionals to educate residents about the ERA program. This effort has led to increased accessibility of professional and holistic support for households in need of ERA services, while also providing applicants to the free online access and other resources.

State of Illinois

The State of Illinois focused its program outreach efforts using grassroots networks and trusted local businesses. Outreach partners have included small grocery stores, laundromats, local faith-based organizations, and the Latino consulates, and have resulted in greater ERA visibility in the community and through culturally relevant media.

Examples of Partnerships that Serve Marginalized Communities

City of Boston, MA

The City of Boston's ERA program is administered by the Mayor's Office of Housing Stability offering application completion online, in person, and over the phone. Boston has completed tabling events at the local libraries and includes ERA information on the weekly Metrolist email that goes out to 27,000 recipients with information on the most recent affordable housing resources. With the capability to analyze application locations around the city, data concludes they have received applications from every neighborhood, and from a variety of demographics, which may be a good indicator that their efforts have provided equal access for all. Additionally, the program partners with agencies who focus on marginalized communities including the Asian American/Pacific Islander community.

Bering Straits Regional Housing Authority, AK

The Bering Straits Regional Housing Authority (BSRHA) implemented the Emergency Rental Assistance (ERA1) Program to target and assist the needs of the most venerable people of the region, by consistently evaluating the reach of the program it was able to adapt and provide for different populations in phases. With flexibility endorsed by its Commissioners, the ERA program at 3rd and 4th phases targeted the homeless population and included assisting Tribal members who lived outside the regional jurisdiction. BSRHA ensured coordination with other ERA programs to avoid duplication by partnering and sharing information. It used the local newspaper and regional radio to advertise for the program and relied on tribal coordinators in each of the villages to spread awareness and provide education to their residents. At program onset, the ERA coordinator flew to a handful of villages to assist and ensure residents complete applications, as these villages are only accessible by boat or aircraft. BSRHA's program administrators consistently assessed their community and regional needs, evaluating and targeting different locations and populations as appropriate.

State of Maine

The State of Maine has translated its application and program materials into eight languages, and program administrators have found that building partnerships with cultural brokers are critical to engagement with local immigrant populations. For instance, partnerships with local organizations focused on Somali immigrants have helped the program identify more specific services that can help these households successfully navigate the ERA program while also providing a bridge to other relevant health and human services programs offered by the state.

Reference: [Culturally and Linguistically Competent Outreach | U.S. Department of the Treasury](#)

2.2 Outreach: Landlord and Utilities-focused Resources

2.2.1 Intentional Landlord Engagement

Grantees have made great strides through the life of the Emergency Rental Assistance (ERA) program to partner with community stakeholders and bring awareness and access for those in need. In addition to rental assistance, ERA can also offer a system of [housing stability](#) and [eviction diversion](#) services. Effective landlord engagement can help tenants connect to these services, avoiding eviction and remaining stably housed. Many grantees have reached out to landlord associations to build relationships and identify barriers to landlords' participation in the ERA program. Regular conversations with small, medium-sized, and large landlord organizations, as well as public housing entities, have been critical in garnering increased landlord participation in many ERA programs. In some cases, grantees have asked their culturally and linguistically competent partners to incorporate landlord outreach into their targeted [outreach](#) efforts since tenants and landlords often live within the same communities and have similar application support needs. Further, many grantees have found that creating separate applications for landlords and tenants have met landlords' needs for a streamlined process and created operational efficiencies for grantees.

FAQ [38](#) and [41](#) provide guidelines for programs incentivizing landlord participation.

Advantages to using this practice

- Builds long-term partnerships that can help with ongoing tenant needs such as eviction prevention and housing location.
- Creates a vital feedback loop used for ongoing program integrity and evaluation.
- Promotes awareness of housing resources that may benefit landlords.
- Contributes to housing program efficacy and tenant sustainability.
- Benefits can be translated across all housing programs that service low-income households in your community.

Steps to take:

- **EVALUATE** landlord engagement needs. [Analyze application data](#) for patterns and gaps. Speak with key community stakeholders.
- **IDENTIFY** and partner with individuals or agencies with existing strategies. Connect with landlord associations, local housing authorities, and community-based organizations. Use information gathered from data analysis and stakeholder conversations to identify additional partners.
- **DEVELOP** coordinated strategy for engagement. Compile and organize information gathered. Develop list of potential strategies. Pair strategies with key partners.
- **ENGAGE** execute strategies, based upon assessment of needs, with identified partners for successful engagement.



Considerations

- Culturally and linguistically appropriate landlord engagement is critical to cutting barriers to program access.
- Sharing relevant community information to landlords through regular meetings, forums, or newsletters can build trust and increase engagement.
- Local Housing Authorities typically have a comprehensive landlord database and existing landlord engagement strategies.
- Web-based platforms to facilitate property management and housing search assistance help to efficiently pair property managers with households in need of housing.

- Staff roles devoted to developing relationships with landlords can create a community database beneficial for creating a long-term engagement infrastructure.
- Programs designed to help “hard-to-house” households can be supported by creating landlord incentives (with the establishment of reasonable safeguards, as required by [FAQ 41](#)).
- Mediation programs between tenant and landlord provide support aimed at eviction prevention.
- Supportive service roles, such as case managers who have frequent contact with tenants, often provide assurance to landlords who are participating in rental assistance programs.
- Programs that were broadly and consistently publicized provide credibility and therefore build trust with community stakeholders, such as landlords.
- Batched payment structures with landlords of multi-family units can help streamline operations for the landlord, and the program, while expediting the approval process for tenants.

Examples:

Ramsey County, MN

Ramsey County promoted the ERA program and engaged with landlords through a variety of communications. It promoted awareness and participation in the program through biweekly email newsletters reaching over 3,800 subscribers, including the Housing Connection, a biweekly newsletter to both tenants and landlords, and the Landlord Link, a monthly newsletter specific to landlords. In addition, Ramsey County instituted a direct mail outreach campaign to 8,300 landlords and requested that all housing authorities share ERA program information with their landlord distribution lists.

City of Boise, ID

The City of Boise’s ERA program is run by its local housing authority. The housing authority is a well-established pillar in the community, possessing both a comprehensive landlord database and the trust of landlords.

City of Wichita, KS

The City of Wichita hosts an annual housing convening which brings together stakeholders, many of whom are landlords. It covers a variety of topics ranging from Fair Housing law, tenant protections, and code enforcement. Additionally, Wichita leveraged State and Local Fiscal Recovery Funds (SLFRF) to develop and implement landlord incentives, targeted to low-income households, including a lease signing bonus and risk mitigation fund.

Clark County, NV

Through its comprehensive engagement strategies, Clark County recruited 200 new landlords to apply for ERA assistance with their tenants. In combination with weekly landlord meetings, Clark County established additional incentives for landlords to participate in ERA. Using sales tax revenue, Clark County created a landlord incentive fund, in addition to a remediation fund.

City of Honolulu, HI

The City of Honolulu used mediation to help ERA beneficiaries avoid an eviction filing and strengthen the tenant/ landlord relationship. Stand-alone webinars about mediation services, hosted by the city, educated the community about mediation but also provided a way to engage with landlords on ERA and the collaborative application process. The mediators, skilled at finding solutions mutually beneficial to the needs of both landlords and tenants, have increased the likelihood of agreements that permit tenants to stay in their home and landlords to retain successful tenants.

Alachua County, FL

Prior to the launch of the program, Alachua County held weekly meetings to obtain feedback from landlords and community organizations, specifically. The goal of these meetings was to include them in the planning process of program implementation as equal stakeholders of reducing evictions across the community. Additionally, the ERA Case manager, the staff member responsible for carrying out supportive services to households applying for ERA, proved beneficial for landlord engagement. Many “mom and pop” landlords needed assistance completing the portal and uploading documents, feeling supported by the staff who could assure that things were completed correctly. Finally, the ERA Call line was an added tool that provided engagement and support to landlords engaging in the program for their tenants.

State of Wyoming

Townhalls have been an effective way to reach communities in Wyoming about the ERA program. In the initial phases of program implementation, the state held approximately four townhalls addressing how to apply, eligibility, and landlord involvement. Following the initial stand up, Wyoming held two townhalls specifically for landlords. Over 200 landlords attended and over 100 questions were answered about ERA and its ability to pay for past and future rent, and in some cases security deposits and application fees. Due to the positive response, additional townhalls were held and have been very effective in reaching the landlords of Wyoming. Townhall presentations are posted on the Wyoming ERA website, as well as YouTube.

Commonwealth of Massachusetts

The Commonwealth of Massachusetts’s ERA program has collaborated with local state housing partnerships to reduce some paperwork requirements for income eligibility when the tenant lives in subsidized housing. This effort resulted in payment processes that allow batched payments to larger landlords. Approximately two-thirds of Massachusetts’s renters who submitted ERA applications live in subsidized housing units, and Massachusetts reports that these batched payments allow many tenants and landlords to receive ERA assistance more efficiently.

What’s next

Consider your long-term strategy for landlord engagement:

- Consider how landlord engagement strategies can help pilot solutions to improve local housing infrastructure and pinpoint solutions that would not have been apparent otherwise.
- Are there other funding streams to leverage for landlord incentives, such as risk mitigation, lease signing bonuses, etc.?
- How can these strategies help to improve other programming meant to serve vulnerable renters in your community?

Reference: [Intentional Landlord Engagement | U.S. Department of the Treasury](#)

2.2.2 Commitment letters

In some situations, applicants may not have a current lease or rental arrears. They may only be seeking assistance for future rent. Often, in order to obtain a rental agreement, the applicant will need proof that they will be able to pay a security deposit and future rent. FAQs [7](#), [8](#), [9](#), [10](#), and [35](#) all address prospective rent. FAQ [8](#) clarifies:

The statutes establishing ERA1 and ERA2 permit the enrollment of households for only prospective benefits.

And [FAQ 7](#) addresses prospective relocation and security deposits:

For both ERA1 and ERA2, other expenses related to housing include relocation expenses (including prospective relocation expenses), such as rental security deposits, and rental fees, which may include application or screening fees.

Similar to how a bank may provide a pre-approval letter for a loan, a grantee may provide documentation to applicants which states that the applicant is preliminarily qualified or approved for rental assistance based on their application for assistance and specifies the amount of financial assistance the ERA grantee will pay a landlord on behalf of the household if the landlord and household enter into a qualifying lease. This documentation may be used as a commitment letter to induce a landlord to enter into a new rental agreement with an eligible household and can help applicants in a variety of situations.

Advantages to using this practice

Having proof of preliminarily qualified or approval for rental assistance can help several populations who have a high need for rental assistance. Examples of those who may be served by this practice include:

- Eligible households who are currently unhoused
- Eligible individuals transitioning from incarceration or foster care
- Eligible individuals escaping domestic violence and seeking new housing
- Eligible households with an expiring lease
- Eligible households with “month-to-month” agreements

By implementing this practice, the program can reach those who are in need and not in a traditional lease situation. This practice can also create a more equitable program by serving populations who are more likely to be without a current lease and are at risk of experiencing homelessness or housing instability.

Steps to take

1. Prepare a document that can be provided to landlords

Ideally, the document:

- Is on the ERA grantee’s official letterhead and shows the tenant’s name and the preliminarily qualified or approved amount of financial assistance available.
- Clarifies that assistance can be used for security deposit, application fees, and current and prospective rent.
- Has clear contact information for the landlord to reach a designated point of contact at the ERA program office. For example, the State of Vermont not only provides a phone number, but also details the operating hours of the call center.

2. Create an interactive screener

The screener should include eligibility questions and the ability to if the applicant is eligible.

3. If the applicant is preliminarily qualified for assistance, allow the applicant to download and print the prepared document that shows they are eligible for rent assistance

- The State of Rhode Island provides a letter addressed to the applicant and instructs them to print the letter to show prospective landlords.
- The City of Denver provides a letter addressed to the landlord/property owner and confirms that the tenant has applied to the ERA program and is preliminarily qualified or approved to receive assistance. In some situations, applicants may not have a current lease or rental arrears. They may only be seeking assistance for future rent. Often, in order to obtain a rental agreement, the applicant will need proof that they will be able to pay a security deposit and future.

Considerations

- Reach out to organizations that work with populations who may benefit from this flexibility.
- Conduct research with landlords to gauge acceptability of a commitment letter and make adjustments based on findings.
- Consider the availability of affordable housing stock in the program's jurisdiction. While this may work well in certain areas, in areas with low availability of affordable housing prospective tenants may be dealing with availability as their primary barrier to stable housing. Northern Circle Indian Housing Authority works proactively with landlords to receive notification of available units as soon as they become vacant.
- Track metrics around this feature.

Examples

State of Connecticut

The state of Connecticut uses a self-service pre-eligibility survey tool, accessible on the UniteCT website, as a form of documentation that tenants may show a landlord to demonstrate that they are eligible for assistance. This practice may help applicants who are currently unhoused and therefore do not have a current rental agreement. It may also help applicants that face eviction and need more immediate proof of future rental assistance while they wait for their application to be processed.

State of Colorado

The State of Colorado makes available to their grantees a commitment letter that clearly states how much will be paid out to the landlord. The form has placeholders for the actual dollar amount that will be paid for three months rent, estimated average utilities, security deposit, additional three months rent, and rental application fees. This makes it very clear how much the landlord will be able to receive by accepting the application of a potential tenant that will be receiving assistance with ERA funds.

City of Denver

The City of Denver provides a Letter of Intent to Provide Rental Assistance. The letter is addressed to the landlord/property owner and confirms that the tenant has applied to the ERA program and is eligible to receive funds to cover the costs of the security deposit, application fees, current and prospective monthly rent, and other reasonable expenses related to housing as described in the rental agreement. It also includes a link and contact information for the landlord to fill out their part of the application or if they have questions.

State of Rhode Island

The State of Rhode Island provides [a letter addressed to the tenant](#). The letter states that the applicant has successfully submitted their application and that they qualify for assistance with a security deposit and up to three months of prospective rent. It also informs them that they have 90 days from the date on the letter to secure a unit and instructs them to print out the letter to show potential landlords as evidence of their ability to provide a security deposit and first month's rent. The letter also includes a phone number that prospective landlords can call to learn more about the program.

State of Vermont

The State of Vermont provides a [letter of intent addressed to the tenant](#). The letter states that the applicant has been preliminary approved for assistance. The letter details that the applicant is approved for a fair market rent amount, set number of bedrooms, and specific county in Vermont. The applicant has 90 days from the date of letter issuance to find a unit. The letter also includes links to eligibility requirements and to an explanation of fair market rents in Vermont, along with a phone number to call for further assistance.

Northern Circle Indian Housing Authority (NCIHA)

[NCIHA](#) is a Tribally Designated Housing Entity that works on behalf of seven federally recognized Tribes in Northern California to carry out housing related programs. NCIHA works directly and proactively with prospective tenants, private landlords, and property managers to house members who do not have a current lease.

NCIHA connects members who are unhoused with landlords and utilizes ERA funding to help those tenants get a start on their new housing. NCIHA builds trust with landlords by providing additional support beyond rent, such as financial counseling, to prospective tenants, ensuring they will experience increased housing stability. By taking a holistic and human-centered approach to program management, NCIHA has been able to secure new leases for over 100 individuals who were previously unhoused.

What's next

Make sure landlords are willing to accept the documentation presented

- If an applicant is preliminarily qualified or approved for assistance but the landlord they are working with is not accepting the documentation, how might the program support that applicant? What should the applicant do in this case?
- If a large number of landlords are not accepting the documentation, what might be changed to improve the acceptance rate? Does the documentation need to appear more formal? Does it need to include contact information?

Make sure potential applicants are aware of this feature

- Are the most vulnerable populations aware of this information?
- What kind of outreach is in place? In Denver, CO, the Department of Housing Stability has a reviewer proactively determine the need for a letter, customizes the letter, and delivers it to the applicant.

How it connects to your program's health

Part of program integrity is making sure the right people are getting access to ERA assistance. Equity recognizes that different people are in different circumstances, and some of those people will need the ability to prove they can access future rent assistance in order to be stably housed. This practice opens up the opportunity of helping those in that circumstance.

Reference: [Using Commitment Letters to Assist Prospective Renters | U.S. Department of the Treasury](#)

2.3 Coordination with utility companies

Grantees in many areas have found that engaging local utility companies and partnering with other utility assistance programs can make the delivery of assistance to households in need more efficient and effective.

Working with Energy Providers to Increase Efficiency and Reach

Strategic coordination and data sharing with utility companies can help promote the utility assistance options available to vulnerable households, increase program efficiency, and connect households to a broader range of housing support services. Promising practices include:

- Encouraging energy providers to include pamphlets or other educational materials about ERA and other housing and utility assistance programs in their regular mailings to potential applicants.

- Building relationships with energy providers and establishing information sharing protocols that bring transparency to the application process. These practices can expedite the identification of and delivery of assistance to eligible consumers. As discussed in [FAQ 38](#), these strategies may include data sharing and bulk and bundled payment methods.
- Encouraging energy providers to automate processes to proactively identify households in need. For instance, vendors energy providers can coordinate with administering agencies to identify households that may be eligible (i.e. related to [COVID-19 financial impact](#) and/or [housing instability](#)) and automate the process of providing potential client data to the relevant intake agency where the eligibility/benefit determination is made.
- Entering into vendor agreements that lead to reconnection, pausing service shut-offs, and offering additional consumer protections for households upon application for utility assistance. Grantees may also explore providing forward-looking utility assistance payments over the next several months to low-income families facing high heating costs. For providers of delivered fuels, vendor agreements should include automatic deliveries to households receiving benefits as quickly as possible.
- Collaborating with grantees of other energy assistance programs. This practice can help make it easier for utility companies to build out customer assistance procedures in their operations that work across several programs and can increase the incentives for the utility companies to engage in consumer-friendly practices.
- Expediting payments through partnerships with non-profits to prevent the loss of utility services when the rapid delivery of a payment could reasonably be necessary to prevent the loss of utility services. [FAQ 42](#) provides guidance designed to give grantees flexibility to partner with nonprofit organizations for the purpose of making immediate payments while a household’s application is still being processed.

Examples

Richland County, SC

Richland County, SC has developed a strong relationship with the area’s utility company. The county proactively reached out to the company to discuss ERA program benefits and found receptive partners. Upon notification that a tenant has applied for ERA funds, the utility company affords the applicant a grace period that suspends the disconnection process while the ERA program administrators process the requested assisted payment.

City of Memphis and Shelby County, TN

The City of Memphis and Shelby County’s joint program developed a partnership with the local utility company to more quickly identify renters who have started ERA applications. This partnership builds on a relationship these grantees established with the utility company and other local government programs during the ERA program’s initial implementation. While originally involving batches of period notifications, the process has evolved to include direct data sharing. Once identified as an ERA recipient, the applicant receives a grace period for utility payments and, if needed, qualifies for an immediate restoration of services. These procedures afford households in need immediate benefits for applying while affording the program administrators time to make the necessary eligibility determinations and complete the payment process.

State of Connecticut

The State of Connecticut has engaged in a data-driven collaborative effort with all regulated electric utility companies within the state to proactively offer utility assistance to eligible households who have not yet applied for rental assistance through the regular application channels. The local utility partners share data on renters living within a Qualified Census Tract (providing a [fact-specific proxy for income eligibility](#)) who have an eligible utility arrearage. Following identification as a likely eligible household, those households receive an email or text in advance of a targeted robocall featuring a recording from the state’s governor offering to pay the utility arrearage. The subsequent call directs the applicant to a live customer service agent who takes them through a series of recorded self-attestations that act as an electronic signature and record of program eligibility—allowing the state’s ERA program

to efficiently collect eligibility documentation and quickly issue payments to the utility provider. Applicants also learn about available resources to apply for further rental assistance. Administrators of this program note that public notification and promotion of the robocall script, as well as coordination with all of the utility providers within the state, has helped to support consistent and transparent messaging to ensure availability of these benefits to constituents across the state.

Coordination with Other Utility Assistance Programs

Coordination with other energy assistance programs can support increased overall household awareness of available utility assistance, better addressing the utility needs of local households, and intake and eligibility determination systems that are as transparent, accessible, efficient, and well-coordinated as possible at state and community levels.

ERA Grantee Coordination with Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP is a longstanding source of federal support for households that need assistance with winter heating costs administered by the U.S. Department of Health and Human Services (HHS). Through a nationwide network of governmental and locally-based nonprofit service providers, LIHEAP provides federally funded assistance in managing costs associated with home energy bills, energy crises, weatherization and energy-related minor home repairs.

On November 18, 2021 HHS shared a [“Dear Colleague” letter](#) to LIHEAP grantees underscoring the benefits of coordination between LIHEAP and ERA programs. HHS coordinated with Treasury staff in preparing a set of promising practices that can help establish a baseline for program administrators beginning that work.

Some promising practices may include:

1. **Regular Communications Between ERA and LIHEAP Program Leadership** – In many cases, these closely-related areas of assistance are available within the same jurisdictions but may be administered through different departments or governmental entities. Establishing regular and thoughtful program leadership communication can ensure awareness of the policies, processes, and systems of their respective program efforts.
2. **Regular Stakeholder Communications** – Establish regular stakeholder communication collaboratively convened by both the LIHEAP and ERA programs with energy providers, local administering agencies, and regulatory authorities, especially related to sharing best practices in program coordination, operational improvements, and outreach to potential eligible households.
3. **Review of Program Offerings** – In preparation for [potential increases in winter utility needs](#), collaborative review of locally-imposed eligibility requirements, the types of assistance offered, and assistance benefit levels can help reveal opportunities to better serve the community. For instance, program administrators may wish to adjust locally imposed caps on benefits, consider offering prospective utility assistance, or explore expanding the range of utilities covered (such as delivered fuels, etc.). This may also include review of the various application processes and adjusting how financial burdens related to increased utility costs might help in documenting [COVID-19 financial impact](#) and/or [housing instability](#).
4. **Developing referral policies between programs** – Referral policies and procedures can help match applicants to the most appropriate program to meet their specific situation. For instance, ERA programs may wish to incorporate a policy to refer applicants to LIHEAP when the household is facing a home energy crisis where there is a need to expedite intervention to restore or prevent the loss of services, as the federal LIHEAP statute requires that eligible households applying for crisis assistance receive an intervention to resolve the crisis within 48 hours or within 18 hours for life-threatening situations.

5. **Coordinated Outreach** – Simple and coordinated messaging about utility and related housing stability resources through trusted channels can smooth applicants’ access to the most appropriate program for their situation (e.g. creating shared educational resources to message utility and related housing stability benefits, coordinated public information campaigns, “no wrong door” portals to guide applicants to the right program, etc.).
6. **Categorical Eligibility** – Categorical eligibility can support faster income determination, reduced paperwork burden, and expedited the overall eligibility process. For example, using eligibility for LIHEAP as categorical eligibility for ERA may simplify intake for households seeking assistance from both programs.
7. **Data Sharing, Linked Application, or Referral Systems** – A single “front door” or single intake process across benefit programs can simplify application processes for households. When feasible, establishing protocols for data sharing, linked applications, and/or referral systems with a warm handoff process can help ensure the best match between the household and the assistance program.

ERA Grantee Coordination with Homeowners Assistance Fund

ERA grantees may also consider coordinating with HAF administrators. The purpose of the [Homeowner Assistance Fund \(HAF\)](#) is to prevent mortgage delinquencies and defaults, foreclosures, loss of utilities or home energy services, and displacement of homeowners experiencing financial hardship after January 21, 2020. Funds from the HAF may be used for assistance with mortgage payments, homeowner’s insurance, utility payments, and other specified purposes. The law prioritizes funds for homeowners who have experienced the greatest hardships, leveraging local and national income indicators to maximize the impact. Incorporating coordination with HAF program administrators would further serve to improve messaging, operational implementation, and overall program effectiveness of providing a range of utility assistance programs locally.

Reference: [Collaboration with Local Utility Companies & Other Utility Assistance Programs | U.S. Department of the Treasury](#)

3. Documentation Burden Reduction

3.1 Considerations for good program design and delivery: Human centered design

Grantees should make decisions about their program based of the intersection of these different factors:

- **Grantee Business Needs:** Resources, skills, and operations must have to run, to serve effectively, and manage their budgets.
- **Social and Political Landscape:** The general situation or attitude held by the community or stakeholders that will determine the reaction to decisions or changes.
- **Grantee and Partner Capacity:** The bandwidth the grantee organization to meet future demand and how it might impact the organization and community.
- **Community Needs (tenants and landlords):** Governments have to actively reach out to understand the needs of some of the public, including some of the most historically marginalized communities and those in crisis.



Considerations for good service design and delivery

Grantees are expected to provide the service of rental assistance to tenants and landlords. That service is made up of a series of interactions that tenants and landlords have in seeking assistance. A service design approach looks at the end-to-end process and the tasks that shape those interactions even if they are spread across different parts of your program or local government. Central to service design is taking a human-centered approach which puts the human at the center of crafting your service in order to better meet community needs.

Taking a human-centered approach

Human-centered design is an approach that can help grantees [better understand](#) the needs of tenants and landlords, thus creating a more impactful ERA program. The approach provides [methods](#) that put the public at the center of decision-making, design, and implementation of services. It is a creative problem-solving process that includes community members and emphasizes a much deeper understanding of their needs in order to arrive at solutions that truly reflect the community's needs and solves for root problems.

Human-centered design is grounded in values: accessibility, equity and usability. These are the values that should be driving and shaping grantee's ERA program.

Values

Values are the cornerstones for how to shape the ERA program. They reinforce what is important, create a unified purpose and guide the behaviors and approaches in how we deliver ERA programs.

Accessibility

Section 508 of the Rehabilitation Act of 1973 states that federal agencies must give disabled employees and members of the public access to and use of information and data that is comparable to the access and use of information and data available to employees and members of the public that are not disabled. Therefore, we expect grantees to do the same for their Emergency Rental Assistance (ERA) program materials and services, including the ERA applications, which should be [accessible to all](#).

- Create applications and services that are accessible to all people, regardless of disability or other factors.
- Design applications for the spectrum of disabilities, because disabilities can be permanent (e.g., chronic health condition), temporary (e.g., broken arm), or situational (e.g., being in a noisy environment).
- The accessibility of an application pertains to the visual design/layout, language used, the applicant/product interaction, and more.
- Local ERA programs with targeted outreach are a key component for making ERA applications accessible.

Equity

ERA applications and programs should be designed with an understanding of the realities of communities. We are missing an opportunity to really meet community needs when this does not happen, and the continued marginalization of these communities breaks trust when governments do not co-design with them. This ultimately results in worse outcomes for already historically marginalized communities, such as higher eviction rates.

- Create an ongoing, inclusive engagement process with the community and stakeholders to be involved and align their feedback with tangible action and iteration on application design and process (e.g., Reach out to get feedback directly from targeted community members, not advocates.)
- Consider who has the current ability to participate in your ERA program and create ways to increase access and barrier bust.
- Create culturally relevant solutions and service support for the application process.

Usability

ERA websites and applications should be easy to find and access. If an application is difficult to use, people will get discouraged to apply for assistance and are significantly more likely not to use it. Usability factors include:

- How easy it is to pick up and self-navigate
- How quickly can they perform tasks
- How easily can they re-enter an application and pick-up a task again

How many and what kinds of errors do users make due to the design

How enjoyable it is to use the design

Reference: [Program & service design | U.S. Department of the Treasury](#)

3.2 Making the Application Process Simple and User Friendly

Many jurisdictions have increased the reach and accessibility of programs by making the application process more user-friendly for both households and landlords. This can include efforts to simplify the application process itself, to make the application itself easily accessible online, or provide other ways to make the applications more generally accessible to tenants and landlords.

Examples

State of Alaska, the Municipality of Anchorage, and 15 agencies representing 148 federally recognized Tribes

The State of Alaska, the Municipality of Anchorage and 15 agencies representing 148 federally recognized Tribes collaboratively developed a standardized mobile-friendly application system using five nonprofit providers from across the state. The application was broken into several stages that each required 3-5 minutes, and the program implemented text messaging functionalities to speed the process. The collaborative planning and implementation approach led to one third of renters within Alaska applying to the program, with Alaska Native/American Indian applicants representing 28% of responses.

State of Virginia

The State of Virginia has implemented efforts to address incomplete applications with outreach phone calls. Combined with translation services, this targeted and direct phone outreach helps to push many applicants in high need areas to complete their application. Program administrators have noted that many applicants had not realized that their applications were incomplete, and these outbound efforts have a direct correlation with improvements in application completion.

Reference: [Making the Application Process Simple and User Friendly | U.S. Department of the Treasury](#)

3.3 Documentation Burden Reduction: Fact-specific Proxies

Applicants must meet certain maximum income limitations in order to be eligible for emergency rental assistance. An applicant's stated income can be reasonably confirmed by cross-checking the factual information provided in the application against statistical data resources.

Relying on these resources can simplify the application process, reduce processing time, and ensure more households avoid eviction and housing instability.

Steps to take

Income proxy

To develop and use an income proxy, a grantee will need to do the following:

1. **Determine a [reasonable geographic area](#) (e.g., census tract, ZIP code, districts, etc.)**

Many grantees, such as Virginia, Washington, and Kentucky, have built their proxies around ZIP Codes. Most of these grantees are using census-tract level data to derive facts at the level of ZIP Codes, and then use ZIP-Code-level data as a part of their application review process to simplify deployment.

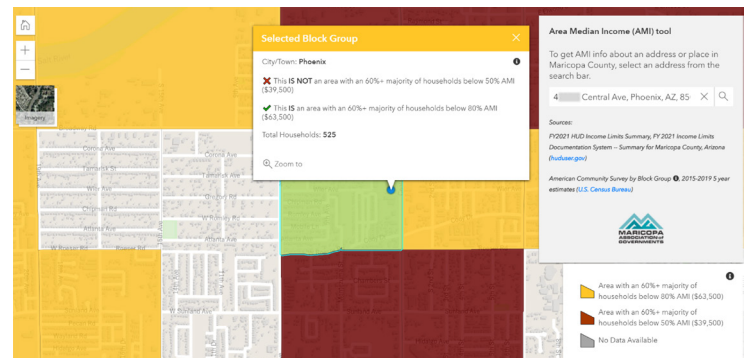
In Kentucky, in instances where a ZIP Code spans two or more counties, the ZIP Code was associated with the county in which a majority of the ZIP Code's population lives. Grantees such as Maricopa County have built systems that allow them to use census tract and block data directly, which offers greater granularity than ZIP Codes.

2. **[Find data sources](#) that offer population-level income data for your geographic area.**

Grantees such as Kentucky and Washington rely on census data from tables such as B19013 for median area incomes at the census-tract or ZIP Code-Tabulation-Area level. The state of Indiana is partnering with local utility companies to obtain data about utility arrears, which they combine with HUD Qualified Census Tracts to determine income eligibility (via the qualified census tracts) and acute need (via the arrears data). The state of Oregon is using 5-Year American Community Survey (ACS) data from the U.S. Census Bureau. When possible, their proxy evaluates median renter household income, rather than the median income of all households in the ZIP Code. When there is no estimate for median renter income in the ACS data, they use the median income of all households.

3. **Implement a [technique for looking up addresses of applicants within your defined geographic areas](#)**

In Phoenix, AZ the Maricopa Association of Governments designed a census block map specifically to identify census blocks with high needs. The map allows a case worker to look up an address and determine if that address sits within a Census Block Group where 60% or more of the population is below 80% AMI of Maricopa County.



4. **[Integrate your new fact-specific proxy](#) with your system to help determine applicant eligibility**

In Virginia, the Department of Housing and Community Development has published [a simple PDF of ZIP codes](#) that an application processor can use to determine that a 3-person household is income eligible for assistance.

Grantees have noted the importance of training staff on how to use a proxy to determine income eligibility, to build in a feedback mechanism from staff to program administrators, and to continuously refine the use of the proxy as the program evolves. In Kentucky, the program started using a fact-specific income proxy as a backup option for determining income eligibility and, after a month of monitoring, expanded the use of the proxy to be a primary method of determining income eligibility.

More detailed illustrations of these steps are available in [“Guidelines for fact-specific proxies”](#).

Categorical Eligibility

Many grantees are using an applicant's participation in other government programs with similar income eligibility criteria as proxy. As defined in [FAQ #4](#), "grantees are permitted to rely on a determination letter from the government agency that verified the applicant's household income or status as a low-income family, provided that the determination for such program was made on or after January 1, 2020." The government programs include but are not limited to:

- Head Start Childhood Education Program
- Medicaid
- Public Housing or Section 8 (housing choice vouchers or project-based)
- Social Security Disability Insurance (SSDI)
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)

What's next

Grantees who have implemented proxies may consider these practices to continuously improve their usage.

Track how your proxy affects your program across multiple dimensions

Key questions to track include:

- How is application processing time affected?
- Is money flowing to the places with the highest need?
- Are you serving more households without increasing program administrative burden?

Track your own metrics and feed your data back into your proxy

As a program matures, it will have a wide source of data about what rents are in an area, what incomes are, and other data similar to what programs derive from census data. Analyzing collected and verified data through the application adjudication process can offer yet another source of data for a proxy and for program improvement overall.

Reference: [Using Fact-Specific Proxies to Simplify Documentation Requirements | U.S. Department of the Treasury.](#)

4. Eviction Diversion: Promising Practices

Many grantees have found that partnerships with their local court systems and legal services organizations are critical tools for preventing housing insecurity and helping landlords recover from rental arrearages. While court systems and eviction procedures vary across states and localities, these grantees have engaged with local courts, legal aid organizations, and other stakeholders to reach households with the greatest need for assistance—those facing imminent eviction. These partnerships have often included streamlined procedures that reduce the eligibility documentation required from households in these situations. Efforts by ERA grantees are sometimes complementary to broader eviction diversion programs. These efforts play an important function in cases where the landlord had already started eviction proceedings. In addition to expediting ERA applications, they often prevent evictions by utilizing the support of legal service professionals and mediators in interventions at the early stages of the court process. ERA grantees have also found court data helpful for informing targeted outreach efforts to landlords and/or high-need geographic areas.

4.1 Eviction Diversion: Maturity model matrix

The following maturity model can help grantees shape a strategy and have actionable steps to address eviction diversion. A maturity model is a tool that helps organize strategy, practices, and process into a framework that can act as a blueprint for building up stronger capabilities. This model is intended to aid ERA grantees and stakeholders in determining their program’s current development stage and identify improvements that will facilitate increasingly robust, comprehensive, and effective approaches to ensuring housing stability within their jurisdictions.

Disclaimer: The practices referenced in this model may contemplate the leveraging of ERA funding with other federal, state, and local resources. The model’s reference to an example practice should not be construed as confirming such practice’s eligibility for any particular type or category of federal funding. Grantees should consult the governing federal program authorities for additional guidance before expending funds for such purposes to confirm eligibility.

	Starting	Emerging	Adapting	Maturing
Resource and shape programs	<ul style="list-style-type: none"> Leverage existing system assets Utilize existing system resources, programs, staff, and community organizations to help manage and shape the program. 	<ul style="list-style-type: none"> Build with the community Listen to local residents to understand needs; leverage partners outside the traditional housing system; and determine how to best use funding sources. 	<ul style="list-style-type: none"> Prepare for volume of evictions Automate and optimize processes with tech and data; Connect directly with tenants before court; Expedited rental payments. 	<ul style="list-style-type: none"> Sustain for the future Plan and prepare for the systemic housing challenges after evictions.
Tenant-based	<ul style="list-style-type: none"> Do community-based outreach Work closely with trusted community sources and people to get the word out about rental assistance. 	<ul style="list-style-type: none"> Use aimed outreach Increase awareness and accessibility through a portfolio of partners and approaches to connect with specific high risk populations. 	<ul style="list-style-type: none"> Connect to options Provide information and pathways to services that can help stabilize tenants and their housing while in crisis. 	<ul style="list-style-type: none"> Advocate for and empower Provide education, guidance and legal representation on housing rights before and during eviction process.
Landlord and property manager-based	<ul style="list-style-type: none"> Accept ERA applications from landlords Encourage and give tools or processes to landlords that helps them be a proactive applicant. 	<ul style="list-style-type: none"> Use aimed outreach Increase awareness through partnerships with real estate, homeowners and property managers groups. 	<ul style="list-style-type: none"> Engage and educate Encourage landlords to honor eviction moratorium and provide information that can help proceed. 	<ul style="list-style-type: none"> Incentivize and support Provide immediate financial assistance to reduce the burden on landlords and offer recognition for service provided to the community.
Relationship-based	<ul style="list-style-type: none"> Advocate for early communication Create messaging and outreach that encourages early and transparent communication between parties. 	<ul style="list-style-type: none"> Create connected applications Create an application process that connects tenants and landlords easily and makes transparent each parties part. 	<ul style="list-style-type: none"> Build bridges between parties Provide mediation services between tenants, landlords, and property managers. 	<ul style="list-style-type: none"> Incentivize resolutions Change property management and eviction courts incentives in order to reward dismissal of evictions.
Prioritizing evictions	<ul style="list-style-type: none"> Flag tenants in imminent danger of eviction Prioritize tenants for emergency rental assistance who face immediate evictions. 	<ul style="list-style-type: none"> Collaborate courts around evictions Connect ERA grantees with courts processing evictions so they can collaborate to assist eligible tenants. 	<ul style="list-style-type: none"> Partner to expedite Work with multiple partners to optimize collaboration to connect with tenants missing documentation and on the eviction court docket. 	<ul style="list-style-type: none"> Proactively address Share data across the system to create shared understanding and automated processes that allows grantees to better prioritize and connect with tenants.

4.2 Eviction Diversion: Program examples

City of Memphis and Shelby County, TN

The city of Memphis and Shelby County’s joint program includes a data sharing relationship with the local court system. This partnership affords ERA program administrators real-time information about neighborhoods with increased eviction activity, allowing more targeted outreach towards tenants and landlords. Using this data, the ERA program administrators have been able to foster effective relationships with larger apartment complexes and engage directly with tenants on the premises. Memphis and Shelby County have also contracted with a local nonprofit organization with experience providing legal services to tenants facing evictions, helping them to reach settlement and avoid evictions. Further efforts to expand tenants’ access to legal services have included enlisting faculty and student volunteers from the local law school. The Memphis and Shelby County ERA program expedites ERA applications that come through these channels, allowing many households to use ERA funds to remain stably housed rather than enduring the hardship of a court-approved eviction.

City of Philadelphia, PA

The city of Philadelphia's ERA program is also integrated directly into the city's eviction court system. The court requires defendants to apply for the city's ERA program before allowing the eviction to proceed. Further, all landlords who enroll in the city's ERA program are automatically enrolled in the eviction diversion system, alerting them to the resources offered by the city to help avoid tenant evictions, such as nonprofit mediation services.

City of Louisville, KY

Louisville, KY is utilizing a multi-pronged approach to eviction diversion that includes legal representation for tenants, community based outreach, and collaboration with local courts. The city has allocated \$400,000 of their ERA funding to enact a right to counsel program for tenants with children who are facing eviction. Their Office of Resilience and Community Services has partnered with the Office of Women, Office of Housing, Neighborhood Place, and the Coalition for the Homeless to target and reach out to Louisville residents at risk of eviction. The collaboration with the Office of Women was born out of the recognition that female led households, especially those headed by African Americans, are disproportionately targeted for eviction. Outreach includes knocking on doors, sending texts, and making phone calls to encourage these tenants not to miss their court dates. Staff also attend eviction court on a daily basis and can coordinate with the judges to stay eviction for tenants who could benefit from emergency rental assistance. To aid tenants who "self-evict", by moving when they receive an eviction notice, the city has put in place a rapid-rehousing program that provides a rental deposit and the first month's rent to help people relocate.

Reference: [Eviction Diversion | U.S. Department of the Treasury](#)

5. Housing Stability Services: Promising Practices

While the Emergency Rental Assistance (ERA) program addresses the immediate financial distress faced by tenants and landlords during the COVID-19 pandemic, ERA can also serve as a catalyst to pilot solutions for existing gaps in the housing ecosystem and support long-term housing stability for renters. Under [ERA1](#), housing stability services may be used to provide eligible households with services related to the COVID-19 outbreak, while [ERA2](#) funds may be used to provide services intended to help keep households stably housed. ERA funds can be used to support services that are intended to keep households stably housed.

[FAQs 1, 23, & 29](#) all address housing stability services. [FAQ 23](#) addresses specific activities related to housing stability services:

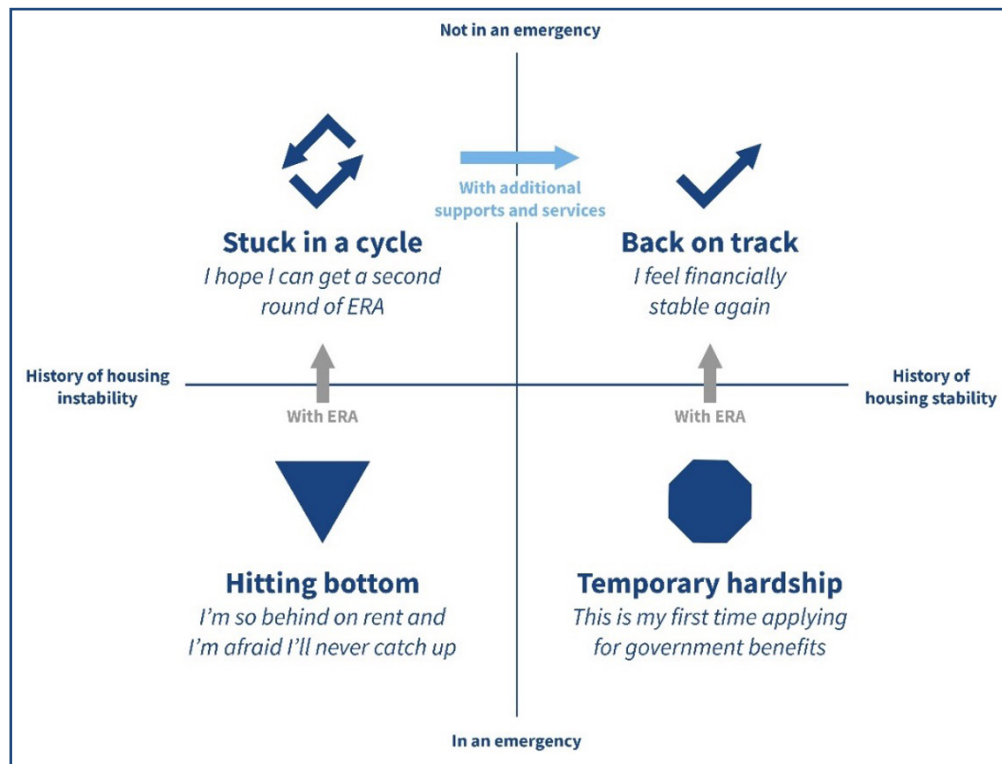
Housing stability services are services "that enable eligible households to maintain or obtain housing." These services may include, among other things, eviction prevention and eviction diversion programs; mediation between landlords and tenants; housing counseling; fair housing counseling; housing navigators or promoters that help households access ERA programs or find housing; case management related to housing stability; housing-related services for survivors of domestic abuse or human trafficking; legal services or attorney's fees related to eviction proceedings and maintaining housing stability; and specialized services for individuals with disabilities or seniors that support their ability to access or maintain housing.

HOUSING STABILITY SERVICES

ERA grantees across the country have successfully used housing stability services to support [outreach](#) to various communities, to fund [eviction prevention and diversion](#) efforts and to support relocation and rehousing efforts. Relocation and rehousing efforts can support households needing to relocate to another unit or unhoused households obtaining housing.

Some grantees are also using ERA financial assistance and housing stability funds to address gaps in existing housing ecosystems by providing better access to existing housing stability services. Through braiding resources, ERA housing stability services can provide wrap-around casework to support vulnerable families and build a long-term infrastructure.

While the priority of many eligible households receiving rental assistance is to address a temporary hardship to get back on track and avoid entering a cycle of housing instability, many households were already stuck in a cycle of financial hardship that was further exacerbated by the pandemic. Integration of wrap-around services can be particularly important for tenants who have more than a temporary hardship related to the pandemic and for whom financial assistance covering rental arrears is not enough to “catch up” over the long term.



[Building Housing Stability Infrastructure | U.S. Department of the Treasury](#)

Advantages of using this practice

Having a network of support services can help households move out of a cycle of housing instability and into a pathway of financial stability. Examples of those who may be served by this practice include eligible households that:

- have previously received rental assistance,
- have a history of eviction,
- need referrals and system navigation to access a variety of services, including but not limited to workforce development, financial literacy, case management, health & behavioral health services, food resources, etc.,
- need additional support and coaching to develop a reliable self-sufficiency plan for maintaining housing, or
- need housing navigation to find affordable and habitable housing options.

By implementing these services, a long-term infrastructure is built that can help break the cycle of housing instability and support a holistic community recovery.

Steps to take

1. **Assess need for long-term housing stability and eviction prevention services in housing ecosystem**
 - Network with program administrators of other housing services and local organizations that serve various vulnerable populations about gaps in the current system.
 - Network with local courts and organizations that provide legal services for tenants facing eviction.
 - Join and/or create coalitions and workgroups that are strategically planning housing stabilization and/or eviction prevention for your community.
 - Analyze available data to determine recurrence of households requesting assistance, evictions, and other metrics as defined.
2. **Map services to create shared understanding of ecosystem**
 - List all services related to housing stability.
 - Indicate programs that are long-term vs. short-term.
 - Consider how an individual or family might become aware of and navigate available assistance.
 - Plot services in a map to show relationship.
 - Consider referral and intake processes for these services.
 - Review map with relevant stakeholders to ensure accuracy and alignment.
 - Facilitate a workshop/focus groups to allow stakeholders to contribute edits.
3. **Identify opportunities to incorporate housing stability and eviction prevention services to fill identified system gaps**
 - Consider braiding funding with other agencies and/or state and local resources to fund services that are directly related to housing and housing stability, such as housing counseling or housing navigation.
 - Consider braiding services with agencies that already offer housing stability and other services directly related to housing and housing stability, including:
 - Credit counseling, budgeting, financial literacy.
 - Case management.
 - Legal services for tenants facing eviction.
 - Assess referral systems and networks.
 - Consider utilizing a centralized system approach to access services.
 - Assess landlord engagement and mediation strategies.
 - Determine which agencies have strategies and forums to engage with landlords to rent to low-income households.
 - Determine if there are agencies facilitating mediation within the courts or community to avoid/prevent eviction.
4. **Implementation of housing stability plan, and incorporation of quality control**
 - Establish system of providers and networks that support housing stabilization and eviction prevention.
 - Consider using data or other strategies to track impact of efforts.

- Develop quantitative metrics that could measure success, which might include:
 - Tracking eviction data.
 - Tracking entrance into homelessness system.
 - Tracking rehousing numbers.
- Develop qualitative metrics that could measure success, which might include:
 - Successful connection to services.
 - Length of time a household is stably housed.
- Develop a follow-up strategy that is manageable within your program design; this may include smaller post-program interview strategies for randomly selected participants.
- Meet regularly with collaborators to adjust as necessary, using quantitative and qualitative data from implemented data platform.
- Establish a community of learning.
- Schedule consistent learning and education opportunities.
- Establish effective communication loops for network of providers.
- Allow opportunities to share challenges and lessons learned.
- Support opportunities to brainstorm and identify collaborative solutions.

Considerations:

- There may be networks and coalitions who are already focused on housing stabilization and will be interested in expanding/refocusing efforts.
- Consider the geographic characteristics of your community, and how this may impact outreach and delivery of services.
- To preserve funding and prioritize assistance, determine ways to evaluate high vulnerability for housing instability.
- There may be data platforms already tracking desired information for other vulnerable populations.
- If coordinated data tracking is not possible, established communication channels are key.
- ERA housing stability services is primarily focused on services that are directly related to obtaining and maintain housing for eligible households.

Examples of partnerships & braiding resources

STATE OF MONTANA

Montana partners with the state Department of Public Health and Human Services (DPHHS) on the intersection of housing and healthcare needs under an Interdepartmental Housing Integration Project (IHIP) that involves monthly meetings between Montana Housing / Commerce staff, DPHHS as well as the State of Montana Continuum of Care and other partners. It's through this partnership that the state identifies training curriculum for partner organizations and shares referral information between its ERA staff (including a call center) and partners to best direct residents to other resources that may be able to support them beyond ERA. Program administrators note that deploying ERA Housing Stability Services is helping the State of Montana better identify and adopt best practices for housing-related supportive services, including housing navigation and housing case management (stability services and eviction prevention).

STATE OF NORTH DAKOTA

In North Dakota, ERA has been a catalyst to support stronger statewide networks of organizations supporting housing stability. The state has contracted with 20 community-based organizations around the state. Through this network, they were able to put in place application counselors and housing facilitators to assist households with the application process and beyond. In addition, they have secured mediation services for those facing eviction. To support continual development of housing stability in the state, program administrators have created “communities of learning,” which involve regular meetings to discuss, develop, and refine their housing stability strategies.

JEFFERSON COUNTY, ALABAMA

Jefferson County, Alabama has established a strong eviction prevention and housing stability infrastructure that did not exist before ERA. Jefferson County’s District Court judges championed the development of a landlord/tenant meeting which is a partnership among the district courts, local legal aid services, the volunteer lawyers, landlord attorneys, Jefferson County Sheriff’s Office, Jefferson County Department of Community Services, and the community-based organization administering the ERA program in addition to tenant advocates. Additionally, mediation clinics have been implemented and ERA program information has been added to tenants’ seven-day eviction notice. The County has taken a comprehensive approach to ensure that both tenants and landlords have access to resources, as well as establishing partnerships that support housing counseling and education services that are also offered through the community-based organization administering the ERA program.

NORTHAMPTON COUNTY, PA

Northampton County has a network of providers that covers all areas of the county. As an eviction prevention strategy, the county hired tenant navigators that complete networking within the courts and connect tenants to social services through a variety of partnerships that offer services such as credit counseling, case management, and other legal services. As a long-term strategy, Northampton is looking into an education component for tenants who will be exiting the program to ensure that they relate to the services and resources necessary to prevent housing instability.

MARICOPA COUNTY, AZ

Maricopa County has used their designation as a Community Action Agency, as well as partnering with other social service agencies to provide wrap-around services which include case management, workforce development, and more. They have also coordinated with other federal programs that they provide in the County, like Head Start, to quickly connect families to rental assistance to prevent evictions. Additionally, their eviction prevention strategy includes navigators in the courts to prevent evictions, as well as a landlord coordinator to work with landlords to prevent the eviction process from even beginning, and a coordination of services with the help of community legal services. 211 Arizona, a nationwide source of information for local resources and services sponsored by the United Way, plays an integral part in coordinating supports for tenants in need.

CITY OF COLUMBUS & FRANKLIN COUNTY, OHIO

Columbus has contracted with over 30 agencies to provide application assistance and wrap-around services for tenants. The combination of agencies covers a variety of vulnerable populations, including refugees, seniors, youth, and those experiencing homelessness. In addition, they’ve also partnered with legal and mediation services to help tenants develop payment plans or moveout plans with landlords, as well as have staff directly in the courts to check real time application data and facilitate continuations. Franklin County has administered its ERA funds through two primary partner agencies, the Department of Job and Family Services, and a local community action agency. Both agencies have a long history of partnership with the county, in addition to having historically dispersed rental assistance to those in need. In addition, they are working with the city of Columbus, to access services through legal aid and mediation to prevent eviction. The Department of Job and Family Services primarily serves households with children and is able to braid funding resources to offer additional rent and utility assistance if necessary.

The Department also contracts with several community partners to offer services ranging from behavioral health, workforce, and food insecurity in order to refer and secure additional wrap-around resources for families. The city and the county collaborate in bringing together a housing stabilization taskforce to identify gaps and opportunities to better serve the community across various programs and funding streams. These have proven invaluable in strengthening local community networks.

CITY OF ATLANTA, GEORGIA

Particularly during the height of the pandemic, remote learning for school-age children created significant stress on renters who often had to forego income to care for children who would have otherwise been at school during the day. In many cases, low-income households also did not have internet services or the necessary technology to help their children successfully navigate remote learning. The city of Atlanta worked with counselors integrated into the school system to identify low-income renter households where children were not attending their classes through remote platforms. Braiding ERA with other funding, local officials were able to offer these households funds for internet services and computer equipment for their children to access the remote classroom, in addition to providing financial support for rent and utilities.

What's next

Determine opportunities to fit housing stability services into programming.

- Determining how to add additional housing stability services into existing rental assistance infrastructure can be challenging. Are there partners or opportunities that can make integration of these services feasible?
- With limited ERA funds available to many grantees, coordination with other housing programs to identify strategies can help ERA programs reach the most vulnerable households that could uniquely benefit from ERA programs. These strategies can also serve as an opportunity to create a “soft landing” for the most vulnerable renters in the community.

Consider your long-term strategy for housing infrastructure.

- ERA1 funds will be available until September 30, 2022 (except funds received through reallocation, which grantees may request to use through December 29, 2022). ERA2 funds are available until September 30, 2025. Budgeting a portion of ERA2 funds for housing stability services, to strategically support the most vulnerable households over the next several years, can help bolster local infrastructure.
- Consider using ERA funds to pilot solutions to improve local housing infrastructure and pinpoint solutions that would not have been apparent otherwise.
- Identify other housing programs that can be beneficiaries of the knowledge gained from the implementation of the ERA program. Were there innovations in outreach, application processes, financial assistance, or housing stability assistance from which other programs can learn?

How it connects to your program's health

An infrastructure of housing stability services can ensure that support for the most vulnerable will be available. Financial assistance is not the only priority, and services can be primarily focused on coaching and educating vulnerable households. When rental assistance is scarce, support services can still play a role in preventing eviction and homelessness.

Reference: [Building Housing Stability Infrastructure | U.S. Department of the Treasury](#)

6. Implementing Program Integrity Measures

Program Integrity is a vital consideration for grantees of the Emergency Rental Assistance (ERA) programs that ensures efficiency and equity in distribution. Treasury requires grantees to implement policies and procedures that include robust compliance and risk-management controls, while also making certain that eligible households can receive timely assistance that supports housing stability.

ERA programs across the country operate in a wide variety of environments, with circumstances varying across population density, geography, the interconnectivity of the community, and many other localized considerations. Accordingly, grantees have identified a variety of program integrity measures that meet the [particular needs for their community](#).

[FAQs 1 and 31](#) both address program integrity. FAQ 1 states that grantees must:

“specify in their policies and procedures under what circumstances they will accept written attestations from the applicant without further documentation to determine any aspect of eligibility or the amount of assistance, and in such cases, grantees must have in place reasonable validation or fraud-prevention procedures to prevent abuse.”

FAQ 31 states:

while “grantees are not required to obtain documentation evidencing the use of ERA program funds by tenants and landlords,” they are “expected to apply reasonable fraud-prevention procedures and to investigate and address potential instances of fraud or the misuse of funds that they became aware of.”

These policies and procedures support the integrity of the ERA programs, ensuring that funds are expediently directed toward qualifying rental assistance, utilities and home energy costs, other expenses related to housing, housing stability services and other affordable housing and eviction prevention purposes. Robust and thoughtful controls may also limit grantees’ risks of audit findings, noncompliance with the ERA Award Terms, fraud, waste, and abuse.

Advantages to using this practice

- Reduces risk of inequitable distribution
- Avoids duplication of assistance
- Optimizes effective operations
- Encourages robust landlord engagement and community partnerships
- Supports program reputation
- Limits program risks

Strategies to Consider

Grantees’ program integrity policies and procedures are likely to vary in accordance with local needs and experiences, as well as with the structure of grantees’ ERA programs. Nonetheless, grantees may wish to consider some of the following in designing controls.

- **High-tech and/or high-touch?:** Programs relying on technology-focused intake may use more automated risk management—a “high-tech” approach—while those who rely on more interpersonal intake processes may rely on more “high-touch” strategies. Larger grantees processing high volumes of applications may find it helpful to use technological solutions that flag potentially problematic applications or patterns using risk scores, data analytics, or other tools. Grantees with lower application volume may benefit from a hands-on approach to application review, leveraging firsthand staff knowledge of the community and application trends to identify possible issues.

- **Staffing up:** Staff with past experience in fraud detection, disaster recovery, and quality control for other benefit programs can help strengthen programs’ integrity policies and procedures. Applying lessons, practices, and tools from comparable contexts—especially contexts that require timely processing—can strengthen risk management.
- **Leveraging vendors:** Partnering with vendors offering fraud or risk management tools and platforms may also promote program integrity, particularly for grantees pursuing a “high-tech” strategy. Vendors can provide technological solutions and platforms, as well as useful data like fraud lists or records.
- **“Screening in” versus “screening out”:** “Screen-in” approaches seek out a pathway to responsibly approve an applicant based on relevant traits or available documentation, instead of focusing on reasons to exclude or deny applicants. “Screen-out” approaches seek out a pathway to responsibly approve an applicant based on relevant information or available documentation, instead of focusing on reasons to exclude or deny applicants. While a screening-in practices must be paired with robust controls, such an approach can help ensure that program integrity systems don’t erect barriers for eligible applicants.
- **Application intake channels:** Programs may consider differing eligibility documentation requirements or risk tiering strategies depending on the application intake channel. For instance, applicants that come to an ERA program through court-based eviction diversion programs or through a trusted social services program may have differing application processing and risk mitigation procedures compared to an applicant that comes to the program through an online application. Differing treatment of applications based on intake channel, as well as the rationale for such treatment, should be documented in the program’s policies and procedures.
- **Landlord and utility company engagement:** Landlords and utility companies can be key actors in promoting housing stability. Strong cooperation can often provide supporting documentation about applicants and further support the integrity of the application process. Also, building knowledge of the landlord and utility landscape in the community can help an ERA program develop informed strategies.
- **Communications with tenants, landlords, and utilities:** Building strong and transparent communication channels with tenants, landlords, and utility companies eases uncertainty, can support stronger cooperation with ERA programs, and allow space for more successful risk mitigation strategies. These communications may take the form of regular communications to stakeholders about the status of an application and/or access to information about the applicant’s status.
- **Coordination with adjacent or overlapping jurisdictions:** Creating a communication loop and/or establishing data sharing agreements with adjacent or overlapping jurisdictions may help to increase program integrity practices. This coordination between ERA programs can help to significantly reduce the likelihood of duplication of ERA benefits.

Steps to take

1. Choose strategies that make sense for the needs of your community and program and integrate a quality control strategy into your program policies and procedures.
2. Partner with networks and organizations that can help in the effort to maintain program integrity.
3. Build strong landlord, utility company, eviction court, and tenant engagement strategies, which can help enhance cooperation, documentation intake, and support strategic risk mitigation efforts.
4. Consistently reevaluate policies and procedures and adjust as necessary.

Examples of maintaining program integrity

High tech vs. High touch

- **One major city** uses a high-tech risk management approach, integrating a variety of cross-agency systems into one platform to facilitate collaboration and case management across the city's social services and identify potential applicant flags on the backend. The jurisdiction also uses a vendor to conduct identity and property verification to flag potential risks using complementary data resources.
- **One county** on the East Coast uses a high-touch program integrity approach focusing on eviction court cases. Program staff attend court in person to intervene in eviction cases and assist applicants in identifying and uploading necessary documents for their rental assistance case to be processed.
- **One Tribally Designated Housing Entity (TDHE)** has partnered with the county's social services and behavioral health departments, and reentry specialists to focus on tenants most in need of housing stability. Meetings with reentry specialists has assisted those that are reintegrating after being unhoused with stable housing to rebuild their lives. Additionally, ERA Housing Occupancy Specialists work closely through phone calls and in-person meetings with local hotels, landlords, and the local utility data system to determine tenants in need in individual villages.

Communications with tenants, landlords, and utilities:

- **One state** in the Midwest uses a waterfall of options to qualify an application for ERA assistance, beginning with Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and/or Temporary Assistance for Needy Families (TANF) programs. They utilize an online unemployment system to verify unemployment in real time. Additionally, they engage landlords in the process by requesting property documentation once the applicant is determined to be eligible.
- **One major city** uses an online scoring system with their applications to assess for risk. They speak to every applicant once verifying eligibility, and also pursue robust landlord engagement strategies resulting in a consistent and transparent feedback loop.

Staffing Up

- **One county** in the south partners with their local compliance department to assist with quality control. Additionally, case managers utilize a checklist during the application process to ensure consistency with checks and balances.

What's next

- **Review Program Integrity Practices and Data:** Consider conducting regular reviews of program integrity policies and practices—how can they be strengthened, added to, or streamlined? Tracking and assessing key program integrity metrics will facilitate these analyses and highlight areas for growth.
- **Learn from Other Grantees:** Grantees may find it helpful to consult with other grantees, particularly grantees in their area or grantees sharing important features, like strategies to manage applicant volume or budget. Sharing experiences can help grantees identify best practices or areas for growth.
- **Consider your long-term strategy for program integrity infrastructure:** Identify other programs that can be beneficiaries of the knowledge gained from the implementation of the ERA program. Have you implemented application process and distribution of innovations that might help other programs implement successful program integrity measures?

Reference: [Implementing Program Integrity Measures | U.S. Department of the Treasury](#)

7. Research and Evaluation

Treasury developed the [Economic Recovery Learning Agenda](#) designed to identify important research questions to better understand the impact of its programs. The key ERA program evaluation questions are:

1. How equitable is the distribution of ERA funds to tenants most in need of assistance?
2. How has the use of promising practices that Treasury encouraged grantees to adopt affected the equitable distribution of ERA funds and the housing stability of tenants?
3. What have we learned from ERA about the development of a national eviction prevention and housing stability infrastructure?
4. How did ERA change tenants' housing stability and other measures of well-being?

The specific areas for evaluation outlined in the learning agenda can be used to guide specific research by Treasury, other federal partners, external researchers, or grantee governments.

Evaluations, Surveys, and Research Papers

Treasury has partnered with other federal agencies to conduct research on ERA to understand its impact and learn lessons for future economic recovery efforts.

Evaluations of Streamlining Applications:

- The General Service Administration's Office of Evaluation Sciences (OES) conducted an evaluation of [streamlining income verification](#) for application processors in Kentucky and found that it increased application approval rates by at least 7 percentage points. The Office of Information and Regulatory Affairs' (OIRA) cited this paper in the "Tackling the Time Tax" report as an example of reducing administrative burden without affecting program integrity.
- OES also conducted an evaluation of the use of [fact-specific proxies in the State of Virginia](#) and found that simplifying income documentation reduced application processing times and increased application approval rates, but did not increase the number of new applications received for ERA assistance

Distribution Evaluation:

- OES conducted an [evaluation of the demographics of ERA beneficiaries](#) in relation to the demographics of those eligible for ERA assistance. This study found that ERA assistance went overwhelmingly to renters most vulnerable to eviction.
- In "[Targeted Relief: Geography and Timing of Emergency Rental Assistance Funds](#)," Economists from U.S. Department of the Treasury and the Federal Reserve Board of Governors found that "ERA sent more funds per renting household to census tracts with higher pre-pandemic eviction filing rates, higher poverty rates, higher shares of Black renters, higher shares of renting households with children, and higher shares of renting single mothers [suggesting] that ERA was largely successful in reaching communities that were most likely to have the highest risk of eviction."

Housing Security Survey:

[Findings from the linking the U.S. Department of Housing and Urban Development and the U.S. Census Bureau's Household Pulse Survey data](#) suggest that during the COVID-19 pandemic, HUD-assisted households faced lower rates of housing insecurity and reported higher rates of ERA uptake than did low-income renters in general.

Ongoing Program Analysis:

Blog on ERA Implementation: [Emergency Rental Assistance: Supporting Renting Families, Driving Lasting Reform](#)

Economic Analysis: [Equitable Recovery in the United States](#)

Playbook: [Supporting Housing Security and Supply](#)

Tribal Emergency Housing: [Tribal Housing Stability Report](#)

Reference: [Research and Evaluation | U.S. Department of the Treasury](#)

