

Administrative Burdens in Emergency Rental Assistance Programs



CLAUDIA AIKEN^{ORCID}, INGRID GOULD ELLEN^{ORCID}, AND VINCENT REINA

Since the onset of the COVID-19 pandemic, localities across the United States have been given unprecedented short-term rental assistance funding and considerable flexibility in its distribution. The emergency nature of these programs suggests that the administrative burden placed on participants should be lower than in typical rental assistance programs such as the housing choice voucher program. Yet there are several features unique to housing, such as the double take-up challenge of engaging both tenants and landlords, that persist. This article draws on national surveys of more than two hundred emergency rental assistance programs, surveys of thousands of tenant and landlord applicants, and interviews with ten program administrators to investigate the degree and sources of administrative burdens in these programs.

Keywords: emergency rental assistance, administrative burden

Researchers from multiple disciplines have highlighted how administrative burdens can limit citizens' access to services and benefits, even when they are eligible (Currie 2004; Peeters 2020; Schwabish 2012). As a result of these burdens, take-up rates for entitlement programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Medicaid, are well below 100 percent (Herd and Moynihan 2018). In 2017, for example, 82 percent of the

eligible population received SNAP (Cunnyngham 2020). Further, some research suggests that these burdens tend to fall most heavily on those with the fewest resources (Cherlin et al. 2002). Although we do not know the share of eligible households that apply for federal rental assistance, the latest national study found that among those who successfully apply and receive housing choice vouchers, 61 percent are able to use them within 180 days (Ellen,

Claudia Aiken director of new research partnerships at the New York University Furman Center for Real Estate and Urban Policy and Housing Solutions Lab, United States. **Ingrid Gould Ellen** is Paulette Goddard Professor of Urban Policy and Planning at New York University and faculty director of the Furman Center for Real Estate and Urban Policy, United States. **Vincent Reina** is associate professor of City and Regional Planning at the University of Pennsylvania and faculty director of the Housing Initiative at Penn, United States.

© 2023 Russell Sage Foundation. Aiken, Claudia, Ingrid Gould Ellen, and Vincent Reina. 2023. "Administrative Burdens in Emergency Rental Assistance Programs." *RSF: The Russell Sage Foundation Journal of the Social Sciences* 9(5): 100–121. DOI: 10.7758/RSF.2023.9.5.05. Vincent Reina's contribution to this article occurred before he took on his position as the senior policy advisor for housing and urban policy in the White House Domestic Policy Council and reflects his personal views only. The authors acknowledge Isabel Harner and Jackie Bein, who provided research assistance. Direct correspondence to: Claudia Aiken, at claudia.aiken@nyu.edu, NYU Furman Center, Wilf Hall, 139 MacDougal St., 2nd Floor, New York, NY 10012, United States.

Open Access Policy: *RSF: The Russell Sage Foundation Journal of the Social Sciences* is an open access journal. This article is published under a Creative Commons Attribution-NonCommercial-NoDerivs 3.0 Unported License.

O'Regan, and Stochak 2023). Yet surprisingly little literature focuses on the administrative burdens within housing programs.

It is arguably even more concerning when administrative barriers limit access to critical public services in the face of emergencies. We study the emergency rental assistance (ERA) funds authorized by a pair of COVID relief bills in 2020 and early 2021. In this case, the federal government provided an unprecedented amount of short-term, emergency support to help the millions of renters facing pandemic-related income losses to pay back rent to their landlords and thus stay in their homes. State and local administrators faced enormous pressure to get money out the door quickly and into the hands of tenants. Despite this pressure, and the evident need, the administrative burdens were formidable in many places, and the funds flowed slowly. Although some of the burdens in ERA programs are similar to those in other social programs, others reflect the unique nature of housing assistance.

Understanding the administrative barriers that hampered the flow of ERA funds can help inform policymakers crafting such emergency assistance in the future. This article's critical analysis is relevant for both emergency and more permanent housing assistance programs. Finally, the variation in ERA implementation is considerable across some 450 distinct state and local programs. As a result, some jurisdictions may have been able to implement program innovations that reduced administrative burdens for renters, and others may have adopted program structures that resulted in greater burdens. This variation also provides important insight into administrative burdens in other federal programs that allow considerable operational flexibility at the local level.

This article has several objectives. First, we develop a framework for understanding administrative burdens in the context of rental housing assistance programs. We highlight the fact that unlike other social programs, rental assistance programs typically require double take-up. Tenants must not only successfully apply, but their landlords must also agree to participate and comply with program requirements, which heightens administrative barriers.

We then examine and describe the adminis-

trative burdens associated with ERA programs across the country, drawing on surveys of program administrators, landlords, and tenants as well as structured interviews with program administrators of ten state or local programs: California, North Carolina, Minnesota, Atlanta, Boston, Chicago, Los Angeles, Philadelphia, Portland, and San Antonio.

Third, we explore the roots of these requirements. We analyze what administrators reported about their motives for imposing and relaxing requirements, if they did. Some researchers view administrative burdens as strategies to reduce demand for services (Lipsky 1984; Herd and Moynihan 2018). Others depict them as "red tape" that results from administrative carelessness or inattention (Bozeman 2000). Still others view them as a way to reduce overpayment and fraud (Brodin 1987; Hanratty 2006). We argue that in the case of emergency rental assistance, these burdens seem to be more a function of concern about potential federal audits and the need to collect data for reporting to a higher level of government, combined with limited data infrastructure and capacity to design and implement what were typically new and significantly expanded programs. Some of these findings are specific to emergency assistance, but they also reflect the need for policymakers to assess and address administrative burdens that exist in long-standing housing programs.

ADMINISTRATIVE BURDENS IN RENTAL HOUSING PROGRAMS

Pamela Herd and Donald Moynihan (2018) usefully identify three distinct types of administrative burdens: learning costs (hurdles to learning about a program or service and how to apply for it), compliance costs (costs of providing documentation to demonstrate eligibility and complying with other rules and requirements), and psychological costs (the stigma and emotional stresses that come from applying for social support).

Administrative burdens limit the degree to which eligible people actually receive the assistance they need. Some burden may be inevitable to limit fraud, ensure that only eligible applicants receive assistance, and prioritize assistance to those most in need. The impacts

of these burdens are not felt evenly, however. Albert Nichols and Richard Zeckhauser (1982) posit that only the neediest will be willing to tolerate the hassles of applying, but empirical work suggests that people with fewer resources and less human capital are least able to negotiate burdens. Burdens thus tend to weed out poor households, immigrants, and households of color more than other eligible households (Aizer 2003; Herd and Moynihan 2018).

Administrative burdens in rental housing assistance programs have been understudied, yet the administrative burdens surrounding housing assistance programs are likely to be more significant in many ways than those associated with the other social programs that have been more studied, such as Temporary Assistance for Needy Families and SNAP.

The main form of rental assistance in the United States is the housing choice voucher program, which provides assistance to approximately 2.3 million households (Center for Budget and Policy Priorities 2021), 70 percent of which are households of color (Reina, Aiken, and Epstein 2021). Unlike most other federal rental assistance programs, the subsidy is not tied to specific housing units; instead, voucher holders use the subsidy to help defray the cost of renting homes on the private market. Voucher recipients generally pay 30 percent of their income toward rent and the local housing authority pays the balance up to a specified local payment standard. States and localities can also use their federal HOME grants to support tenant-based rental assistance. Research shows that tenant-based rental subsidies reduce the rent burdens of low-income households, allow them to live in less crowded homes, help them to avoid homelessness, and improve children's performance in school (Mills et al. 2006; Schwartz et al. 2019). Administrative burdens, though, limit their promise.

Households applying for rental assistance programs confront learning costs, compliance costs, and psychological costs. In terms of learning costs, many eligible renters may not even know about rental assistance. They must find out from neighbors, friends, nonprofit service agencies, or case workers about the availability of assistance and then figure out where and how to apply for it. The shortage of rental

assistance is well documented: only one household of every eligible five receives it (Reina, Aiken, and Epstein 2021). As a result, wait lists for Section 8 vouchers are quite long in many jurisdictions, and some housing authorities only open their wait lists to new applicants for short periods. When the County of Los Angeles opened its voucher wait list for the first time in more than a decade in 2017, households were given only two weeks to learn about the opportunity and submit an application (HACLA 2017).

Once a household does apply, it faces significant compliance costs in completing applications and producing the necessary documents. Applicants must provide documentation to demonstrate their eligibility for the program, including proof of citizenship or immigration status, family income, assets, expenses, and family composition (which involves producing birth certificates of each child in the household). Housing authorities use this information to determine eligibility, the size of the home applicants can rent, and the amount of housing assistance they can receive. If an applicant secures a spot on the wait list (in Los Angeles, only twenty thousand of the 170,000 applicants who applied in 2017 were selected for a spot before the wait list closed once more), to stay on it they must continually report changes in address and contact information to the housing authority. Given the high level of housing instability of low-income households, such policies disadvantage the most vulnerable applicants (Kim 2020). Finally, if a household actually receives and uses a voucher, they must agree to meet with housing authority officials on an ongoing basis to recertify their income to demonstrate that they are still eligible and, when incomes change, to reset their subsidy level.

Households applying for rental assistance are also likely to experience psychological costs. First, considerable social stigma is attached to low-income rental assistance and its recipients. Many consider it a handout. Many landlords distrust and avoid tenants with vouchers, viewing them as more likely to be late on their portion of rent, damage properties, or be disruptive to neighbors (Garboden et al. 2018). Philip Garboden and his colleagues

(2018) find that between 21 and 45 percent of surveyed landlords viewed voucher holders as “worse” tenants than others. Households may resist applying for rental assistance to avoid such negative treatment. Interactions with the housing authority may also raise broader concerns about the way the government will use their data, often a significant concern for immigrant households (Aiken and Reina 2021). Last is the long wait and uncertainty in many areas about whether and when households will actually receive a voucher. In many places, wait lists are so long that applicants wait years to receive their voucher. To our knowledge, no studies on the psychological toll exacted by this burdensome process have been undertaken.

These administrative costs are not dissimilar from those of other social programs, though the wait and uncertainty surrounding vouchers is far greater. Further, unlike in many other social programs, a second stage of take-up involves households successfully using their vouchers. It begins when a voucher is received. The household then has a limited time to find a unit that both meets the program’s quality standards and entails a rent that the local housing authority deems reasonable given the local market. Many are unsuccessful. The latest evidence suggests that only six of every ten households that received a voucher in 2019 managed to rent a unit within 180 days, and the search duration was especially long in tight housing markets (Ellen, O’Regan, and Strochak 2021). Other studies show voucher take-up to be still lower among vulnerable subgroups, including unemployed, people with criminal histories, older adults and Black households (Chyn, Hyman, and Kapustin 2019; Reina and Winter 2018).

The challenge of actually using a voucher after receiving it can be considered a fourth type of administrative burden, which Carolyn Barnes (2021) calls the cost of redeeming assistance. She focuses on the hurdles that recipients of SNAP and WIC (Special Supplemental Nutrition Program for Women, Infants, and Children) face in using their benefits, but rental assistance recipients also face significant redemption hurdles because they bear the time and transaction costs not only of applying for assistance but also of searching across multiple units until an owner accepts the assis-

tance contract. Landlords must agree to house tenants with vouchers for an ongoing period (typically at least one year), face significant administrative hurdles in getting housing authority approval to rent their unit to voucher holders, and must agree to annual inspections on an ongoing basis. If rental assistance recipients are unsuccessful in finding a willing landlord, they lose access to the subsidy.

Another way to frame this fourth leg of administrative burden is that rental assistance programs require double take-up, that is, the participation of both tenants and landlords. Many landlords resist housing tenants with vouchers because of some combination of social biases about voucher holders, low rent subsidies relative to the market, lack of familiarity and administrative burdens (Cunningham et al. 2018; Garboden et al. 2018; Rosen 2020). Mary Cunningham and her colleagues (2018) describe how landlords reference administrative burdens in refusing to accept vouchers, for example saying, “Section 8 is too much work,” or that vouchers give them “a headache.” Other research points specifically to the voucher program’s annual housing inspection requirements as a barrier to participation. More than half of the landlords Garboden and his colleagues (2018) surveyed in Cleveland and Baltimore described annual housing quality inspections as “burdensome and costly.” Nearly half reported that interactions with their local housing authority were a “negative factor” in affecting their decision about whether to agree to house voucher holders.

Beyond the rental assistance programs themselves, some landlords may also worry about the ongoing costs associated with engaging with the government. Accepting tenants with vouchers may require landlords to register their properties with their city as formal rentals, which could invite additional scrutiny and taxes. It is also possible that landlords wish to avoid the stigma or market signal of serving voucher holders, worrying that it may dampen demand for their properties over the longer term.

Further, on the landlord side, compliance costs mean that it is often only worthwhile for landlords in high-poverty neighborhoods, who cannot attract market tenants able to reliably

pay “fair market rent,” to participate (Garboden et al. 2018). As a result, the voucher program tends to exclude voucher holders from low-poverty neighborhoods that may have more amenities, such as high-performing schools (Varady 2010).

Housing authorities typically face little pressure to alleviate these burdens. Because the demand for vouchers so vastly exceeds the available assistance, housing authorities do not need to worry that relatively few households apply or are able to use a voucher; another household is always willing to try (Moore 2016). Stefanie DeLuca, Lawrence Katz, and Sarah Oppenheimer (2023, this issue) show that in the rare cases when housing authorities do take meaningful action to reduce administrative burden, they can significantly improve outcomes, with respect to not only take-up but also location and emotional well-being.

Double take-up barriers are particularly troubling in the case of short-term, emergency rental assistance programs, such as the recent ERA initiatives enacted during the COVID-19 pandemic, when the need for housing support is urgent. Emergency rental assistance is meant to help renters remain in their current homes, not seek new ones. This alters the stakes for applicants; if landlords are granted the ability to opt out of the program, the consequence for participating households is not prolonging their housing search or even losing their opportunity to use the subsidy, but potentially losing their home in the midst of a pandemic.

Despite this, the administrative burdens surrounding emergency programs may be even greater than those associated with conventional rental assistance programs, at least in some respects. Specifically, during broad-based emergencies, learning costs may be higher because emergency programs are often new initiatives and many of the normal channels of outreach may be unavailable. Compliance costs can also be higher when people are experiencing emergencies because it is more difficult for them to produce required documents. Ethan Raker and Tyler Woods (2023, this issue) find, in the case of Federal Emergency Management Agency aid to Louisianans in the wake of Hurricane Katrina, that the compliance costs of gathering documentation were exacerbated by

the “rushed and chaotic conditions” of the disaster. Further, the delay and denial of aid in the context of a disaster resulted in acute psychological distress.

On the other hand, landlords presumably have less incentive to opt out of emergency rental assistance to cover back rent for tenants they have already agreed to house, especially under state and local moratoria prohibiting evictions. Further, because of the urgency of the need, the greater public attention, and the greater pressure to get funds out the door (see, for instance, DeParle 2021 and Zaveri 2021), program administrators or legislators may relax some of the standard application requirements. Finally, arguably less stigma is attached to emergency rental programs enacted during broad-based crises because recipients may be viewed as more deserving, though Jessica Lasky-Fink and Elizabeth Linos (2022) show that stigma is a significant barrier to take-up even in the case of emergency rental assistance.

SUMMARY OF THE ERA PROGRAM

In March 2020, the discovery that the COVID-19 virus had entered the phase of *community spread* resulted in shuttered businesses and schools, leaving millions of American households without the income they needed to pay rent. To alleviate this economic hardship and help people stay in their homes, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which included two funding streams for emergency rental assistance: \$150 billion in Coronavirus Relief Funds (CRF) administered by the U.S. Treasury and \$5 billion in Community Development Block Grants (CDBG-CV) overseen by the U.S. Department of Housing and Urban Development (HUD). These funds were distributed among states and localities according to a combination of traditional allocation formulas and COVID-19 infection rates, and the recipient jurisdictions were given considerable latitude to apply the funds in the way they thought best. Many chose to create emergency rental assistance programs. The National Low Income Housing Coalition had identified 438 such programs, sixty-eight state and 370 local, as of October 2020 (Yae et al. 2020).

Emergency rental assistance has some clear similarities to the voucher program, not surprisingly, given that HUD created the guidelines governing CARES Act funding for emergency rental assistance and thus informed the initial design of many ERA programs. Interviews with ERA program administrators also found that some had modeled their intake processes on those of their local voucher program (Aiken et al. 2021). But variation in design was notable across ERA programs, especially in the first wave. Although some jurisdictions used the funds to expand existing rental assistance efforts, a survey of 220 first-wave programs found that the majority (72 percent) were new, and that most (80 percent) had launched within four months of the CARES Act (Reina, Aiken, Verbrugge, Ellen, et al. 2021). The programs often combined multiple funding streams, including CDBG-CV and CRF dollars as well as local and philanthropic sources. As the pandemic wore on, however, it became clear that the initial infusion of funds fell far short of renters' needs. In late December 2020, Congress appropriated \$25 billion for the Emergency Rental Assistance Program, which would flow to states and localities exclusively through the Treasury Department. The statute governing these ERA1 funds was more restrictive, setting parameters for which households could be eligible for assistance and how many months of assistance could be provided per household, and requiring that administrators seek the cooperation of landlords to accept payments on their tenants' behalf. In the following months, Treasury issued five iterations of guidance to help jurisdictions comply with the ERA1 statute, each time offering a more relaxed interpretation of the requirements. Finally, in March 2021, the American Rescue Plan Act provided an additional \$21.55 billion in ERA2 funds with considerably more flexibility (Reina, Aiken, Verbrugge, Harner, et al. 2021).

According to Treasury Department data, the program ultimately succeeded in reaching many vulnerable renters. During 2021, the program made 3.8 million payments to renters across the country, 80 percent of whom earned less than half of their local area median income. As for race, 59 percent of recipients were Black or Hispanic, slightly below the share for

housing choice voucher holders. It is impossible to precisely benchmark these percentages to underlying need. The Office of Evaluation Sciences (2022), however, finds that Black renters were overrepresented among ERA recipients, based on a comparison between the demographics of renters who received ERA and those of ERA-eligible renters, estimated with census data.

DATA

This article relies on four sets of original data: first, a series of national surveys of ERA program administrators; second, surveys of tens of thousands of tenants who applied for ERA programs in the City and County of Los Angeles and in California at large; third, surveys of landlords whose tenants applied for assistance in Los Angeles; and, last, a set of ten in-depth interviews with ERA program administrators. Together these data offer a unique opportunity to understand the administrative burdens of COVID-19 rental assistance programs for tenants and landlords.

The authors, in collaboration with the National Low Income Housing Coalition (NLIHC), conducted multiple surveys of ERA program administrators, capturing aspects of program design and implementation at different junctures over the course of the pandemic. The first survey wave, conducted from August through October 2020, included more than sixty questions and was emailed to state, municipal, and nonprofit agencies captured in NLIHC's database of ERA program administrators (NLIHC 2022). It collected a total of 220 responses, though some (26 percent) were partial. The respondents represented a broad variety of jurisdictions (twenty-two statewide programs, forty-eight regional programs, eighty county-level programs, and seventy city-level programs) in forty states. The second wave, in April 2021, collected sixty-four responses from among the 140 programs that NLIHC determined to have launched or relaunched their programs to distribute ERA1 funds by that time for a response rate of 46 percent. A third wave, in July 2021, explored how well programs had been able to distribute these funds and collected 105 responses (representing 21 percent of programs known to exist at the time). The first wave of

programs reflects the greatest program variation; subsequent program iterations were more uniform as a result of the December statute and Treasury guidance. Nevertheless, the multiple waves elucidate programmatic change and illuminate how evolving legislative requirements affected program design. The survey waves do not track the same set of programs over time; only six individual programs are represented across all three survey waves. Eighteen jurisdictions surveyed in the first wave were resurveyed in the second (8 percent), and thirty-three programs surveyed in the second wave were resurveyed in the third (52 percent). Yet each survey captured a relatively large and representative cross section of ERA programs at the time.

A second dataset comes from surveys of tens of thousands of tenants who applied to emergency rental assistance programs administered by the City of Los Angeles, the County of Los Angeles, and the State of California. Two of the authors emailed survey links in January 2021 to a subset of tenants who had applied for rental assistance in the City and County of Los Angeles during the previous year and gathered 16,127 and 9,154 unique responses, respectively, response rates of approximately 46 percent and 22 percent. In the case of the California statewide program, a survey link was embedded directly into the online application and collected 16,154 valid responses between the program launch in March 2021 and June of that year, a response rate of approximately 27 percent. Thus, the Los Angeles survey responses pertain to first-wave ERA programs that used CARES Act funds, and California survey responses pertain to a second-wave program created to disburse Treasury ERA1 funds. All tenants who completed a survey were entered into lotteries for \$50 gift cards. The questions varied among the three surveys, some asking directly about barriers to applying for rental assistance and others about the respondent's housing situation, citizenship status, internet access, and tenant-landlord relations, all of which can shed light on the administrative burdens tenants bear. Table 1 lays out our various surveys and response rates.

An important limitation of the tenant survey data is that they include only responses from

tenants who filled out an ERA application and were able to complete an online survey. They do not take into account the many tenants who may have been eligible for assistance but were unaware that it existed, were unable to access the application, or did not have an email address or consistent access to internet. Thus the findings are biased toward those who could overcome several initial administrative hurdles. Rates of survey participation by race and ethnicity were, however, largely representative of the applicant pools. In California, for instance, Black and Hispanic applicants participated at rates of 17 percent and 40 percent, respectively, relative to their application rates of 16 percent and 37 percent.

Although the tenant survey responses are all from Los Angeles and California, findings are likely to be generalizable to other ERA sites. First, at the time of the surveys, the three ERA programs in question used online applications supplemented by call centers and community-based outreach. According to program surveys, hundreds of ERA programs nationwide had a similar administrative infrastructure in both 2020 and 2021: as of the fall of 2020, 92 percent of ERA programs had online portals, 48 percent allowed applications by hotline, and 77 percent conducted outreach by community-based organizations; by the summer of 2021, these figures had risen to 100 percent, 49 percent, and 89 percent, respectively. Second, because many of the eligibility criteria for ERA programs were determined at the federal level, applicants in California are likely to be similar to applicants elsewhere in that they are primarily very and extremely low-income, have experienced COVID-19-related hardship, and are at risk of housing instability and homelessness. Finally, identical or nearly identical survey questions that the authors have conducted with ERA applicants in Philadelphia in other work have yielded similar results; for example, lack of internet access and lack of awareness about the program hotline were the top challenges among both Philadelphia and California applicants during the application process.

Two of the authors also emailed a survey to landlords whose tenants had applied for ERA from the City of Los Angeles. This survey had a much smaller sample size than the tenant

Table 1. Survey Samples and Response Rates

Survey	Observations	Response Rate
National Program Surveys		
August–October 2021	220	50%
April 2021	64	46%
July 2021	105	21%
Tenant Surveys		
City of Los Angeles (January 2021)	16,127	46%
Los Angeles County (January 2021)	9,154	22%
State of California (March–June 2021)	16,154	27%
Landlord Survey		
City of Los Angeles (December 2020)	1,283	1%

Source: Authors' calculations.

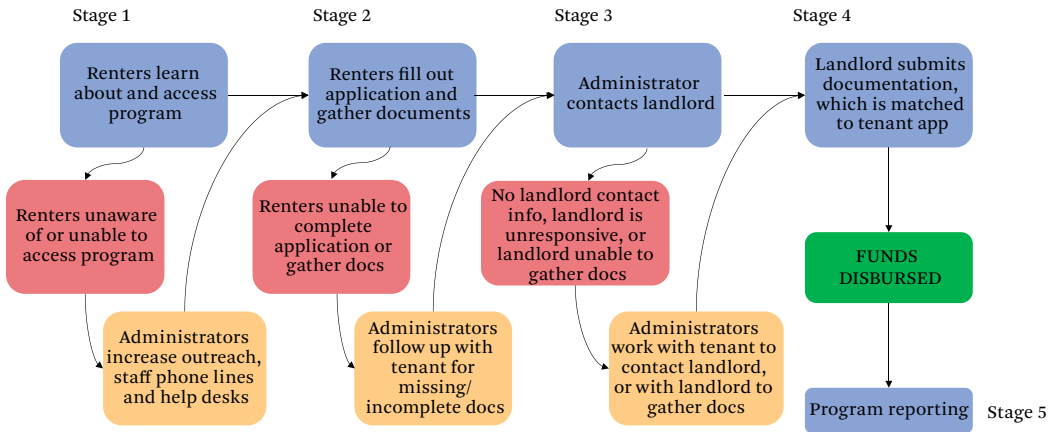
surveys, which is perhaps unsurprising, given that landlords had not initiated the application for assistance and therefore may have had less interest in the program and attempts to evaluate it, and that landlord contact information, which tenants provided, included many erroneous email addresses as well as corporate accounts which may not be regularly monitored, or are monitored by someone who may not have felt empowered to take the survey. The December 2020 survey of Los Angeles landlords received 1,283 responses. This represents a response rate of only about 1 percent of landlords whose tenants applied for assistance. It is also less clear how generalizable the results are, given that the federal statute imposed no ERA eligibility criteria on landlords. Nevertheless, the survey yielded novel information about landlords' perceptions about the local ERA program and, among those who chose to participate, their experience with the administrative process.

Finally, in August 2021, the authors conducted forty-five-minute Zoom interviews with the administrators of ERA programs serving the cities of Atlanta, Boston, Chicago, Los Angeles, Philadelphia, Portland, and San Antonio, and the states of California, Minnesota, and North Carolina. Unlike surveys, interviews could get at the question of why ERA programs were structured in certain ways, that is, the roots of burdensome requirements. The ten sites were selected to include a mix of state and local programs, which operate at different

scales and in different political contexts. Most of the programs were launched in the first year of the pandemic and thus have evolved in tandem with new funding sources and restrictions; the exception is California's statewide program, which did not launch until March 2021. The sample also includes some of the largest programs in the United States—the California ERA program, for instance, has been tasked with distributing more than \$2 billion in rental assistance—which have affected large numbers of tenants and landlords. Finally, the ten sites draw on the experiences of administrators from every part of the country. The interview protocol asked administrators their perceptions of the degree of administrative burden in their program and of the sources of that burden (for a copy of the interview protocol, see the appendix).

ADMINISTRATIVE BURDENS IN ERA PROGRAMS BURDENS

To understand the administrative burdens experienced by ERA applicants, it is useful to map the typical process for applying for emergency rental assistance. Figure 1 shows the four stages prior to disbursement of funds: renters learning about and accessing the application, renters submitting application and required documents, administrators contacting applicants' landlords, and landlords submitting documents. After these four stages are complete and funds have been disbursed, administrators are also responsible for a fifth stage—

Figure 1. Typical Process for Applying for Emergency Rental Assistance

Source: Authors' tabulation.

reporting—to ensure compliance with funding statutes. Additional steps are taken if submitted documentation is incomplete or an applicant's landlord is either unresponsive or unwilling to participate. This chart reflects the reality that ERA programs, especially in the first wave, required tenants to complete the initial application (97 percent of programs) but directed payment to landlords (91 percent), thus creating a dual take-up scenario.

In later iterations, ERA programs were more likely to have created platforms for both tenants and landlords to complete an initial application, 48 percent and 49 percent in waves 2 and 3, respectively. This did not eliminate the dual take-up challenge, however; the other party typically still needed to cooperate. The survey results are somewhat muddled because some administrators selected all three possible responses for questions about which party completes the application or receives payment. Nonetheless, it is striking that even in the third survey wave, 26 percent of programs continued to deny aid to tenants whose landlords did not agree to participate.

LEARNING COSTS

A key challenge for many programs was getting the word out about their ERA programs. These were either substantial expansions of small-scale existing programs (28 percent) or brand-new programs (72 percent) that were launched in a matter of months. Further, it was difficult

to get the word out about during lockdowns. Jung Hyun Choi, Laurie Goodman, and Daniel Pang (2021) find that in February 2021 just 30 percent of surveyed tenants living in buildings owned by small landlords were aware of their local emergency rental assistance program. Responding to an open-ended first-wave survey question—“Did the program receive as many tenant responses as anticipated?”—one-third (34 percent) answered in the negative. Some respondents noted “limited marketing/outreach,” “confusion about eligibility and communication of the program,” or “a lack of information/awareness,” though others attributed the shortfall to renters taking advantage of extra unemployment benefits and other assistance.

Most programs combined a variety of outreach methods, including both traditional platforms such as newspaper and radio with more targeted outreach via community-based organizations and housing counselors (see table 2). It may have been particularly difficult to get the word out in the case of ERA because the programs were trying to reach renters who do not normally interact with the social service system. Many first-wave programs, 39 percent of survey respondents, in fact excluded renters who received other housing subsidies, and a few also reduced aid based on unemployment insurance and entitlements.

Interviews with program administrators also point to learning costs for renters. Some

Table 2. ERA Outreach Methods

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
Outreach						
Social media	142	88%	49	94%	67	92%
Newspaper	97	60%	38	73%	50	68%
Radio	52	32%	38	73%	42	58%
Agency mailing list	73	45%	33	63%	44	60%
Advertisement by community-based organizations	125	77%	47	90%	65	89%
Advertisement by housing counselors	73	45%	35	67%	46	63%
Advertisement in housing court	44	27%	33	63%	34	47%
Other	56	35%	23	44%	20	27%
Total respondents	162		52		73	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

interviewees praised their agency's outreach efforts: "from the beginning we've had outreach strategies for those who may not be comfortable working with government programs or [have] informal leases and rent arrangements." Others were less confident. One interviewee said that despite their agency's outreach efforts, "I do think awareness [of the program] is still really limited. . . . it's almost a pre-application barrier, from what we're hearing from advocates and . . . the geospatial patterns that we're seeing in terms of [where] our applications are coming from . . . I think we are still not fully reaching the most vulnerable folks . . . and I think some if it is just because folks haven't heard about it, or they don't think it's real, or there's skepticism." Another interviewee discussed how a significant lack of applications from immigrant communities in the first two iterations of their ERA program was now prompting the agency to ramp up outreach efforts, including multilingual advertisements on transit and billboards, public events, and partnering with immigrant-serving organizations to spread the word.

COMPLIANCE COSTS

Once renters learned about their local or state ERA program, they faced compliance costs associated with accessing and completing the application, which often involved submitting multiple pieces of documentation and identify-

ing and providing contact information for their landlord. Technological barriers proved significant for programs that relied heavily on online application platforms; the survey of renters who applied for rental assistance from California's statewide program in 2021 shows that issues with internet access was one of the greatest barriers to applying for assistance, second only to lack of awareness of a hotline that had been created to help applicants troubleshoot application issues (see table 3). The survey of households that applied for the County of Los Angeles' program in 2020 found that internet access had been the greatest barrier for applicants (affecting 20 percent of respondents), relative to awareness of the program hotline (13 percent), lacking proof of income loss (16 percent), or lacking income documentation (13 percent). This is perhaps unsurprising, given America's persistent digital divide between lower- and higher-income households (Vogels 2021). The survey of City of Los Angeles ERA applicants found that 14 percent had no internet access at home apart from cellular data.

The experience of these barriers varied by race and ethnicity (table 4). Hispanic applicants in California were significantly more likely than other applicants to identify at least one barrier to accessing the program. Difficulty documenting loss of income and tenancy were significantly more prevalent among Hispanic applicants. Issues with internet access, wide-

Table 3. Application Barriers in the California Statewide Program

	Respondents	Percent
Check all that apply.		
Not aware of the hotline	3,039	21
Could not reach the hotline	1,031	7
Issues with internet access	2,908	20
Not having proof of loss of income	2,383	16
Not having income documents	2,174	15
No proof of tenancy	1,030	7
Language barriers	716	5
Other	1,652	11
None of the above	6,296	43
Total respondents	14,590	100

Source: Authors' tabulation based on March–June 2021 Survey of California COVID-19 Rent Relief applicants by Housing Initiative at Penn (Reina and Goldstein 2021).

Table 4. Application Barriers in the California Statewide Program

	Non-Hispanic		Non-Hispanic	
	Black	Hispanic	Asian/Pacific Islander	Non-Hispanic White
Check all that apply.				
Was not aware of the hotline	21.0	19.8*	18.9	23.0*
Could not reach the hotline	6.3	7.2	7.6	7.4*
Issues with internet access	20.6	21.6*	17.4*	18.7*
Not having proof of loss of income	15.0	17.9*	14.7	16.2
Not having income documents	14.0	15.6	13.5	15.1
No proof of tenancy	5.6*	8.6*	6.7	6.3
Language barriers	0.5*	7.1*	10.9*	2.1*
Other	10.1*	10.6*	12.6	11.8
None of the above	47.1*	40.4*	42.4	45.1*
Total number of respondents	2,255	5,201	1,232	3,901

Source: March–June 2021 Survey of California COVID-19 Rent Relief applicants by Housing Initiative at Penn (Reina and Goldstein 2021).

Note: All numbers in percentages except the totals, which are numbers.

* $p < .05$ (significant difference relative to all other respondents)

spread across races and ethnicities, were also significantly more severe among Hispanic applicants. This resonates with Stephanie Pierce and Stephanie Moulton's (2023, this issue) findings that policies aiming to reduce compliance costs in the federal foreclosure prevention program, the Hardest Hit Fund, most benefited homeowners of color.

Program administrators did not always per-

ceive internet access to be a significant barrier. "Personally, I don't think it can be any easier," one interviewee said. "[Accessing the application] is not the hurdle. It's easy. . . . [Community organizations] can help persons who don't have—who are not computer savvy or don't have access to the internet, get to the program." National program surveys show that although most programs featured online appli-

Table 5. ERA Application Access

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
How did/do tenants and landlords access the application? Select all that apply.						
Online	123	88%	52	98%	44	100%
Telephone hotline	64	60%	24	45%	23	52%
Paper (mail)	62	32%	19	36%	23	52%
Paper (drop off)	55	45%	20	38%	25	57%
In person	42	77%	21	40%	28	64%
Total respondents	134		53		44	
Is/was the application available in languages other than English?						
Yes	85	63%	46	87%	34	79%
No	49	37%	7	13%	9	21%
Total respondents	135		53		43	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

cations (100 percent of the survey sample by the summer of 2021), a majority did also incorporate telephone and in-person options and some also offered a paper application option (see table 5). Yet the tenant survey results suggest that applicants were not always aware of these alternatives (one-fifth of applicants to California's program), or that they may have entailed additional challenges, such as a busy telephone queue.

A significant share of program applications were not available in languages other than English, as many as 37 percent among first-wave programs (see table 4), which may have imposed significant access barriers for renters with limited English-language proficiency. California's statewide ERA program did translate its online application into five languages and also partnered with local organizations that employ bilingual staff, yet 5 percent of the survey sample still cited language barriers as an impediment to applying.

Once applicants have accessed and understood the application, they face the compliance costs of tracking down and uploading the required documentation. Most programs, our surveys show, required renters to document their income (such as paystubs, bank statements, or tax returns), provide a current lease, and upload some form of identification. Early ERA programs also typically required tenants

to prove that they had lost income, accrued medical debt, or experienced some other form of financial hardship as a result of COVID-19; this requirement was relaxed over time as it became clear how difficult it was to document those hardships. Programs also varied in the stringency of identification requirements; some, by requiring Social Security numbers, excluded noncitizens.

The program administrators we interviewed attest that each documentation requirement has posed an important hurdle for applicants.

Anecdotally the biggest issues [for applicants] have been whenever they had to upload a document. . . . It introduced all sorts of [problems]. You know, say I have to upload a lease, well, I don't have a lease. A huge percentage of people [in our jurisdiction] have verbal or month-to-month leases. What do you want me to do? You know, we've been flexible to that to even, like, look, do you have receipts from paying rent? Just a screenshot, or something? . . . But some people pay in cash. And so that's been a challenge.

Similar issues arise for income verification, which is next to impossible for renters with cash earnings. Even identification could be a challenge: "Our case management staff reported a lot of people who had foreign IDs that

expired ten years ago, and initially, we were like, we're not going to take that, and we eventually realized they don't have anything else."

Treasury guidance has now given ERA programs explicit permission to address these issues by introducing self-attestation, whereby applicants can sign and date a statement of their income, financial hardship, tenancy, or identity (table 6). Between the spring and summer of 2021, of nineteen program administrators who responded to a question about programmatic change, all (100 percent) had introduced self-attestation of COVID-19 financial hardship, ten (53 percent) had introduced self-attestation of housing instability, and four (21 percent) allowed self-attestation of rental arrears. However, research shows that programs often offer opportunities to self-attest on a case-by-case basis, and thus an applicant may still bear the burden of a back-and-forth with program staff to be granted permission to self-attest (Reina, Aiken, Verbrugge, Harner, et al. 2021).

Another more recent strategy is to shift the

burden of documentation to the agency by relying on administrative data or proxies. One interviewee described efforts to collect income information directly from other offices within the jurisdiction, "so that we know who automatically income-qualifies based on people who are on Medicaid or SNAP . . . we just got that to work, last week, finally." Another said that if an applicant could not document their income but lived in a "proxy zip code" where the median renter household was income-qualified for the program, they would now accept the application. Still, program administrators continued to feel constrained in their ability to simplify the application for tenants. Language in funding statutes required them to ask for a current lease first and offer alternatives only if the tenant could not provide one, for example. "[If] we [had] the opportunity to ask them up front . . . we would have a much greater success rate of being able to review applications on the first try."

More than two-thirds (70 percent) of respondents cited "completeness of applications" as

Table 6. ERA Documentation Requirements

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
What is/was asked in the application? Select all that apply.						
Documentation of income	107	83%	51	96%	70	95%
Current lease	106	82%	39	74%	48	65%
Proof of COVID-19 financial hardship	76	59%	40	75%	55	74%
Driver's license or state ID	75	58%	35	66%	37	50%
Social security number	52	40%	14	26%	19	26%
Birth certificate	27	21%	3	6%	5	7%
Documentation of housing instability	n/a	n/a	36	68%	46	62%
Total respondents	129		53		74	
May tenants self-certify or self-attest any of the following? Select all that apply.						
COVID-19 financial hardship	84	65%	51	100%	35	81%
Income	n/a	n/a	38	75%	30	75%
Tenancy (in the absence of a lease)	n/a	n/a	22	43%	13	30%
Rental arrears	n/a	n/a	13	25%	8	19%
Total respondents	129		51		43	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

a program limitation in the first-wave survey. When applications are incomplete, program staff must reach back out to applicants for additional information. Yet “tenant responsiveness” is also a major limitation according to 56 percent of second-wave and 62 percent of third-wave program administrators surveyed. Most of the program administrators noted that follow-up with applicants about a particular document was an especially burdensome part of the process and hoped to avoid it:

The biggest burden [for us] is going back and forth with applicants whose applications need to be corrected in some way . . . and you know one of the things we are now emulating [from another ERA program] is, when they got all their applications, the first thing they did is they went through all of them, they identified which ones had some sort of issue the person needed to correct in terms of documentation and they basically put them on a pile and said we’re going to get to you later. And you know I think there’s a trade-off there because the people who have the less-than-perfect applications are probably disproportionately people who are more vulnerable.

The third stage of the typical ERA program involves contacting the applicants’ landlord to have them sign an agreement; upload further documentation, usually an Internal Revenue Service W-9 form, proof of ownership, and sometimes a tenant rent ledger; and provide the banking information needed to send rental assistance payments to the landlord. This introduces new compliance costs for tenants, many of whom do not know their landlord or how to reach them. The survey of tenants who applied for assistance in the City of Los Angeles found that about 30 percent had never interacted with their landlord or had done so but only online. In interviews, program administrators discussed the challenge of identifying and contacting landlords: “It’s proven to be a huge issue . . . we ask [tenants] to give us anything, you know, about your landlord, what do you know about them, their name, phone number. And that . . . creates administrative work on our side to then go track them down and actually

get them connected to the application so they know their tenant in the process.”

Further, a few Los Angeles tenant survey respondents reported altercations with their landlord related to nonpayment (9 percent), illegal rent increases (6 percent), illegal fines or fees for nonpayment (5 percent), or other harassment (27 percent). Such experiences can make tenants reluctant to contact their landlord to ask them to participate in a rental assistance program.

The challenges of this dual take-up model are apparent in program survey data. Nearly half (44 percent) of first-wave program administrators selected landlord cooperation as a program limitation. The two subsequent program surveys found landlord responsiveness to be a challenge 44 percent and 65 percent of the time, respectively. Interviews revealed that many program administrators tried to mediate the burden placed on tenants and landlords, such as by creating a landlord-facing portal that automatically matches landlords with their tenants. “One of the cool functionalities [of our system] is that landlords can go in and create an account for themselves and enter multiple bank accounts [and addresses], if they want to. And so . . . if a tenant then goes in and creates an application with that address, [it will] automatically get to the landlord. So that’s one tool that we put in place to try and easily link to landlords, because a lot of tenants don’t know who their landlords are.”

Twelve ERA programs surveyed in the fall of 2020 (9 percent of the survey sample) sent payments directly to qualifying tenants, effectively eliminating the dual take-up challenge. But Treasury guidance for the subsequent iteration of emergency rental assistance (ERA1) barred programs from making direct payments to tenants without first trying to engage landlords. One interviewee spoke to the effects of the policy change: “You know, I think we would have wanted to figure out some way to open the application to landlords anyway, but honestly, I think we all—I think we would have been interested in both tenant-only and landlord-only applications, which, interestingly, both of which were not really allowed.” Instead, tenants and landlords now had to work together, and programs needed to get information and consent

from both of them. This created problems, for example, when a landlord sought rental assistance, but their nonpaying tenant had already self-evicted and was no longer responsive. Now those landlords, many of whom are “owner occupant landlords in two-to-four-unit buildings [for whom] eight months without rent can be pretty devastating,” would be unable to access assistance.

Virtually every program administrator interviewed described programmatic changes designed to make it easier for tenants and landlords to apply for assistance. Many of these changes came in response to federal guidance. National program surveys show that as the Treasury released new ERA guidance over the course of the spring of 2021, about half of respondents revised their documentation requirements, usually requiring fewer total documents. Some (21 percent) also revamped their application process entirely. Some administrators reported that they had wanted to allow such flexibility from the start but had been frustrated by federal guidelines that they perceived as “compliance heavy.” Unfortunately, these initial restrictions became baked into the program infrastructure and were difficult to change:

I will say . . . from the start, we were so disappointed by the January guidance [from the Treasury Department] . . . and then we expected the February guidance to really relax to a much more simplified process, and I wouldn't say it did . . . [even] the March guidance maintained a pretty rigid structure. . . . The lack of ability to simplify got solidified [into] the infrastructure [of the program]. The ship doesn't turn that quickly. We've already taken applications in the old system and we've trained staff [to use it], we have two hundred processors who are looking at these applications.

PSYCHOLOGICAL COSTS

The stigma associated with ERA programs may have been less than in typical rental assistance programs because of the perception that people lost income due to the pandemic and through no fault of their own. Yet a recent randomized controlled trial found that sending

renters destigmatized information about an ERA program in Denver, Colorado, significantly increased take-up relative to those who received information about the program that was “clear and actionable” but did not address potential sources of stigma. Simply including phrases like “you're not alone and it's not your fault” and “we're here to help every eligible household get the assistance they deserve” on an informational postcard boosted participation over a noncommunication control by 89 percent, whereas excluding these phrases increased take-up by only 56 percent (Lasky-Fink and Linos 2022).

Renters and landlords also bear psychological costs that come from the hassles of applying, lengthy delays, and uncertainty about whether they would receive funds. Renters have recounted spending stressful hours filling out program applications as deadlines, such as expiration of their lease or lifting of federal eviction moratoria, rapidly approached (DeParle 2021; Zaveri 2021). Raker and Woods (2023, this issue) find the delay and denial of housing assistance in a disaster context to be associated with significant psychological distress. The reasons for these decisions were typically opaque; after repeatedly appealing delays or denials they did not understand, many applicants of assistance simply gave up. This process resulted in feelings of inferiority and despair.

Finally, psychological costs may also stem from negative perceptions of government. In an interview, one program administrator noted, “I think, in programs like this, it's so easy to forget the deep-seated mistrust and historical context that we're working in. There's just a lot of resistance and skepticism.” Having to rely for critical assistance on an entity one does not trust likely exacerbates stresses associated with the length and uncertainty of the application process.

LANDLORD ADMINISTRATIVE BURDEN

Landlords also experience administrative burden under the dual take-up model. Besides submitting documentation, they must understand and agree to any restrictions the program imposes. “For our program, we do have a funding acceptance letter that landlords have to sign . . . that, basically, states that they won't move for-

ward with eviction, for the period that our assistance covers and that they'll notify [a certain office] if there are any changes in tenancy. And kind of unpacking that letter for them is something that can take additional time."

The documentation requirements for landlords can be burdensome. The survey of Los Angeles landlords whose tenants had applied for ERA showed that most were able to complete the application for each tenant in less than thirty minutes (48 percent) or between thirty minutes and an hour (37 percent), but the remaining 15 percent spent upward of an hour per tenant. Only a third (34 percent) of landlords found the process somewhat or very easy, with the rest perceiving it to be neither difficult nor easy (34 percent), somewhat difficult (23 percent), or very difficult (8 percent). More than half of those surveyed (57 percent) found it somewhat unreasonable or unreasonable that the city required landlords to be up to date on their taxes in order to receive assistance. Some 38 percent deemed the requirement that landlords be licensed either somewhat unreasonable or unreasonable.

Both learning and compliance costs may have fallen especially heavily on mom-and-pop operations. As one program administrator noted, "I have a hunch that . . . larger landlords have the staff and resources to access or even initiate an application through our system . . . and then follow up with the required paperwork." The survey of landlords whose tenants applied to the Los Angeles ERA program found that large landlords, those with portfolios of thirty or more units, were about 90 percent more likely than small landlords, those with five or fewer, to be aware of the local eviction moratorium and 52 percent more likely to choose to participate in the ERA program. These results suggest the greater capacity of large landlords to monitor public policy and engage with public programs.

Finally, when landlords initiate the program application, they may face challenges engaging their tenants. "We are seeing a frustrated landlord contingency who wants to participate and is finding a resistant tenant, and the scale of our program makes it hard to provide, potentially, case management to that tenant. I think there's a lot of fear from that tenant that this is

coming through their landlord, and not understanding the dynamic," one program administrator said in an interview.

DOES GREATER ADMINISTRATIVE BURDEN REDUCE ACCESS?

Administrative burdens may have a wide range of negative impacts. They may undermine people's faith in the capacity of government, make programs less efficient and more costly, and contribute to social inequality by excluding people who have fewer resources or less capacity to overcome administrative hurdles (Herd and Moynihan 2018). It is beyond the scope of this article to determine the extent to which administrative burdens in ERA programs have contributed to these outcomes. Yet two subjective outcome measures built into the fall 2020 national program survey allow us to explore, on a basic level, whether certain program features were associated with increased or reduced access to aid.

The survey asked program administrators whether their program had experienced various limitations, including issues with application completeness. Analyzing whether certain program features were associated with higher or lower levels of application completion yields mixed results. We find that administrators were less likely to report incomplete applications as an issue when nonprofit organizations played a role in program implementation, though the difference was not significant. This suggests that when additional support was available to spread the word and help applicants navigate potentially burdensome application requirements, programs were more successful. We also find that administrators were slightly less likely to report incomplete applications as an issue when their program application was translated into multiple languages (again, the difference was not significant). Requiring tenants to provide proof of hardships related to COVID-19, provide a Social Security number, or not to have received other housing assistance significantly increased the likelihood of application completion challenges. Finally, a higher number of application requirements was weakly but positively correlated with application completion challenges (corr = 0.11).

These data offer some support for the con-

clusion that, by reducing administrative burdens, ERA programs can increase the number of eligible households served. The outcome measure is imperfect, however, because program administrators' perception of application completion as a limitation may have been endogenously linked with program design. That is, an administrator who had helped design and implement a more burdensome program might have been satisfied with a lower level of applicant follow-through. A more robust analysis would examine the relationship between program design and actual take-up in terms of the volume of tenant applications begun and completed.

THE ROOTS OF ADMINISTRATIVE BURDENS

A key question is why these administrative burdens exist and how they are justified. In our interviews with program administrators from ten ERA programs across the country, we asked about their perceptions of the roots of these burdens. Several administrators emphasized learning costs—highlighting the challenge of outreach: “The challenge is more so making sure people know about the program.” They emphasized the newness of these programs, the digital divide, as well as the fact that the pandemic closed off many of the normal channels of outreach, such as community meetings, door-knocking, and fliers at social service agencies and public institutions.

As for the roots of compliance costs, the explanation they raised most commonly was that requirements came directly from federal guidance. The program administrators asserted that their programs rarely required more documentation than what they believed the federal guidelines mandated or what was necessary to collect to comply with federal reporting requirements. Several interviewees specifically complained about the level of reporting that they were required to do. One program administrator said that the federal reporting requirements required them to “retool their data entry system” and that they drove most of their eight-page application.

The second most cited reason for documentation requirements also related to federal requirements: preparing for federal audits. In-

deed, many administrators seemed less concerned about fraud than about being punished if they failed to follow program rules. For example, one administrator described their program's documentation requirements as being about producing clear records to prepare for federal auditing. Another city brought in experts in federal compliance: “We had our own internal audit team come in and look at and review the files, they looked at the federal requirements and said, oh, this is what the federal team will look at when they come.” An interviewee from another jurisdiction noted that administrators were “leaning toward heavy documentation because of their concern about . . . audits.” They were less concerned about fraud than about the need to document everything to prepare for an audit, they explained: “I hear more conversations about audits than I do about fraud.” An administrator from another program stated they were wary about “what they might have to prove in an audit trail” and careful about “documenting their process for their audit trail.” Wary of audits, many administrators seemed to take a conservative approach, defaulting to viewing documents as required unless federal guidance expressly stated otherwise.

Shifting federal guidance added to administrators' woes. They complained that inconsistent and changing federal guidelines made program administration difficult, especially when staffing capacity was already an issue. Having to review and interpret new guidance, communicate changes, and retrain staff was challenging to program staff and also likely confusing to both tenants and landlords. All of this underscores the added administrative barriers that can come when multiple layers of government are involved in delivering a social program.

That said, the documentation requirements were not simply about following federal guidelines. Several program administrators noted the objective of minimizing fraud and ensuring that assistance went to the people who needed it. The interviews suggested that although real instances of fraud had arisen, they were rare: “We caught an instance recently where somebody applied for a property that we learned didn't actually exist anymore. It was demol-

ished. . . . People try to get very creative, as I call it. . . . But I mean, I have to say in the greater scheme of things, there has not been a huge amount of fraud allegations or suspicious situations. You know, I think there will always be someone [when] there is so much money on the table.”

Interviewees spoke frankly about trying to strike “an appropriate balance” between wanting to get funds out the door quickly while ensuring that dollars flowed to households in need. One administrator explained: “we have a real commitment to wanting to be responsible fiscal stewards or resources and really wanting to make sure that these resources are going to the households that they were intended to serve, but not making it an overly cumbersome process that actually has the adverse effect.” As another program administrator put it, “You don’t want the fear of fraud to make the program. . . . But, on the other hand, you don’t want to just open it up and give people money that, you know, could be used for someone who really did need help.”

In striking the right balance, many described conscious efforts to make rules simpler and more flexible, given the emergency nature of this program. For example, one program administrator said that they tried to prioritize simplicity from the start by allowing a variety of options for identification cards. An administrator from another city expressly distinguished their more flexible program from other social programs: “The status quo of many government assistance programs is falling farther away from accessibility.” Several program administrators indicated that their programs had loosened many administrative safeguards over time given that federal guidance expressly permitted self-attestation and more flexibility in the documentation programs could accept to demonstrate need. One promising approach was to implement internal processes that could reduce fraud without requiring additional documentation or effort from applicants, such as randomly auditing a small share of applications. The Ohio State Finance Agency also used this approach in administering mortgage foreclosure prevention (see Pierce and Moulton 2023, this issue). Another was using software that automatically validates email addresses,

phone numbers, and property occupancy as applicants fill out the application.

Many program administrators said that they quickly took advantage of federal guidelines that allowed them to lower barriers to applications, including allowing self-attestation. That said, adapting application processes to make them more user-friendly takes time and investment. One program administrator noted that as time went on capacity to incorporate a more strategic approach to making the application process easier for tenants decreased. A lack of staff capacity, cited as a challenge by 69 percent of first-wave survey respondents, could also prevent programs from building streamlined application platforms or offering case management services to assist individual households in completing their application.

The bureaucratic environment also played a role in shaping administrative burdens. One program administrator noted that their city leaders urged them to be more flexible given the urgency of the need, but others operated in more restrictive legal and political environments. Risk-averse programs did not take advantage of flexibility in funding statutes to implement burden-reducing mechanisms such as self-attestation, proxies, and direct-to-tenant payments until federal guidance granted them explicit permission to do so.

Finally, program administrators sometimes perceived their programs to be less burdensome than they were. For example, one administrator said in an interview that “where we sit now, we probably could be a pretty good model for other jurisdictions,” and felt that their program “had done a really good job being sensitive” to the challenges faced by tenants in completing the application—yet this program fell on the upper end of the spectrum with respect to number and stringency of tenant documentation requirements. Some discrepancies are also evident between what program administrators reported in terms of the availability of self-attestation and other burden-reducing features and what was observable based on program documentation (Reina, Aiken, Verbrugge, Harner, et al. 2021). Across ERA programs, interviews found a broad range of perceptions about what constitutes administrative burden and about what levels of burden are acceptable.

CONCLUSION

Despite the urgency of the need, administrative burdens in ERA programs have often been heavy. They have imposed significant learning, compliance, and psychological costs on the renters and landlords they are meant to serve. The burdens stemmed from the difficulty renters faced in learning about the ERA program (or the latest local iteration they were eligible for), technological barriers to accessing and completing an application, and documentation requirements. Over the course of the pandemic, some administrators made significant efforts to increase outreach, simplify program applications, and assist renters and landlords with the hurdles they encountered.

But perhaps the most fundamental barrier was that the vast majority of programs required both tenants and landlords to cooperate to receive assistance, creating the same dual take-up challenge that exists in many nonemergency rental housing assistance programs, including the housing choice voucher program. Some program administrators noted this and voiced a desire for a more radical revisioning of their rental assistance efforts. One described the benefits that could come from separating tenant and landlord assistance into two independent programs:

I think there are some basic challenges with the way that . . . the legislation has set up the [ERA] program . . . and I think this is one, that it requires coordination between landlords and tenants . . . you know, despite all the focus that Treasury has had on trying to reduce barriers to entry. So if, for example, this were just a guaranteed income program . . . you [wouldn't] have to prove that you rented an apartment, [that] you owed [rent] to the landlord, that would be a lower bar just based on program design. [And] if, for example, the landlord was applying for a tax refund that they were eligible for based on business losses in a given fiscal year, and the tenant didn't have to supply income information at all, that would be a lower bar as well.

Another interviewee suggested a universal basic income approach, saying, "I think there is

really something to be said for the sort of stimulus check model where it just shows up in your bank account. It's almost like you're automatically in unless you're not, as opposed to the other way around. . . . We also have to introduce different models of administering these programs and [reconsider] the assumptions we make about who needs help."

Going forward, the federal government might consider establishing standing emergency rental assistance accounts, which could help low-income renters manage idiosyncratic financial shocks, and could also be easily scaled up in times of broader need (Collinson et al. 2021). Such programs would be simple and automatic and would eliminate the need for double take-up on the part of both tenants and landlords. Such simplicity would come with trade-offs. Direct-to-tenant assistance would no longer be able to condition aid on landlord concessions, such as requirements to delay evictions and rent increases, and fewer documentation requirements would make targeting more difficult but could also invite more fraud. Especially in times of urgent need, however, policymakers should arguably view some level of fraud as acceptable if it means assisting a greater number of deserving applicants.

One potential silver lining to the delays in getting ERA funds out the door is the considerable media attention they attracted. Traditionally, administrative burdens associated with rental assistance have been largely invisible to the broader public despite their impact on low-income renters. Perhaps this experience will motivate that legislators and program administrators to assess and address burdens across housing assistance programs more generally. Although this article focuses on the administrative burdens that low-income tenants and their landlords face in emergency rental assistance programs, many of the challenges highlighted, especially related to the need for double take-up, are likely to hamper participation for housing choice vouchers as well. Evaluating and testing strategies to address burdens across all housing assistance programs is critical, especially as policymakers consider potential expansions.

APPENDIX: INTERVIEW PROTOCOL

We are doing research on the application process and documentation requirements in ERA (Emergency Rental Assistance) programs. We are trying to understand how administrators balanced the need to screen applicants and target eligible renters, while getting money out the door as quickly as possible.

Where do you think your program sits on the spectrum between administrative simplicity and accessibility on the one hand and other goals (e.g., fraud, waste and abuse)? Why is that the case? How do you strike the right balance?

Do you feel like you have the authority/ability to make the program work how you would have liked, why or why not? What would you change, if anything?

What have you heard have been the largest hurdles faced by tenants in completing applications? What about landlords? What about the agency?

I reviewed your application and documentation requirements, but can you confirm that both tenants and landlords can apply?

And it looks like you require: X, Y, Z documents? Is this correct? Is there anything else required from tenants? From landlords?

Do you allow for self-attestation in place of these documents? In which cases? How is the option to self-attest communicated to applicants?

To what extent were documentation requirements a function of state/federal statutory requirements?

Which documents were required by federal regulations?

What documents were required by state law?

For documents that weren't required by federal or state law, why do you think the program required this information? [Run through each requirement if there's time.]

[Listen for open-ended answer.

Follow up if needed:

Was the aim to reduce fraud?

Was it to ensure that only the truly needy apply for and receive funds (given limited dollars)?]

Have these requirements changed since the program started? If so, why?

Do you think those changes increased the volume of applications?

Do you think they shifted the composition of people applying?

Were there any unintended consequences?

How did you conduct outreach to ensure people could easily learn about the program?

Did you adopt any other strategies to make it easier for tenants or landlords to apply?

Were there unintended consequences?

REFERENCES

- Aiken, Claudia, Isabel Harner, Vincent Reina, Andrew Aurand, and Rebecca Yae. 2022. "Emergency Rental Assistance (ERA) During the Pandemic: Implications for the Design of Permanent ERA Programs." Philadelphia, Pa.: Housing Initiative at Penn, National Low Income Housing Coalition, and NYU Furman Center.
- Aiken, Claudia, and Vincent Reina. 2021. "Fair Housing: Asian and Latino/a Experiences, Perceptions, and Strategies." *RSF: Russell Sage Foundation Journal of the Social Sciences* 7(2): 201-23. DOI: <https://doi.org/10.7758/RSF.2021.07.02.10>.
- Aiken, Claudia, Vincent Reina, Julia Verbrugge, Andrew Aurand, Rebecca Yae, Ingrid Gould Ellen, and Tyler Hauptert. 2021. "Learning from Emergency Rental Assistance Programs: Lessons from Fifteen Case Studies." Washington, D.C.: NYU Furman Center, Housing Initiative at Penn, and National Low Income Housing Coalition. Accessed November 28, 2022. <https://nlihc.org/sites/default/files/ERA-Programs-Case-Study.pdf>.
- Aizer, Anna. 2003. "Low Take-Up in Medicaid: Does Outreach Matter and for Whom?" *American Economic Review Papers and Proceedings* 93(2): 238-41.
- Barnes, Carolyn Y. 2021. "It Takes a While to Get Used To': The Costs of Redeeming Public Benefits." *Journal of Public Administration Research and Theory* 31(2): 295-310.

- Bozeman, Barry. 2000. *Bureaucracy and Red Tape*. Upper Saddle River, N.J.: Prentice Hall.
- Brodkin, Evelyn. 1987. "Policy Priorities: If We Can't Govern, Can We Manage?" *Political Science Quarterly* 102(4): 571-87.
- Center for Budget and Policy Priorities. 2021. "Policy Basics: The Housing Choice Voucher Program." Last modified April 12, 2021. Accessed April 27, 2022. <https://www.cbpp.org/sites/default/files/atoms/files/PolicyBasics-housing-1-25-13vouch.pdf>.
- Cherlin, Andrew J., Karen Bogen, James M. Quane, and Linda Burton. 2002. "Operating Within the Rules: Welfare Recipients' Experiences with Sanctions and Case Closings." *Social Service Review* 76(3): 387-405.
- Choi, Jung Hyun, Laurie Goodman, and Daniel Pang. 2021. "As Renter Protections End, Emergency Rental Assistance is Critical. Why Haven't More Landlords and Tenants Applied for It?" *Urban Wire*, November 1, 2021.
- Chyn, Eric, Joshua Hyman, and Max Kapustin. 2019. "Housing Voucher Take-Up and Labor Market Impacts." *Journal of Policy Analysis and Management* 38(1): 65-98.
- Collinson, Robert, Ingrid Gould Ellen, and Benjamin Keys. 2021. "Bolstering the Housing Safety Net: The Promise of Automatic Stabilizers." Washington, D.C.: The Hamilton Project: Brookings Institution. Accessed November 29, 2022. <https://www.brookings.edu/research/bolstering-the-housing-safety-net-the-promise-of-automatic-stabilizers/>.
- Cunningham, Mary K., Martha Galvez, Claudia L. Aranda, Rob Santos, Doug Wissoker, Alyse Oneto, Rob Pitingolo, and James Crawford. 2018. "A Pilot Study of Landlord Acceptance of Housing Choice Vouchers." Washington: U.S. Department of Housing and Urban Development, Office of Policy Development and Research.
- Cunyngham, Karen. 2020. "Reaching Those in Need: Estimates of State Supplemental Nutrition Assistance Program Participation Rates in 2017." Washington, D.C.: Mathematica Policy Research.
- Currie, Janet. 2004. "The Take-Up of Social Benefits." *NBER working paper no. 10488*. Cambridge, Mass.: National Bureau of Economic Research.
- DeLuca, Stefanie, Lawrence F. Katz, and Sarah C. Oppenheimer. 2023. "When Someone Cares About You, It's Priceless: Reducing Administrative Burdens and Boosting Housing Search Confidence to Increase Opportunity Moves for Voucher Holders." *RSF: The Russell Sage Foundation Journal of the Social Sciences* 9(5): 179-211. DOI: <https://doi.org/10.7758/RSF.2023.9.5.08>.
- DeParle, Jason. 2021. "Federal Aid to Renters Moves Slowly, Leaving Many at Risk." *New York Times*, April 25. Accessed November 29, 2022. <https://www.nytimes.com/2021/04/25/us/politics/rental-assistance-pandemic.html>
- Ellen, Ingrid Gould, Katherine O'Regan, and Sarah Stochak. 2023. "Using HUD Administrative Data to Estimate Success Rates and Search Durations for New Voucher Recipients." Washington: U.S. Department of Housing and Urban Development Office of Policy Development and Research. <https://www.huduser.gov/portal/publications/Using-HUD-Administrative-Data-to-Estimate-Success-Rates.html>.
- Garboden, Philip M. E., Eva Rosen, Stefanie DeLuca, and Kathryn Edin. 2018. "Taking Stock: What Drives Landlord Participation in the Housing Choice Voucher Program." *Housing Policy Debate* 28(6): 979-1003.
- Hanratty, Maria. 2006. "Has the Food Stamp Program Become More Accessible? Impacts of Recent Changes in Reporting Requirements and Asset Eligibility." *Journal of Policy Analysis and Management* 25(3): 603-21.
- Herd, Pamela, and Donald P. Moynihan. 2018. *Administrative Burden: Policymaking by Other Means*. New York: Russell Sage Foundation.
- Housing Authority of the City of Los Angeles (HACLA). 2017. "Section 8 Housing Choice Voucher Waiting List Lottery to Open on Monday." News Release, October 2. Accessed November 29, 2022. <http://home.hacla.org/news-notifications/articleid/124/section-8-housing-choice-voucher-waiting-list-lottery-to-open>.
- Kim, Huiyun. 2020. "Failing the Least Advantaged: An Unintended Consequence of Local Implementation of the Housing Choice Voucher Program." *Housing Policy Debate* 32(3): 369-85.
- Lasky-Fink, Jessica, and Elizabeth Linos. 2022. "It's Not Your Fault: Reducing Stigma Increases Take-Up of Government Assistance Programs." *HKS working paper no. RWP22-022*. Cambridge, Mass.: Harvard Kennedy School. DOI: <http://dx.doi.org/10.2139/ssrn.4040234>.
- Lipsky, Michael. 1984. "Bureaucratic Disentitlement in Social Welfare Programs." *Social Service Review* 58(1): 3-27.
- Mills, Gregory, Daniel Gubits, Larry Orr, David Long,

- Judie Feins, Bulbul Kaul, and Michelle Wood. 2006. "The Effects of Housing Vouchers on Welfare Families." Washington: U.S. Department of Housing and Urban Development, Office of Policy Development and Research.
- Moore, Kathleen. 2016. "Lists and Lotteries: Rationing in the Housing Choice Voucher Program." *Housing Policy Debate* 26(3): 474–87.
- National Low Income Housing Coalition (NLIHC). 2022. "Treasury Emergency Rental Assistance (ERA) Dashboard." Accessed November 29, 2022. <https://nlihc.org/era-dashboard>.
- Nichols, Albert L., and Richard J. Zeckhauser. 1982. "Targeting Transfers Through Restrictions on Recipients." *American Economic Review* 72(2): 372–77.
- Office of Evaluation Sciences. 2022. "Descriptive Study of Equity in the Distribution of the Emergency Rental Assistance Program." Washington, D.C.: General Services Administration. Accessed November 29, 2022. <https://oes.gsa.gov/projects/era-equity/>.
- Peeters, Rik. 2020. "The Political Economy of Administrative Burdens: A Theoretical Framework for Analyzing the Organizational Origins of Administrative Burdens." *Administration & Society* 52(4): 566–92.
- Pierce, Stephanie Casey, and Stephanie Moulton. 2023. "The Effects of Administrative Burden on Program Equity and Performance: Evidence from a Natural Experiment in a Foreclosure Prevention Program." *RSF: The Russell Sage Foundation Journal of the Social Sciences* 9(5): 146–78. DOI: <https://doi.org/10.7758/RSF.2023.9.5.07>.
- Raker, Ethan J., and Tyler Woods. 2023. "Disastrous Burdens: Hurricane Katrina, Federal Housing Assistance, and Well-Being." *RSF: The Russell Sage Foundation Journal of the Social Sciences* 9(5): 122–43. DOI: <https://doi.org/10.7758/RSF.2023.9.5.06>.
- Reina, Vincent, Claudia Aiken, and Jenna Epstein. 2021. "Exploring a Universal Housing Voucher." Interactive report, September 21. Philadelphia, Pa.: Housing Initiative at Penn. Accessed November 29, 2022. <https://www.housinginitiative.org/universal-voucher.html>.
- Reina, Vincent, Claudia Aiken, Julia Verbrugge, Ingrid Gould Ellen, Tyler Hauptert, Andrew Aurand, and Rebecca Yae. 2021. "COVID-19 Emergency Rental Assistance: Analysis of a National Survey of Programs." Philadelphia, Pa.: Housing Initiative at Penn, National Low Income Housing Coalition, and NYU Furman Center.
- Reina, Vincent, Claudia Aiken, Julia Verbrugge, Isabel Harner, Andrew Aurand, and Rebecca Yae. 2021. "Treasury Emergency Rental Assistance Programs in 2021: Analysis of a National Survey." Philadelphia, Pa.: Housing Initiative at Penn, National Low Income Housing Coalition, and NYU Furman Center.
- Reina, Vincent, and Sydney Goldstein. 2021. "An Early Analysis of the California COVID-19 Rental Relief Program." *Research Brief*. Philadelphia, Pa.: Housing Initiative at Penn.
- Reina, Vincent, and Ben Winter. 2018. "Safety Net? The Use of Vouchers When a Place-Based Rental Subsidy Ends." *Urban Studies* 56(1): 2092–111.
- Rosen, Eva. 2020. *The Voucher Promise*. Princeton, N.J.: Princeton University Press.
- Schwabish, Jonathan A. 2012. "Downloading Benefits: The Impact of Online Food Stamp Applications on Participation." Paper presented to the Association for Public Policy Analysis and Management, Fall Research Conference. Baltimore (November 10, 2012).
- Schwartz, Amy Ellen, Keren Mertens Horn, Ingrid Gould Ellen, and Sarah A. Cordes. 2019. "Do Housing Vouchers Improve Academic Performance? Evidence from New York City." *Journal of Policy Analysis and Management* 39(1): 131–58.
- Varady, David. 2010. "What Should Housing Vouchers Do? A Review of the Recent Literature." *Journal of Housing and the Built Environment* 25: 391–407.
- Vogels, Emily A. 2021. "Digital Divide Persists Even as Americans with Lower Incomes Make Gains in Tech Adoption." *FactTank* (Pew Research Center blog), June 22. Accessed November 29, 2022. <https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>.
- Yae, Rebecca, Andrew Aurand, Daniel Threet, and Emma Foley. 2020. "Emergency Rental Assistance Programs in Response to COVID-19." Research Note. Washington, D.C.: National Low Income Housing Coalition.
- Zaveri, Mihir. 2021. "New York Has \$2.7 Billion for Rent Relief. Many Have Yet to Receive Aid." *New York Times*, July 25. Accessed November 29, 2022. <https://www.nytimes.com/2021/07/25/nyregion/new-york-city-rent-relief.html>.