HOUSING AND COMMUNITIES

Lessons Learned from Emergency Rental Assistance Implementation

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Contents

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Executive Summary

This study examines the Emergency Rental Assistance (ERA) Program, created by Congress and with funds disbursed by the US Treasury Department to provide rental assistance to support housing stability for rental households. This report provides a high-level overview of program components, examines the program's implementation and outcomes trajectory, and presents takeaways from research literature and interviews with property management companies and housing finance agencies. Based on this review, it identifies lessons for the field to inform a future emergency rental assistance program or some other application-based cash assistance program.

ERA was first authorized by Congress in December 2020, providing $25 billion that the US Treasury Department would send to states, territories, local governments, and Tribes or Tribally Designated Entities in the form of grants. The first round of funding (ERA1) was distributed to close to 700 grantees by the end of January 2021 and supplemented by a second round of funding (ERA2) in March 2021. This quick distribution of funds meant grantees had to rapidly identify and design an approach, hire staff, build out an outreach effort, and create an application process. There were program requirements, and the Treasury provided some guidance (that was expanded over time), but the program left many of the actual creation and implementation decisions up to grantees.

Initial rollout in early 2021 was slow, as grantees navigated program setup. The program expanded quickly by the end of that year, though some grantees set up programs more quickly than others. Over time, ERA's reach was substantial, reaching more than 3 million low-income households. Grantees were permitted to serve only households earning up to 80 percent of their area median income (AMI) and generally served households well below that income threshold: More than 80 percent of participants in ERA1 (86 percent) and ERA2 (84 percent) had incomes less than half of their AMI.[1]

Existing studies indicated that ERA promoted housing stability, decreased homelessness, helped stabilize status, and improved mental health and was effective in reaching vulnerable households during the pandemic.

There was initially a *perception* of slowness in how funds were being distributed, but given the program's emergency nature, most states and localities, even the ones seen as slow to start up programs, built robust and large programs in short order. Even so, a few months' delay can be consequential during an emergency. Further, the program's flexibility allowed grantees to devise programs tailored to local conditions, particularly around partnership and outreach strategies, but its open-endedness came at the cost of standardization and clarity. This report identifies challenges and key takeaways that could inform future emergency programs:

- **Funding allocations should match program demand.** Initial state-level allocations did not fully account for varying needs and renter populations in various states, creating a mismatch between need and resources. Reallocations partially responded to the issue but were an incomplete and inefficient fix.
- **Uniformity (i.e., standardization) is critical.** Although flexibility provided some advantages, the lack of standardization in program administration and guidance slowed initial rollout in many areas and slowed the distribution of aid to residents and housing providers. Future efforts should provide guidelines for known issues to help standardize and streamline processes and requirements.
- **Limit program requirements that are unrelated to payments, and coordinate timelines for housing provider and resident clarity.** Some state requirements discouraged housing provider program use, particularly those that tied applications to either rent freezes or long freezes in the eviction process. With uncertain timelines to receive funding, some providers, particularly in cases where residents already had histories of late payments, were hesitant to participate. Better coordinating the timelines for eviction and rental assistance, giving both housing providers and residents certainty, would be helpful, as would a waterfall in which the rental funds went directly to the provider, unless there was a reason to do otherwise.
- **Think carefully about the trade-off between the cost of additional documentation and take-up and program effectiveness.** Reducing documentation requirements—especially by encouraging self-attestation and leveraging eligibility from other federal programs or geographic targeting—can increase take-up rates and program effectiveness. In fact, further standardizing future systems to take advantage of existing data could also support faster take-up and reduce fraud.
- **Federal government guidance at the outset of the program is essential.** For ERA, clear and early Treasury guidance, particularly on application requirements and technology solutions, would have accelerated rollout and reduced confusion.
- **More standardization and guidance are necessary to handle entity overlap.** Because ERA state and local programs sometimes overlapped, standardizing approaches to handle coordination would help prevent duplication and would streamline application processes.

- **User-friendly systems are essential.** Systems to facilitate document uploads, link housing provider and resident applications, provide status updates, and allow bulk processing are essential.
- **Productive outreach to both housing providers and residents improves program awareness. A program that is not known will not get used.** Proactive outreach to both housing providers and residents—including partnerships with community organizations and hands-on support from property managers—is vital to raise awareness and promote program use.

ERA met its goal of distributing the allocated rental assistance funds to support the needs of low-income renter families, but there were lessons that would strengthen the use of this type of emergency funding in the future and ensure it can be ramped up quickly, targeted to need, and efficiently implemented. The challenges of setting up a massive program such as ERA are clear, as it needed to balance flexibility with clear guidance and quick and efficient distribution with monitoring and compliance. The pandemic ERA experience can help inform these trade-offs going forward. As ERA was a short-term intervention, reporting and assessments have focused on its short-term outcomes. There are ongoing questions about ERA's long-term impacts, but no data are available to answer those questions.

Lessons Learned from Emergency Rental Assistance Implementation

This study examines the Emergency Rental Assistance (ERA) Program, created by Congress and with funds disbursed by the US Treasury Department to provide rental assistance to support housing stability for rental households. With the program now largely over, it is a good time to review its impact and lessons learned to understand what worked, what was challenging, and what could inform future efforts to provide emergency support to promote housing stability.

From its start in March 2020, it was clear the COVID-19 pandemic would have profound impacts on health, education, and the economy. With lockdowns and attendant disruptions to the labor force, housing stability became a central policy concern so people could safely isolate to prevent the spread of COVID-19. Federal and local responses to promote housing stability ranged from eviction moratoriums to forbearance programs to rental assistance. And a key policy response was the ERA Program (sometimes referred to as ERAP).

ERA, which provided assistance to renter households across the US, was a massive undertaking requiring the federal government, grantees (including state- and local-level intermediaries), community-based organizations, housing providers, households, and other partners to set up systems, staffing, outreach, and distribution as quickly as possible. Now that most ERA efforts have wound down, this study provides a timely examination of its implementation and impact and identifies lessons learned for future emergency response efforts.

In December 2020, Congress first authorized ERA funding in the Consolidated Appropriations Act of 2021, providing $25 billion that the Treasury would send to states, territories, local governments, and Tribes or Tribally Designated Entities in the form of grants. The Treasury provided some guidance but left many of the actual creation and implementation decisions up to grantees.

Funds were distributed quickly: Awards were distributed to close to 700 grantees by the end of January 2021 (and completed by the end of 2022). Grantees needed to rapidly identify and design an approach, hire staff, build out an outreach effort, and create an application process.

This initial ERA funding (ERA1) was supplemented in March 2021 by a part of the American Rescue Plan Act that provided an additional $21.55 billion (ERA2). Grantees were required to spend these awards by September 30, 2025.

There was a significant amount of research and media coverage about ERA as it got under way, especially given early challenges that gave rise to concerns that programs were slow to distribute funds. In this report, we have investigated, with the benefit of hindsight, *why* some places implemented ERA more quickly and efficiently than others. The Treasury's program data show the program was ultimately effective at administering the funds and reaching predominantly households with low incomes relative to the area median income (AMI). It was aimed toward recipients with the most need, and even though it got off to a slow start, grantees eventually were able to distribute rental support efficiently.

The next section of this report provides a short overview of program components and how they changed. We then present an overview of ERA's trajectory: how it scaled up (and down), who it served, and where it was implemented most and least rapidly. After a review of existing assessments, we then present takeaways from interviews with property management companies and housing finance agencies. These interviews are not exhaustive—ERA implementation varied widely—but they highlight mechanisms and decisions influenced by what happened on the ground.

Finally, we tie these strands together to identify lessons for the field. These lessons will help inform a future emergency rental assistance program or some other application-based cash assistance program.

ERA Program Components

ERA programs had several requirements for grantees to follow, but even within the guidelines the Treasury created, there was latitude for flexibility. At a high level, there were stipulations about how grantees could use their funds. For ERA1, grantees needed to use at least 80 percent of funds on payments, defined as rent, rent arrears, utility and home energy costs and arrears, and other housing-related expenses (e.g., relocation expenses, late fees, and internet service costs). No more than 10 percent of funds could be used for housing stability services (i.e., nonmonetary assistance that included rental counseling and eviction diversion programming). In ERA1, administrative costs were limited to 10 percent. This amount was increased to 15 percent in ERA2. Finally, in ERA2, grantees that had used 75 percent of their funds could, after October 1, 2022, use their remaining funds for other affordable housing purposes.

More detailed program requirements fell into several categories:

- eligibility criteria
- how funds could be used

- application and payment processes
- verification and attestation requirements

The Treasury revised several program requirements when setting up ERA2, allowing for greater flexibility than in ERA1 (table 1). A key difference was that under ERA1, applicants were required to show that financial hardship was *directly caused by* the pandemic, but under ERA2, applicants needed to show only that financial hardship happened *during* the pandemic. Self-attestation requirements (where the household verified their claims on their economic and housing situation) also changed. In ERA1, self-attestation was permitted, though guidance to that effect was not issued immediately. In ERA2, self-attestation was encouraged. Other changes provided more opportunities for residents. In ERA1, the Treasury encouraged grantees to let residents apply. In ERA2, grantees were required to allow residents to apply. Similarly, in ERA1, payment attempts first needed to go to the housing provider or utility provider before they could be made to a resident, while in ERA2, payments could be made to the resident directly. Finally, ERA1 required rental arrears to be paid before the funds could cover prospective rent, while ERA2 did not have this requirement.

TABLE 1
Selected ERA1 and ERA2 Components

	ERA1	ERA2
Fund spending deadline	To 9/30/22	To 9/30/25
Eligibility	Income < 80% of the AMI (those earning up to 50% of AMI are prioritized)	Same as ERA1 (defined here as low income)
	Hardship attributable directly or indirectly to the pandemic	Hardship during or attributable directly or indirectly to the pandemic
	Demonstrated risk of homelessness or housing instability	Same as ERA1
Verification and attestation	Grantee must receive written attestation; the Treasury allows self-attestation	Grantee can accept written attestation or other documentation; the Treasury encourages grantees to use self-attestation
Payment time limit	Not to exceed 12 months (additional 3 months may be provided)	Not to exceed 18 months
Application	Resident or housing provider can initiate	Not specified
	The Treasury encourages grantees to allow residents to apply	The Treasury requires grantees to allow residents to apply
	If housing provider initiated, residents must cosign, housing provider must provide documentation to the resident, and payments must satisfy rental obligations	Not specified
Payment	Grantee must first try to make payment to housing provider or utility provider; if not responsive, grantee can pay directly to resident	Grantee has discretion to make payment to housing provider or utility provider or pay resident directly
Federally assisted households	May not apply funds that have been or will be reimbursed by other federal assistance; grantees encouraged to cover resident share of assistance	Grantees prohibited from refusing assistance to federally assisted households to pay for resident portion of rent
Arrears requirements	Grantees can provide prospective rent payments only if all other arrears are brought current	Not specified in statute; Treasury guidance states grantees can use ERA2 for prospective rent payments without covering arrears

Source: Adapted from National Council of State Housing Agencies (NCSHA), "Emergency Rental Assistance Program Comparison" (Washington, DC: NCSHA, 2021).
Note: AMI = area median income; ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA.

Other program requirements remained constant across ERA1 and ERA2. Under both programs, grantees were allowed to establish criteria for defining risk of homelessness or housing instability to determine eligibility, and grantees needed to prioritize households with incomes up to 50 percent of the AMI and those with a member unemployed for at least 90 days. ERA1 also had stipulations that were not specified in ERA2 but were continued: Payments on behalf of households were not to be treated as income or as a resource used to determine benefits assistance, and grantees were expected to try ensuring that households were not receiving other rental assistance funding.

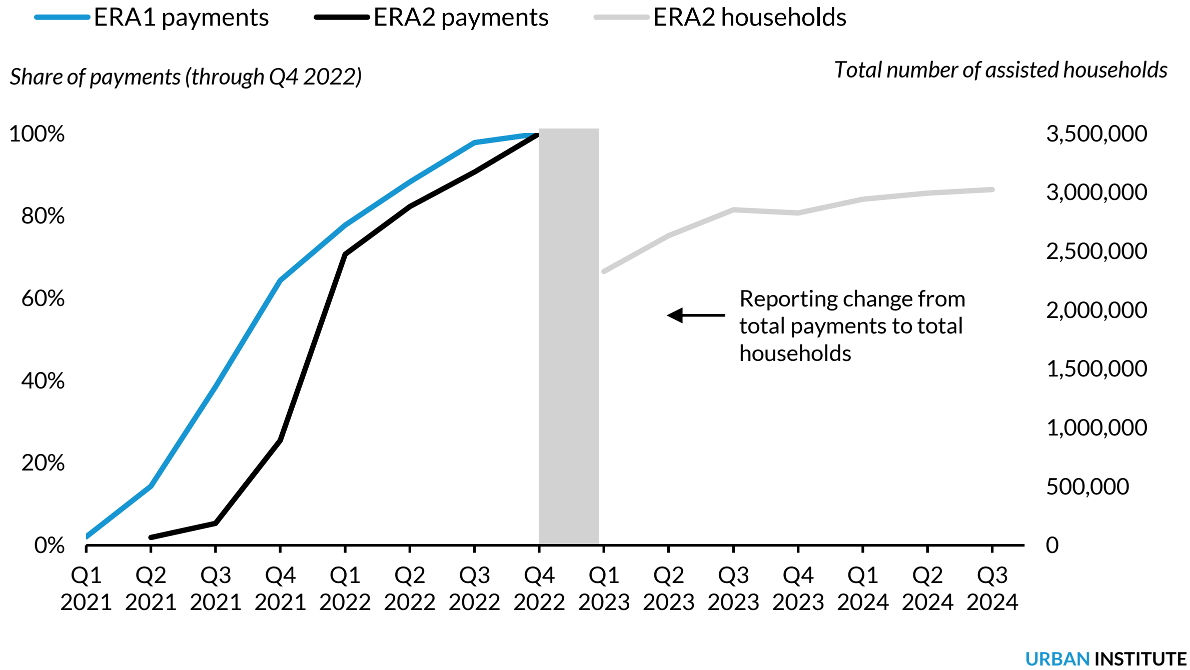
ERA Trajectory

From the first quarter of 2021 (Q1 2021) through Q4 2022, the Treasury required state and local grantees to report the amount of funding and number of households served, initially monthly through June 2022 and then quarterly through December 2022 (US Treasury Department 2022). Based on these public ERA quarterly reports, we find that the national spending trends for ERA1 and ERA2 had an initial slow rollout but expanded quickly toward the end of 2021. In Q1 2021, state and local grantees spent 2.1 percent of their awards on average and 14 percent by the end of Q2 2021. Cumulative expenditures increased to 64.3 percent by the end of 2021. For ERA2, state and local grantees spent 5.3 percent of their awards through Q3 2021 but spent 25 percent through Q4 2021 and 71 percent through Q1 2022. These trends show that once states navigated setting up their programs in the early months of 2021, they were able to accelerate ERA payments.

The scale of ERA was notable, reaching more than 3 million households. After Q4 2022, the Treasury stopped reporting public data on ERA1 and switched its reporting to focus on the cumulative number of households served nationally. The total number of households served by ERA2 increased 30 percentage points from Q1 2023 (2.3 million) to Q3 2024 (3.0 million) (figure 1). Although most households served through ERA2 received services in 2021 or 2022, state and local programs continued to increase the number of participating households through the end of 2024.

FIGURE 1

ERA Funding and Households Assisted over Time, by Program and Quarter



Sources: US Treasury Department quarterly reports and Urban Institute calculations.
Note: ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA; Q = quarter.

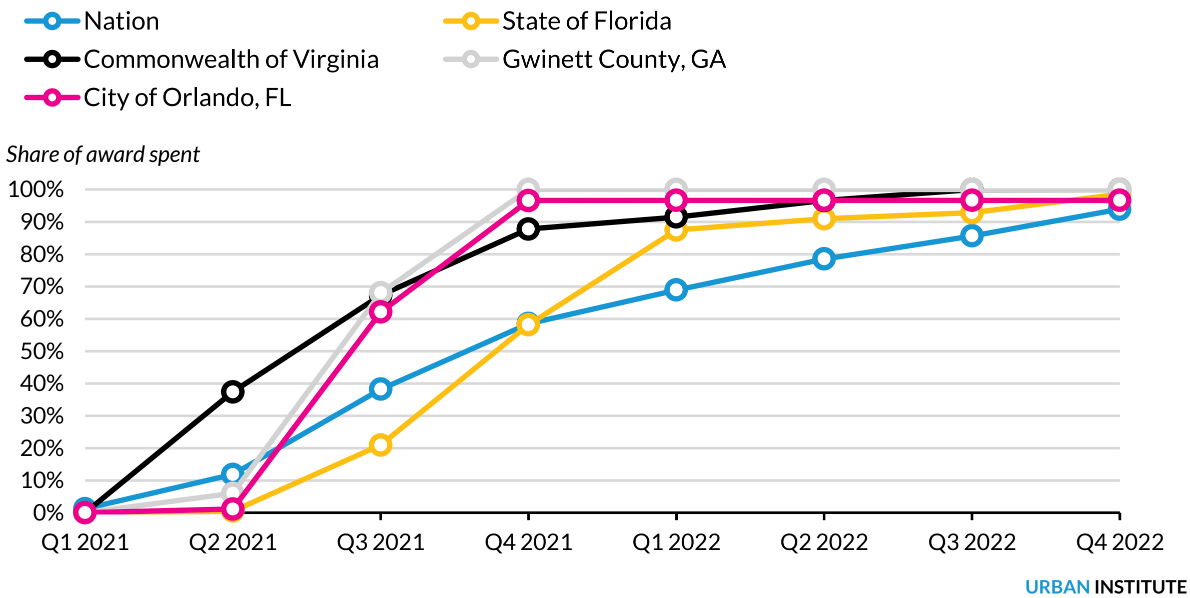
When comparing trends across programs, we noticed significant variation on spending progress by state and locality (figure 2). The Commonwealth of Virginia, which had already implemented its own small rental assistance program at the start of the pandemic, spent nearly 37 percent of its ERA1 funds by the end of Q2 2021 and 88 percent of its ERA1 award through Q4 2021. All programs nationally spent 12 percent by the end of Q2 and 59 percent through Q4. This reflected a willingness, based on prior experience, to accept self-attestation of hardship before the Treasury guidance was released, growing familiarity and experience with application systems, and extensive outreach.

By contrast, a few instances of slow starts highlight some of the problems that arose and solutions that could provide valuable lessons for future use cases for rental assistance and other large-scale cash disbursement programs:

- The State of Florida, which spent below the national average in the early quarters but caught up to the rest of the nation at the end of 2021, did not accept self-attestation of hardship until Treasury guidance explicitly permitted it, contributing heavily to a slow rollout (NLIHC 2021). There is little evidence that self-attestation of hardship, which was the standard for mortgage forbearance for homeowners, increases fraud. The Florida experience highlights the importance of both Treasury guidance at program inception and eliminating the need for unnecessary documentation.

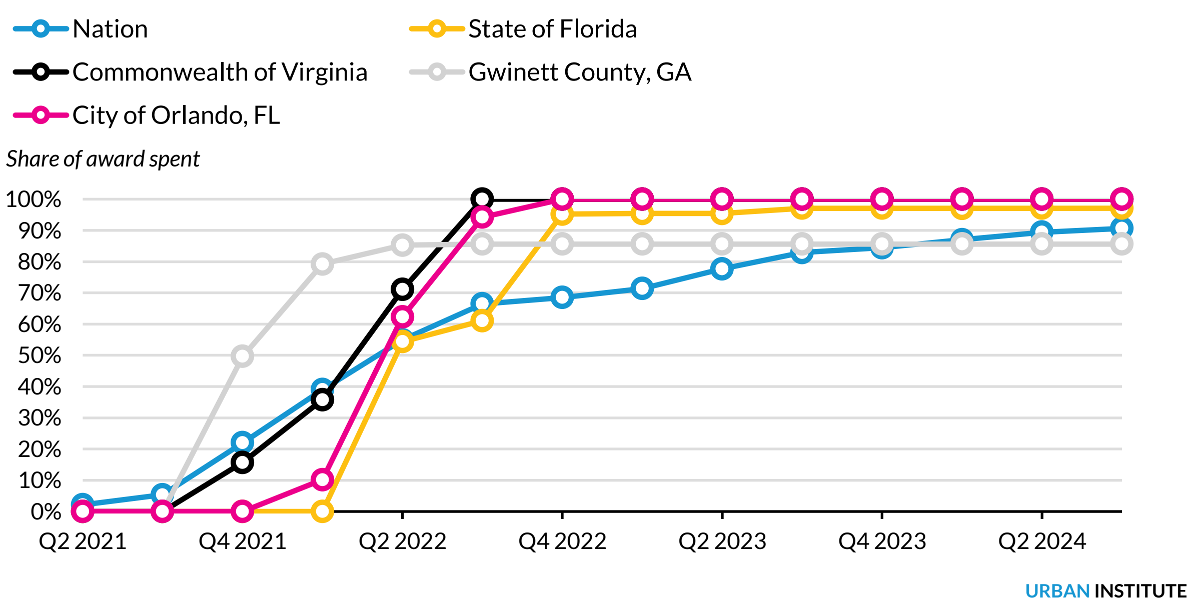
- The City of Orlando initially tried to build its own system. After a slow start, it became clear the city would be better off gaining access to an established system and customize as necessary. The City later partnered with a Big Four accounting firm that helped implement and customize an externally developed system.[2]
- Gwinnett County, Georgia, had a slow initial start but excelled at outreach, and by Q3 2021, the county had distributed most of its ERA1 funds and had quick distribution on ERA2 as well. The Treasury acknowledged the county's program—Project RESET—as a top performer. The Treasury attributed the county's high levels of engagement with renters in the community to its direct partnerships with several community-based organizations, including "the school system, library system, hospital system, Gwinnett Chamber, nonprofit, and faith-based organizations" (US Treasury Department 2024b, 3).

FIGURE 2A
ERA1 Quarterly Spending Progress, by Select Grantees



Sources: US Treasury public data and Urban Institute calculations.
Notes: ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA; Q = quarter. No ERA1 data past Q4 2022.

FIGURE 2B
ERA2 Quarterly Spending Progress, by Select Grantees



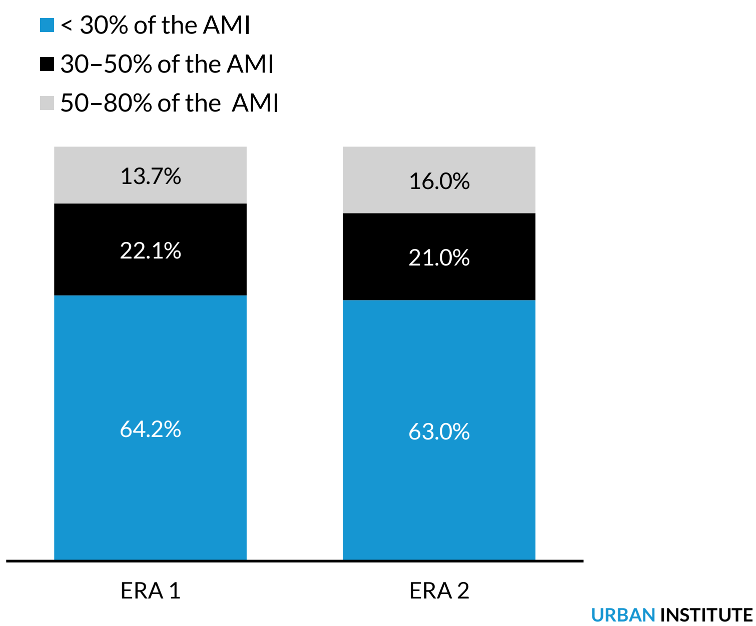
Sources: US Treasury public data and Urban Institute calculations.
Notes: ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA; Q = quarter. No ERA1 data past Q4 2022.

ERA Recipient Characteristics

Although state and local programs were permitted to serve only households earning up to 80 percent of their AMI, most programs prioritized lower-income residents and ended up serving households well below that 80 percent threshold. This illustrates that despite the difficulties setting up and administering the programs, the money benefited households it was intended to help. More than 80 percent of participants in ERA1 (86 percent) and ERA2 (84 percent) had incomes less than half of their AMI (figure 3). National data from the American Community Survey show that 80 percent of renters earning below 60 percent of the AMI experienced housing cost burdens in 2022, reflecting the need for direct financial assistance for renters with the lowest incomes.

FIGURE 3

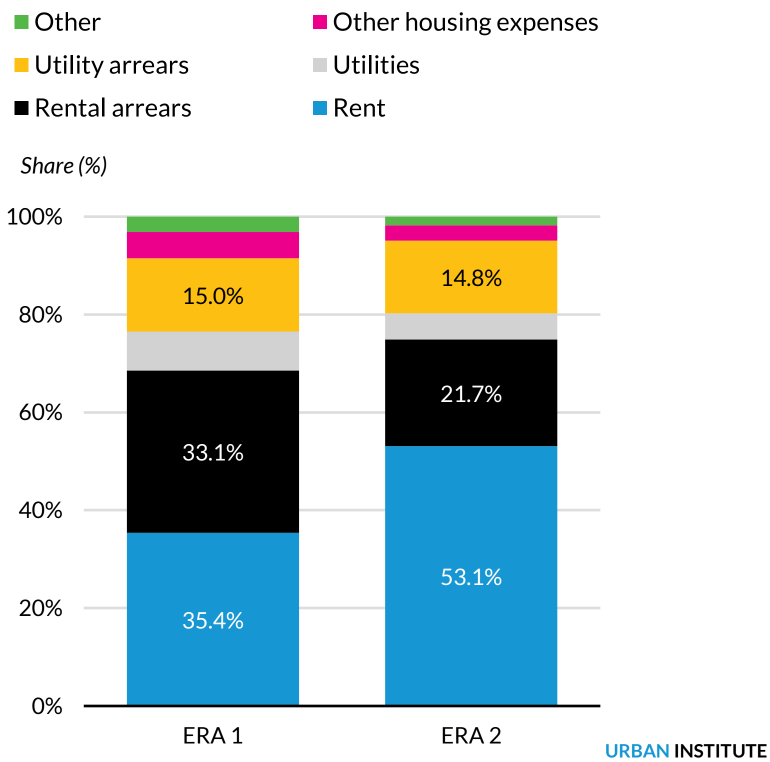
Share of Renters Participating in ERA Programs, by AMI



Source: US Treasury Department quarterly reports and Urban Institute calculations.
Notes: AMI = area median income; ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA.

It is interesting to look at how the ERA money was spent, as it could include rent (payments on future months' rent), rental arrears (payments on previous months' rent), utility payments, utility arrears, other housing expenses, and housing stability services. Figure 4 shows that 68.5 percent of ERA1's assisted households and 74.8 percent of ERA2's assisted households received support for rental arrears or future rent payments. ERA1 required that money be used to pay rental arrears before covering future rent. ERA2 had no such requirements. As a result, although 35.4 percent of households received future rent payments in ERA1, 53.1 percent did in ERA2. Households receiving rental arrears made up a larger share of the distribution in ERA1 (33.1 percent) than in ERA2 (21.7 percent). It would be useful to know whether the arrears-first requirement resulted in more resident stability, but these data are unavailable. Utility assistance and other housing expenses, including rental application fees and relocation assistance,[3] made up 31.5 percent of ERA1's services and 25.2 percent of ERA2's services. The "other" category, which includes housing stability services (e.g., rental counseling and eviction diversion), is very small.

FIGURE 4
Share of ERA services, by Program Phase

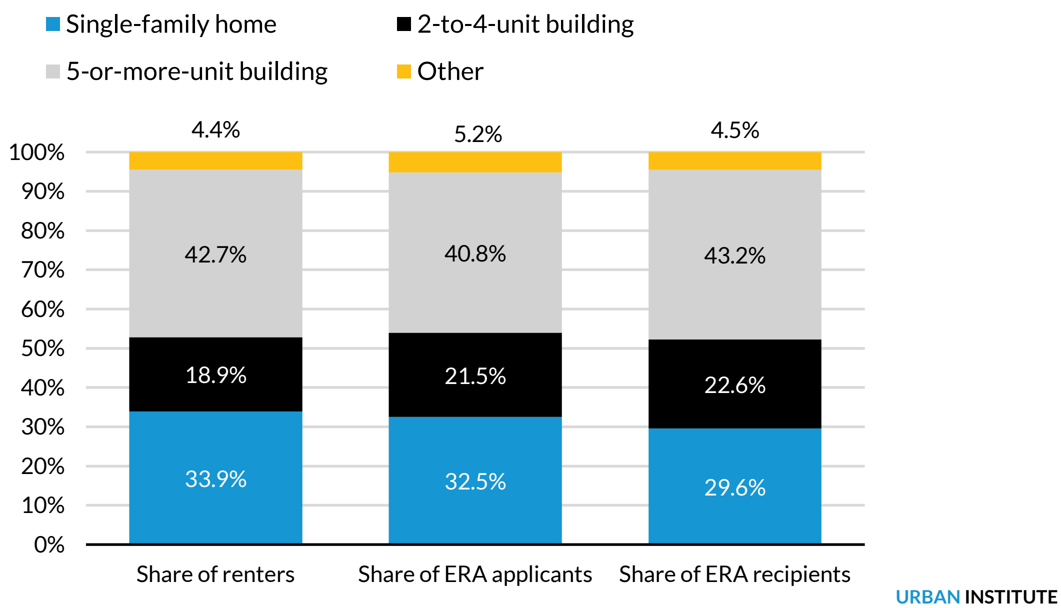


Sources: US Treasury ERA quarterly reports and Urban Institute calculations.
Notes: ERA = Emergency Rental Assistance Program; ERA1 = first round of ERA; ERA2 = second round of ERA; Q = quarter. Numbers as of Q4 2022.

To investigate whether institutional housing providers were more apt to use ERA than mom-and-pop housing providers, we used the number of units in the structure, as single-family rentals are more often owned by mom-and-pop housing providers, while multifamily units more often have institutional housing providers (Goodman et al. 2023). We did find a differential, but it was small, much less than we would have expected. Using US Census Bureau Household Pulse Survey estimates, we find that single-family renters made up 33.9 percent of renters overall, 32.5 percent of ERA applicants, and 29.6 percent of ERA recipients. Renters in structures with five or more units made up 40.8 percent of ERA applicants and 43.2 percent of recipients (figure 5).

FIGURE 5

Share of ERA Applicants and Recipients, by Building Type



Sources: US Census Bureau Household Pulse Survey and Urban Institute calculations.
Notes: ERA = Emergency Rental Assistance Program. "Other" includes mobile homes, motor homes, recreational vehicles, and vans.

Existing Assessments

As ERA started up in early 2021, there were many media accounts, often focusing on how quickly (or slowly) certain grantees were getting programs running and laying out challenges. Since then, assessments of ERAP have continued to be released, from research organizations, advocates, and government agencies.

We refer to a selection of these studies in our Key Takeaways section below, but a few studies stand out in terms of their overviews of ERAP's earlier implementation and impact:

- An early implementation study from Abt Associates supported by the National Council of State Housing Agencies in 2021, *Lessons from Eight States Regarding Factors That Have Contributed to*

States' ERA1 Spending Rates, was based on interviews with ERA program staff members in California, Illinois, Kansas, Maine, Oklahoma, South Dakota, Tennessee, and Virginia (Abt Associates 2021).

- A US Government Accountability Office (GAO) report, *Emergency Rental Assistance: Treasury's Oversight Is Limited by Incomplete Data and Risk Assessment*, released in December 2022, examines ERA payment timeliness, reallocation of excess funds, recipient and grantee characteristics, and data collection and oversight (GAO 2022).[4]
- The Housing Initiative at the University of Pennsylvania has convened stakeholders and compiled resources. The summary of the 2022 convening "What Have We Learned about Emergency Rental Assistance?" involved researchers from the Housing Initiative at Penn and representatives from the Treasury, the US Department of Housing and Urban Development, and elsewhere reporting on successes and challenges, and the initiative has compiled other resources and studies.[5]
- The US Treasury Department has continued to monitor and report on ERA's progress. Its *ERA1 Closeout Report*, released in January 2025, provides a program overview, assistance data, and an appendix with promising practices on outreach, documentation, eviction diversion, housing stability services, program integrity measures, and research and evaluation (US Treasury Department 2025). The Treasury ERA landing page hosts other resources, including a compilation of frequently asked questions and program guidance, other promising practices, and other program data and documentation.[6]

Elsewhere, other resources and studies will continue to come online in the upcoming months and years, which are sure to provide more data and insights. For example, in May 2025, the Eviction Lab released a dataset and tool to track local-level ERA spending data,[7] and the US Department of Housing and Urban Development funded three studies to assess ERA's impact.[8]

Understanding Impact and Implementation

Studies have indicated ERA promoted housing stability, decreased homelessness, helped stabilize status and improve mental health (particularly in the short term), and was effective in reaching vulnerable households during the pandemic (Airgood-Obrycki 2022).[9] As ERA was a short-term pandemic intervention, there are ongoing questions about ERA's long-term impacts and whether it is appropriate to think of it in these terms (Airgood-Obrycki 2022).[10] Moreover, there is no post-ERAP tracking to allow for a study of long-term impacts.

In terms of implementation, the program's flexibility allowed grantees to devise programs tailored to local conditions. The Treasury's reporting highlights these features (figure 6). Many of these practices focused on tailoring local outreach, though it also highlighted examples of how grantees could streamline the application process (e.g., giving primacy to self-attestation, simplifying income verification, and automating prioritization processes).

Treasury reporting on ERA touts the flexibility to build robust systems and simplify documentation, but these goals are valuable to every grantee, and most grantees would have preferred earlier guidance and greater standardization to reduce the added costs and time to adjust their programs.

FIGURE 6

Promising Practices from the US Treasury

Promising practices for ERA programs

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, the relevant ERA statute, and Treasury's guidance.

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

Some examples of promising practices include: [1]

- Partnerships in Program Implementation
- Culturally and Linguistically Competent Outreach
- Intentional Landlord Engagement
- Partnerships with Broader Eviction Diversion Programs
- Collaboration with Local Utility Companies
- Adjusting Program Strategies to Meet Local Needs
- Implementing Program Integrity Measures
- Making the Application Process Simple and User Friendly
- Using Fact-Specific Proxies to Simplify Documentation Requirements
- Automation Supporting Application Prioritization
- Data-Driven Program Strategies
- Using Commitment Letters to Assist Prospective Renters
- Example Forms
- Housing Stability Services
- Intentional Tenant Engagement

Source: "Promising Practices for ERA Programs," US Treasury Department, accessed July 30, 2025, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/promising-practices.

There are two dynamics to note regarding ERA's implementation that inform the following sections. First, especially early in implementation, there was a *perception* of slowness in how funds were initially distributed. As the Abt Associates report notes, this was partly attributable to the Treasury having sent funds to grantees so quickly, making the relative gap between grantee receipt of funds and distribution to households *seem* long. But in actual terms, most states and localities, even the ones seen as slow to start up programs, built out large programs within a few quarters, never having done so before. Some of these programs worked better than others. We do not have a measure of residents who needed help but who were discouraged because of the application process. We also do not know how many housing providers were in a state of uncertainty, as they could not evict nonpaying renters and some applications were pending for months. And in terms of rollout, amid a pandemic or another crisis, a few quarters can make a big difference to recipients.

Second, the issue of how to balance flexibility with clear guidance was a common theme in research studies (and in our interviews). Reporting from the Treasury highlighted ERA's flexibility and how the program was tweaked to respond to changing conditions and identified issues, as well as how the program was structured to enable creativity and local responsiveness. But for many, that open-endedness came at the cost of standardization and clarity. Most of the advantages from flexibility came in creative forms of outreach used by some to the program administrators and some of the partnerships they formed. By contrast, there was little creativity in the systems themselves. Some were simply easier to use than others. And by the end, most found that streamlining unnecessary documentation allowed for an easier rollout.

Key Takeaways from the Literature and Stakeholder Interviews

This section highlights key takeaways from our scan of published literature and from interviews with program stakeholders—both housing providers and program administrators—to understand program design and implementation strategies across state and local programs. Housing provider contacts we interviewed were primarily those with national portfolios, providing more opportunities to compare programs in different geographies.

Initial Program Funding Distribution

One aspect of the program that became clear quickly related to the initial design was that initial state-level allocations did not fully account for varying needs and renter populations in various states, which meant some states (particularly less populated ones) received significantly higher per capita grants than others and, in some cases, were not able to fully disburse their funds. Although reallocations were made to redistribute funds where need was greatest, they did not fully correct discrepancies (e.g., allocations were $4,100 per low-income renter in Alaska and $740 per low-income renter in New York). These allocations per renter did not match up with fair market rents at the metropolitan area level: Alaska's allocations per renter were $2,537 higher than the median fair market rent in the Anchorage metro area for a two-bedroom apartment ($1,563), but New York's allocations were $2,040, lower than the New York City metro area's fair market rent for a two-bedroom apartment ($2,780).[11] The initial allocations would have benefited from a look across a wider range of metrics (GAO 2022).

Program Oversight and Compliance

US Treasury documentation framed compliance in terms of how grantees could optimize their compliance and integrity measures to allow for efficient distribution of funds while monitoring for misuse (e.g., building-combined platforms with the capacity to identify potential fraud or abuse).[12] Although state program administrators appreciated the flexibility to design programs tailored to their state's needs, most interviewees wanted more specific written guidance from the Treasury related to program oversight.

This came up both in the context of the documentation needed to process an application, as well as in preventing duplication of services between state and local programs. One interviewee noted that the Treasury's guidance on fraud prevention evolved over the course of the program, shifting away from documentation that added barriers. For example, guidance to allow self-attestation was not initially released but was issued later. As the Treasury's fraud-prevention expectations of state and local grantees evolved, some state and local grantees would have liked additional guidance on how to adjust their internal compliance practices.

Setting Up Portals to Serve High Demand for ERA

Based on our review of existing assessments, grantees' limited experience setting up large-scale time-sensitive programs such as ERA programs came up repeatedly as a key start-up challenge, including among state housing finance agencies. Both the Abt and GAO reports discuss how agencies scrambled to staff up and to build systems, either directly or working with vendors. Some states (e.g., Virginia) had experience running smaller but similar relief programs using money from the Coronavirus Aid, Relief, and Economic Security Act that they could repurpose and expand, but some states had to start from scratch, often more than once. For example, Oklahoma initially used a system for distributing scholarships that did not work as effectively as intended, requiring state officials to start over with a new system (Abt Associates 2021). And Orlando tried to build a system from scratch before moving to an established system, customized for their use.

Grantees recognized that setting up large programs would require support from third-party vendors. Setting up relationships with third-party vendors was an important component of program design, but vendor selection is often a time-consuming and bureaucratic process that was new for many grantees. One interviewee noted that the time needed to select vendors was reduced when their governor declared a pandemic-related state of emergency, as some selection steps could be circumvented.

Grantees acknowledged a trade-off between speed and perfecting every detail. When moving quickly from design to implementation, administrators recognized the need to build flexibility into the program and make necessary changes as they came up in each phase. For example, Texas's state program administrators did not anticipate the demand when opening their portal, and the portal crashed when it opened. Program administrators resolved that issue by working directly with the vendor to enhance their system, while adding additional vendors to expedite application reviews and meet the demand. Michigan's state program administrators wanted to design a flexible application software with their vendor to adjust both to the US Treasury's guidance and stakeholder feedback. But the state did not want to delay serving clients with high needs. The result was that states needed to adapt their software as the program unfolded.

Application Systems Design Choices

Many grantees were not sure how to set up systems or requirements at the start of the program. In some cases, this led to trial-and-error efforts as issues came up and needed to be resolved. The Treasury would provide guidance to state and local programs on how to set up their application processes, with February 2021 revisions to the initial frequently-asked-questions document including clarifications about strategies for determining eligibility and collecting documentation from residents and housing providers.[13] Even so, more guidance would have been appreciated. The Government Accountability Office recommended more guidance from the Treasury in December 2022 (GAO 2022).

Several existing research studies on ERA program design and implementation focus on the application requirements that reduced barriers for applicants, such as adapting self-attestation and reducing the amount of up-front documentation needed to apply. According to the National Low Income Housing Coalition, more than 62 percent of ERA programs incorporated self-attestation into one or more eligibility components, and 51.4 percent of programs used self-attestation to determine COVID-19 hardship.[14]

The Housing Initiative at Penn conducted a quarterly survey of state and local program administrators and showed that programs attempted to promote low-barrier applications over the course of 2021. According to their sample of programs, the use of categorical eligibility (i.e., determining whether an applicant qualifies for ERA if they receive assistance from other government programs) increased 17 percentage points from spring to fall 2021, and the number of programs using fact-specific proxies to determine eligibility, such as the applicant's census tract, increased 15 percentage points. These strategies attempted to reduce residents' incomplete applications, which survey respondents flagged as an increased issue over the course of 2021 (Aiken et al. 2022).

Our interviews added to this information by focusing on how housing providers navigated the application systems themselves and how application system designs reduced or added barriers to participate in ERA programs.

Some of the housing providers we spoke with found the amount of repetitive manual work during the application process frustrating. One housing provider discussed how the ERA portal required housing providers to repeatedly upload the same W-9s for applicants from the same building: "[The ERA portal] required this information for every single application. It wasn't like I could send this once for one building with 600 units. If I had 300 people that didn't pay rent in that building, I had to upload that deed 300 times." Finding efficiencies and minimizing the amount of redundant manual work would expedite the time it takes for housing providers to complete applications, particularly for housing providers in larger buildings.

State and local programs varied as to whether a housing provider could apply on a resident's behalf (US Treasury Department 2024a). Most programs required applications from both the resident and the housing provider. A common challenge was connecting the applications if a housing provider and resident applied separately. Several housing providers mentioned cases where a resident applied separately from an application in progress by the housing provider. The application portal did not connect these applications, and they moved through the process on different timelines. This made it more difficult for housing providers to track the applications with their residents and delayed the review timelines versus what would have happened if the resident and housing provider had applied together. Our interviewees thought the application system should have been able to link these applications through matching phone numbers or email addresses. This was particularly problematic if the housing provider and resident applied to different programs. In some cases, there was no way to connect the applications. Although most of these problems were ultimately resolved, often through resubmitting part of the application, it took a lot of time and was aggravating for both housing provider and resident.

Our interviewees appreciated application design choices that promoted transparency about the review timeline and process. Some state and local programs included status updates for each application in their portal. This design choice promoted transparency, encouraged trust for housing providers, and expedited application timelines. One state designed its application portal so that "housing providers could go in and see where the application was in the process. If we could see that it was hung up on documents and waiting on verification, we would reach out to that resident." This application design choice reduced the time between review steps and made it easier for housing providers to navigate ERA programs. In other programs, the timeline for receiving the assistance was long, and there was no transparency. This was made harder still as some localities did not allow for an eviction to proceed if an application for rental assistance was in process, and the housing provider did not know whether the resident would be approved or rejected.

Some participants also faced challenges receiving program assistance after their application was approved. Several housing providers noted that some application portals did not provide an option to verify the address to send the funding and, in some cases for larger property management companies, programs would mail these checks to the corporate headquarters in another state or locality. This made it difficult for some housing providers to track program payments and extended the uncertainty for both residents and housing providers about whether the application was successful.

Under ERA1, the program administrator was required to pay the housing provider, unless the housing provider is not cooperative. Under ERA2, the program administrator could pay either party. In some cases, housing providers reported knowing the resident received the funds but did not pay their full balance (or did not make any payment at all). The property managers thought multiple factors could have influenced this. On one hand, the delinquent balance could have increased since the application time, so the disbursal did not match the current balance. But some housing providers we spoke with also believed a small minority of renters received funds and used the money for other purposes, as there were few consequences for doing so.

Coordination of ERA and Renter Protection Policies

The housing providers we spoke with found it challenging to navigate different state and local policies around eviction, as well as differences in ERA practices. This was compounded by the constantly changing policy environment. In some markets, state and local officials coordinated ERA with other eviction moratoriums and rent freezes, but officials in other markets did not. One housing provider we spoke with stated that differences between ERA programs and the differences between renter protections in different communities inspired their company to build a team that monitors local differences, such as the number of days of notice needed before beginning the eviction process.

Although the purpose of ERA is to keep residents housed, there was considerable frustration among housing providers that some localities imposed additional conditions that made the program less appealing or so unappealing they did not apply. Housing providers gave examples where a jurisdiction did not permit the housing provider to evict a renter who was behind on rent while the ERA application was being processed, even if the resident was chronically behind before the pandemic and owed more than the maximum ERA could pay. Moreover, this was compounded by the fact that some applications took months to approve, and there was no guarantee of approval. One housing provider declined to participate for renters who were chronically late, likely owed more than ERA would cover, and were in an area where eviction was prohibited if the application was pending. Another housing provider expressed frustration with an ERA application requiring a rent freeze in certain localities, as other residents who did not receive ERA in his buildings experienced a rent increase.

Navigating Differences across State and Local Programs

Housing Providers

Other themes from multiple studies included start-up complications and delays caused by local legislatures (sometimes, as in California, multiple levels of government legislative bodies were involved in design) and limited housing provider involvement and buy-in (Abt Associates 2021).[15] State and local grantees reported that engaging with housing providers over time was an ongoing challenge: the share of program administrators citing housing provider responsiveness as a challenge increased from 44 percent in April 2021 to 74 percent by the end of the year (Aiken et al. 2022). The early difficulties getting these programs off the ground influenced housing providers' long-term perceptions of ERA. For example, housing providers we interviewed noted challenges regarding overlapping programs in a single locality, which could lead to situations where housing providers applied to one program and residents applied to another. And in the same building, different residents often applied to different programs, making it more difficult for the housing provider to navigate the process. These navigational difficulties were compounded by the variety of program design choices across jurisdictions. Even in the same jurisdiction, there were cases where the city, county, and state ERA programs all had different eligibility and documentation requirements. In particular, differences across programs make it more difficult for housing providers to standardize their own approach, keep their processes organized, and realize economies of scale. And housing providers with national portfolios found it especially challenging to keep track of program differences across jurisdictions, as well as differences in changing state and local mandates, such as changes in eviction timelines and resident protections.

ERA Program Administrators

Another challenge was the matter of overlapping grantee jurisdictions in states where grants were made both to state and local entities. This had the potential to add flexibility and capacity, but with limited guidance from the Treasury (beyond the requirement to ensure that applications were not receiving funds from more than one grantee) about *how* to coordinate, this often created confusion for both applicants to these programs and administrators themselves (Abt Associates 2021).

Because the Treasury prohibited residents from receiving services across state and local programs, program administrators had to build systems to monitor this (Abt Associates 2021). We heard in our interviews that some state grantees took an affirmative approach to working with local grantees, essentially acting as an administrator for local programs. This involved sharing their application software and data with local entities. Other state grantees we spoke with chose not to work directly with local grantees or to serve clients in areas with other local programs. State grantees' determination to collaborate with local grantees depended on several factors, including how much faster they could distribute funding and the number of local grantees in their state. The more local the grantees, the more likely there needed to be some coordination.

To meet demand for services, some states partnered with community-based organizations to administer the program. These larger programs with lots of community-based organizations found it important to build more structured guidance for local participants. For example, interviewees from Michigan's program stated that they appreciated the chance to work with community-based organizations to support application review and disbursements, but the state administrators created additional guidance to keep processes consistent and manage their large network of nonprofit organizations. Michigan's program administrators built guidebooks for community organizations when supporting residents through applications and reviewing application materials to standardize practices. These program administrators appreciated the up-front flexibility to leverage their network of community-based organizations across their state to support the program's capacity, but they also recognized the need for additional guidance to improve program implementation.

Outreach Strategies

A survey of ERA grantees in California showed that most program administrators (93 percent of respondents) engaged applicants and partner organizations on social media, but a plurality of partner organizations reached out to residents and provided direct support on applications. Although the survey showed that 85 percent of respondents incorporated languages other than English, one of the housing providers we spoke with noted the challenges of setting up multilingual outreach to residents without working with community organizations (Dozier et al. 2023).

State program administrators took advantage of ERA's flexibility when designing their outreach strategies. For a program administered at the state level, our interviewees spoke about the importance of customizing outreach to different places in the state. One administrator said their program's outreach in rural areas focused on facilitating word-of-mouth engagement, and their state's program made bartenders and hair salon employees aware of the program, as they were often the only party outside of family members who knew a resident had an issue. Another interviewee stated that their program partnered with community-based organizations to expand its reach.

We also found that housing providers played an important outreach role. A couple of housing providers we spoke with highlighted their proactive outreach to residents who fell behind on rent, contacting residents directly and including instructions for how to apply. Some housing providers tried to reduce application barriers for their residents by providing technology, gathering documentation with their residents, and answering any questions as they completed their application. These housing providers found that providing this hands-on support encouraged more of their residents to complete an application.

Lessons for Future Emergency Responses

The ERA experience contains helpful lessons for the next nationwide rollout of an emergency rental assistance program or other application-based cash assistance program.

Funding allocations should match program demand. A more systematic issue was that initial state-level allocations did not fully account for varying needs and renter populations in various states. Congress required that smaller states receive a minimum allocation of $200 million. This meant some states received significantly higher per capita grants than others and in some cases were not able to fully disburse their funds (Abt Associates 2021). In some cases, these allocations per renter did not match the median rents at the state and metro area levels because the Treasury did not consider median rents in the first allocation method (Abt Associates 2021; GAO 2022). This means less populated states had more resources to allocate per renter than highly populated states at the start of ERA, which prompted the Treasury to reallocate funding based on program demand (Abt Associates

2021; GAO 2022). And although reallocations were made to redistribute funds where need was greatest, they did not fully correct discrepancies (GAO 2022). The initial allocations would have benefited from a look across a wider range of metrics using Census Bureau data such as (1) the share of renter households at the state and local level, (2) median renter household incomes, (3) housing cost burdens for renters, and (4) unemployment rates. A more appropriate initial allocation would have increased efficiency by both ensuring resources were matched to need and limiting the need to spend significant effort on reallocations.

Uniformity (i.e., standardization) is critical. The ERA program, when rolled out, prized flexibility. But the lack of standardization in basic program administration made the rollout less efficient, which meant longer wait times for residents in financial distress as well as housing providers who were providing shelter in many cases for free. But the Treasury's desire for flexibility meant many state grantees struggled in setting up systems where none existed before. In addition, housing providers who operated in many locations were subject to multiple systems and could not realize the efficiencies that could have come from a more uniform set of programs. Grantees did value the ability to tailor their outreach to fit their constituents, and many were creative with their outreach efforts.

Limit program requirements that are unrelated to payments, and coordinate timelines for housing provider and resident clarity. Many states and localities tied the emergency rental assistance application to a freeze on rent or on not moving forward with eviction for long periods. But the housing providers were unsure how long the application would take to get approved and in some cases were unsure whether it would get approved. As a result, some housing providers were unwilling to participate in the program, and others were unwilling to participate for certain residents, particularly those who had a history of late payments and could not make up the arrears with the ERA payment. Better coordinating the timelines for eviction and rental assistance, giving both housing providers and residents certainty, would be helpful, as would a waterfall in which the rental funds went directly to the provider, unless there was a reason to do otherwise. Similarly, emergency rental assistance should not be tied to rent freezes or other actions unrelated to the payment of rent. Such actions discourage housing providers' use of the program.

Think carefully about the trade-off between the cost of additional documentation and the take-up rate and program effectiveness. Err on the side of less documentation and leverage data from other government programs to help. Initially, the Treasury did not weigh in on guidance as to whether self-attestation of hardship was permitted. Some programs allowed for it, but some did not. In programs that did not allow for it, there was often confusion about what documentation was necessary to establish the hardship. The Treasury later clarified that self-attestation was acceptable and, in ERA2, was actually encouraged. Income verification was required for ERA applications.

Loss mitigation programs on the homeownership side have undergone a similar learning process. After the financial crisis, most modification programs required income verification, as the early modification programs targeted a modified mortgage payment based on the borrower's income. For example, the Home Affordable Modification Program explicitly targeted a certain payment-to-income ratio. Then, as the financial crisis dragged on, the government-sponsored enterprises (GSEs) began a streamlined modification program that targeted a reduction in the borrower's payment. This did not rely on income verification, and the GSEs did not require income verification. This streamlined modification program was successful (Goodman, Scott, and Zhu 2018). Although the redefault rate was higher on the streamlined modifications, the take-up rate was higher and program effectiveness improved 34 percent. The Federal Housing Administration followed suit, allowing for a modification program without proof of income and a more generous program with proof of income. Over time, modification programs have been revamped to target payment reductions rather than income-based targets.

During the pandemic, the loss mitigation waterfall for homeowners was standardized with a 12-to-18-month forbearance period at the top of the waterfall. To access forbearance, the borrower needed only to self-attest to hardship. And when the borrower exited forbearance, they had a conversation with their servicer to determine whether they could pay back the forbearance immediately, could maintain their old payments (the forborne amount added to the end of the mortgage), or needed a payment reduction (via a mortgage modification). Income verification was not necessary for a modification. These pandemic-era loss mitigation waterfalls have been made permanent at the Federal Housing Administration and the GSEs.

How does this relate to ERA? First, lessons from other programs are consistent with ERA: take-up rates are higher with less documentation. Certainly, self-attestation of a hardship should be included in future programs.

But unlike for the mortgage modification programs, eligibility for the ERA program was explicitly income constrained. As a result, some measure of income is needed. But there are several possible alternatives that would both improve accuracy and sharply reduce the number of residents that need income documentation.

- Conform guidelines so that if a renter is eligible for certain delineated federal programs (e.g., the Supplemental Nutrition Assistance Program), they are automatically eligible for rental assistance.
- Allow for geographic targeting. If a renter is in a low-income census tract, they automatically qualify.

Some grantees implemented this approach during the pandemic ERA.

Clear government guidance at the outset of a program such as this is essential. Stronger Treasury guidance would have quickened the rollout and made the process less frustrating for both residents and housing providers. There are two sets of guidance that would have accelerated the speed of the rollout: standardized information required for applications and technology solutions to help set up these programs. The Treasury initially issued little guidance about the information that was required for applications, and many grantees asked for what they thought the Treasury might have wanted. In fact, many collected far more than what was required, thus delaying rollouts. The State of Florida was slow to roll out, as state officials would not accept self-attestation of hardship until the Treasury said it was permissible.

Some guidance on technology solutions would also have been valuable. Many grantees initially chose to do their own system, and few had experience doing so, resulting in systems that were often cumbersome. A list of firms that had systems that could be adapted for emergency rental assistance, such as disaster recovery systems, would have been valuable to grantees. The list could be updated as the Treasury became aware of new entrants.

More standardization and guidance are necessary to handle entity overlap. One of the problems with ERA was that there was entity overlap, such as if a community was served by a state, county, and municipal program. Twenty-two states adopted a statewide application system; in the other states, there were no such systems (New Impact and Schultz Family Foundation 2024). In February 2022, the National Low Income Housing Coalition identified 511 programs in its ERA dashboard. In some cases, a resident applied to one program and a housing provider applied to another. In states with a statewide application system, the issue could often be identified, and the two applications could be processed together. In states without such a system, one party or the other would have to reapply to allow for the application to be processed. Telling the grantees they need to coordinate is not enough; either mandating standardized programs or allowing for only one statewide program might be a better path forward.

User-friendly systems are essential. The ERA systems or any system for distributing cash payments that requires many users to access the system should do the following:

- Allow for easy uploading of documents, as many renters had never uploaded documents before. (During ERA, some administrators corresponded with renters using text messages, as this was the easiest way for many renters to send pictures of documents.)
- Allow for easy matching of renter and housing provider applications and further streamlining of the process to encourage joint applications. The need to collect information from both housing providers and renters to approve and process applications means some coordination complexity is unavoidable, but it affects every application, so this issue should be front and center, not an afterthought.
- Allow the housing provider to upload the information for each building one time so they are not reuploading the deed and W-9 for each unit.
- Identify missing information and notify the housing provider and the resident.
- Allow for both rental claims and utility claims, if applicable on the same application.
- Allow the housing provider and the resident to check the status of their application, and give system administrators feedback on where the bottlenecks are.
- Allow for bulk processing of applications and payments.
- Have a set hierarchy of payments. Send funds directly to the provider, unless it is not possible because the provider is unresponsive. For rental and rental arrears, funds should be sent to the housing provider, and funds for utilities should be sent to the utility provider. If the provider is unresponsive, funds should be sent to the resident. This makes it easier to tie eviction timelines to rental assistance.
- Have a contingency plan if residents cannot apply for themselves, allowing the housing provider to apply on behalf of residents. Similarly, the system should have a contingency if the housing provider chooses not to participate in the program.

A lot of the frustrations with the ERA process were on the systems side. The actions above are common sense, but because few grantees had ever done a system of this sort before, they were unaware of what was needed until problems arose.

Productive outreach to both housing providers and residents improves program awareness. A program that is not known will not get used. Grantees have to do outreach to housing providers and residents. This can take many forms, and many grantees were creative. In certain rural counties in Virginia, some grantees left their cards with bartenders and hairdressers, figuring that renters would be more apt to open up to these often-sympathetic listeners. Other grantees had utility companies include information on rental (and utility) assistance to those who were overdue on their utility bills. The Treasury has gathered this information, though in a multitude of places. It would be helpful to compile the information into one resource for the future and examine the impact of their effectiveness.

Housing providers can play an important role both in the outreach and application process. Many housing providers did extensive outreach to their delinquent residents. Outreach included e-mails, phone calls, and door knocking to make sure renters knew the assistance was available. Outreach also usually included offers to help access this assistance. This help often consisted of either in-person or virtual appointments to help renters find the right program, complete the application, or even apply on behalf of the resident. In advance of the appointment, the renter was generally told exactly what information was needed, including proof of identity and verification of income or unemployment compensation.

Conclusion

This brief synthesizes some of the lessons learned when designing emergency rental assistance programs using existing research, public data from the Household Pulse Survey and ERA quarterly reports, and stakeholder interviews. The pandemic ERA program was the first nationwide emergency rental assistance program ever launched—$46.5 billion was deployed in rental assistance, with more than 3 million rental households aided by this program. Because the Treasury encouraged state and local grantees to build flexibility into their program design and implementation, grantees took different approaches when administering their programs. Although overall the program met its goals of distributing rental assistance funds to support low-income renter families , there were lessons that can strengthen the use of this type of emergency funding in the future and ensure it can be ramped up quickly, targeted to need, and efficiently implemented. The challenges of setting up a massive program such as ERA are clear, as it needed to balance flexibility with clear guidance and quick and efficient distribution with monitoring and compliance. We hope the lessons discussed in this report are incorporated into future emergency rental assistance or other large-scale emergency cash assistance efforts.

Notes

[1] To put this in perspective, there were roughly 44 million renter households in the United States in 2022. ERA reached about 7 percent of all renter households, intentionally targeted toward those with the lowest incomes who were affected by the pandemic.

[2] City of Orlando, "City Partners with KPMG and Neighborly on Emergency Rental Assistance," press release, April 22, 2021, https://www.orlando.gov/News/Press-Releases/2021-Press-Releases/City-of-Orlando-Partners-with-KPMG-and-Neighborly-on-Emergency-Rental-Assistance-Program.

[3] "ERA: FAQs," US Treasury Department, last updated December 4, 2024, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/faqs.

[4] Also useful is the National Low Income Housing Coalition's overview of GAO report takeaways. See "GAO Report Examines Implementation of Treasury's ERA Program," National Low Income Housing Coalition, January 9, 2023, https://nlihc.org/resource/gao-report-examines-implementation-treasurys-era-program.

[5] Also part of this effort was a research directory document compiling national and local studies, as well as other materials relevant to ERAP. See "What Have We Learned about Emergency Rental Assistance: Convening Summary," The Housing Initiative at Penn, accessed July 30, 2025, https://www.housinginitiative.org/what-have-we-learned-about-emergency-rental-assistance.html.

[6] "Emergency Rental Assistance Program," US Treasury Department, accessed June 1, 2025, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program.

[7] The analysis and tool reflects a dataset representing $20.6 billion in ERA funds, representing somewhat less than half the program overall. See Grace Hartley, Jacob Haas, and Peter Hepburn, "How Much Rental Assistance Did Your Community Receive during the Pandemic?" Eviction Lab, May 8, 2025, https://evictionlab.org/pandemic-rental-assistance/.

[8] US Department of Housing and Urban Development, "HUD Awards $2 Million to Assess the Impact of Emergency Rental Assistance on Housing Stability," news release, November 3, 2022, https://archives.hud.gov/news/2022/pr22-226.cfm.

[9] "What Have We Learned about Emergency Rental Assistance," The Housing Initiative at Penn.

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[12] "Promising Practices: Implementing Program Integrity Measures," US Treasury Department, accessed July 30, 2025, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/promising-practices/implementing-program-integrity-measures.

[13] "Change Log," US Treasury Department, accessed July 30, 2025, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/faqs/change-log.

[14] "Treasury Emergency Rental Assistance (ERA) Dashboard," National Low-Income Housing Coalition, accessed July 30, 2025, https://nlihc.org/era-dashboard.

[15] Reports note how some states worked to promote housing provider buy-in. The Abt study discusses how in Kansas, late fees were originally excluded from reimbursement but were later added in.

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