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An Uneven Housing Safety Net: Disparities in the Disbursement of Emergency Rental Assistance and the Role of Local Institutional Capacity

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Introduction

In response to the impacts of the COVID-19 pandemic and the disproportionate toll it has taken on renter households—who are more likely to be lower income and to work in industries hit hardest by the economic downturn—the federal government allocated a total of \$46.55 billion to states and localities to assist renters struggling with arrears and at risk of eviction amid the pandemic. By January 2022, state and local agencies had spent or obligated more than \$25 billion of Emergency Rental Assistance (ERA) funds and made more than 4.3 million payments to renters and landlords.¹ The Census Bureau’s Household Pulse Survey data from the end of January show that, of the 2.9 million respondents who applied for rental assistance and received it, 2.2 million also reported being caught up on rent.²

While these resources are playing a critical role in helping to stabilize vulnerable renters and prevent evictions³, the disbursement of assistance has been uneven.⁴ Some states and larger local governments that were eligible for their own allocation of ERA dollars have already run out of funds. Others are still working to disburse their ERA allocations, and some have returned unspent funds, either voluntarily or through a reallocation process mandated by the Treasury Department.⁵ A number of factors are contributing to these differences across places. For instance, the pandemic’s impacts have hit some communities harder than others, but ERA was allocated on a per capita basis, rather than based on indicators of need. As a result, some communities may have received more assistance than they needed while others are grappling with insufficient funds. In addition, states—as well as the local governments that received

direct ERA allocations—had to significantly expand or create from whole cloth the infrastructure needed to disburse rent relief. These efforts were a massive undertaking given the scale of the aid and the time pressures of the crisis, and depend heavily on local institutional capacity, which varies widely across communities.

Research has shown the importance of local institutional capacity in effectively standing up ERA programs, including the ability to enlist local partners—such as nonprofit housing or human service organizations or public housing authorities—to conduct outreach to the most vulnerable households, review applications, and/or help administer payments.⁶ A recent analysis by researchers at the Housing Initiative at Penn and the National Low Income Housing Coalition found that, by the end of 2021, four out of five ERA programs they surveyed were working with nonprofits in some way.⁷ However, institutional capacity—including the staff capacity of local governments and the presence and level of resources of community-based nonprofits—is itself unevenly distributed and this local infrastructure has not always been able to respond rapidly to shifts in need.⁸

In this brief, we use several data sources to better understand the geography of ERA disbursement and where local capacity gaps might be hindering the delivery of aid to households in need, especially in communities that were already experiencing elevated levels of economic hardship before the pandemic. After a description of the data sources and methods used, we present findings from an analysis of ERA take-up, which we measure as the number of very low-income (VLI) renter households served by ERA. First, we assess jurisdictions that rely on state-ad-

ministered ERA programs, based on data we were able to assemble on nearly 1,200 counties. We then turn to an analysis of ERA take-up in jurisdictions administering their own ERA programs, based on data reported by the Treasury Department. Drawing on findings from these two analyses, we then consider implications for counties across the country that have been hard hit by the COVID-19-related downturn and those that were already experiencing elevated levels of hardship before the pandemic and are likely to see the need for assistance persist even after ERA is exhausted.

The findings of this analysis have near-term implications as states, localities, and the Treasury Department seek to make the best use of remaining, limited resources to stabilize struggling renters and prevent evictions. But the disparities in local institutional capacity surfaced in this brief are also emblematic of long-standing challenges and gaps in the systems routinely used to deliver federal housing and community development funding to communities and households in need. We conclude the brief by articulating the need for more and better data to understand spatial disparities in the delivery of assistance. We also lay the groundwork for additional, forthcoming analysis that draws out lessons learned from this emergency response to inform longer-term efforts to bridge local capacity gaps in ways that ensure vulnerable communities and households are not left behind in the delivery of federal aid.

Data Sources and Metrics

This analysis draws on several data sources—compiled into a national county-level dataset—and metrics to assess the relative take-up of federal ERA in the context of local institutional capacity, and to identify potentially vulnerable communities where constraints to local institutional capacity may be a particular concern.

This section highlights key sources and metrics used throughout the analysis. For a detailed discussion of data sources and metrics, including data limitations, see the Technical Appendix.

Our key variable of interest is the **ERA Take-Up Rate**. We measure this as the number of ERA payments made divided by the number of very low income renter households (i.e., households with incomes of 50 percent of the area median income or less, also referred to as VLI). Although state and local programs have flexibility in how they target ERA dollars, both the first and second round of ERA funding establish that priority should be given to VLI households. Treasury data show that among households served by ERA in 2021, roughly 85 percent had incomes that met that criteria. This measure thus captures how much assistance was provided in relation to who that aid was supposed to help.

To calculate this measure, we use a combination of:

- **State-reported data.** Publicly available data on the spatial distribution of state-administered ERA (especially on less populous jurisdictions that did not qualify for their own ERA allocation) has been limited. However, some states have created online dashboards

or dedicated websites to share data on the distribution of ERA funds they administer. We were able to scrape or otherwise collect data from 22 states (as of January 2022) to assemble county-level data on ERA distribution.

- **U.S. Treasury Department data.** The Treasury data releases monthly data on the number of payments made by larger local city and county governments that received direct allocations of ERA funds. The most recent data available at the time of this analysis were those released on March 8, 2022, and reflect program spending through January 31, 2022.

We then develop measures that allow us to capture the landscape of local nonprofits and public agencies that are critical to helping disburse those funds. We use three indicators of local institutional capacity:

1. **Receipt of HUD funding in 2019.** While many HUD grantees still grapple with capacity constraints—including staffing shortages and turnover—local governments with direct HUD funding had some familiarity navigating and administering federal housing programs before the onset of pandemic.
2. **Presence of a Public Housing Authority (PHA) with voucher-administering authority.** The Treasury Department allocated ERA dollars directly to state and local governments. However, some PHAs have partnered with state and local governments to assist in administering ERA. In particular, PHAs that administer housing choice vouchers have developed infrastructure to disburse rental assistance and could be sources of supplemental capacity for localities.

3. Presence and financial resources of nonprofit organizations. To determine the number and size of registered nonprofits in a given county, we use IRS 990 data on tax-exempt organizations from the Urban Institute's National Center on Charitable Statistics 2020 Business Master Files database. Specifically, we focus our analysis on the types of organizations that might be well-positioned to partner in ERA distribution, including organizations that identify their primary activity as Housing & Shelter, Community Improvement & Capacity Building, or Human Services. Within each county, we calculate the (1) number of nonprofit organizations in the selected service sectors and (2) nonprofit revenue per VLI renter household (i.e., the total revenue of nonprofits in the selected service sectors divided by the total number of VLI renter households in the county).

These measures provide a proxy for places that may be capacity constrained in helping to get aid to those in need. Capacity constraints in communities that were already struggling before the pandemic could be of particular concern if they contribute to an uneven crisis response or recovery. For that reason, we create two designations to identify potentially vulnerable communities:

- **Structurally Vulnerable counties** are those that:
 - Had a poverty rate above the national average in the 2019 American Community Survey five-year data, or were home to at least one high-poverty jurisdiction (defined as a poverty rate of 20 percent or more), AND
 - Had an above-average share of renter households that qualified as VLI before the pandemic.
- **Hard Hit counties** are those that meet the pre-pandemic criteria to be flagged Structurally Vulnerable, and also were negatively impacted the pandemic-related downturn in that they:
 - Experienced increases in the unemployment rate in the first year of the pandemic (February 2020 to February 2021), AND
 - Had an unemployment rate in December of 2021 that remained above the national average.

The inclusion of unemployment indicators in the Hard Hit designation recognizes that the first wave of ERA funds (authorized in the Consolidated Appropriations Act) required that recipients demonstrate a COVID-19-related hardship. The second wave of ERA (authorized in the American Rescue Plan Act) offers more flexibility in that it broadens eligibility to households that have experienced hardship during (not just strictly due to) the pandemic. The Structurally Vulnerable designation is a useful lens given that increased flexibility, and also in thinking about where need may persist even after the pandemic, given long-standing, elevated levels of hardship.

A Note on State-Administered versus Local Government-Administered ERA Programs

In this analysis, we consider counties relying on state-administered ERA separately from those with direct allocations for two reasons. First, there is reason to believe local institutional capacity is likely to differ in significant ways in smaller localities dependent on state-administered

Table 1. Number of Counties by Presence of ERA Data and Structurally Vulnerable or Hard Hit Designation

	All Counties	All Counties for Which We Have ERA Data	Counties Included in the State-Administered ERA Analysis	Counties Included in the Local Government-Administered ERA Analysis
All Counties	3,142	1,419	1,164	255
Structurally Vulnerable Counties	1,440	540	460	80
Hard Hit Counties	438	190	152	38

Note: Hard Hit Counties are a subset of Structurally Vulnerable Counties; Counties included in the state-administered ERA analysis are a distinct group from counties included in the local government-administered ERA analysis.

Source: Turner Center analysis of U.S. Treasury Department ERA data, data scraped from 22 state dashboards on state-administered ERA distribution, American Community Survey, and Bureau of Labor Statistics data.

programs compared with jurisdictions that qualified for—and opted to—administer their own ERA allocations. Second, the variability of the amount and type of data and the level of geographic detail made available through online dashboards or state websites complicates apples-to-apples comparisons across states and with Treasury-reported data. Table 1 summarizes the number of counties for which we have state-reported data on state-administered ERA, counties for which we have Treasury data on local government-administered ERA, and the number of counties that meet the Structurally Vulnerable and Hard Hit designations used in this analysis.

In addition, because of variations in data reporting and the range of factors that could affect a household's eligibility for ERA, this analysis does not focus directly on the take-up rates of individual counties or try to assess what an adequate take-up rate target might be. Rather we focus on the relative take-up rates of counties to better understand how community characteris-

tics and capacity considerations may vary in places that exhibited relatively higher versus lower take-up of ERA. To do so, we assign each county to a quartile based on their calculated take-up rate. For our analysis of state-reported data on state-administered ERA, we compare counties to others in their state and assign them to quartiles based on the state-administered ERA take-up rate. (We remove jurisdictions with direct ERA allocations from the analysis of state-reported scraped data so that in that assessment we are considering counties that are only accessing ERA through state-administered funding.) For our analysis of Treasury-reported data on the 255 counties with direct allocations, we do not segment by state.

Findings

First we assess the relative take-up of ERA in the 22 states for which we were able to collect geographic data on state-administered ERA (i.e., for the 1,164 counties that rely on state programs and did not receive direct allocations). Then we turn to an analysis of the 255 counties that received ERA allocations from the Treasury Department to stand up local programs. Finally, we consider the nation-wide implications of this analysis, not just focusing on the counties for which we have ERA data, but assessing potential capacity gaps in all Hard Hit and Structurally Vulnerable counties across the country.

Part 1. Distribution of State-Administered Emergency Rental Assistance

Among counties relying on state-administered ERA programs, those with higher ERA take-up rates also had steeper job losses during the downturn, higher shares of renter households, and more residents of color.

Among the nearly 1,200 counties for which we have data on state-administered ERA, counties with relatively stronger take-up rates (i.e., counties in the top quartile for their state) experienced much larger increases in unemployment over the first

Table 2. Average County-Level Unemployment Rates, by State-Administered ERA Take-Up Rate Quartile

State-Administered ERA Take-Up Rate Quartile	Number of Counties	Unemployment Rate, February 2020	Unemployment Rate, February 2021	Percentage Point Change	Unemployment Rate, December 2021
Upper Quartile (Highest Take-Up) Counties	299	3.6%	7.8%	4.2%	4.4%
3rd Quartile Counties	289	4.3%	6.2%	1.9%	3.6%
2nd Quartile Counties	278	4.1%	6.1%	2.1%	3.2%
Lower Quartile (Lowest Take-Up) Counties	298	4.7%	6.3%	1.7%	3.6%

Source: Turner Center analysis of data scraped from 22 state dashboards on state-administered ERA distribution and Bureau of Labor Statistics Local Area Unemployment Statistics data.

year of the pandemic—roughly double the average increase registered by counties with lower levels of ERA take-up (Table 2). These upper-quartile counties also continued to exhibit a higher unemployment rate at the end of 2021.

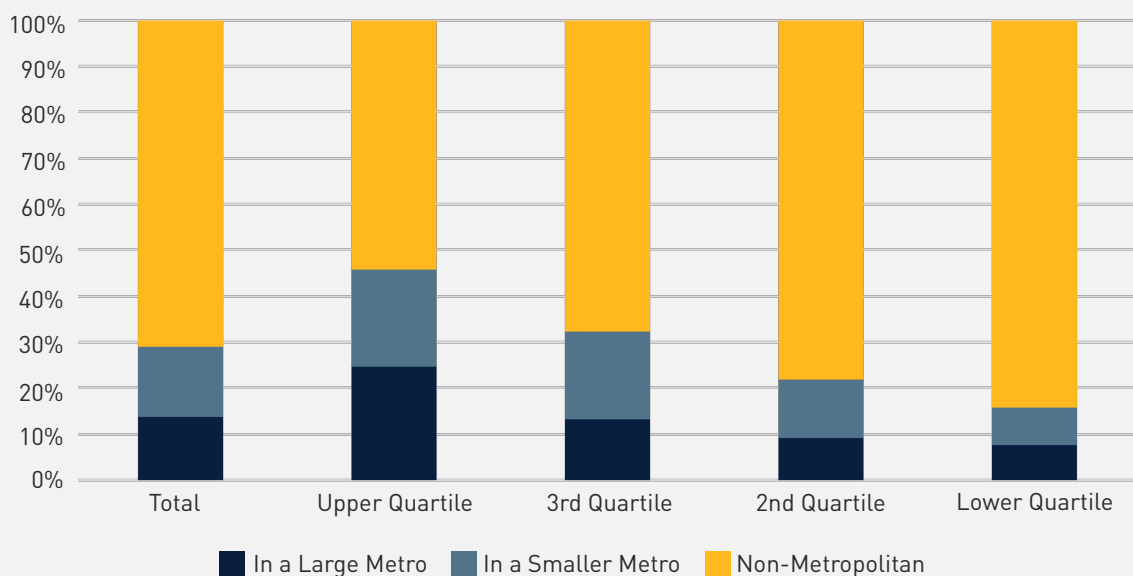
Conversely, counties with the lowest state-administered ERA take-up rates began the pandemic with higher levels of unemployment. Lower-quartile counties experienced increases in unemployment after the onset of the pandemic, which were still evident in February 2021. But the collective increase was not as steep, and by the end of 2021 the average unemployment rate in the lower-quartile counties was nearly a percentage point below the rate for upper-quartile counties.

These distinct patterns, in part, reflect differences in the location and makeup of the counties in each quartile. As a group,

the counties relying on state-administered ERA are more likely to be less populous and less dense, as might be expected given that more populous local governments qualified for their own allocation of ERA dollars. Among this state-administered cohort, most counties are rural, and those that are not tend to be suburban counties in large metro areas that have populations of 500,000 or more or counties located in smaller metro areas.

However, these different types of counties do not distribute evenly across quartiles (Figure 1). Among counties in the top quartile for take-up of state-administered ERA, nearly half are located in a metropolitan area, with one in four in a large metro area. In contrast, among counties with the lowest relative take-up rates for state-administered ERA, more than four out of five are rural.

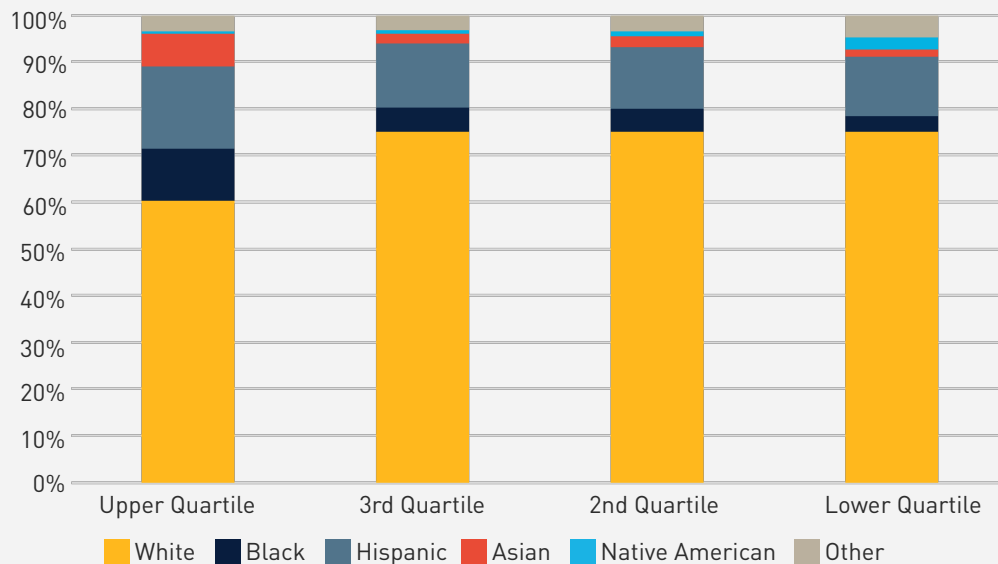
Figure 1. Geography Type of Counties, by State-Administered ERAP Take-Up Rate Quartile



*Large Metro means the county is located in a metropolitan statistical area with a population of 500,000 or more.

Source: Turner Center analysis of data scraped from 22 state dashboards on state-administered ERA distribution and American Community Survey data.

Figure 2. Racial and Ethnic Composition of Counties, by State-Administered ERA Take-Up Rate Quartile



Source: Turner Center analysis of data scraped from 22 state dashboards on state-administered ERA distribution and American Community Survey data.

As the unemployment trends and geographic distribution might suggest, counties with higher rates of take-up are also more likely to be home to populations that have disproportionately borne the brunt of the pandemic's impacts, including people of color and renter households. Upper-quartile counties are more racially and ethnically diverse than their counterparts (Figure 2). Nearly 18 percent of residents in upper-quartile counties were Hispanic or Latinx as of the 2019 American Community Survey, more than 11 percent were Black, and 7 percent were Asian. Those shares were all at least 4 percentage points lower in counties with relatively lower state-administered ERA take-up rates, where more than three in four residents were non-Hispanic White. However, counties in the bottom quartile were home to a larger share of Native Americans: nearly 3 percent of residents in the lowest-take-up counties were Native American, compared to 1 percent or less in the other quartiles.

Top-quartile counties were also home to a higher share of renter households (41 percent) compared to counties with lower rates of take-up, where just under 30 percent of households were renters. Although, among renter households, lower-quartile counties had a slightly higher share that were VLI—46 percent versus 45 percent, respectively. The pre-pandemic poverty rate was also slightly higher in lower-quartile counties (14 percent) on average compared to upper-quartile counties (13 percent).

These findings indicate that, on the whole, communities hit harder by the economic impacts of the pandemic are seeing relatively more take-up of state-administered ERA, suggesting that the aid has reached places with the highest need. But these aggregate snapshots can obscure communities in need that may be lagging behind in their efforts to connect struggling households to aid.

Local institutional capacity was less robust, on average, in counties with lower take-up of state-administered ERA, especially in counties that were already struggling before the pandemic.

Only a modest share of counties in our sample of state-reported data have local governmental bodies with direct experience navigating and administering federal housing program funding prior to the pandemic. But those that have this administrative capacity are disproportionately represented in the top two quartiles for take-up of state-administered ERA (Table 3). For instance, among counties that scored in the upper quartile for state-administered ERA take-up, nearly one in four were recipients of direct HUD grants before the pandemic, but only 2 percent of counties in the bottom quartile were home to localities that received funding directly from HUD in 2019. At the same time,

nearly half the upper-quartile counties have a PHA with voucher-administering authority and one in 10 contain a large PHA. But that share falls to just under 20 percent for lower-quartile counties, and only five counties in the bottom quartile are home to a large PHA.

These numbers suggest that counties with some experience and familiarity with administering federal housing programs fared relatively better on state-administered ERA take-up rates. These numbers also underscore that most counties relying on state-administered ERA programs lack a local governmental body with experience administering federal funds, suggesting that nonprofit partners may be particularly important in those places.

However, local nonprofit networks also tend to be less extensive in counties that have exhibited relatively lower state-administered ERA take-up rates. On

Table 3. Indicators of Local Institutional Capacity, by State-Administered ERA Take-Up Rate Quartile

State-Administered ERA Take-Up Rate Quartile	Receives Direct HUD Funding	Has a Voucher-Administering PHA	Has a Large PHA (1,000+ Vouchers)	HUD Grants or a Large PHA Present	Average Number of Nonprofits*	Average Nonprofit* Revenue per VLI Renter Household
Upper Quartile Counties	24%	47%	10%	25%	18	\$5,574
3rd Quartile Counties	12%	42%	6%	13%	8	\$4,583
2nd Quartile Counties	8%	40%	6%	9%	7	\$4,050
Lower Quartile Counties	1%	19%	2%	2%	4	\$4,107

*Nonprofits reflect organizations classified under the National Taxonomy of Exempt Entities system as Housing & Shelter, Community Improvement & Capacity Building, or Human Services entities.

Source: Turner Center analysis of data scraped from 22 state dashboards on state-administered ERA distribution, American Community Survey data, HUD, and National Center for Charitable Statistics data.

average, counties in the bottom quartile for relative take-up of state-administered ERA had four locally-based nonprofits in the Housing, Community Improvement & Capacity Building, or Human Services sectors. In contrast, counties in the upper quartile had more than four times as many nonprofits on average. In addition, upper-quartile counties tended to have nonprofits with more financial resources. The average nonprofit revenue per VLI renter household in upper-quartile counties was nearly \$5,600—roughly \$1,500 more than the average in lower-quartile counties.⁹

These findings do not tell the full story: we do not have full information about where PHAs have played or are playing a role in ERA distribution, and, as noted above, being a HUD grantee does not mean that the locality does not have capacity constraints. In addition, for some counties, having fewer local nonprofit resources may not be an issue. For instance, if a county saw little to no impact from the pandemic on unemployment rates and has

few low-income renters, then we might expect lower take-up of ERA and less need for social service nonprofits. It should also be said that just because an organization is small does not mean it is not an important and effective partner in engaging with the community.

But lower levels of local institutional capacity can be concerning in places that were already struggling before experiencing additional pandemic-related economic hardship (i.e., Hard Hit counties), and where ERA take-up rates have been relatively lower. Among counties in our sample that qualified as Hard Hit, those that ranked in the bottom quartile for ERA take-up had markedly fewer nonprofit resources per VLI renter households than those that saw higher take-up rates (Table 4). Hard Hit counties with lower rates of ERA take-up include suburban counties in large metropolitan areas (e.g., Yolo County, California in the Sacramento metro area and Assumption Parish, Louisiana in the Baton Rouge

Table 4. Indicators of Local Institutional Capacity in Hard Hit Counties, by State-Administered ERA Take-Up Rate Quartile

State-Administered ERA Take-Up Rate Quartile	Receives Direct HUD Funding	HUD Grants or a Large PHA Present	Average Nonprofit* Revenue per VLI Renter Household
Upper Quartile Counties	38	32%	\$3,977
3rd Quartile Counties	41	17%	\$4,746
2nd Quartile Counties	36	14%	\$4,102
Lower Quartile Counties	37	3%	\$2,481

*Nonprofits reflect organizations classified under the National Taxonomy of Exempt Entities system as Housing & Shelter, Community Improvement & Capacity Building, or Human Services entities.

Source: Turner Center analysis of data scraped from 22 state dashboards on state-administered ERA distribution, American Community Survey data, HUD, and National Center for Charitable Statistics data.

metro area), smaller metropolitan counties (e.g., Carlton County, Minnesota in the Duluth metro area), and rural areas (e.g., Montmorency County in northern Michigan, Starr County in South Texas). Nonprofit revenues in these counties were even less than the roughly \$2,500 per VLI renter household average among lower-quartile counties.

Part 2. Distribution of Local Government-Administered Emergency Rental Assistance

Among counties with direct ERA allocations, those with the lowest ERA take-up rates exhibited greater economic hardship before and during the pandemic.

Among the 255 counties that met the population threshold (i.e., 200,000 or more residents) and opted to receive direct ERA allocations, all but one¹⁰ are located in a metropolitan statistical area, and three out of four are in large metro areas. Given the different scale of these counties compared to the less-populous

jurisdictions relying on state-administered ERA, it is perhaps not surprising that different patterns emerge when parsing counties by ERA take-up.

Across ERA take-up quartiles, average unemployment rates and trends over the course of the pandemic clustered more closely together for these large counties (Table 5). However, counties that fall in the lower quartile for local government-administered ERA registered slightly higher average unemployment rates before the onset of the COVID-19 pandemic, greater increases in the first year of the crisis, and continued to post the highest average unemployment rate at the end of 2021.

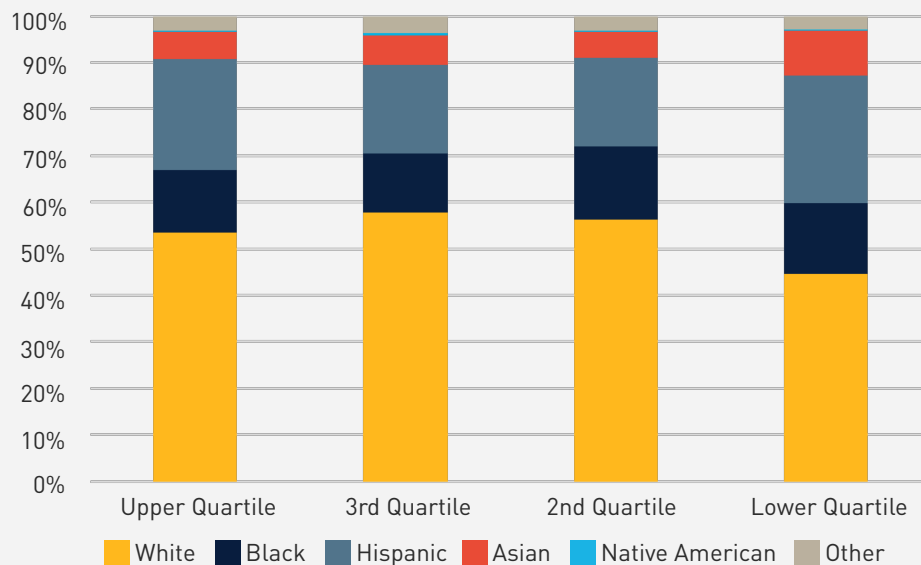
Contrary to the patterns among counties served by state-allocated ERA programs, counties in the bottom quintile for take-up of local government-administered ERA are more racially and ethnically diverse than their peers with higher take-up rates (Figure 3). The majority of residents in bottom-quartile counties are people of color: more than one-quarter (27 percent) are Hispanic or Latinx, 15 percent are Black,

Table 5. Average County-Level Unemployment Rates, by Local Government-Administered ERA Take-Up Rate Quartile

Local Government-Administered ERA Take-Up Rate Quartile	Number of Counties	Unemployment Rate, February 2020	Unemployment Rate, February 2021	Percentage Point Change	Unemployment Rate, December 2021
Upper Quartile Counties	63	3.5%	6.2%	2.7%	3.5%
3rd Quartile Counties	65	3.5%	6.3%	2.7%	3.4%
2nd Quartile Counties	64	3.8%	6.7%	3.0%	3.9%
Lower Quartile Counties	63	3.6%	6.8%	3.2%	4.2%

Source: Turner Center analysis of Treasury Department data on 255 counties with local government-administered ERA allocations and Bureau of Labor Statistics Local Area Unemployment Statistics data.

Figure 3. Racial and Ethnic Composition of Counties, by Local Government-Administered ERA Take-Up Rate Quartile



Source: Turner Center analysis of Treasury Department data on 255 counties with local government-administered ERA allocations and American Community Survey data.

and one in 10 are Asian. Bottom-quartile counties also have a larger share of renter households on average (e.g., 41 percent in bottom-quartile counties compared to 38 percent in upper-quartile counties).

However, there are some instances where the direct-allocation ERA patterns resemble the state-administered analysis. For instance, a greater share of renter households are VLI in counties in the bottom quartile for local government-administered ERA (44 percent) compared to counties with higher rates of take-up (e.g., 40 percent in upper-quartile counties). Bottom-quartile counties also had higher pre-pandemic poverty rates on average (Table 6). They were also home to 60 percent more high-poverty municipalities—areas with greater economic distress even before the pandemic—compared to counties in the top quartile.

Almost all counties with direct allocations of ERA were already HUD grantees or had a large PHA before the pandemic, but those with the lowest ERA take-up rates had somewhat fewer local nonprofit resources.

Differences in indicators of local institutional capacity are not as clear cut among these more populous jurisdictions compared to the smaller counties that rely on state-administered ERA programs (Table 7). Nearly all these counties received direct HUD grants before the pandemic or have a large PHA within their borders. In fact, 100 percent of counties in the bottom quartile for take-up of local government-administered ERA meet those criteria compared to 94 percent of counties in the top quartile. However, nonprofits in top-quartile counties reported more resources per VLI renter household on average than counties in the bottom quartile.

Table 6. Poverty Rate and Presence of High-Poverty Jurisdictions, by Local Government-Administered ERA Take-Up Rate Quartile

Local Government-Administered Take-Up Rate Quartile	Poverty Rate	Number of High-Poverty Municipalities
Upper Quartile Counties	12.8%	85
3rd Quartile Counties	12.5%	129
2nd Quartile Counties	12.9%	145
Lower Quartile Counties	13.7%	136

Source: Turner Center analysis of Treasury Department data on 255 counties with local government-administered ERA allocations and American Community Survey data.

Table 7. Indicators of Local Institutional Capacity, by Local Government-Administered ERA Take-Up Rate Quartile

Local Government-Administered Take-Up Rate Quartile	HUD Grants or a Large PHA Present	Average Nonprofit* Revenue per VLI Renter Household
Upper Quartile Counties	94%	\$5,318
3rd Quartile Counties	97%	\$4,767
2nd Quartile Counties	97%	\$5,129
Lower Quartile Counties	100%	\$4,954

*Nonprofits reflect organizations classified under the National Taxonomy of Exempt Entities system as Housing & Shelter, Community Improvement & Capacity Building, or Human Services entities.

Source: Turner Center analysis of Treasury Department data on 255 counties with local government-administered ERA allocations, American Community Survey data, HUD, and National Center for Charitable Statistics data.

Among Hard Hit counties, differences in nonprofit resources per VLI renter households were much more pronounced (Table 8). Counties with relatively lower take-up rates—such as Hidalgo County, Texas (i.e., the McAllen-Edinburg-Mission metro area), Passaic County, New Jersey (part of the New York City metro area), Fresno County in California’s Central Valley, and in Genesee County, Michigan (i.e., the Flint metro area)—registered

roughly half of what was available on average in counties in the upper quartile for ERA take-up.

These findings make clear that lower-quartile counties were grappling with more poverty and areas of high poverty even before experiencing steeper upticks in unemployment amid the pandemic. While some differences in indicators of local institutional capacity emerge in this anal-

Table 8. Indicators of Local Institutional Capacity in Hard Hit Counties, by Local Government-Administered ERA Take-Up Rate Quartile

Take-Up Rate Quartile for Local Government-Administered ERA	Number of Hard Hit Counties	Average Nonprofit* Revenue per VLI Renter Household
Upper Quartile Counties	6	\$9,561
3rd Quartile Counties	5	\$6,912
2nd Quartile Counties	11	\$5,146
Lower Quartile Counties	16	\$5,257

*Nonprofits reflect organizations classified under the National Taxonomy of Exempt Entities system as Housing & Shelter, Community Improvement & Capacity Building, or Human Services entities.

Source: Turner Center analysis of Treasury Department data on 255 counties with local government-administered ERA allocations, American Community Survey data, HUD, and National Center for Charitable Statistics data.

ysis—especially around local nonprofit resources relative to the size of the VLI renter population—more detailed analysis of the types of capacity gaps or constraints they are facing is needed to better understand potential pathways for bridging those gaps.

Part 3. The Landscape of Hard Hit and Structurally Vulnerable Jurisdictions

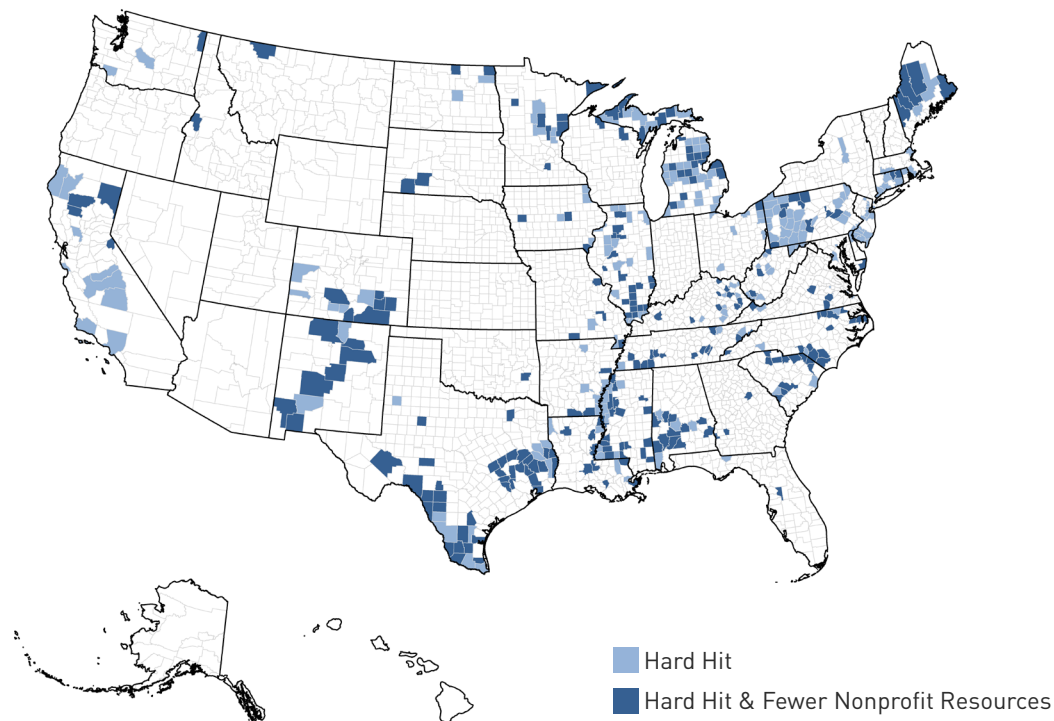
More than half of the nation’s Hard Hit and Structurally Vulnerable counties also have local nonprofit institutions with relatively fewer resources, which could signal capacity constraints in reaching renters eligible for ERA.

In this section, we look beyond the sample of counties for which we have ERA data to consider how the findings in this brief help illuminate potential capacity caps and areas of vulnerability across all of the nation’s counties. We draw on the common elements that emerged among

lower quartile counties in both the state-allocated ERA analysis and the local government-administered ERA analysis—such as elevated levels of pre-existing hardship and fewer nonprofit resources per VLI renter household—and assess the extent to which these conditions exist across the country.

Map 1 provides a national look at counties that meet our Hard Hit designation—meaning they not only had indicators of higher poverty and higher shares of renters with very low incomes pre-pandemic (as did bottom-quartile counties in our analysis of both state- and local government-administered ERA), but they were also particularly impacted by job losses during the downturn. The map also highlights which Hard Hit counties have lower-than-average nonprofit revenues per VLI renter household—a trait that could impede efforts to distribute ERA program and that ERA administrators and policymakers should consider when assessing reallocations of resources.¹¹

Map 1. Hard Hit Counties and Level of Nonprofit Resources per VLI Renter Household



Source: Turner Center analysis of American Community Survey, Bureau of Labor Statistics, and National Center for Charitable Statistics data.

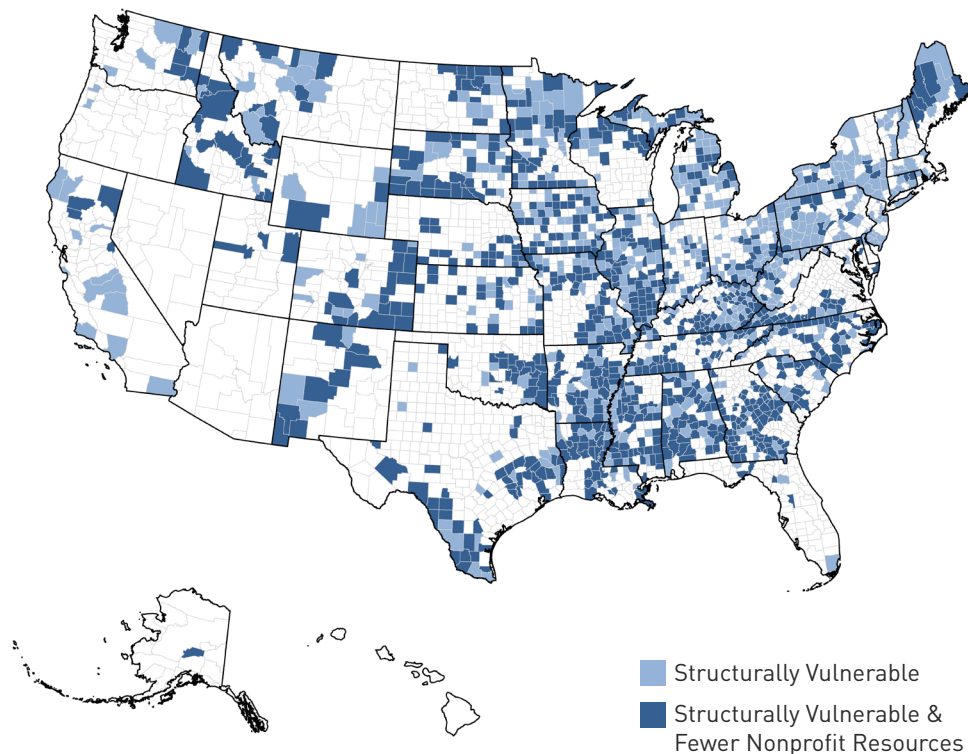
Among the 438 counties that meet the Hard Hit criteria, more than half (237 counties) also have lower-than-average nonprofit revenues per VLI renter household, suggesting more limited (and in some cases no) local nonprofit networks that could bolster pandemic response as well as broader anti-poverty efforts. While these counties are scattered across the country, clusters emerge in several places in the South (e.g., in Texas, New Mexico, Alabama, and along the Mississippi River), in the Midwest (e.g., in Illinois and lower and upper Michigan), and in the Northeast (e.g., in Pennsylvania and Maine). Most of these counties are rural—just 35 are located in a metropolitan area, although those metropolitan counties contain nearly 67,000 VLI renter households. However, the less-resourced rural counties on the map are home to more than half a million renter households, and more than 276,000 of those households were

VLI before the pandemic hit, suggesting particular vulnerability to COVID-19-era hardships.

In Map 2, we remove the employment indicators to consider all Structurally Vulnerable counties—recognizing that, even absent pronounced employment impacts during the downturn, these counties likely have larger shares of households that could claim a period of hardship during the pandemic (per the greater flexibility allowed in ERA 2) and are likely to continue experiencing hardship after the crisis. A much larger number of counties—more than one in four—meet our criteria of being both Structurally Vulnerable and less-resourced in terms of nonprofit revenues per VLI renter household.

Nearly 1.2 million VLI renter households live in the 877 Structurally Vulnerable counties with fewer nonprofit resources across the country. More than one-third

Map 2. Structurally Vulnerable Counties and Level of Nonprofit Resources per VLI Renter Household



Source: Turner Center analysis of American Community Survey data and National Center for Charitable Statistics data.

of those households are in metropolitan statistical areas, largely in suburban counties or smaller metros, while the rest are spread across more than 660 rural counties. Well over half of these counties (57 percent) are home to multiple high-poverty municipalities.

The uneven clustering of VLI renter households and economic hardship within these counties points to some of the limitations of county-level indicators while also underscoring the need for more granular spatial data on the take-up of ERA. For instance, Arizona and Nevada show up as blank spots on these maps, and western states in general see relatively fewer counties flagged as Hard Hit or Structurally Vulnerable. Part of that reflects the much larger size of counties in the West, which can mask sub-county concentrations of need.¹² For instance,

a number of Arizona's counties meet the poverty criteria but do not meet the VLI renter criterion, even though they have a sizable number of VLI renter households. In Nevada, the opposite is true. Multiple counties meet the VLI renter criterion but not the high poverty test. For both these states (and others as well), moving down to the municipal level would highlight areas that would qualify as structurally vulnerable. Pairing more granular data on ERA take-up with more localized analysis of community indicators—especially in large counties and in communities where concentrations of poverty make for an uneven economic landscape—would provide greater insight into the experience and capacity needs of Structurally Vulnerable communities.

Discussion and Conclusion

The metrics presented in this analysis can offer useful indicators of where pre-existing economic hardship, pandemic-related employment impacts, and limited local institutional infrastructure and capacity could be contributing to housing instability or hindering efforts to ensure an even and equitable recovery. The findings of this analysis raise several questions and point to areas for further research.

In the near term, it is becoming clear that there will not be enough rental assistance resources for some states and communities to meet the level of need among their struggling renter households. But as states and the federal government consider how to allocate remaining resources as effectively as possible, these findings point to a number of important questions and areas for caution. For counties relying on state-administered ERA, this analysis suggests that there are a significant number of VLI renters in Hard Hit communities that could be at risk of housing instability or eviction and where indicators of limited local institutional capacity paired with lower ERA take-up rates suggest that not all eligible households have been reached. At the same time, for communities administering direct allocations of ERA, the more economic hardship and greater concentrations of disadvantage that existed in these large jurisdictions before the pandemic, the more likely they are to be seeing relatively lower ERA take-up rates and grappling with fewer nonprofit resources relative to the size of their VLI renter population. Where these combinations of factors exist, alternative strategies should be considered before reallocating assistance meant for these Hard Hit and Structurally Vulnerable

communities. What can be learned from similarly situated communities that have succeeded in allocating resources more effectively that could inform alternative strategies, technical assistance, or timelines for dispersing aid?

Longer term, there are lessons to be learned about the ways in which the ERA program—and the infrastructure states and localities stood up to administer these new funding streams—helped to extend capacity and where. It is unclear how much (and which parts) of that ERA infrastructure will be sustainable once federal funds are exhausted, although there are other federal resources—such as the time-limited State and Local Fiscal Recovery Funds included in the American Rescue Plan, or CDBG or HOME funds, each of which have sizeable increases proposed in the FY2023 budget—which could potentially be used to help sustain some of this expanded capacity. The Treasury Department is also “encouraging state and local governments to invest in long-term strategies to prevent evictions and build affordable housing, using other resources.”¹³ However, leaving

Beyond sustained, scaled funding, what role can the federal government play to address growing disparities—with regard to rental assistance and eviction protection but also in ways that recognize and address the longstanding unevenness in the local capacity and infrastructure to deliver and administer federal funding for housing?

it to states and localities to step in to maintain or extend this rental assistance and eviction prevention (not to mention affordable housing production) infrastructure risks further exacerbating place-based disparities in capacity and resources to assist struggling households. Beyond sustained, scaled funding, what role can the federal government play in stemming growing disparities—with regard to rental assistance and eviction protection but also in ways that recognize and address the longstanding unevenness in the local capacity and infrastructure to deliver and administer federal funding for housing? And given the prevalence of rural communities among less-resourced Hard Hit and Structurally Vulnerable counties, is there a larger role for USDA to play or opportunities for cross-agency coordination to target and extend technical assistance and capacity building strategies?

A forthcoming companion analysis will engage with these questions in greater detail, drawing on a series of stakeholder interviews with state, county, and municipal staff, as well as nonprofit intermediaries working to administer federal housing programs and address capacity gaps within and across local jurisdictions. In the meantime, while states, localities, and the Treasury Department should be applauded for the timely data they are making available on the spatial distribution and take-up of ERA, there is clearly a need for more extensive, comparable, and granular data. Providing access to the wealth of data being collected from ERA programs across the country would pave the way toward developing a better understanding of what is and is not working in the provision of assistance and where households may be most at risk of being left behind.



Technical Appendix

This analysis draws on several data sources—compiled into a national county-level dataset—and metrics to assess the relative take-up of federal ERA in the context of local community characteristics and institutional capacity, and to identify potentially vulnerable communities where constraints to local institutional capacity may be a particular concern.

Emergency Rental Assistance Distribution

Our key variable of interest is **ERA Take-Up Rate**. Rather than relying solely on the number of payments made or households served by ERA in each county, we calculate a proxy of the “take-up” rate.¹⁴ It is difficult to establish which renter households would be considered eligible for ERA—not just because of limitations of available data, but also, by design, programs have flexibility in how they target ERA dollars. However, both the first and second round of ERA establish that priority should be given to very low income households (i.e., households at or below 50 percent of AMI, also referred to as VLI households), and Treasury data show that among households served by ERA in 2021, roughly 85 percent had incomes that met that criteria.¹⁵ Thus, we calculate the estimated take-up rate as the number of ERA payments made divided by the number of VLI renter households in the county.¹⁶

ERA can be distributed by differing government levels. Each state received allocations of ERA funds from the Treasury Department. In addition, large local governments—those with a population of at least 200,000—had the option of receiving a direct allocation of ERA dollars from the Treasury Department to set up or expand local programs. Jurisdictions too small (or that opted not) to receive direct ERA allocations, access aid through state-administered ERA programs. We pulled from multiple data sources to compile local-level statistics on ERA take-up.

These data sources include:

- **State-reported data.** Publicly available data on the spatial distribution of state-administered ERA (especially on less populous jurisdictions that did not qualify for their own ERA allocation) has been limited. However, some states have created online dashboards or dedicated websites to share data on the distribution of ERA funds they administer. We were able to scrape or otherwise collect data from 22 states (as of January 2022) to assemble county-level data on ERA distribution.¹⁷
- **U.S. Treasury Department data** on the number of payments made by local city and county governments that received direct allocations of ERA funds. The most recent data available at the time of this analysis were those released on March 8, 2022, and reflect program spending through January 31, 2022.¹⁸

Taken together, we use these data sources to assess ERA distribution in 1,419 counties across the country (1,164 with state-reported data and 255 with direct allocations), which accounts for 45 percent of the nation’s counties and 71 percent of the nation’s population.

In this analysis, we consider counties relying on state-administered ERA separately from those with direct allocations for two reasons. First, there is reason to believe local institutional capacity is likely to differ in significant ways in smaller localities dependent on state-administered programs compared with jurisdictions that qualified for—and opted to—administer their own ERA allocations.

Second, the variability of the amount and type of data and the level of geographic detail made available through online dashboards or state websites complicates apples-to-apples comparisons across states and with Treasury-reported data. For instance, some states only include data for the portion of ERA funds the state is administering, while others include data for both state and local government allocations, and still others fall somewhere in between. Some states provide a range of variables on take-up, including applications received, applications approved, number of payments made, number of households served, average payments made, and total funds disbursed. Others provide more limited information.

For these reasons, we conduct two separate analyses: the first focusing on state-administered ERA using state-reported scraped data and the second focusing on local government-administered ERA using the Treasury-reported data on jurisdictions with direct ERA allocations. We remove jurisdictions with direct ERA allocations¹⁹ from the analysis of state-reported data so that in that assessment we are only considering counties that are accessing ERA through state-administered funding. This approach minimizes the prospect of double counting assistance administered, and also recognizes the likelihood that local institutional capacity looks different in larger jurisdictions that received direct ERA allocations compared to jurisdictions relying on state-administered dollars.

In addition, because of variations in data reporting and the range of factors that could affect a household's eligibility for ERA, this analysis does not focus directly on the take-up rates of individual counties or try to assess what an adequate take-up rate target might be. Rather we focus on the relative take-up rates of counties to better understand how community characteristics and capacity considerations may vary in places that exhibited relatively higher versus lower take-up of ERA. To do so, we assign each county to a quartile based on their calculated take-up rate. For our analysis of scraped data on state allocations, we compare counties to others in their state (to ensure apples-to-apples comparison given differences in how states report data) and assign them to quartiles based on the state-administered ERA take-up rate. For our analysis of Treasury-reported data on the 255 counties with direct allocations, we do not segment by state but treat them as one group.

Indicators of Local Institutional Capacity

Ideally, to understand local institutional capacity—and specifically the existing infrastructure (or lack thereof) to implement assistance programs like ERA—we would collect information on indicators such as the presence and number of dedicated housing staff employed by a given local government, the size and scope of existing housing/rental assistance programs provided by the locality, and the level of experience implementing and complying with federal funding programs. We would also want similar information

for local nonprofits and other intermediaries that could be well-positioned to partner on administering assistance. Because such information is not readily available, especially given the national scope of this analysis, we use a set of proxies to suggest where local government and institutional capacity may be relatively more or less robust.

The indicators of local government and institutional capacity we consider include:

- **Receipt of HUD funding prior to the pandemic.** If a county or any of the jurisdictions within its boundaries was a Community Development Block Grant (CDBG) entitlement community or received grants from the Emergency Solutions Grant, Housing Opportunities for Persons with AIDS, or HOME Investment Partnerships Program in 2019, we code them as being a direct HUD grantee. While many HUD grantees still grapple with capacity constraints²⁰—including staffing shortages and turnover—local governments with direct HUD funding had some familiarity navigating and administering federal housing programs before the onset of pandemic.
- **Presence of a Public Housing Authority (PHA) with voucher-administering authority.** While the Treasury Department allocated ERA dollars directly to state and local governments, some PHAs have partnered with state and local governments to assist in administering ERA. In particular, PHAs that administer housing choice vouchers have developed infrastructure to disburse rental assistance and could be sources of supplemental capacity for localities, especially PHAs that administer a substantial number of vouchers such as those HUD identifies as large (1,000 to 4,999 vouchers) or extra large (5,000 vouchers or more).²¹

For this analysis we code a county as having a voucher-administering PHA if a PHA of any voucher size category is located within its borders. We also distinguish when counties have a large PHA that administers 1,000 vouchers or more. Note that some PHAs have a service area that spans more than one county. Given the challenges of establishing how a PHA's vouchers are distributed across jurisdictions using publicly-available data, we tag multi-county PHAs to the county in which they are located.

- **Presence and financial resources of nonprofit organizations.** To determine the number and size of registered nonprofits in a given county, we use IRS 990 data on tax-exempt organizations from the Urban Institute's National Center on Charitable Statistics 2020 Business Master Files database. We include nonprofits with gross receipts of \$50,000 or more, consistent with IRS tax-filing requirement thresholds. Specifically, we focus our analysis on the types of organizations that might be well-positioned to partner in ERA distribution, including organizations that identify their primary activity as Housing & Shelter, Community Improvement & Capacity Building, or Human Services.²² We code these organizations to the county in which they are located and focus on two main indicators of nonprofit capacity at the county level: (1) number of nonprofit organizations in the selected service sectors and (2) nonprofit revenue per VLI renter household (calculated as the total revenue of nonprofits in the selected service sectors divided by the total number of VLI renter households in the county).

These proxies of nonprofit presence and capacity have their limitations. For instance, as with some PHAs, nonprofit organizations can have service areas that encompass multiple counties, especially if they are located in lower-density suburban or rural communities.²³ For the purposes of this analysis, nonprofits are assigned to the county in which they are located. In addition, not all the nonprofits captured may provide direct services, and the 990 data may not capture small local nonprofits that can be important partners in reaching community members. However, after testing alternative (both more and less expansive) specifications for identifying local nonprofit capacity, we believe these indicators offer useful insights on the extent to which the size and scope of local nonprofit networks vary across different kinds of counties.

Community Characteristics

Data on local population and housing characteristics (e.g., population size, race and ethnicity, poverty status, tenure, household income) come from the 2019 five-year American Community Survey (ACS). We also use ACS microdata from that same period to estimate the number of VLI renter households based on the income limits by county and household size set by HUD. Monthly unemployment figures come from the U.S. Bureau of Labor Statistics Local Area Unemployment Statistics data.

Because capacity constraints in communities that were already struggling before the pandemic could be of particular concern if they contribute to an uneven crisis response or recovery, we also use ACS and BLS data to create two designations to identify potentially vulnerable communities:

- **Structurally Vulnerable Counties.** Capacity constraints in communities that were already struggling before the pandemic could be of particular concern if they contribute to an uneven crisis response or recovery. Thus, we identify counties that were already exhibiting signs of elevated economic hardship before the onset of the pandemic, and flag them as Structurally Vulnerable if they:
 - Had an above-average county poverty rate in the 2019 ACS²⁴ or were home to at least one high-poverty jurisdiction (defined as a poverty rate of 20 percent or more)²⁵, AND
 - Had an above-average share of renter households that qualified as VLI before the pandemic.²⁶

Taken together, 1,440 of the nation's counties (46 percent) meet our Structurally Vulnerable criteria. Among our sample of counties with ERA data, 540 (38 percent) are Structurally Vulnerable (Table A).

Table A. Number of Counties by Presence of ERA Data and Structurally Vulnerable or Hard Hit Designation

	All Counties	All Counties for Which We Have ERA Data	Counties Included in the State-Administered ERA Analysis	Counties Included in the Local-Government-Administered ERA Analysis
All Counties	3,142	1,419	1,164	255
Structurally Vulnerable Counties	1,440	540	460	80
Hard Hit Counties	438	190	152	38

Note: Hard Hit Counties are a subset of Structurally Vulnerable Counties; Counties included in the state-administered ERA analysis are a distinct group from counties included in the local government-administered ERA analysis.

Source: Turner Center analysis of U.S. Treasury Department ERA data, data scraped from 22 state dashboards on state-administered ERA distribution, American Community Survey, and Bureau of Labor Statistics data.

- **Hard Hit Counties.** These counties meet the pre-pandemic criteria to be flagged Structurally Vulnerable, and also were negatively impacted the pandemic-related downturn in that they:
 - Experienced increases in the unemployment rate in the first year of the pandemic (February 2020 to February 2021)²⁷, AND
 - Had an unemployment rate in December of 2021 that remained above the national average.²⁸

Based on these criteria, 438 of the nation's counties (14 percent) qualify as Hard Hit. Among the counties for which we have ERA data, 190 (13 percent) are Hard Hit (Table A).

Each of these designations provides useful overlays in assessing potential capacity gaps in struggling communities. The inclusion of unemployment indicators in the Hard Hit designation recognizes that the first wave of ERA funds (authorized in the Consolidated Appropriations Act) required that recipients demonstrate a COVID-19-related hardship. The second wave of ERA (authorized in the American Rescue Plan Act) offers more flexibility in that it broadens eligibility to households that have experienced hardship during (not just strictly due to) the pandemic. The Structurally Vulnerable designation is a useful lens given that increased flexibility and—in thinking about where need may persist even after the pandemic, given long-standing—elevated levels of hardship.

ENDNOTES

1. U.S. Department of the Treasury. “Deputy Secretary of the Treasury Wally Adeyemo Highlights Emergency Rental Assistance Program in Memphis, Tennessee on American Rescue Plan Anniversary Tour.” (2022). Retrieved from: <https://home.treasury.gov/news/press-releases/jy0639>.
2. U.S. Census Bureau. “Week 42 Household Pulse Survey: January 26 - February 7.” (2022). Retrieved from: <https://www.census.gov/data/tables/2022/demo/hhp/hhp42.html>.
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7. Aiken, C., Harner, I., Reina, V., Aurand, A., & Yae, R. (2022). “Emergency Rental Assistance (ERA) During the Pandemic: Implications for the Design of Permanent ERA Programs.” Housing Initiative at Penn; National Low Income Housing Coalition. Retrieved from: https://www.housinginitiative.org/uploads/1/3/2/9/132946414/hip_nlihc_2022_3-10_final.pdf.
8. Allard, S. W. (2019). “Spatial Patterns of Work, Poverty, & Safety Net Provision in the U.S.” Peter G. Peterson Foundation. Retrieved from: <https://www.pgpf.org/us-2050/research-projects/Spatial-Patterns-of-Work-Poverty-and-Safety-Net-Provision-in-the-US>.
9. Not all revenues a nonprofit reports will go to or be available to serve VLI renter households, but this measure provides an indication of the varying financial resources of nonprofits across different kinds of counties relative to the size of low-income renter population.



10. Hawaii County is located in the Hilo micropolitan statistical area.
11. Counties are designated as “less resourced” if they have nonprofit revenues per VLI renter households below the national average. Recognizing that larger, entitlement counties operate at a different scale than less populous places (e.g., the correlation coefficient for presence of CDBG funding and number of nonprofits is 0.77 and 0.69 for nonprofit revenue), averages are calculated separately for counties with HUD grants or a large PHA and for those without.
12. Mattiuzzi, E., & Weir, M. (2022). “Community Development Research Briefs: Overlooked Suburbs: The Changing Metropolitan Geography of Poverty in the Western United States.” Federal Reserve Bank of San Francisco. Retrieved from: <https://www.frbsf.org/community-development/publications/community-development-research-briefs/2022/january/overlooked-suburbs-changing-metropolitan-geography-of-poverty-western-us/>.
13. Thrush, G. (2022). “Treasury Shifts Cash Among States as Pandemic Housing Aid Dries Up.” The New York Times. Retrieved from: <https://www.nytimes.com/2022/03/16/us/politics/pandemic-housing-aid.html>.
14. There are other ways to measure take-up, focusing more on determining eligibility (a difficult proposition given the variability across programs) or on potential need (e.g., Gould Ellen, I., Lochhead, E., & Hedman, C. (2022). “Falling Through the Cracks? The Distribution of ERAP Spending in New York State.” NYU Furman Center, Housing Crisis Research Collaborative. Retrieved from: https://furmancenter.org/files/publications/ERAP_Falling_Through_the_Cracks_Final.pdf). We focus on VLI renters as an expansive and consistent national metric and given the provisions of the funding regulations prioritizing VLI renter households.
15. February Treasury release of quarterly data on the demographics of ERA recipients in 2021.
16. Among counties with direct ERA allocations, 68 also include localities with direct allocations. We include both municipal and county disbursements in the calculation of the take-up rate.
17. The 22 states include: Alaska, Arizona, California, Colorado, Connecticut, Hawaii, Indiana, Kansas, Louisiana, Maryland, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New York, Oregon, Rhode Island, Texas, Utah, Vermont, and Wyoming.
18. For counties with direct allocations that contain a city (or cities) that received their own direct allocations, we aggregate all Treasury-reported data so that all programs are reflected in the county total of households served.



19. Counties removed from the scraped-data analysis of state-allocated ERA include 97 counties that received direct allocations as well as 10 counties that did not receive direct ERA allocations but contain jurisdictions that did. In total, we assess 255 counties in the direct-allocation analysis and 1,164 in the state-allocation analysis.

20. Theodos, B., Plerhoples Stacy, C., & Ho, H. (2017). "Taking Stock of the Community Development Block Grant." Metropolitan Housing and Communities Policy Center, Urban Institute. Retrieved from: https://www.urban.org/sites/default/files/publication/89551/cdbg_brief.pdf.

21. Some jurisdictions administer their own locally-funded vouchers or had rent relief programs prior to the pandemic, which would likely be an even stronger indicator of local capacity. However, no comprehensive data source exists to identify which communities have those programs in place.

22. We selected National Taxonomy of Exempt Entity activity codes related to housing, community development, and human services (L20-22, L24-25, L30, L40-41, L80, L82, L89, P20, P22, P24, P26-28, P30, P40, P42-47, P50-52, P60, P81, P83-85, P99, S20, S30-32) and removed subsection codes (5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 25, 92) to help narrow the list to entities more likely to be involved in direct service. We also removed any organizations primarily working outside of the United States.

23. Allard, S. W. (2017). Places in Need: The Changing Geography of Poverty. New York. Russell Sage Foundation.

24. 1,738 counties had a poverty rate above 13.4 percent in the 2019 five-year ACS.

25. 2,203 counties contained at least one incorporated place with a poverty rate of 20 percent or higher.

26. 1,790 counties had more than 43.2 percent of their renter households qualify as VLI.

27. While most counties experienced unemployment increases between February 2020 and February 2021, 482 counties saw their unemployment rate decline in this period.

28. In December 2021, 958 counties had unemployment rates above the national unemployment rate of 3.7 percent. Because the monthly LAUS county estimates are not seasonally adjusted, we use the unadjusted national rate as the benchmark (see: "Unemployment Rate." Federal Reserve Bank of St. Louis (FRED), U.S. Bureau of Labor Statistics. (2021). Retrieved from: <https://fred.stlouisfed.org/series/UNRATENSA>).



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