### **Reaching Priority Populations through Emergency Rental Assistance Programs in Response to**

**COVID-19:** Lessons from Chicago, Illinois

This technical guide provides advice to agencies administering emergency rental assistance programs. It includes guidance on reaching priority populations by 1) designing tailored outreach and application strategies, and 2) using data to make real-time improvements to those strategies. The insights draw heavily on the Government Performance Lab's (GPL) work with Chicago's Department of Family and Support Services to revamp their emergency rental assistance program in response to the COVID-19 pandemic.

#### Introduction

Unprecedented job losses, associated with the COVID-19 pandemic, have exacerbated housing instability across the country. Low-income renters, who tend to concentrate in industries where COVID-19 related layoffs were the largest, have been disproportionally affected.<sup>1</sup> As a result of pandemic-related unemployment, approximately 1.3 million renter households accrued roughly \$7.2 billion in unpaid rent by the end of 2020.<sup>2</sup> To support these renters, many state and local governments have launched or expanded emergency rental assistance programs that provide cash payments for eligible housing expenses and back-rent. In particular, emergency rental assistance programs provide funding for eviction prevention and housing stabilization. Faced with pressure to get these funds out the door quickly, government agencies run the risk of supporting those most able to complete the application process over those most in need.

With assistance from the GPL, Chicago's Department of Family and Support Services (DFSS) revamped their emergency rental assistance program with expanded CARES Act<sup>3</sup> funding. Chicago's emergency rental assistance program gives cash payments for future or back-rent to low-income renters (via their landlords) who are at-risk of homelessness, i.e. those who currently have housing but who may become homeless soon due to lost income or a household emergency.

Chicago's emergency rental assistance program needed to distribute funds quickly in order to effectively prevent eviction and homelessness. However, Chicago DFSS recognized that equally important to distributing funds quickly was getting those funds to the people who need them most. In Chicago, like many places across the country, the need for emergency rental assistance is greater than the resources that state and local agencies can provide. Because of this, agency staff were eager to ensure that limited available resources were reaching populations disparately impacted by COVID-19. In their efforts to quickly get emergency rental assistance to identified priority populations, Chicago's DFSS identified two critical sets of practices:

- 1. Design an outreach and application process with strategies tailored to help priority populations learn about, initiate, and complete emergency rental assistance applications
- 2. Use real-time data to make program adjustments that more effectively reach priority populations

<sup>&</sup>lt;sup>1</sup> Mary K. Cunningham, Laurie Goodman, and Jung Hyun Choi, "Don't Overlook the Importance of Unemployment Benefits for Renters," *Urban Institute* (blog), April 23, 2020,

https://www.urban.org/urban-wire/dont-overlook-importance-unemployment-benefits-renters. <sup>2</sup> Davin Reed and Eileen Divringi, "Household Rental Debt During COVID-19" (Federal Reserve Bank of Philadelphia, October 2020).

<sup>&</sup>lt;sup>3</sup> CARES Act refers to the federal Coronavirus Aid, Relief, and Economic Security Act passed in 2020.

**Identifying priority populations to target for emergency rental assistance** Prioritizing emergency rental assistance applications is an important step when not every individual or family can be supported. Relying on a first-come, first-served policy instead the default for many agencies—can contribute to inequitable outcomes. First-come, firstserved policies effectively prioritize individuals with the fewest obstacles to completing an application, potentially disadvantaging historically marginalized populations who face a disproportionate share of these obstacles. Alternatively, targeting specific demographics or circumstances in emergency rental assistance prioritization can enable more equitable program outcomes.

Deciding which groups to prioritize for emergency rental assistance can be a difficult task, as there is no single right answer; choices will be guided by an agency's overall values and goals. Agencies may wish to advance multiple goals with these funds, often aiming to balance reaching:

- 1. Households at the most immediate risk of homelessness. For example, households who are already far behind on their rent or have received an eviction warning.
- 2. Households most likely to preserve their tenancy following support. For example, those with a long history of stable housing facing a specific, temporary setback.
- 3. Historically underserved households. For example, low-income households or communities of color who historically have received less housing support.

Across these household types, agencies may further prioritize by specific demographic factors, such as income, geography, race, ethnicity, or household size.

<u>Chicago's experience:</u> When DFSS received approximately \$16 million in additional emergency rental assistance funds through the CARES Act, they wanted distributed funds to reflect the disproportionate impact of COVID-19 on specific community areas. Although DFSS had historically awarded emergency rental assistance on a first-come, first-served basis, COVID-19 dramatically increased the need for support, making prioritization more important. In parallel with a mandate from Chicago's mayor to support areas of the city most impacted by COVID-19 (primarily low-income communities of color), DFSS prioritized applications by both household income and geographic areas disparately impacted by COVID-19.

In addition to designing a formal lottery process to guarantee that at least 50% of the applications processed came from the lowest-income households (those earning below 15% of annual median income), DFSS designed outreach and application processes tailored to reach priority applicants and monitored their success in real time, adjusting as needed.

#### Design outreach and application processes with strategies tailored to help priority populations learn about, initiate, and complete emergency rental assistance applications

Defining the priority populations for emergency rental assistance is only the first step to successfully connecting these individuals with cash assistance to prevent eviction. Often, those most in need of emergency rental assistance face the most significant barriers to participating in the application process. Chicago DFSS saw priority groups face barriers at two distinct stages: (1) accessing information to start an application and (2) following through to successfully submit an application. The following section highlights strategies for supporting priority populations through these two stages, essential to getting emergency rental assistance funds into the hands of these communities.

#### Stage 1: Getting priority populations to start applications

To successfully disburse emergency rental assistance to priority populations, residents must be able to learn about, navigate to, comprehend, and start the application process. Agency staff might consider the following practices to support priority populations in starting an application:

• **Design user-focused eligibility communications and requirements**: Program outreach should clearly articulate eligibility requirements in a format that enables applicants to easily self-assess whether or not they are eligible (as opposed to simply copying eligibility language directly from funding requirements, which can be jargon-filled and difficult to interpret). For example, an agency might explicitly state "you may be eligible if you meet all three of the following requirements," and then list those requirements in plain language. Careful consideration of how to express these criteria can save both applicants and reviewers time attempting to submit and process ineligible applications.

Relatedly, applicants should be able to easily answer eligibility questions and provide the required documentation. Requests for detailed or complex information at the beginning of an application can prevent priority populations from applying if the information is too burdensome to document. To avoid this, agencies may consider limiting up-front requirements to information needed to conduct an initial eligibility screen (later supporting applicants to provide any additional documentation needed to complete the full application), or using intuitive proxy indicators to determine eligibility. For example, an agency might use income level (which can be easily demonstrated) as a proxy for risk of homelessness (which might be harder to prove).<sup>4</sup> When possible, agencies might also provide a list of alternative options for proving eligibility, or allow for affidavits to be used in place of documentation.

<u>Chicago's Experience:</u> DFSS was careful to develop clear, consistent messaging about eligibility across all outreach and application platforms. They communicated eligibility information in the form of a concise "You are eligible if..." list. This was supplemented by an "Options to prove eligibility" list, which included various ways applicants could demonstrate household income or risk of eviction. To identify the community area in which each applicant lived, DFSS matched applicant addresses to a list of community areas behind the scenes, rather than asking applicants to self-identify their community area. For applicants, providing their address is more straightforward than figuring out which community area they live in.

• **Pursue targeted outreach tactics, leveraging existing trusted messengers and platforms**: Many government agencies have limited budgets for marketing and outreach. As a result, program staff might feel limited to using broad, low-cost public announcements to communicate emergency rental assistance availability and basic eligibility requirements, such as government press releases, websites, and social media. Although these "one-size-fits- all" strategies require less resources, they can be insufficient to reach priority populations facing greater barriers to information and participation.

To efficiently target outreach, agencies should take advantage of existing communication networks by sharing materials with contacts who already interact with potential priority applicants. These contacts and avenues might include:

- Trusted messengers in government (e.g. local elected officials or public programs)
- Public platforms and spaces (e.g. libraries, schools, or hospitals)
- Community organizations or leaders (e.g. food pantries or other non-profit agencies)

<sup>&</sup>lt;sup>4</sup> For this strategy to work, the chosen proxy indicator (i.e. income level) must be reliably correlated with the prioritization factor (i.e. risk of homelessness) chosen by an agency.

<u>Chicago's Experience</u>: DFSS funds a number of social services in Chicago in addition to the emergency rental assistance program, including early learning. Emergency rental assistance program staff leveraged their proximity to these programs to ask organizations serving priority communities to directly contact families who may be in need of emergency rental assistance and offer support in applying, if needed. DFSS also identified food pantries as one of the few places where people were still visiting in-person during the COVID-19 pandemic. DFSS delivered hard copies of emergency rental assistance program flyers to the umbrella food pantry organization, which then included the flyers in pick-up boxes distributed in high-need communities.

- **Ensure application accessibility along multiple dimensions**: Specific barriers to accessing, comprehending, and fulfilling emergency rental assistance application requirements threaten to prevent priority populations from starting (and completing) an application. Two primary accessibility concerns relate to technological compatibility and language availability:
  - <u>Technological Compatibility</u>: Agencies might seek to balance the use of web- and paperbased applications, as the latter might be preferred by seniors, people with audio- and visual disabilities, and those with limited access to the internet. Among web-based applications, Chicago DFSS staff noted the vast majority of applicants reported applying from mobile phones (as opposed to desktop computers). Anticipating similar trends in other jurisdictions, agencies might format and demo the application on multiple mobile operating systems, paying particular attention to document upload functions and errors.<sup>5</sup>
  - <u>Language Accessibility</u>: Agencies should provide translated instructions at the top of all materials detailing how to access translation services. If there are dominant languages spoken in a jurisdiction other than English, it may be efficient (or required) to translate all published materials. In addition, agencies should aim to write all materials in plain language, at the lowest possible reading level<sup>6</sup>, in order to maximize accessibility for applicants with a range of literacy levels.

<u>Chicago's Experience</u>: To better reach Latinx households, who were under-represented among early applicants, DFSS translated all updated communication materials into Spanish. Agency staff also reorganized their English materials to position translation services information at the very top, and worked to lower the reading level of materials in both languages—aiming for a middle school reading level.

#### Stage 2: Getting priority populations to complete applications

Residents who initiate emergency rental assistance applications are experiencing levels of economic and housing instability that make it common for them to also face competing, high priority demands for their attention. As a result of these barriers to participation, priority populations might not complete applications they started without additional nudges or supports. Below are three practices to help priority communities complete their emergency rental assistance applications:

• *Plan to engage applicants multiple times*: Residents may stop work on their application when they don't know how to complete a required step, or they might miss a deadline as they struggle to address personal crises related to housing instability. To support these applicants, consider collecting multiple methods of contact information (email

<sup>&</sup>lt;sup>5</sup> Having program staff complete applications themselves can help uncover any "bugs" in the application that could contribute to a frustrating, confusing, or inflexible user experience. Recognizing that many applicants will not complete their applications in a single sitting, staff should also test functionality around starting, stopping, and resuming applications.

<sup>&</sup>lt;sup>6</sup> Free software exists to help translate materials to lower reading levels.

addresses and phone numbers) to enable follow-up such as e-mail nudges, notices of where to go for additional help, or follow-up phone calls to provide real-time support.

<u>Chicago's Experience</u>: DFSS staff sent periodic email reminders in both English and Spanish to applicants who had started but not completed applications, providing additional information on nearby physical locations where applicants could receive support completing the application. On the day following an email reminder, the number of applications submitted nearly doubled compared with the average on preceding days.

• Strategically dedicate resources to assist in completing applications: Agencies may consider reallocating, hiring, or contracting staff resources to provide additional support for residents to complete application requirements. This support can take many forms, but might include assigning staff to monitor dedicated email addresses or phone lines to answer questions about application fields and documentation requirements, or having staff proactively reach out to applicants with incomplete applications to offer direct support. It may not be practical to offer support to all applicants at all application steps, especially if total requests for assistance are likely to eclipse available funding. Agencies might consider positioning the most critical requirements to screen for eligibility at the start of the application. This could enable staff to more easily identify and provide targeted support to applications which are likely to be approved, instead of expending resources to support applicants that are categorically ineligible.

<u>Chicago's Experience</u>: In Chicago, DFSS allowed applications to be submitted without all of the required documents (so as to not discourage those who were eligible but needed more support providing documentation). Once selected for review, DFSS then supported those applicants to fix any documentation issues.

• **Proactively identify which application requirements can be flexible if found to drive low completion rates for priority populations**: Some agencies have, over time, created process steps and application requirements that go above and beyond the minimum requirements laid out by funding sources or regulations. While these additional requirements are typically designed to reduce potential fraud or waste, they may not work as intended, instead posing added barriers to priority applicants successfully completing applications. As agencies identify common barriers or requests for support, they should consider making the relevant requirements more flexible, when permitted within funding rules. Understanding which rules are firm or flexible early in program design can help to facilitate this trouble-shooting process.

<u>Chicago's Experience</u>: DFSS found that a disproportionate share of Black applicants were denied because they were unable to provide proof of their ability to pay rent after receiving emergency rental assistance. Proof of future income was a requirement previously created by DFSS to more effectively target emergency rental assistance support, not part of the funding source rules. Given the nature of employment uncertainty caused by the COVID-19 pandemic, DFSS determined this requirement was no longer reasonable and eliminated it as a requirement.

## Use real-time data to make program adjustments that more effectively reach priority populations

Even a thoughtfully tailored outreach and application process may not initially or consistently lead to priority populations submitting applications for emergency rental assistance. In addition to considering the specific strategies outlined above, staff should monitor data in real-time in order to detect and address challenges to reaching these populations in practice. <u>Chicago's Experience</u>: DFSS aimed to prioritize populations that were the most impacted by COVID-19 for emergency rental assistance support. In practice, these were largely low-income communities of color. In order to monitor how successfully they were reaching these populations, the agency regularly reviewed data by community area, race and ethnicity, and income at each application stage. The agency quickly discovered that disproportionately fewer Latinx applicants were on track to receive emergency rental assistance funding. Uncovering this challenge prompted DFSS to adjust their outreach efforts, successfully increasing the number of Latinx applicants by 30% in the next application round.

Based on Chicago's experience, below are some analytical strategies that might help surface challenges and disparities in reaching priority populations in real-time:

1. Disaggregate data on who receives emergency rental assistance by major steps in the application process and by priority demographics: Relying on aggregate data about the distribution of emergency rental assistance funds can obscure differential experiences of priority populations, and can make it difficult to diagnose where things are going wrong in the application process. Analysis by individual steps in the application process and by priority demographics can help uncover specific barriers and focus program adjustments. Application steps for disaggregation commonly include: (a) started the application, (b) submitted the application, (c) selected for application review, (d) started processing application, (e) application approved, and (f) funds disbursed. Further disaggregating each application step by priority demographic data can support racial and other forms of representative equity throughout the process. For example, Chicago DFSS tracked a range of demographic indicators, including race, ethnicity, income, first language, and geography.

<u>Chicago's Experience</u>: Disaggregating data by application step, DFSS diagnosed that the under-representation of Latinx applicants was largely driven by low rates of Latinx applicants starting applications in the first place. This insight allowed DFSS to focus their improvement efforts on initial outreach and engagement. The agency tested strategies to increase the share of applications initiated from Latinx applicants, including translating communications into Spanish, generating easy-to-access video tutorials, clarifying and elevating messaging that undocumented individuals are eligible for support, and leveraging trusted community partners to do outreach in priority community areas.

- **2.** *Monitor the time it takes to complete each application stage*: Delays in specific process steps can contribute to disengagement from priority applicants. Monitoring the time it takes to complete each application step can help diagnose where delays occur, pointing to areas for process improvement. For example, if delays occur between applications being started and submitted, it may signal that the application is too onerous or that applicants need more support prior to submission. In addition, agencies should seek to streamline the total duration of the application process; if it takes too long for emergency rental assistance funds to be disbursed, residents may not receive support in time to prevent evictions.
- **3.** *Consider other common disaggregation methods:* Other application data can help to uncover key sources of program inefficiencies and inequities, including:
  - <u>Application method (computer, phone, paper, etc.)</u>: Understanding trends in how residents are accessing applications can help prioritize efforts to improve application accessibility, focusing attention on the most-used platforms.
  - <u>Reason for application denial:</u> Analyzing the reason for application denial in combination with applicant demographics can help agencies identify specific kinds of support or program changes needed to successfully reach priority populations.

• <u>Referral source:</u> Collecting and analyzing data about how applicants heard about the program can help agencies target efforts to strengthen relationships with important referral sources, or identify and reinforce pathways that are working.

Critically, data monitoring is most useful when done regularly throughout the course of accepting applications and disbursing funds (rather than retrospectively once funds are exhausted or on an annual basis). This more frequent cadence, similar to <u>Active Contract</u> <u>Management</u> strategies, provides opportunities to implement program improvements or course corrections in real time. Agencies might benefit from proactively aligning data reviews with key program milestones – such as the midpoint of an open application period. For example, in Chicago, DFSS staff met weekly during open application periods to review application data, which allowed them to take advantage of the time between application periods to implement adjustments to their outreach strategy and the application process.

#### Conclusion

In the wake of increasing demand for rental support, many state and local governments are providing cash payments to prevent evictions through their emergency rental assistance programs. Faced with pressure to get these funds out the door quickly, government agencies run the risk of supporting those most able to complete the application process over those most in need. Chicago's experience provides lessons on how to avoid this, by identifying priority populations, designing intentional strategies to reach them, and continuing to monitor and adjust in real-time so that emergency rental assistance reaches the communities most in need.

For more on the GPL's work with Chicago, visit <u>https://govlab.hks.harvard.edu/chicago-</u> <u>department-family-and-support-services</u>. For more on active contract management and related performance improvement strategies developed by the GPL, visit: <u>https://govlab.hks.harvard.edu/tools</u>.

# Appendix: Other considerations for agency staff implementing emergency rental assistance programs

- **A. Assess emergency rental assistance impact on housing outcomes:** In addition to knowing that their emergency rental assistance funds are reaching priority populations, it is important for agencies to know whether their emergency rental assistance program works to stabilize housing for those recipients over the short and longer-term. This data can inform future emergency rental assistance program design to better support residents in achieving housing stability. To better understand the impact of emergency rental assistance programs, agencies may consider measuring housing stability and related positive outcomes, including:
  - **Tenancy preservation:** Tracking housing outcomes of emergency rental assistance applicants shortly after fund disbursement can indicate whether the program is working to prevent evictions in the short-term.
  - *Homelessness prevention*: Tracking long-term housing outcomes of emergency rental assistance applicants, such as whether they faced subsequent evictions or experienced homelessness, can help determine whether the program successfully prevents homelessness.
  - *Household stability*: The cash infusion from emergency rental assistance may have benefits outside the explicit goal of preventing an eviction (e.g. more money to spend on food), or it might not be enough to prevent eviction if households face more complex obstacles (e.g. medical challenges). Tracking auxiliary household outcomes, for example related to health, food security, mental health, or school stability, can help assess any concurrent obstacles to household stability, as well as additional benefits beyond housing stabilization. Insights from these analyses may be useful in determining whether other supports are needed to prevent evictions after funds are received.
- **B.** Streamline diverse funding programs into a single application portal: If a jurisdiction uses multiple housing support program websites or disburses emergency rental assistance from multiple sources, using a single application portal can guard against conflicting information and improve back-end organization.

<u>Chicago's Experience:</u> At DFSS, staff used a single web-based housing support portal that was integrated with Chicago's Department of Housing (DoH), and the Illinois Housing Development Authority (IHDA). DoH and IDHA offered separate rental support programs that had distinct requirements from DFSS's emergency rental assistance program. The single portal asked a few simple questions to determine for which program the applicant would most likely be eligible. This made it easier for the user, as applicants could check eligibility and potentially access any of the programs through one single entry point. The process also made it easier for the departments to coordinate resources and avoid violating funding restrictions by awarding funding to applicants through multiple programs.

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