



# Building Racial Equity into Emergency Rental Assistance Programs

An Equity Checklist for Program Administrators

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The COVID-19 pandemic highlighted the disproportionate housing stability challenges faced by Black, Latinx, and Indigenous people, and its health and economic effects made those disparities even worse. State and local governments are now distributing the almost \$47 billion in emergency rental assistance made available through federal relief efforts. Targeting the renters most affected and most vulnerable, predominantly renters of color, will be [critical to ensuring assistance reaches the people who need it most](#).

This checklist, a companion to our [Emergency Rental Assistance Priority \(ERAP\) Index tool](#), is designed to help state and local administrators implementing emergency rental assistance programs. Assistance programs can more effectively target households at the highest risk of housing instability by prioritizing racial equity in program design and implementation.

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### Why racial equity is critical to emergency rental assistance program design

Black, Latinx, and Indigenous communities have experienced the highest COVID-19 [infection and death rates](#), the most severe pandemic-related [job and wage losses](#), and the highest levels of food and housing insecurity. This is not a coincidence; racist policies and systemic discrimination, which began generations ago and remain persistent today, have created inequitable outcomes for people of color across a myriad of issues, including housing and health.

Even before the pandemic, Black, Latinx, and Indigenous renters faced [higher rates](#) of housing instability and homelessness. COVID-19 exacerbated those challenges, and the income and job loss experienced by renters of color during the crisis has cascaded into financial hardships that have left them facing significant [rent burdens and eviction risks](#). Many renters of color continue to struggle to maintain steady incomes, and their past rent payments keep piling up.

Stable housing has been proven to [lower the rate](#) of COVID-19 infection and death. With the national eviction moratorium set to expire at the end of July 2021 and most state and local eviction moratoriums already expired, it is more critical than ever that state and local governments and their community partners equitably and effectively disburse the remaining emergency rental assistance funds.

## How to use the equity checklist and the Emergency Rental Assistance Priority Index tool

This equity checklist can guide emergency rental assistance program designers to prioritize racial equity in three main areas: (1) program structure, (2) outreach and engagement, and (3) data collection and program monitoring. We encourage program administrators and their partners to use this checklist in tandem with our [ERAP tool](#), but they can use the checklist independently as well.

The ERAP tool uses an index score to identify neighborhoods in each state where low-income renters face greater risks of housing instability and homelessness. The score comprises three indexes: the risk of housing instability; the impact of the COVID-19 crisis on jobs and health; and other risk factors, such as the share of households that receive public assistance and the share that earn very low incomes.

Administrators and their partners can use the ERAP tool to inform an equitable COVID-19 response at each stage in the distribution of emergency rental assistance funds. For more information about how we created the ERAP index, see the [data dictionary](#) and [technical appendix](#). We encourage program administrators and partners to supplement these data with local, contextualized knowledge and relevant local datasets.

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### About

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# Designing a Program with Racial Equity Goals

The ERAP tool can help program administrators effectively prioritize assistance to households with the highest risk of housing instability, most often Black, Indigenous, and Latinx households. Oregon’s [Emergency Rental Assistance Program](#) prioritizes rental assistance to households using four criteria, one being that the household resides in a census tract with a high prevalence of low-income renters at risk of experiencing housing instability and homelessness from the impact of the COVID-19 pandemic. This criterion is based on data from the ERAP tool.

Here, we present factors that program administrators could consider in addition to the geographic targeting the ERAP tool offers, to ensure that emergency rental assistance reaches the local households most adversely affected by the pandemic.

## PRIORITIZING RECIPIENTS

- Do you plan to prioritize assistance to households based on their risk of housing instability (in addition to the income and unemployment factors required by the US Treasury)?
- Have you explored pairing ERAP tool data with other local data sources?
  - Prior admissions to shelter
  - Current eviction filings
  - Local data on unemployment or other public assistance filings
  - COVID-19 infection and morbidity rates
  - Other: \_\_\_\_\_

## DESIGNING THE APPLICATION PROCESS

- Is the application accessible to read—that is, written in simple language and easy to fill out?
- Is the application available in different languages?
- Does your program have low barriers to self-certification of income loss or financial hardship to allow recipients with jobs in the informal economy to access rental assistance?
- Does your program allow self-certification to document rent owed?
- Does your program allow self-certification to document the risk of experiencing homelessness and housing instability?
- Can the application be submitted through multiple venues to account for gaps in digital literacy—for example, by phone, online, on paper, through a trusted partner organization, and/or by app?
- Are there physically accessible and COVID-19-safe locations where case workers, community-based actors, or culturally specific organizations can help people complete applications for rental assistance?
  - Is your rental assistance program partnering with key community-based actors or culturally and linguistically specific organizations to identify people in need of assistance and help them with the application process?
  - Did you use the ERAP tool or other local data to identify neighborhoods in which to set up sites?
  - Are your sites in areas easily accessed by the public?

## REACHING UNDOCUMENTED, MIXED-STATUS, AND OTHER HOUSEHOLDS SOMETIMES EXCLUDED FROM ASSISTANCE

- Are [organizations](#) trusted by people who are undocumented, and other people who fear that acquiring federal assistance might put their citizenship or immigration status in jeopardy, partners in program design and implementation?
- Is your program open to undocumented or mixed-status households?
- Is your application designed with undocumented and mixed-status families in mind? Does the documentation you require inadvertently preclude undocumented or mixed-status households (for example, requests for Social Security cards or government-issued IDs)?
- Does your program explicitly debunk myths about eligibility and immigration consequences of program participation and state the legal rights undocumented or mixed-status families have to access federal emergency rental assistance? Does your staff understand these details?
- Can [organizations that serve immigrant and refugee households and/or households of color](#) submit applications directly to your program on their clients' behalf?
- Does your program offer culturally and linguistically competent housing navigation or other financial support for relocation, security deposits, utilities, several months' rent, or transitional hotel stays to help people currently experiencing homelessness find housing?

## DISSEMINATING RENTAL ASSISTANCE

- Is your program providing tenants with direct payments if their landlord does not wish to participate in your program or cannot be reached (or has been given the [requisite notice under program guidelines](#))?
- Is your program considering long-term housing stability when administering emergency rental assistance?
  - Can you ensure that all rental debt (fees, charges, or any other expenses tenants accrued during the arrears period) is cleared through payment or by negotiating with landlords to lower rental debt in exchange for future rent payments?
  - Can you ensure that assistance includes other financial support, such as payment for utilities and utility arrears, as well as any fees, charges, or other expenses on the tenants' account?
  - Before rental assistance became available, tenants may have [incurred debts so they could pay rent](#), by taking on payday loans or loans from friends or family or by deferring other bills. These debts are not reimbursable with emergency rental assistance funding from the Treasury but [affect a household's financial health](#). Given this reality, can you offer applicants complementary services—such as financial health counseling, legal assistance, referrals to longer-term housing assistance, and other forms of assistance such as food, transportation, or medical assistance—to promote long-term housing and financial stability?
- Is it possible to implement a building- or buildings-wide strategy to determine household eligibility and to bundle, in a single payment, rental debt or future rent for many tenants at once?
- Are you braiding other available state and local funds to boost program capacity?

## EMPLOYING LANDLORD-TENANT MITIGATION STRATEGIES

- Does your program offer housing navigation or other financial support for relocation, security deposits, utilities, several months' rent, or transitional hotel stays to help renters who must relocate despite rental debt being paid? [Services should be prioritized to the renter households most likely to be discriminated](#) against and to face barriers to re-lease in the private market.
- Is your program enforcing the federal requirement that prevents evictions of renters for nonpayment in the month the rental assistance is received?
- Has your program added an additional requirement that a landlord may not evict for nonpayment of rent for up to 90 days longer than the period covered by emergency rental assistance?
- Has your program considered an additional requirement that a landlord must renew or extend the lease for a certain period of time?

## DEFINING ROLES FOR PARTNER ORGANIZATIONS

- Have you intentionally targeted community-based or culturally specific organizations already embedded in the priority neighborhoods identified by the ERAP tool or other local data?
- Are you considering multiple roles for partner organizations, depending on your community context?
  - *Outreach only*: organizations that help spread the word, can help translate material and get information into ERAP-identified communities, but may or may not be able to directly refer people to your program.
  - *Outreach plus application support*: organizations that help with outreach, can refer applicants to your program, and can assist them in meeting application and documentation requirements.
  - *Outreach plus administration*: organizations that help with outreach and application support and can directly disburse funds.
- Have you simplified contracting requirements to allow smaller, community-based, or culturally specific organizations to effectively partner with your program?
- Have you streamlined reimbursement processes that compensate smaller community-based or culturally specific organizations so they are not at risk of financial hardship? For example, you could consider providing a share of your emergency rental assistance contract up front to ensure the community organization has working capital.

# Developing Outreach Strategies to Spread the Word about Available Assistance

State and local programs are expending close to \$47 billion in federal emergency rental assistance funds. For communities with high needs to receive their fair share, agencies will need an effective communication and outreach strategy. Even in late May 2021, research showed that [only 60 percent of small rental-housing owners and 43 percent of their tenants](#) knew that emergency rental assistance was available locally.

Community-based partners are integral bridges between residents and government entities. For example, [All Home California](#) is a nonprofit and regional collaboration of all nine counties in the San Francisco Bay area. All Home used the ERAP tool to geographically target outreach to community-based organizations working with the communities most at risk of housing instability and homelessness, such as undocumented households. The questions below can help program administrators ensure that local knowledge is informing their approach.

- Have you used the ERAP tool or local indicators to geographically target outreach to organizations and community leaders trusted by community members at likely risk for housing insecurity (even if the organizations and leaders have not previously worked in housing or homelessness)?
  - Organizations that are a trusted resource for people of color, immigrants, or non-English speaking people
  - Organizations that are multilingual
  - Culturally specific or culturally competent organizations
  - Nontraditional ambassadors or gatekeepers, such as churches
  - Organizations that work with small landlords (fewer than four units), such as community development financial institutions or member organizations
  - Service providers, homeless outreach teams, shelters, food pantries, community health clinics, and similar organizations
  - Other: \_\_\_\_\_
- In addition to the organizations mentioned above, have you considered using common touch points with other systems—such as state and municipal civil and housing courts, social services, financial health education providers, schools, and infant and child services—to provide information about available rental assistance?
- Have you considered providing education about your program to landlords, especially owners with four or fewer units, to dispel common misperceptions about emergency rental assistance?

## Conducting community engagement to inform program design

Some localities have begun to engage and empower communities during early program design and to inform continuous program improvement. Engagement and outreach can help program administrators tailor assistance to make it more accessible and build trust between public agencies and the people they aim to serve.

Engagement ensures that programs reflect the priorities of the people and communities at the heart of the complex issues local governments strive to solve. When engagement is intentional, key stakeholders are at the table to identify local needs and challenges. With so many renters in urgent need, emergency rental assistance programs need to activate quickly. Engagement along the way ensures that the program is actually reaching the beneficiaries it intends to serve.

Administrators of the Homelessness Prevention System in California's Santa Clara County built in feedback mechanisms from the start. Destination: Home and Sacred Heart, the two lead agencies, partnered with 70 community organizations to advertise and disseminate rental assistance. Adapting an ethos of "don't do something for people without people," the Homelessness Prevention System sought continuous feedback from clients receiving assistance, as well as partners. In addition to gathering comments through informal channels, administrators surveyed more than 300 households about their experiences with the program and then changed the design accordingly. For example, after learning that certain documentation requirements were too burdensome or were denying some people the opportunity to apply, administrators changed their standards. And they added ways to access the application other than online when one-quarter of those surveyed struggled with the technology platform. The Homelessness Prevention System viewed these steps as crucial to ensuring that assistance was effective in serving the community.

# Collecting Data and Monitoring Your Program

Building a program that intentionally uses a racial equity frame requires continuous feedback to ensure that the assistance is reaching the desired households and not reinforcing existing inequity. Often, policies that on their face seem neutral may have a positive or negative impact on the participation of households of color. Routine process and program monitoring check points are vital for ensuring that your program is having its desired impact.

## MONITORING PROGRAM PROCESSES AND IMPLEMENTATION

- Have you identified what success will look like, based on your goals and prioritization?
- Are you tracking participants' demographics, against targets, as they move through the pipeline, such as households that apply, households that provide the necessary documentation, households that are qualified for assistance, households that have received assistance? For example, if you are prioritizing three census tracts based on the ERAP tool or other local data, are you meeting your goal percentage of participants in those census tracts?
- If the data are available, could you also compare participants' demographics against the demographics of households evicted before moratoriums?
- Are you monitoring how long it takes people to complete the application process?
  - If you notice any bottlenecks, do you have mechanisms for troubleshooting?
  - Are you monitoring by demographics to see whether certain groups of people are less likely to complete the application process? At what points do these groups drop out?
- Are you tracking the amount of assistance received by participants' demographics?
- Are you tracking landlords' characteristics as they move through the pipeline, particularly small versus large landlords?
- What mechanisms do you have to follow up with applicants who are nonresponsive or not moving forward on their application on their own?
- Are you consulting partner organizations about trends or program suggestions?
- Do you have mechanisms for changing aspects of your program on the basis of your data and input from partners?

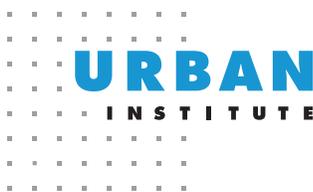
## MONITORING PROGRAM OUTCOMES

- Are you disaggregating data based on race and ethnicity to identify who is being served?
- Are you using local data sources to track program outcomes?
  - Are you monitoring homeless management information system data for households served?
  - Are you monitoring eviction court filings for households served?
  - Are you sharing program data with partner organizations? With the public?
- Can you develop ways to collect additional qualitative data to illuminate quantitative trends?
- Are you using different methods of engagement to gather feedback from people being served? Examples include a survey of participants and follow-up interviews.

- Do you plan to evaluate your program, track long-term housing stability for the households served, or both?

## BUILDING CAPACITY FOR DATA COLLECTION AND PROGRAM MONITORING

- Do you have a staff person responsible for collecting data?
- Have you considered partnering with a research organization or a local university?
- Do you review the data regularly (e.g., weekly, biweekly)?



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