

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

(Updated July 2021)



The Framework for an Equitable COVID-19 Homelessness Response
#HousingEquity

Homelessness and housing instability are profoundly racially inequitable, driven by systemic racism. States, U.S. Territories, local governments, and Indian tribes are implementing [Emergency Rental Assistance](#) resources made available through the **Consolidated Appropriations Act (ERA-1)** and through the **American Rescue Plan Act (ERA-2)** and administered by the U.S. Department of the Treasury. These resources provide vital opportunities 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 goals and homelessness prevention and rehousing opportunities, including decisions about geographic targeting and ensuring assistance reaches households experiencing the worst impacts of the pandemic, especially BIPOC households. The graphic below illustrates how to align interventions with levels of risk for experiencing homelessness, ranging from Rehousing to Eviction Prevention. [As clarified in recent FAQs](#), ERA resources can support activities across all of these interventions, including Rehousing people who are exiting homelessness. To have the maximum impact on homelessness and equity with these resources, communities should balance the following uses of these resources:

1. Use ERA resources to **complement and scale other efforts to connect households exiting homelessness to housing, or who are presenting for homelessness assistance**, that may be funded through homelessness-dedicated sources like ESG-CV (**Rehousing and Homelessness Diversion**)¹
2. Within prevention uses of ERA funds, **serve those households who are at high-risk of homelessness** and fill gaps with homelessness-dedicated funding (**Homelessness Prevention**)
3. Support important **eviction prevention work with ERA and other flexible funding sources (Eviction Prevention)**



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.

Reach 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 highest rates of homelessness and experiencing 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, 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, with organizations with deep connections to those neighborhoods, and with people currently experiencing and exiting homelessness**, 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. For households facing eviction in these neighborhoods, who are unlikely to be able to retain their current housing, provide relocation assistance using ERA.
- 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.

Reach Households Experiencing or at Greatest Risk of Homelessness

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

- Prioritizing access to assistance for **households who are exiting homelessness and households who have prior histories of homelessness**, one of the only documented, evidence-based predictors of homelessness.
- Focusing significant resources toward **households at the lowest income levels, less than 30% of Area Median Income (AMI)**.
- Ensuring 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 situations of people before they enter homelessness.
- Ensuring promotion, outreach, and services strategies and partners will be able to **reach immigrant households and can serve people who communicate in different languages**.
- Ensuring eligibility criteria and processes can **effectively serve, and protect the safety, of people who are survivors of domestic, intimate partner, or sexual violence**.
- Assessing **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.
- Assessing **data on income levels of households being served, and households with current or 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.

Adjust Program Design and Practices to Achieve Targeting Goals

The design and implementation of emergency rental assistance programs should be continuously adjusted to **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 experiencing and exiting homeless and other people impacted by the pandemic for **input on program design**.
 - ✓ Use **self-certification or self-attestation or other non-traditional methods where needed** to document eligibility, living arrangements, and arrears, as Treasury has made clear is acceptable and encouraged.
 - ✓ 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 currently exiting homelessness or at-risk of homelessness, and implement many potential referral pathways to ensure access for such households.
 - ✓ 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, as Treasury has clarified is allowable.
- 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. Consider “door knocking” in areas with high rates of eviction and entries into homelessness.
- 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**:

- [FAQs Regarding the Emergency Rental Assistance Program](#) – U.S. Department of Treasury
- [Harnessing the American Rescue Plan to Prevent and End Homelessness](#) – HousingEquityFramework.org
- [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.



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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 •
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