Having the Greatest Impact on Preventing Homelessness and Addressing Racial Inequities with New Federal Emergency Rental Assistance Resources

Homelessness and housing instability are profoundly racially inequitable, driven by systemic racism. Even with the federal eviction moratorium in place, households are being evicted or losing their housing in the midst of a pandemic that disproportionately impacts communities of color. States, U.S. Territories, local governments, and Indian tribes are making decisions right now on how to implement the suite of emergency rental assistance resources made available through different COVID Relief programs, including the new Emergency Rental Assistance (ERA) program passed by Congress in December 2020 and allocated to communities. This creates a vital opportunity to address these racial inequities and to ensure that these resources have an impact on preventing increases in homelessness.

This document guides communities through important decisions about program design and targeting that will be central to realizing racial justice and homelessness prevention opportunities, including decisions about geographic targeting and ensuring assistance reaches households experiencing the worst impacts of the pandemic, especially BIPOC households. The graphic below lays out a high-level approach to the use of available funds for diversion and prevention initiatives:

1. Serve households who are already experiencing homelessness with homelessness-dedicated funding like ESG-CV (Homelessness Diversion)

2. Serve those who are at high-risk of homelessness with more flexible funding sources and fill gaps with homelessness-dedicated funding (Homelessness Prevention)

3. Do important eviction prevention work with ERA and other flexible funding sources (Eviction Prevention)

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**Homelessness Diversion**

- **Target Population:** HHs presenting for homelessness assistance, highly impacted neighborhoods
- **Funding Sources:** ESG-CV, CDBG-CV, Coronavirus Relief Fund, Private/Local Sources

**Homelessness Prevention**

- **Target Population:** HHs with a previous episode of homelessness, 0-30% AMI, HHs with rent/utility arrears, highly impacted neighborhoods
- **Funding Sources:** Emergency Rental Assistance (Treasury), Coronavirus Relief Fund, CDBG-CV, ESG-CV

**Eviction Prevention**

- **Target Population:** 0-50% AMI, highly impacted neighborhoods, HHs with rent or utility arrears, small landlords
- **Funding Sources:** Emergency Rental Assistance (Treasury), Coronavirus Relief Fund, CDBG-CV

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1 As described in previous guidance, including Making the Case for the Framework and At-a-Glance Matrix: How to Fund COVID-19 Homelessness Responses with CARES Act Funding, uses of ESG-CV should prioritize people who are already experiencing homelessness. Please see housingequityframework.org for more information.
Target Neighborhoods Experiencing the Greatest Impacts and Risks

The design of rental assistance programs should ensure that outreach efforts and resources are effectively reaching neighborhoods and communities, including BIPOC communities, with the greatest risks and needs for assistance, including:

- Using the web-based tool, Where to Prioritize Emergency Rental Assistance to Keep Renters in Their Homes, created by the Urban Institute Urban, to identify neighborhoods in which households are likely facing the greatest risks of loss of housing during the pandemic.²

- Partnering with residents from those neighborhoods, and with organizations with deep connections to those neighborhoods, to:
  - Develop marketing and outreach strategies.
  - Identify and engage landlords with small portfolios of units, who may be leasing to the most-at-risk households.
  - Implement accessible application processes and the provision of financial assistance and services.

- Targeting or dedicating shares of the emergency rental assistance to the neighborhoods experiencing the greatest impacts and risks.

- Assessing data regarding the neighborhood locations of households being served in as close to real time as possible and adjust outreach strategies to better reach highest-risk neighborhoods, as needed.

Target Households Facing the Greatest Risks of Homelessness

The design and implementation of rental assistance programs should also ensure that the resources will reach and prioritize the specific households who face the greatest risks of homelessness, if they lose their housing, especially given that those risks are starkly racially inequitable, including:

- Prioritizing access to assistance for households with prior histories of homelessness, which is one of the only documented, evidence-based predictors of future experiencing of homelessness.

- Focusing significant resources toward households at the lowest income levels, less than 30% of Area Median Income (AMI).

- Ensure that households who are staying in more informal living arrangements, such as sharing housing with others without a formal lease agreement, are eligible. These are often the last living situation of people before they enter homelessness.

- Ensure promotion, outreach, and services strategies and partners will be able to reach immigrant households and can serve people who communicate in different languages.

- Ensure eligibility criteria and processes can effectively serve, and protect the safety, of people who are survivors of domestic, intimate partner, or sexual violence.

- Assess data on racial demographics of households being served in as close to real time as possible, and compare that data to the demographics of people experiencing homelessness in your community, and adjust outreach strategies to better address racial inequities.

- Assess data on income levels of households being served, and households with prior experiences of homelessness being served, in as close to real time as possible, and adjust outreach and prioritization strategies as needed.

² See this Technical Appendix to the tool to read more about the data that is used to analyze and assess these risks.
Program Design and Practices to Achieve Targeting Goals

The design and implementation of emergency rental assistance programs should ensure that these community and household targeting priorities are achieved, that the program design is as simple, flexible and accessible as possible, and that the program is supporting progress toward racial equity and justice.

☐ Make implementation at the local level as FLEXIBLE as possible:
  ✓ Ask people impacted by the pandemic for input on program design.
  ✓ Use self-certification or non-traditional methods where needed to document eligibility, living arrangements, arrears.
  ✓ Partner with a range of public and private organizations (PHAs, non-profits, public systems and agencies, like TANF and Child Welfare, homelessness services providers, landlords) to ensure a broad reach, the identification of households at-risk of homelessness, and many potential referral pathways for households with greatest risks.
  ✓ Develop multiple ways to apply, thinking beyond only allowing on-line applications or only accepting applications during traditional business hours, and partner with 2-1-1 to provide access.
  ✓ Allow for payments to go to either landlords and utility providers or directly to households to use for allowable arrears.
  ✓ Make the re-application process as simple as possible for households with ongoing needs.
  ✓ Allow for relocation assistance when needed, especially for doubled-up households who are at high risk of losing their living situation.

☐ Partner with residents and organizations with deep connections in highly-impacted neighborhoods to develop targeted marketing and outreach strategies and application processes and to provide services.

☐ Proactively identify and reach out to households who have recently exited homelessness, such as through rapid rehousing programming, to identify if they are in need of financial assistance to remain stably housed.

☐ Ensure marketing and outreach strategies are reaching people currently or previously serving as essential workers, who are experiencing vastly disproportionate impacts of the pandemic.

☐ Pass through adequate administrative funds for local organizations conducting front-line work.

☐ Target outreach and set aside a portion of funds to work with small landlords who may not be as connected to public resources as larger landlords.

☐ Engage fair housing experts and organizations to address any questions or concerns that are raised regarding targeting and prioritization decisions.

☐ Connect program and processes to local Continuum of Care and coordinated entry processes, and other services systems, to align and leverage other forms of support households may need.

☐ Collect, share, and analyze relevant data to support efficient use of funds and to identify needed mid-course corrections in program design.

☐ Create a feedback loop to assess data regarding the neighborhood locations of households being served in as close to real time as possible and adjust outreach strategies to better reach highest-risk neighborhoods and households, as needed.
Additional Implementation and Operational Guidance

Please see the following tools and resources for more detailed operational guidance for implementing emergency rental assistance programs and/or homelessness prevention strategies:

- FAQ regarding the Emergency Rental Assistance Program – U.S. Department of Treasury
- Emergency Rental Assistance Program Webpage – U.S. Department of Treasury
- Homelessness Prevention: Effective and Efficient Prevention Programs – HUD Technical Assistance Providers
- Prevention to Promote Equity – HUD Technical Assistance Providers
- Increasing Equity in the Homeless Response System Through Expanding Procurement – HUD Technical Assistance Providers
- Targeting Homeless Prevention in the Midst of COVID-19 – HUD Webinar
- Strategies for Renter Protection – HUD Technical Assistance Providers
- Strategies for Eviction Prevention – HUD Technical Assistance Providers
- Developing a Centralized Rent Administration Program – HUD Technical Assistance Providers
- Recommendations for Treasury Department Emergency Rental Assistance Guidance – National Low Income Housing Coalition
- Best Practices for State and Local Emergency Rental Assistance Programs – National Low Income Housing Coalition
- Three Principles to Equitably and Efficiently Implement New COVID-19 Emergency Rental Assistance – Urban Institute
- Centralized Diversion Fund: A Necessary Tool for Addressing Homelessness in King County – Building Change

Please see https://housingequityframework.org/resources for many other tools and resources to support the implementation of effective, equitable COVID-19 homelessness responses, including: information on funding sources and eligible activities; protocols, forms, and program designs from states, local communities, CoCs and nonprofits; federal guidance, information, and rules; and interactive tools and videos.

The Framework for an Equitable COVID-19 Homelessness Response project is being collaboratively guided by the following partners:

- Center on Budget and Policy Priorities
- National Alliance to End Homelessness
- National Innovation Service
- National Health Care for the Homeless Council
- National Low Income Housing Coalition
- Urban Institute
- Barbara Poppe and associates
- Matthew Doherty Consulting