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Building Local Institutional Capacity

Lessons Learned from the Emergency Rental Assistance Program

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Introduction

When the federal government authorized emergency rental assistance funding as part of a package of COVID-19 relief measures at the end of 2020—with a second wave of funding soon to follow in the American Rescue Plan—jurisdictions across the country had to make a number of rapid assessments to determine the most feasible and effective approach to distributing assistance (Box 1). Given the magnitude of funds allocated through the Emergency Rental Assistance Program (ERAP) and the ambitious timeline for deploying aid to households struggling to pay rent, localities had to decide what functions they would (or would not) take on in-house and whether they would partner with external organizations to implement the program. While many ERAP administrators ultimately did choose to partner in their rollout of ERAP,[1] the extent to which they did—and how they chose to do so—varied widely and was shaped not just by their own internal capacity but also by the landscape of potential partners in or around their community.

An earlier Terner analysis of ERAP distribution[2] assessed a variety of quantitative indicators of local institutional capacity to illustrate how variable and patchy that local landscape can be and how that variation can affect ERAP deployment. To delve deeper into the capacity-based considerations that shaped ERAP rollout, this brief draws on interviews with 41 stakeholders with insights into the design and distribution of ERAP funding at the local level. Interviewees include government staff and elected officials in jurisdictions that either received direct allocations of ERAP from the Treasury Department or subgrants from their states; housing and human services nonprofit organizations and Public Housing Authorities (PHAs) that partnered on ERAP in some way; and intermediaries (e.g., national networks and membership organizations) that provided support to local ERA programs. Taken together, interviewees represent 21 different ERA programs from across the country that span the urban-rural continuum—ranging from major metropolitan cities to suburban counties to rural areas—and represent ERA funding allocations of very different scales (e.g., urban jurisdictions dispersing well over $100 million in ERAP vs. rural communities with subgrants closer to $1 million). The range of programs captured also provide insights into how jurisdictions and organizations with differing levels of institutional capacity navigated the emergency response when the pandemic hit.

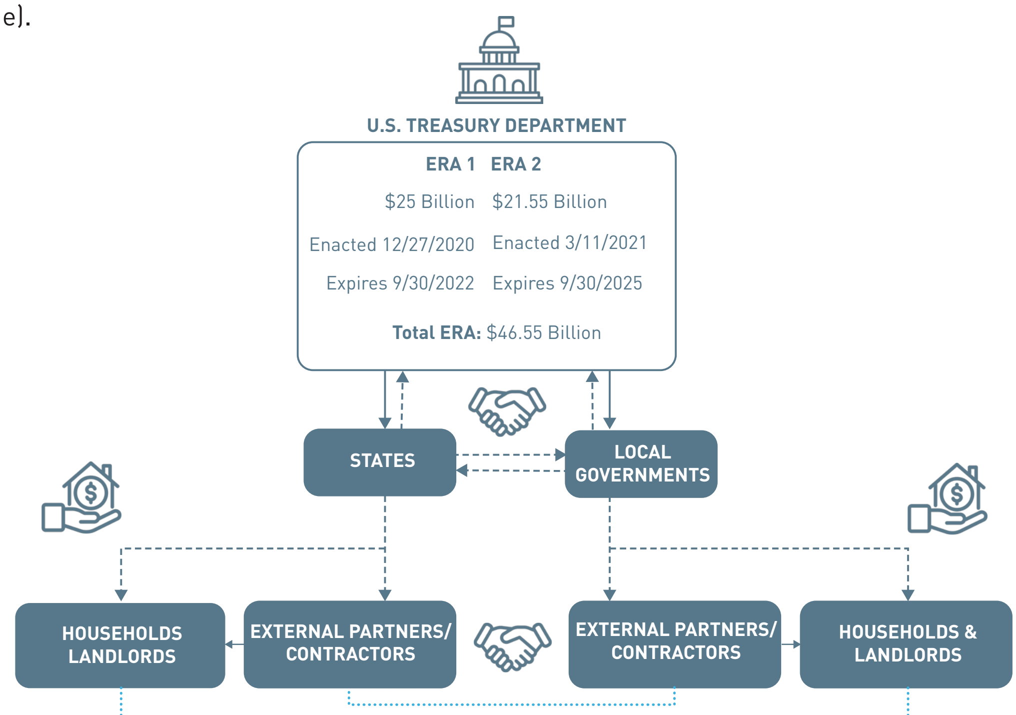
As described by interviewees, no two deployment models of the ERA program were exactly the same. As stakeholders reflected on their experiences with the rollout of emergency assistance, however, common insights emerged around how existing capacity informed the design and implementation of ERAP and how emergency funding was leveraged to extend and expand local capacity to aid in pandemic response. In particular, the infusion of funds deployed through ERAP helped many communities make tangible strides in improving their technological infrastructure and sparked many new partnerships and ways of working collaboratively that are likely to extend past the expiration of the program. But the experiences of interviewees also underscored the challenges of one-time funding and its limitations in bridging critical capacity gaps, particularly in expanding and sustaining staffing capacity, especially for communities that were already struggling with constraints before the pandemic hit.

Box 1: Design of the Emergency Rental Assistance Program

The Emergency Rental Assistance Program was first authorized during the Trump Administration in December 2020 as part of the Consolidated Appropriations Act, which allocated $25 billion to the U.S. Treasury Department to establish what would become ERA 1. In March of 2021, the Biden Administration allocated an additional $21.55 billion to the Treasury Department as part of the American Rescue Plan to fund ERA 2.

Programmatic differences between the two waves of ERA exist (e.g., ERA 1's eligibility guidelines stipulated that hardship be directly or indirectly due to the pandemic, while ERA 2's guidelines extended to hardship experienced during the pandemic; under ERA 1 households could potentially receive up to 15 months assistance, while ERA 2 covered up to 18 months).[3] But both waves of ERA were similar in that they flowed to both states and selected localities. Every state received an allocation of ERAP funding. In addition, any local government with a population of 200,000 or more was eligible to receive their own direct allocation of ERAP funds. What happened from there depended on the state or locality in question. See the infographic below where dotted lines connote funding pathways that some grantees, but not all, used to distribute assistance.

Some states and local governments returned unused funds to the Treasury Department voluntarily, while others had funding involuntarily recaptured. Not all local governments opted to receive the allocation for which they were eligible, or they took their allocation but gave it to the state to administer. Some states subgranted funds to local jurisdictions (including those not large enough to receive a direct allocation), but others did not. And, as this analysis explores, some grantees (this holds for both states and local governments) distributed assistance directly to households and landlords, while others subcontracted with external partners to distribute their full allocation of assistance, and yet others chose a hybrid approach. As shown by the light blue dotted lines, certain partners and subcontractors worked with more than one government grantee, and there are instances where households or landlords may have received funding from multiple state or local government sources/partners (e.g., depending on which programs had funding at the time).



This report first details the capacity-related insights gleaned from interviewees and their experiences designing and deploying ERAP. It then distills important lessons that can not only improve the implementation of future emergency response efforts but also advance longer-term systemic reforms to improve the delivery and uptake of programs more broadly across the nation's diverse jurisdictional landscape. As many communities have exhausted or are close to exhausting their ERAP funds, the level of ongoing vulnerability and housing insecurity among struggling renters reported by interviewees makes the urgency of acting on these lessons all the more pressing for policymakers, funders, and practitioners.

Findings

Local governmental capacity helped determine the extent to which—and how—jurisdictions used partners to help deploy ERAP.

Whether the ERAP funds were received directly from the Treasury Department or as subgrants from the state, localities had to act quickly to determine how they would handle fund disbursement. According to interviewees, some jurisdictions chose to handle the administration of ERAP "in house", meaning they maintained primary responsibility for the disbursement of funds. When those jurisdictions partnered, they utilized external organizations to help with outreach or support functions like intake and application screening. Other jurisdictions, however, chose to subgrant some or all of their funding for administration and disbursement by external entities.

Among interviewees who chose to subgrant some or all of their funding, capacity constraints were commonly cited as a determining factor across a diverse array of jurisdictions. A staffer from a rural county with fewer than 20,000 residents said that there was never a question of whether their county would subgrant the ERAP funding received from the state to an external partner, noting, "We have a small everything here. Small finance department. Everything."[4] But it was not only smaller jurisdictions that made the decision to subgrant their funds due to constraints around staffing. A staffer in a large suburban county made a similar determination with their direct allocation of ERAP, saying, "I could not stand up a rental assistance program in the quick time frame necessary. First, I don't have the physical space. And second of all, it's very challenging and cumbersome to hire people within the county hiring structure." Hiring challenges were also raised by staff in another suburban county: "It's just difficult to add staff [in this county], especially programs that are going to sunset…I knew right away, we would not be adding staff for any of our programming." An interviewee from a city with more than half a million residents pointed to "where our city is budgetarily" as part of their hiring challenges. The staff member noted "At this time, we're facing some pension issues and some pretty severe funding issues," dynamics which they said informed the city's decision to subgrant their ERAP dollars.

Timeliness was another leading capacity-related factor for jurisdictions that chose to subgrant all or some of their dollars for external administration. An interviewee from a large suburban county said, "We definitely wanted [our partner] to process the checks. They could do it much, much faster than we could." A city staffer cited similar considerations in explaining their choice to pursue a hybrid model for disbursing funds: "If you want to cut a check [from] the city, it probably takes a couple of weeks to get. So we put some of our rental assistance over with United Way because they can cut checks immediately and go down to a court and say, 'Hey, we're here in order for this person not to get evicted.'"

While lack of internal capacity was a primary motivation for subcontracting among interviewees, it was not the only consideration that shaped strategic program design decisions made by localities. Non-capacity-related considerations surfaced by interviewees also included the local political context, whether there were historical tensions between different agencies to navigate, and perceptions of what local institutions seemed most trusted to implement ERAP. An interviewee from a large city reflected that, in their case, "People don't trust the city…[If] you're the big bad city, it's not necessarily always the place [people] want to go to for help. And a lot of that reputation is really unwarranted. But…people believe what they hear, and not their experience, because maybe they haven't had one yet."

> "We were in [the rental assistance] space already, and it's core to our mission… We already had the infrastructure and so it made sense for [the county] to be able to work directly with us."

The types of potential partners in and around each community—including existing relationships, expertise, and capacity—also influenced the design and approach of local ERAP implementation.

Many interviewees spoke about how existing partnerships and relationships were particularly important considerations in the ways their jurisdictions chose to leverage external partners. One county staffer observed, "I think everyone I've talked to who received funding was able to find a partner they had worked with before…to sort of stretch their capacity to do this."

In selecting partners and allocating funding, localities also considered the partners' experience navigating federal funding, particularly familiarity with housing assistance and Department of Housing and Urban Development (HUD) programs (Box 2). For instance, a suburban county staffer shared that they "just reached out to the nonprofits who get [Community Development Block Grant (CDBG) funding] and asked could they expand their programming…'Hey, with this limited money, what can you do? And how quickly can you do it?'" One of the nonprofits that county reached out to noted that "We were in [the rental assistance] space already, and it's core to our mission…We already had the infrastructure and so it made sense for them to be able to work directly with us." Another interviewee from a Community Action Agency[5] in a rural community said the county "opted to go with us as their housing organization. We're HUD certified. And they said, 'You know what, we're just going to give [our funding] to you.'" Similarly, a suburban county official said, "We gave significant funding to our Community

Box 2: Emergency Rental Assistance: A Treasury Department Program Benefiting from HUD-Built Infrastructure

A key tension that emerged as interviewees described the local program design decisions made in standing up ERAP stemmed from Congress' choice to administer the program solely through the Treasury Department. Some interviewees noted the challenges associated with creating an entirely new program outside of the typical systems used for delivering housing assistance. As one city staffer put it, "Using the existing, proven [HUD] programs that have existing written rules, or just maybe tweaking the existing written rules" to deploy ERAP would have been "so much easier". However, the more common opinion shared by respondents was that it would have been difficult to move as quickly if ERAP were distributed through HUD rather than the Treasury Department. One city staffer said they did not think HUD's established systems "are the number one go-to for immediate response" because "these channels are built to operate at a much slower pace than what was needed."

Yet the extent to which localities leveraged the infrastructure created by HUD funding and programs to deploy ERAP is striking. As noted in the second finding, existing institutions and networks frequently cited by interviewees as having the technical expertise and capacity to partner on ERAP included experienced HUD grantees and HUD-certified housing counseling agencies (which often include Community Action Agencies, entities that also administer the Community Services Block Grant from the Department of Health and Human Services), PHAs, and Continuums of Care.

What is more, multiple communities noted that they were also able to leverage technical infrastructure used for HUD programs in their deployment of ERAP, such as the Homeless Management Information System (HMIS) platform used by Continuums of Care to track client information on the provision of services and housing to clients at risk of or experiencing homelessness. A nonprofit organization that partnered with multiple neighboring counties on ERAP distribution said, "We knew we needed to get a system to be able to house and process applications…We really built the system off of our homelessness prevention program. That is our HUD-funded program. And so the [HMIS] infrastructure was there…We just built [the application] to meet the needs of the Treasury dollars." A PHA staffer working in another community as one of 15 partners pulled together by the county said, "Most of the communication that we have with them is through the [HMIS] system." They use the system to track applications and coordinate across service providers.

That is not to say these elements of existing HUD infrastructure are being leveraged the same way—or even at all—across localities. That infrastructure is itself uneven and was not equally well-positioned in different communities to be tapped in the deployment of ERAP. For instance, three PHAs in neighboring regions on the West Coast took three different paths to ERAP: one served as the primary administrator of ERAP for their area; one opted not to participate beyond assisting their tenants with applications, citing capacity constraints; and one was not even approached by their local jurisdiction, which instead selected a different nonprofit partner. In that way, one interviewee said that "ERA perfectly reflects the systemic inequalities in how we run most housing and community development programs" that depend on local capacity to implement.

Action Council, who is the main housing provider here in the county, because they have the resources and the caseworkers." They also allocated funding to the housing authority because "the housing authority manages the voucher program, not me. So they can also assist clients with adjusting their voucher if they lost their jobs due to COVID."

At the same time, partners without direct experience in housing assistance also stepped into new roles to assist with ERAP disbursement and outreach. In some cases, localities looked for new partners who could help reach vulnerable populations that might be skeptical or distrustful of interacting directly with a government agency. For example, a city staffer noted that they intentionally brought in a diverse mix of partners—such as a smaller nonprofit whose focus was mental health services targeted to the Hispanic/Latinx community (including those who might be undocumented)—to make sure they were reaching as many households that were potentially eligible as possible. In other cases, high-capacity nonprofits adapted their infrastructure to take on ERAP because other local institutions were unable to scale up quickly. One such partner reflected, "We didn't do any type of services at all for rental assistance, direct payments, any of that type of activity [before ERAP]. We only took it on because our United Way locally was unsure that the agency that usually did rental assistance was going to be able to build their capacity to do it."

The magnitude of resources deployed through ERAP helped expand local institutional capacity in a number of ways to serve vulnerable households.

Regardless of an ERAP administrator's pre-pandemic starting point on the continuum of capacity, or which type of partner (or collection of partners) stepped in to assist in emergency response, the influx of resources deployed through ERAP required—and enabled—local capacity ecosystems to expand or extend their capabilities to handle the volume and urgency of delivering rental assistance. Interviewees pointed to a number of ways the influx of ERAP funds spurred capacity expansions within their communities—most notably around staffing, collaborations, and technology—as they scaled up rental assistance and eviction prevention services.

Staffing Strategically

Each local model for deploying ERAP had to contend with the best way to expand the staff capacity available to implement the program. Interviewees consistently pointed to the limited administrative funding available, especially in the first wave of ERAP, that constrained options for many respondents as they considered staffing needs.

As one administrator noted, "Nobody wants to hire someone, and then say later, 'I'm sorry, I don't have any resources to keep you on.' So it's, 'How do you manage these services that are currently available, knowing that they're not always going to be there, and serve as many people as possible?'" A common tactic cited by respondents was shifting existing capacity within organizations to focus on ERAP. One Community Action Agency reflected, "It was like all hands on deck...everybody had to be cross trained and support [the rollout of ERAP]". Some smaller organizations relied solely on that approach, such as a suburban housing counseling agency that noted the time-limited nature—in addition to the limited administrative dollars associated with the funding—as barriers to adding staff. Noting similar concerns, a Community Action Agency staffer serving rural communities said, "We've been doing ERAP with two people and me. And as the Deputy Director, I have a much larger job than 'housing person,' but I became a housing person. Because it takes more than two people to do this job."

Another strategy used by some interviewees was to add temporary staff to administer ERAP. One nonprofit partner reported that they "were pulling from different departments, and probably four or five months in, it just got to be so much... We were able to grow from 10 to 15-ish on staff to upwards of 60 staff in total. Some of those folks we hired as temps, some of those folks we hired from an outside staffing agency." Another large nonprofit that partnered with multiple jurisdictions on ERAP administration said, "We used to have about a little over 100 staff and I think we're up to 200. And much of that is the housing department."

Some respondents—typically larger, higher-capacity nonprofits—were able to convert some of their temporary hires to full-time employees or to recruit full-time staff. One interviewee noted that, at the beginning of the pandemic, "We did try to hire students that were home [from college] because of COVID [but] the longer it went on, we hired more and more full-time staff." Another Community Action Agency leader determined that the temporary staffing arrangement was not meeting their program needs, noting: "We ended up hiring staff permanently because the temporary staff structure was not yielding the quality that we wanted, and the commitment. Because people will come in and stay for a week and go. And these are complicated programs where they require a lot of investment of time in learning and training. And there are lots of systems—database systems and programs—that people need to understand and become efficient at. So we quickly realized that we needed to kind of change our mindset, and not worry about that this is one time funding." This strategy was possible because the nonprofit had a sufficiently diverse and flexible mix of funding streams to support the decision.

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Leveraging Cross-Jurisdictional Collaboration

Some communities also looked further afield to forge new partnerships and cross-jurisdictional collaborations that could extend their capacity. One suburban county staffer noted, "Our nonprofits here in the county just didn't have the capacity...When we first found out about the Treasury money...I talked to [a neighboring county]. And they said, 'Hey, we've actually kind of got this already going, and we're going to work with [this provider]. Maybe you should approach them and see if we could do this together." The staffer added, "That was kind of a newer experience for us. With HUD funding, you're not really crossing county lines ever, you really stay kind of in your own little jurisdiction. So it was nice to be able to have a co-project with them." Similarly, a rural county staffer said that they reached out to a local agency they knew were already working with neighboring counties. The staffer said they "tried to mirror [the neighboring county] as best as possible" in terms of aligning applications and coordinating on outreach "because we had one service provider, one administrator."

An administrator working with multiple county governments also found themselves partnering in new ways with other service providers: "It really took down the barriers between agencies…We knew about each other, but we kind of did our own thing. 'Yeah, I'm a Community Action Agency, and I'm over here doing my thing,' and 'Yeah, I'm a shelter, and I'm over here doing my thing.' But we never really mingled our services. But then COVID hit, and we realized we couldn't do it alone. And very quickly, all of us became friends and partners."

A number of interviewees were also able to leverage a one-stop-shop model to streamline access to their network of partners. A city staffer reflected, "We had a one-stop-shop to coordinate these diverse groups that were dealing with the distribution of the rental assistance. Someone could come in, they could figure out which program was better for them, they could sit down at a computer and an individual could help them apply…And then if emergency assistance wasn't the right thing, or the only thing that they needed, the other resources were available there as well."

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Strengthening Technological Infrastructure

The scale and rapid deployment of ERAP—along with the extensive reporting that the Treasury Department required—also spurred the expansion of technological infrastructure for many localities. For one rural community, where access to technology can be uneven, ERAP funds allowed them to "purchase tablets and laptops for our staff so that, as we go out to community events, we can turn on a hotspot and sit there with applicants and do an application on the spot. And that way, it's just done." Multiple interviewees also noted that ERAP funds allowed them to move to more sophisticated platforms for tracking client data. For instance, one county staffer observed: "We started on an Excel spreadsheet, and we started to learn that was not going to work with the volume." The county contracted with a provider that created a platform that "allowed people to apply right from their mobile phone. So they didn't have to bring papers anywhere. They didn't have to copy papers, they could just apply right on their mobile phone and get into the system and get help." In addition, their provider "gave training to all the caseworkers. They were there weekly giving training to my staff, and following up with support about how to do the invoicing and the reimbursements. They made changes to the platform continuously. They have been an amazing partner. And we would not have been as successful without that." Another organization said that they "had begun the whole process of having a universal application for all of our programs" before the pandemic, and "had started the process of putting that on our website." But they noted that ERAP "opened up the door where we had more funding to actually hire experts who came in and helped revamp our website in order to allow families to complete their applications online."

However, interviewees also highlighted the ways in which ERAP deployment underscored the unevenness of digital literacy, the persistence of the digital divide, and the equity implications of those gaps. As one nonprofit leader cautioned, "[We] need to be cognizant not to leave people behind who don't have access to computers or don't know how to use their phone. There's still a lot of people that are digitally illiterate or illiterate in our neighborhoods." A PHA staffer noted, "With COVID, it was hard for some people to communicate electronically…There's some that are very tech savvy, and they can do everything on their own and they can upload everything on their own. And then there's others that can't." Another nonprofit staffer shared, "We did build additional partnerships with other organizations…to have hard copy applications because we know that we need an array of different access points. Because not everybody has access and the availability to do the online applications."

Some of the capacity improvements related to ERAP may continue to benefit localities longer term, but without federal action, many will end or will be significantly scaled back once emergency assistance expires.

The capacity extensions and expansions cited by interviewees have been significant across the range of communities and program models represented. However, how much of that infrastructure will be sustained once ERAP funding is gone was less clear.

Technological improvements to their service models are one of the key capacity extensions that interviewees expected to benefit from after ERAP dollars are gone. One nonprofit leader said, "I was surprised how our staff like it. They were resistant to using technology prior to this, and now they're like, 'Hey, this is great.' So the outcomes, the skill sets are better. We were able to reach more people [online]." Another nonprofit partner pointed to the operational efficiencies they gained from new technology: "Now there's a common backend that we can all use and tap into, and the data resides in one place." A Community Action Agency staffer said "Forever it has changed our organization and the way we do things," and post-COVID they expect to continue "to provide access to those who can submit their application using electronic platforms to receive service that way." Those sentiments were echoed by another nonprofit staffer who said, "Having a virtual system that everybody can attain, can access, has just changed the way everybody looks at social services here.…It's just a different model completely. We are changed forever."

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Many interviewees also saw sustaining partnerships built during their emergency response experience as an ongoing, capacity-building benefit. A rural county staffer reflected, "I think building the partnerships was the most successful" aspect of ERAP implementation. A provider in a large suburban community shared the same perspective: "The collaboration and partnership was really the core of our success, to say 'Let's bring everybody together.'" One nonprofit partner pointed to the one-stop-shop they developed: "It's a drop-in space run by our staff, but we also have legal services there for eviction prevention. We have an eviction prevention agency that works with people who have a court case. We have mediation there to try and encourage landlords and tenants to mediate. So those are all things I think we've learned that we want to continue, we just have to figure out how to make that work moving forward."

Not all partners that extended their services or stepped into new spaces planned to continue. As one PHA partner reflected, some of their partnering organizations "have completed their contracts and have chosen not to move forward because it's a lot of work." Like the one-stop shop mentioned above, other interviewees also see the capacity they developed through ERAP changing their programming in the longer term. As one nonprofit leader reported, "We are fundamentally changed as an organization. [Before the pandemic] we always said, 'Okay, we're building wealth. It's all about economic opportunity.' But we were really starting with people who had stable housing. And suddenly, as everybody's housing became unstable, or a lot of people did, we are looking at 'economic empowerment does mean rental assistance, it does mean eviction prevention.'...So for us, we are looking at changes to our mission as we go forward." Another nonprofit partner shared a similar reflection: "Now we take probably a more holistic approach [to] stabilizing people's housing....It's fundamentally changed our perspective."

One challenge to sustaining expanded services or new ways of delivering services is maintaining the staff. One nonprofit leader said, "When we scaled up, we got some really amazing temps. And we'd love to be able to hire them and keep them and use the skills that they built with ERAP. But we need to have a way to do that and to be able to pay them." Another nonprofit operator that significantly staffed up to administer ERAP in multiple jurisdictions said, "I don't imagine that we would be able to maintain this level of staffing without the ERA funding." A nonprofit that intends to keep on the full-time staff they added as part of their emergency response noted that they are able to do so because "our board of directors and myself made a commitment that we will raise the funds in order to maintain some of the staff that we've added...So we have been writing grants nonstop."

The time-limited nature of ERAP—and the lack of any federal alternative or extension to take its place—loomed large for interviewees, and several interviewees reflected on their search for alternative funding streams to help sustain some version of the capacity localities have built through ERAP. One nonprofit leader who expanded their programming during the pandemic response said, "Our government partners…are scouring their budgets because they're trying to figure out how to keep this program going." A city staffer contemplating ways to repurpose other resources said, "It's a matter of, 'Do we want to allocate our regular round of CDBG funding [when ERAP is gone]?' And it's just very competitive money. I think the board would be interested in it, but maybe not at the expense of taking away from our homeless programs or our food programs…But in either case, it would be a much, much smaller program." For localities or partners looking beyond government funding options, their local context—and the richness of their local capacity ecosystem—also shapes how many potential funding alternatives may even be available. As one interviewee framed it, "It's not like urban centers are immune, but the universe of potential funders gets smaller depending on where you're going…It's one thing if you're in [a big city] and you have 10 major banks providing you with program support [versus] if you're in a town and you get a $5,000 check from a bank. It's just a very different resource development environment."

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Lessons for Improving Emergency Response Efforts

Reflecting on the rapid rollout of ERAP and the scale of funding distributed to stabilize vulnerable renters during the pandemic, interviewees consistently voiced their appreciation for the flexibility of the emergency funding. However, clear pain points emerged across the range of interviewee experiences and approaches. These common insights offer lessons that can improve future emergency programs in ways that recognize the capacity constraints and needs in different types of communities and maximize the ability of flexible, responsive dollars to reach hard-hit populations and communities. Specifically, interviewees pointed to the need for emergency response funding to:

Provide Clear Guidance and Minimize Burdensome Requirements

As the first and then second waves of ERA funding began reaching communities, the Treasury Department continued to refine and issue new guidance (including in February, March, May, June, and August of 2021 and in July of 2022) to help speed disbursement to impacted renters and landlords by reducing barriers and easing administrative burdens and complexity.[6]

While respondents acknowledged the efforts the Treasury Department has made to respond to feedback from providers, the consensus was also that the shifting guidance created challenges. One suburban county staffer shared, "Treasury [is] being very responsive to what they're hearing and to changing needs, which is great. But that can also be very confusing, because their program rules have changed throughout the process. And their reporting rules have changed throughout the process. And it has been difficult to keep up with that." A nonprofit leader reflected, "Every time we stepped back and provided a new set of rules to our team, by the time they got to understand it and began to implement it, it changed…our case managers almost didn't believe it." For instance, their caseworkers were reluctant to reduce the amount of documentation they were requesting when that became an option because "they were so ingrained in, 'I want to make sure that nobody is committing fraud, and I'm not missing anything. So I'm going to ask for every piece of paper.'"

Providing clear guidance up front—guidance that offers "guardrails" around what is not allowed but that otherwise prioritizes reducing administrative burden and barriers to access—would help speed implementation of emergency assistance. In the event that guidance needs to change to improve program rollout, those changes should be shared through clear and responsive communication channels.

Ensure a Responsive Communication Infrastructure

In addition to the issue of shifting guidance, a parallel challenge interviewees pointed to was the lack of robust communication channels to help answer questions and provide clarifications on program design. Because the Treasury Department does not typically serve this type of program administration function, it did not have existing infrastructure that other federal departments have built over time to provide more extensive oversight and guidance to grantees.

One county staffer said, "With Treasury, I think it was amazing how quickly that money got out the door. It literally just showed up in our bank account …[But the] difficult thing has been that, with HUD funding, you have somebody you can talk to. You've got your field office, people you've worked with for a long time. You can ask questions. This, I felt like it's just yelling into the void." While not directly referencing HUD regional/field office infrastructure, a city staffer said, "[It] would be very helpful if there was someone, even regionally, that we could talk to that understood our market and what we are trying to do, and could provide simple answers. That would be very effective…Instead, it's just a bunch of people banging their heads."

In addition to compliance concerns, the immediacy and severity of the crisis also drove frustrations with the absence of communication infrastructure. As one administrator emphasized, "These are people and households in distress over their housing…You want to give an answer to them that day. You don't want to wait six hours or 24 hours or 72 hours to get back to somebody with an answer…It was really challenging because [the Treasury Department was] inundated with tons of questions. I think we sent them a question via email and they said, 'We will respond within three months.' Well, we're not able to wait."

Interviewees also noted that, absent robust communication from the Treasury Department, they depended on other channels to help troubleshoot implementation questions and share best practices. Often these forums were provided by membership networks, existing partnerships, or their state or region. One interviewee shared, "We as Community Action Agencies have talked to each other a lot in the last year, 'Hey, I'm seeing this. What are you doing about it?' Especially when it came to applications, forms, things like that, so that they can try to keep it uniform." Another nonprofit staffer said, "For many years, even though it wasn't really funded, we had done these monthly Continuum of Care calls" that they would use for peer sharing and knowledge building. The staffer added, "When COVID hit, having that infrastructure in place was critical. Groups talked about how they were dealing with these emergent issues with a pandemic." These opportunities for peer learning are a valuable resource, and should be strategically leveraged in future emergency response efforts. But they should be seen as a complement to clear, responsive communication channels established by the federal agency administering emergency assistance.

Create Off-the-Shelf Products to Improve Efficiencies and Compliance

Larger, higher capacity jurisdictions and non-governmental partners were more likely to have pre-existing infrastructure and/or the capacity to take advantage of the flexibility offered by ERAP and quickly stand up or adapt their own applications, online portals, and data and reporting systems. Interviewees facing capacity or resource constraints, however, were more likely to report that they would have benefitted from having access to "off-the-shelf" products they could be confident were compliant with program requirements. For instance, if the Treasury Department had offered application templates as the funding became available, localities could have saved time on the front end by adopting or adapting a Treasury-approved format.

Interviewees expressed similar sentiments about having pre-approved technology solutions. One city staffer discussed the challenges of having to navigate both city and county ERAP rollout: "There's a lot of coordination that needs to go on when you have dual systems operating in the same geographic area. And this technology doesn't talk to each other. [Or there is a] lack of technology…If there was something out of the box, or something that you could buy from a suite of vendors that was approved, it would just be so much easier."

For localities or providers that have well-functioning technological infrastructure, allowing flexibility on how to administer applications and collect data can help integrate emergency responses into their existing systems. But for the interviewees that reported starting with Excel spreadsheets, and for similarly capacity or resource constrained administrators, having approved providers or platforms established up front would have helped shorten the runway on program implementation. Another way of speeding implementation and ensuring compliance would be to explicitly leverage (or signal that localities are allowed or encouraged to make use of) existing infrastructure, like those interviewees who naturally gravitated toward HMIS (Homeless Management Information System) infrastructure for application tracking and data management.

In future emergency response efforts, creating templates for applications and supporting documentation as well as contemplating technological infrastructure adaptations and/or vetting vendors and platforms could speed implementation, help standardize and facilitate reporting, and ease compliance concerns as localities navigate new flexible funding sources.[7]

Build Sufficient Administrative Funding and Support for Capacity Building

Emergency assistance is typically temporary by design. When ERAP was first authorized, it was unclear how long the pandemic and its public health and economic impacts would last. While interviewees pointed to the time-limited nature of the funding as one factor shaping their staffing and program design decisions, those decisions were also influenced by the limited resources available for administration and operations. Interviewees noted that the second wave of ERAP corrected the issue somewhat and provided more administrative support. However, greater support for operations from the start could have helped alleviate capacity and resource constraints, especially given the program's focus on speed of spending.

Not only could greater administrative support upfront have helped speed the scaling up of capacity, it may have also helped address, at least to some extent, the level of burnout and turnover interviewees reported. One nonprofit staffer observed that ERAP administrators "just did their work because of the importance, even though they were understaffed. And I think that that's why there's a great fatigue...frontline folks are just exhausted. Another nonprofit administrator said, "As far as turnover, we saw it increase. It's probably about 5 to 10 percent a month."

In addition, as important as the technological advances supported by ERAP have been, the experience of interviewees underscores the pervasiveness and persistence of the digital divide, which further highlights the need for sufficient staffing resources in any future emergency response. As one rural provider noted, "We have a last mile issue here. You're not going to get internet at some of these rural homes, and you don't have to live far out of town to not get it... Unless you are in a clustered town, you're not going to get the same digital treatment."

One program administrator discussed their approach to ERAP outreach in less populous, rural areas that not only faced digital divide issues but also lacked a locally-based partner. The ability to have staff that could provide "boots on the ground" was especially important: "Aside from making phone calls, we were going to these areas where there may not have been an agency or where resources are hard to come by. So we were able to be there in person and deliver this information."

While it is critical for federal emergency response dollars to build in sufficient administrative support, these capacity considerations also apply to sub-granting entities. In some cases localities made a point of disbursing allocations up front, recognizing that their partners may not have the ability to operate on an invoice-for-services basis. One county official said, "We direct-deposited a certain amount of money and then have a monthly auditing process with [our partners]...We definitely wanted them to process the checks, they could do it much, much faster than we could. So we had to be able to give them a pot of money because there was such a backlog at first. They couldn't forward $2 million and then get reimbursed for it." But not all localities adopted that approach. One non-governmental partner noted that while the county they worked with subgranted the entirety of the funds up front, the city they partnered with chose to only advance 20 percent of the funds and required invoices for the rest. As a partner with other resources to draw on, they could make that model work, although it was more challenging to navigate. But for

Box 3: Could Future Emergency Response Efforts Advance Greater Coordination and Leveraging of Existing Infrastructure at the Federal Level?

In the same way the influx of federal ERAP funding spurred state and local partners to work together in new ways, some interviewees noted that Congress missed an opportunity to spur that same kind of coordination and collaboration among federal agencies when it created the ERA program.

A different path to delivering emergency assistance might have been one that not only drew on the Treasury Department's ability to move quickly and offer flexibility in its deployment of funds. But one that also paired Treasury's nimbleness with the communications infrastructure and technical assistance expertise that HUD has developed over the years.

Interviewees also noted that another overlooked federal asset was the infrastructure the United States Department of Agriculture (USDA) has built; the department could have been a "third leg of the stool" in this alternative assistance scenario. USDA runs housing programs that specifically target rural communities that do not necessarily have on-the-ground institutional capacity. As one interviewee reflected, "USDA Rural Development has more staff than HUD. It's a fundamentally different model. HUD takes big chunks of cash and gives them to local institutions. Rural areas can't implement that way so USDA takes a totally different approach."

Putting these pieces together at the federal level could have provided an outreach, technical assistance, and implementation infrastructure that may have allowed new programmatic funding administered by the Treasury Department to flow more readily to hard-to-reach populations and under-resourced communities. Of course, forging these kinds of collaborations takes time that may have slowed the initial deployment of funds compared to what the Treasury Department was able to achieve on its own. However, given the unevenness of that initial deployment because of hurdles and uncertainties encountered by states and localities as they worked to navigate this new program—along with the capacity challenges this analysis and other research has documented—it is worth future emergency response efforts weighing these design tradeoffs. In particular, given the challenge of using one-time funding to create entirely new infrastructure that avoids the pitfalls and shortcomings of existing systems, an important question for future emergency response efforts is: how might existing, cross-agency/programmatic infrastructure be leveraged so that an infusion of one-time funding can help redress systemic inequities and better reach marginalized and under-resourced communities?

a smaller, less-resourced partner, it would have been much more difficult to front those resources.

Lessons for Longer-Term Systems Reform

Many of the lessons for emergency response efforts can be adapted to inform longer-term systemic reforms that could not only improve the delivery of housing assistance, but also bolster the broader infrastructure used to deliver aid to low-income households and communities. Such systemic reforms will be critical to overcoming racial, economic, and geographic disparities that threaten to impede an equitable recovery.

However, the fragmentation of policies, programs, and the jurisdictional and institutional landscape could prove a critical challenge to extending these lessons beyond ERAP, because there is no single starting point or solution to addressing capacity gaps in the way aid is currently delivered. Making broader, systemic improvements in this context will require action from multiple government programs and agencies, philanthropic funders and private sector partners, and the supportive architecture of national membership networks and technical assistance providers. In addition, what an effective path toward capacity building and systems improvement looks like in any individual community will be influenced by where they are starting in terms of local assets, institutional strengths, and existing relationships (including any historical tensions or barriers).

The push to stand up ERAP revealed both the extent to which existing infrastructure can be leveraged in new ways to expand capacity—for instance, working through United Ways, Continuums of Care, Community Action Agencies, PHAs, and other such networks of institutions that can be found in communities across the country—but also how the coverage and capacity of those existing institutions can vary between communities. Organizations and governmental entities do not all hold the same place in their local capacity ecosystems, depending on community history, politics, relationships, and scope of capacity and expertise. For instance, a member of one of these networks may be able to play the role of trusted partner and connect with hard-to-reach and disparately impacted populations in one community, but their counterpart in another community may not be positioned to play that same role.

Political will and historical contexts also necessitate multiple strategies to ensure the most structurally vulnerable and hard-to-reach communities are not being overlooked in efforts to improve systems delivery and program uptake. In one Republican-led state, a staffer in a Democrat-led county said, “The best way for us to work with the state is not to work with the state,” which is why they value funding streams that they can access and receive directly from the federal level. However, an interviewee reflecting on capacity gaps in rural areas noted that, in some states working through counties can help get resources closer to the ground where they are needed, but in others the county infrastructure is “an old boy’s network” where “racism runs deep” and threatens to reinforce historic patterns of systemic racial inequities.

The intersections of these various considerations underscore the fact that no one cookie-cutter solution will solve these systemic challenges. At the same time, the diversity among local institutional capacity ecosystems also means there are multiple opportunities and dimensions along which progress can be made.

Regardless of where a community may be starting from in terms of its ecosystem of local institutional capacity, pursuing the following systemic improvements can help improve the ability of localities and non-governmental partners to better reach and help stabilize struggling households.

Recognize the Ongoing Need for Emergency Rental Assistance and the Infrastructure to Deliver It

Across the range of communities represented by interviewees, respondents voiced their concerns about the ongoing level of need they continue to see, especially as housing costs have climbed and many communities face underlying shortfalls in the supply of rental housing. An ERAP administrator in a rural area said, “So the person who was paying $850 and couldn’t afford that is now paying $1,000. They cannot afford purchasing groceries, they cannot afford putting gas in vehicles…People are getting back to work. I mean, they really are. Their expenses are outpacing what they’re bringing home.” These same concerns were voiced by a staffer in a large city: “I just think that the economics haven’t recovered in a meaningful way here. The jobs that are available just don’t pay what people were being paid…And the rent keeps going up substantially.”

While the need for eviction-prevention assistance remains high in many communities, without federal action to provide some level of funding for emergency rental assistance beyond ERAP, the capacity expansions achieved during the pandemic are likely to significantly atrophy and the eviction crisis largely averted by federal emergency responses may yet materialize. By creating sustained funding for emergency rental assistance and/or making more funding available as non-competitive formula based funding, the federal government could help stave off that eviction wave. Federal funding could also help make significant strides in preserving the infrastructure and capacity gains achieved during the pandemic so that, when the next crisis comes, the response can be swifter because localities will not first be tasked with rebuilding what was lost in the interim.

Create More Flexibility and Less Administrative Burden in Non-Emergency Funding

Extending greater flexibility to existing federal and state programs and funding sources could provide the space and capacity to tailor services to meet the needs of a given community and adapt as those needs may shift, whether due to economic crises or longer-term structural change. As one nonprofit leader noted, “The ability to respond to one’s community is first and foremost, and no two communities are the same…So that flexibility is really needed along with accountability.” Added flexibility could come in different forms, such as allowing a wider array of uses or applications of existing funding streams, paired with accountability metrics to ensure grantees are using the funds to the benefit of low-income households and communities. But government programs could also advance flexibility and responsiveness by reducing administrative burdens and/or aligning regulations and reporting requirements in ways that allow recipients to more easily braid government funding sources with more flexible philanthropic or other charitable contributions.

Interviewees from high-capacity nonprofit organizations noted that they were already finding their own ways to weave disparate federal funding streams and other resources together to create more responsive, integrated service models. However, the complexity involved in that level of coordination requires a great deal of internal administrative expertise and capacity. One nonprofit leader described how their organization approached program coordination and integration by creating a universal application that would allow them to take a more holistic approach to service provision: "Thirty-five sources of revenue come into our organization. They all have to work together…We started that before the pandemic. We went through every single grant, every requirement, and made sure that our universal application basically was accepted by all of the funders." That process allowed for a more seamless and integrated intake process for this provider and their clients, and made it easier for the provider to blend services and programs for clients that qualified for multiple supports. However, putting the onus on providers or local administrators to navigate the complexities of a fragmented funding landscape—rather than federal agencies findings ways to reduce fragmentation, allow more flexibility, or facilitate braiding across programs—means that less-resourced, capacity-constrained communities are less equipped to create the responsive and integrated service infrastructure their higher-capacity counterparts are able to build.

While increasing flexibility and/or reducing administrative burden and complexity is something all levels and types of funders could support, federal agencies hold particular sway given the scale of their funding programs. For instance, finding ways to create greater flexibility within HUD funding streams would not only help aid capacity building and responsiveness to changing needs but it could also position those systems for rapid emergency responses in the future.

One nonprofit leader said they would ask funders to look at nonprofits "just like any other business, and allow them to use innovation, creativity, and funding…to deliver high-quality services. I would say take the handcuffs off a little bit and trust the subject matter experts to do what they do every single day in a really good way." High-capacity localities and organizations are particularly well-positioned to directly take advantage of that kind of flexibility to innovate and improve their programming responsiveness, but by the same token, increased flexibility and easier braiding of funds could also benefit smaller and less-resourced communities that are more likely to depend on intermediaries for their aid deployment. Accountability considerations provided alongside increased flexibility could include expectations that intermediaries are using their enhanced responsiveness and deployment capacity to ensure they are tailoring their outreach to the range of needs in the smaller localities they serve.

Finally, the goals of increasing flexibility and reducing administrative burden can run counter to each other depending on how accountability metrics are implemented. In order to maximize the benefits for grantees and the people they serve, These types of reforms should be pursued in a holistic, cross-program overhaul, rather than one funding stream at a time. While program-by-program change could still yield improvements, a piecemeal approach would be less likely to account for the cumulative impact of program requirements and their related accountability metrics on grantees administering multiple programs.

Build Capacity Along the Continuum Through Administrative Support and Technical Assistance

Insufficient administrative funding was cited by multiple interviewees as a challenge that extends beyond emergency assistance. A rural provider noted the ongoing need "to have some increased funds for administration. Because so often you get these grants, and they don't allow you to have admin. They want us to provide all these services, but they don't give us money to pay the people to provide the services." That dearth of administrative funding means that this provider taps "other grants like [the Community Services Block Grant] to pay for the people. That CSBG money is meant to fill the gaps within our programming. And we're taking it to pay people, which is all well and good. But then our programming suffers. It would be really nice to... continue to expand our programming and have it staffed appropriately."

Another interviewee pointed to the winnowing of administrative funding over time, noting that "CDBG—a program from the 70s—offers 20 percent admin. But you look at HOME from the 90s and it gives 10 percent admin." The interviewee added that funding for Continuums of Care, which was authorized after HOME, "gives 5 percent admin." The interviewee observed, "It's like the entire infrastructure of money going out the door is saying 'You're supposed to do more with less.' But you're doing more with less so many times that at this point you're expected to do everything with nothing."

A staffer from a large urban county made a similar observation about both their nonprofit partners and their own internal capacity to administer programs: "Oftentimes, when we look to nonprofit organizations to step in and do new work, people don't recognize all of the other activity that's necessary to actually move something forward." They added, "You want us to do this program we've never done. But you've only given us money for passthrough. How am I going to pay for my finance staff and [monitoring] and my outreach engagement? Because they're all going to be part of the execution of this grant, but you gave the department no money.'" Another city staffer noted that administrative resources "that are specifically geared towards local governments being able to increase their capacity" are especially important "in markets that are seeing a deep decrease in general funds.'"[8]

Multiple interviewees also pointed to the "chicken-egg" challenge that competing for sufficient grant support to be able to fund permanent staff and programming requires dedicated staff time and expertise to apply for that funding in the first place. One rural county staffer reflected on the fact that they were the first dedicated staff working on housing issues after years without anyone filling that role (although housing is only one of their responsibilities: they are also responsible for transportation and community engagement). That staffer shared, "As capacity shrank within the county, [along with] the ability to administer and apply for those grants, so did the work. And so it just evaporated, because you had to ask for the funding to support the positions. And then when it became onerous....it wasn't a priority anymore. And so, the work just stopped." It was only after a local nonprofit published a report highlighting the extent of the housing and transportation needs in the county that a new state funding source was identified to enable the county to replace lost staff capacity.

In some cases, particularly for high-capacity localities and organizations, adequate administrative funding and flexibility could spur capacity gains and system improvements. For less-resourced, mid-sized or smaller communities and organizations, additional targeted support and technical assistance would help reduce administrative burdens and seed capacity gains. For instance, applying for competitive grants can be a costly undertaking and those costs can be hard (or impossible) to bear if the bid for funding fails. Technical assistance from federal and state agencies can help less-resourced localities navigate the application process, as could support for intermediaries that could assist resource development efforts in localities that lack the wherewithal to bring those functions in-house. At the same time, it is also important to recognize that not all localities can or should take on all these service delivery functions themselves, nor would it be an efficient or effective use of resources to have them do so. For those communities, particularly those that are structurally vulnerable and/or grappling with persistent poverty, having access to broader networks or cross-jurisdictional entities which can provide "boots on the ground" capacity can ensure their residents are adequately connected to critical support services.

"Our dream as a community is to turn everyone into one-stop shops....I would love to have a resource, a person that I can hire that [that] is their job. In the meantime, we're all just... learning as much as we can. It has to start somewhere."

Leverage Regional and Collaborative Solutions

In times of crisis, including the foreclosure crisis and the pandemic, the frequency with which communities turn to cross-jurisdictional and institutional partnerships to deploy assistance underscores the important role those types of collaborations play in expanding capacity and the ability to reach particularly vulnerable populations and communities. But those collaborative models themselves require dedicated support and infrastructure development, related to but distinct from the administrative support any individual grantee may require to administer a particular funding stream. One nonprofit partner noted: "We're a rural community, and we spread our resources and we go where we're needed" including across town and county boundaries, not "just where we're planted. Because that's how you have to do things in rural communities, you pool your resources together." They want to continue the collaborative housing initiative that evolved in their community during the pandemic, but maintaining and building on that infrastructure requires dedicated staff time and resources: "Our dream as a community is to turn everyone into one-stop shops to where, if they sat down in my office, I would know what programs were available [from other providers], and I would know what their income guidelines are…I would love to have a resource, a person that I can hire that [that] is their job. In the meantime, we're all just…learning as much as we can. It has to start somewhere."

One large county staffer reflected on their efforts to bridge capacity gaps in their local nonprofit infrastructure. The staffer said that they "don't have a nonprofit or CDC landscape in the unincorporated areas we are targeted to serve." Their local nonprofits "tend to be city-centric, and we're trying to figure out how we can expand some of their capacity to move or do some more work in the outer reaches of the county, or grow some of those smaller nonprofits in the county." In doing so, they are paying particular attention to the capacity and infrastructure needed to make that expansion possible. The staffer said that the county staff are asking themselves, "How can we invest in improving [the nonprofit's] financial infrastructure and technological infrastructure? Because those are going to be essential for them to be able to turn around invoices and have a financial system that's going to allow us to ensure that the funds that they're expending are appropriate." The staffer also noted that "there's an expectation that there's financial capacity, [that] there are some reserves that are going to be accessible for projects on the nonprofit side. And that's oftentimes, even for larger organizations, not the case." As a result, the county is exploring "creating this reimbursable fund at the county so certain entities can tap into that and have that working capital that they would need to start a project."

These coordinated cross-jurisdictional, peer-to-peer collaborations and intentional efforts to seed and expand nonprofit infrastructure speak to the need to look beyond individual program administration in capacity-building efforts and to intentionally target and support the development of the systems-level interactions and infrastructure required to effectively improve service delivery and extend its reach to underserved communities. Those efforts could be bolstered by philanthropy, entities that are well-positioned to help seed collaborations and the supportive infrastructure required to operate them, as well as by explicit incentives or funding support from federal programs to help sustain these efforts longer term.

Take Advantage of Existing Networks and Infrastructure

In assessing where to begin in addressing capacity challenges within such a fragmented programmatic, jurisdictional, and institutional landscape, it can be tempting to create something new to avoid the sticking points inherent in the existing infrastructure. Yet often that approach creates an additional layer in an already patchwork system that adds to complexity rather than reduces it.

While the experience of rolling out ERA illustrated the unevenness of existing infrastructure, it also underscored the range of assets that do exist in many different communities that were able to step in and partner, including United Ways, Community Action Agencies, PHAs Continuums of Care, and similar organizations. These kinds of institutions may not be everywhere or equally positioned where they do exist. However, targeting capacity-building resources and technical expertise to the network infrastructure that supports organizations like these can provide one avenue through which to bring lower-capacity members along and close some of the capacity gaps and variability across these institutions.

These kinds of entities and intermediaries can be particularly important in less populous, capacity-constrained communities, including many rural areas, that could benefit from collaborative strategies that take advantage of the back-office operations of larger partners rather than trying to develop that staffing and expertise locally. As one interviewee noted, "A strength that rural communities bring is that they have a strong collaborative muscle." The interviewee added, "Enabling them to be part of a larger system" by offering more pathways or opportunities for smaller, capacity-constrained jurisdictions to benefit from the

Box 4: Taking Action to Advance Local Institutional Capacity Building Longer-Term

Programmatic, jurisdictional, and institutional fragmentation characterize the nation's patchy and uneven service-delivery infrastructure. This fragmentation complicates efforts to meet communities where they are, bridge capacity gaps, and advance their ability to serve vulnerable households.

There is no cookie cutter solution to building capacity and no one entity responsible for advancing systemic changes. But there are steps key stakeholders can take to implement flexible solutions that can support capacity building across a range of community types.

Government Agencies and Funding Sources: While government funding is typically built to be risk averse, taking steps to **increase flexibility** and **reduce frictions** across funding sources to the extent possible can help create a service delivery infrastructure that is more responsive to changing local needs. Allocating more **dedicated administrative support** is also essential for building capacity, in addition to providing **technical assistance** and support (e.g., off-the-shelf products and assistance navigating applications) tailored to the differing capacity needs of grantees.

Philanthropic and Private Sector Partners: While philanthropic or charitable funding is unlikely to be the source of significant long-term operating or program support, this type of funding can be blended in critical ways to help communities fill in gaps and **extend flexibility** as they braid and bridge more restrictive sources of funding. This type of funding can also **build critical infrastructure** that can support institutional and jurisdictional collaboratives as well as **scale up technological solutions** and platforms (e.g., online access and backend data tracking) that can extend capacity to hard-to-reach communities. Private funding can also **seed innovations** and provide proof of concept for local/regional pilots that could lead to larger systemic reforms.

National Networks/Membership Organizations/Technical Assistance Providers: These partners and network structures can play an important role **providing tailored technical support** and skill building along the capacity continuum and help peers learn from one another. These entities also have insights into what successes their members are finding and the challenges they are facing, which make them an important **part of the feedback loop** between local providers and government administrators.

infrastructure of larger entities would help overcome their individual constraints.

The pandemic response also highlighted the role national networks, membership organizations, and other intermediaries play in providing forums for knowledge sharing and skill building across a range of community types and institutional capacity levels. One interviewee noted how important those kinds of channels can be for providing technical assistance and sharing best practices, especially for smaller and more capacity-constrained localities: "With smaller, mid-sized cities, there isn't that subject matter expertise in your elected officials...Intermediaries come in, they're able to say, 'Okay, look at these best practices across the country. Look at what people are doing [in these] spaces. Here's how we've seen communities of your size [responding].'" The interviewee added, "Is that all it takes? No. There's definitely a lot on the front end on the local side. But I think the intermediaries help build the framework of 'This is what is possible. This is what's holding you back from getting there'. And when the resources and opportunities become available, you have the option to align and move in that direction."

Interviewees also noted that while these networks and forums can be important sources of information sharing, they tend to work best when the scale of the forum is well targeted to the purpose. For instance, larger group convenings can play a role when providing top-down information sharing, but multiple interviewees noted that, for the ERA program rollout, the most effective forums in which they participated were smaller venues that brought together similar peers and facilitated more substantive peer exchange. Intermediaries that helped convene these regular sessions with their members also played a role in the feedback loop between government officials and program administrators, helping to lift up insights from their members while helping their members to navigate and understand shifting federal guidance. Those insights could inform broader efforts and investments in capacity building across ongoing programs that might benefit from leveraging these communication channels and structures.

Simply scaling up the information sharing and training made available through these kinds of networks and membership organizations will, however, only go so far if the local staff meant to be on the receiving end of these resources do not have the time or support to take advantage of them. One elected official noted the value they've gleaned from being connected with their counterparts through a leadership network being convened by a national intermediary with philanthropic support. They noted that "I've never been part of a thing where everything gets paid for." Instead, over the years they've used their limited salary as a local elected official to pay for any conferences or learning opportunities. However, with the leadership network they are now participating in, "This is totally reimbursed....And they've provided a lot of good technical support. So, I've tried to bring back things for other staff people and share things with my county board. But if I wasn't actively involved, we wouldn't be getting that much information."

Conclusion

The reflections of local jurisdictions, nonprofit organizations, and intermediaries captured in this analysis hold a number of important takeaways from the rollout of ERAP for policymakers, funders, and practitioners. On one hand, their experiences illustrate the extent to which an infusion of flexible resources can work to rapidly build and extend local institutional capacity in a range of different kinds of communities across the country. But they also surface tangible takeaways that could improve future emergency response efforts by pairing flexible emergency funding with clear guidance and guardrails from the start, active and responsive channels of communication, adequate administrative and capacity-building support, and off-the-shelf products to increase the speed of implementation.

Many of these same lessons apply well beyond the confines of the time-limited emergency response to the pandemic, although the complexity of implementing them only deepens when considering the fragmentation of the existing, ongoing system for delivering aid to households and communities in need. Making the kinds of systemic reforms necessary to bridge capacity gaps and improve service delivery longer-term—especially to structurally vulnerable and hard-to-reach populations—is essential both to ensure an equitable recovery from this current crisis and to create more resiliency before the next crisis hits.

Many interviewees voiced their concern that the time-limited pandemic response which has helped shield so many households from housing instability and eviction may have only been a reprieve in the face of an underlying housing crisis, which has only worsened as cost increases have mounted. As the nation shifts away from pandemic crisis response, the need for more durable forms of assistance and the expanded capacity to help vulnerable households remains pressing. As one provider reflected, “It’s a reminder of what we experienced way back during the [foreclosure] crisis. I think that we’ve been so caught up in ensuring that people are able to remain in place and to be able to stabilize, that we haven’t even picked up our heads yet to see what the future holds for many of those who are still struggling.... We may be in a worse situation than we were initially.” A county staffer echoed those sentiments, noting that program administrators “can’t look beyond today because today is just so crucial in what they need to focus on.” But to shift the needle for vulnerable households longer term, “It really is essential to say, ‘What are the expectations of some of the work that we’re doing now to change the trajectory of the lives that we’re touching?’” Taking lessons from the ERA program will not only set up service providers, policymakers, and other partners to improve future emergency response, but also lay the groundwork for advancing the deeper systems change that is needed to close long-standing gaps in the way aid is delivered to vulnerable households and communities.

ENDNOTES

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3. For more details on the design of and differences between ERA 1 and ERA 2, see: https://nlihc.org/sites/default/files/FAQs_Emergency-Rental-Assistance.pdf.

4. Interviews for this research took place between January 28, 2022 and September 7, 2022.

5. Community Action Agencies are local public and private nonprofit organizations created to implement the Community Action Program, which was enacted as part of the 1964 Economic Opportunity Act during President Lyndon B. Johnson's War on Poverty. See, e.g., https://communityactionpartnership.com/about-us/.

6. See: https://nlihc.org/sites/default/files/FAQs_Emergency-Rental-Assistance.pdf.

7. There is some precedent for this kind of approach. The Community Development Block Grant-Disaster Recovery funds, and the fact sheets and toolkits it provides when a jurisdiction receives an allocation of CDBG-DR funding, provide one model and opportunity for assessing what works and what might be adapted or improved for other emergency funding streams. See, e.g., https://files.hudexchange.info/resources/documents/Key-Things-to-Do-When-You-Receive-CDBG-DR-Funds.pdf.

8. Different initiatives have emerged over time to address these kinds of local capacity constraints. The Partnership for Equitable and Resilient Communities, launched by HUD in partnership with the Melville Charitable Trust, is one recent example of efforts to address local capacity constraints and the challenges associated with navigating the fragmented funding landscape. It is doing so in part by placing interagency teams in a select number of pilot cities to help coordinate and target technical assistance, foster partnerships, and leverage waivers where possible. Past efforts, like the Strong Cities, Strong Communities initiative likewise embedded staff in select localities to help navigate disparate funding opportunities and created technical assistance and peer learning networks and opportunities. These types of initiatives offer an opportunity to identify common barriers and responses that can effectively overcome them. The challenge remains how to scale those insights and solutions to help advance capacity building across the continuum of communities grappling with these challenges.

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