

COVID-19 and Housing Security: Assessing Equity & Efficiency Across North Carolina's Emergency Rental Assistance Programs

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Executive Summary

COVID-19 has exacerbated the nation’s existing affordable crisis, putting approximately 14 million Americans out of work, and leading to widespread housing insecurity nationwide. This hardship has disproportionately affected renters, many of whom are just a paycheck away from being unable to pay their rent. Estimates show that 30-40 million renters could face eviction due to non-payment of rent.¹ COVID-19 has impacted households differently, with low-income households, households of color, and single-parent households bearing the brunt of financial hardship and housing insecurity.

This report explores how government agencies in North Carolina have responded to the emerging housing crisis with emergency rental assistance programs. This research aims to answer the policy question: *How have state and local policies and program design elements impacted funding distribution across North Carolina’s emergency rental assistance programs?* To answer this question, I conducted mixed methods research including document analysis, qualitative interviews with program administrators, and quantitative analysis of participant data.

This analysis finds that renters and program administrators alike experienced a series of challenges accessing and administering ERA programs. Renters often faced accessibility barriers, including limited access to online applications, burdensome documentation requirements, and complex referral processes. Administrators faced challenges including limited administrative funds, inadequate staffing capacity, and limited technological infrastructure to keep up with demand.

This report offers a series of recommendations to inform policy making and program implementation. The recommendations are categorized broadly into five categories. Topline recommendations include:

Cross-Program Collaboration	Outreach & Referrals	Application Support	Assistance Distribution	Program Capacity
Create an online resource hub that directs tenants to applicable programs.	Partner with diverse organizations and networks to reach households who need assistance most.	Provide alternative application options to ensure the process is widely accessible.	Remain flexible to program changes , such as increasing payment amounts, based on need.	Allot appropriate program funds to be used for administrative purposes, such as staff and outreach.
Collaborate with nearby jurisdictions to form county-city or cross-city rental assistance programs.	Target outreach to populations who have a demonstrated need.	Simplify and streamline applications as much as possible, making real-time modifications	Explicitly allow for direct-to-tenant payments when landlords refuse to participate.	Automate processes to minimize need for temporary staff.

The report is divided into four core sections. The *Issue Background* frames the COVID-19 housing crisis within the country’s broader affordable housing crisis. This section also highlights the ways in which certain households have been disproportionately impacted by COVID-19 and provides an overview of how emergency rental assistance efforts intend to mitigate these effects. *North Carolina Emergency Rental Assistance Need* uses a variety of data to highlight the sheer level of ERA need and to identify which populations need assistance the most. *North Carolina Emergency Rental Assistance Program Landscape* outlines the funding sources, timeline, and geographic distribution of ERA programs statewide. And lastly, *Programs Challenges & Recommendations* presents findings from stakeholder interviews on challenges that programs faced, as well as recommendations for the future.

Issue Background

COVID-19 has caused disproportionate economic hardship for households of color and low-income households. Through stakeholder interviews, document analysis, and quantitative analysis of applicant datasets, this project aims to assess how efficiently and equitably North Carolina's emergency rental assistance programs responded to housing insecurity. This report examines the policy and programmatic factors that encouraged and inhibited effective program implementation in order to inform the North Carolina Housing Coalition (NCHC), a statewide affordable housing advocacy organization. NCHC may use these findings to advocate for equitable emergency rental assistance program design amid COVID-19 or for ongoing rental assistance efforts more generally.

Policy Question: How have state and local policies and program design elements impacted funding distribution across North Carolina's emergency rental assistance programs?

Causes & Impacts of the Affordable Housing Crisis

Renters in the United States are experiencing an affordable housing crisis. In 2017, 20.5 million renters – nearly half of all renters nationally – were cost-burdened, paying over 30% of their income on housing.² These numbers are even starker for those with extremely low incomes, over 70% of whom are severely cost-burdened, paying more than 50% of their income on housing.³

The affordable housing crisis has been exacerbated by COVID-19, a pandemic that has put approximately 14 million Americans out of work, with many more experiencing decreased hours and reduced income.⁴ This reduction in employment and income has led to a vast increase in housing insecurity, particularly for households who depend on a monthly paycheck to make ends meet. Recent estimates show that 30-40 million renters could face eviction due to non-payment of rent.⁵ Weekly data collected by the U.S. Census Bureau since the start of the pandemic shows that as of mid-March 2021, approximately 15% of renters were not current on their rent payments and 25% of renters reported having no/slight confidence in their ability to make next month's rental payment.

The affordable housing crisis has long been in the making. Rent increases and stagnant wages mean that individuals are forced to pay a higher percent of their income on rent. Between 2001 and 2018, rents rose almost 13% while incomes only rose 0.5%.⁶ Government interventions have focused on providing individual-based subsidies for existing housing rather than increasing supply, limiting growth in the country's affordable housing stock. Analysis of affordable housing supply finds there is a shortage of seven million affordable rental homes in the United States.⁷

In the United States, rental assistance has traditionally been provided by the U.S. Department of Housing and Urban Development (HUD) in the form of public housing, project-based rental assistance, and Housing Choice Vouchers (HCVs).⁸ For the last half-century, the supply of affordable housing in the United States has remained relatively stagnant, failing to keep pace with growing demand and pricing out the lowest-income renters. HCVs, the largest of the three programs, is also vastly underfunded, creating long waiting lists and leaving eligible families with few alternatives: in 2017, nearly 3 million families were on HCV waiting lists.⁹ Only one-third of renting households below the poverty line receives assistance.¹⁰

Affordable housing has a profound impact on social and economic equity and opportunity. Unaffordable housing puts individuals at elevated risks of housing instability, homelessness, and eviction.¹¹ The effects of unaffordable housing are also inextricably linked with other life outcomes including economic mobility, education, and health. For example, counties with higher shares of severely cost-burdened renters also have higher rates of food insecurity, child poverty, and people self-reporting poor health.¹² These issues become even more urgent amid COVID-19, a pandemic that can only be curbed by isolation and lack of social contact. While evictions and homelessness come with a myriad of consequences in normal times, these are made even worse if families have to double up with others or enter congregate shelters, increasing their risk of contracting COVID-19.

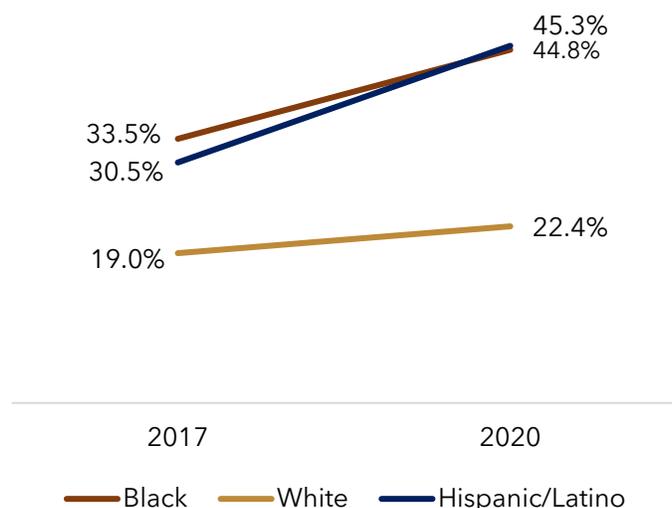
Disparate Impact of COVID-19

Even before COVID-19, the affordable housing crisis disproportionately affected low-income renters and racial/ethnic minorities. Low-income renters are more likely to experience housing instability because such a large proportion of their limited incomes go toward housing costs. As a result, many low-income renters are only one unexpected expenditure away from missing their rent payment; only 23% of adults in the U.S. say they have enough savings to last three months in case of an emergency.¹³ COVID-19 has also hit those in the lowest income brackets the hardest. Data collected in February 2021 shows that 40% of renters making less than \$34,999 annually have no or slight confidence that they will be able to make rental payments next month, and 24% of renters are currently behind on rent.¹⁴

Racial and ethnic minorities are also far more likely to be low-income renters. Only 6% of white households are extremely low-income renters, compared to 20%, 17%, and 15% of Black, Native American, and Latinx renters, respectively.¹⁵ This puts minority households at a greater risk of experiencing housing insecurity. In 2017, 19% of white households reported housing insecurity, compared to 33.5% of Black households and 30.5% of Hispanic households.¹⁶

These disparities across racial, ethnic, and socioeconomic lines have been exacerbated amid COVID-19 as housing insecurity has grown far more for Black and Latino households compared to white households. 22.4% of white renters report experiencing housing insecurity in 2020, compared to 44.8% of Black households and 45.3% of Latino households.¹⁷ In recent months, approximately double the share of Black and Latino renters reported being behind on their rent payments compared to their white counterparts. As of February 2021, an estimated 33% of Black renters and 20% of Latino renters reported not being caught up on rent payments compared to an estimated 13% of White renters.^{18,19} 22% of white renters reported no/slight confidence in paying next month's rent, compared to 42% and 39% of Black and Latino renters, respectively.²⁰

Figure 1. Percent of Households Reporting Housing Insecurity Nationally, by Race and Ethnicity



COVID-19 Emergency Rental Assistance (ERA)

Amid the growing housing crisis exacerbated by COVID-19, two main strategies have been implemented to keep renters in their homes. First, a federal eviction moratorium is in place through June 30, 2021 that mandates landlords cannot evict any renters making less than \$99,000 annually on the grounds of non-payment of rent.²¹ This is accompanied by both local and state moratoriums, which last for varying periods of time and contain different levels of protection. Though these moratoria aim to keep people in their homes, they do not provide rent forgiveness and have not been consistently enforced.²²

Emergency rental assistance (ERA) fills this gap by providing funds to stop the accumulation of debt for months when renters cannot pay their rent. Though emergency rental assistance programs generally have similar foundations, they can vary significantly in how they are implemented. Program design elements that vary by program include: 1) target population; 2) eligibility requirements; 3) duration of assistance; 4) funding per household, 5) landlord requirements, and 6) application selection methods. These program elements can greatly affect how funds are distributed and who ultimately receives assistance.

Though some states and localities ran emergency rental assistance programs before COVID-19, these were not guaranteed. A survey of rental housing programs across all 50 states and the 72 largest cities identified 110 rental assistance programs that existed prior to COVID-19, though this only represented 37 unique states and 14 unique cities.²³ These were funded in a variety of ways, including using flexible federal funding streams, locally budgeted funds, and philanthropic funding.²⁴ Since the onset of COVID-19, over 800 ERA programs have opened, and this number is growing daily.²⁵

As the need for emergency rental housing has grown, a massive infusion of rental assistance funding has been allocated to states and localities. In 2020, much of this funding came from the federal Coronavirus Aid, Relief, and Economic Security Act (CARES) Act, which provided several flexible funding streams that states and localities could use to deliver emergency rental assistance. These included the Community Development Block Grant (CDBG-CV) fund, Emergency Solutions Grant (ESG-CV) fund, and Coronavirus Relief Funds (CRF).²⁶ Given the flexibility of these funding streams, it is difficult to quantify exactly how much of this money has gone toward rental assistance. A current ERA database contains programs across the country totaling over \$4.5 billion, but due to data collection limitations, this is likely lower than the actual amount allocated for CARES ERA programs.²⁷ Municipalities have also tapped into their own emergency funds and housing operating budgets to fill the gap for renters in need.

In December 2020, Congress passed the Consolidated Appropriations Act of 2021, which included \$25 billion for emergency rental assistance. Administered by the Department of Treasury, this funding has been allocated to states, localities, territories, and tribal governments for immediate distribution.²⁸ On March 11, President Biden signed the American Rescue Plan, a COVID relief package that will provide an additional \$21.6 billion for emergency rental assistance.²⁹ This will also be administered by the Department of Treasury, but only high-level details around the program, such as state funding amounts and general usage information, have been released.

The following sections investigate the landscape of emergency rental assistance in North Carolina, including: 1) the need for emergency rental assistance across demographic groups; 2) funding sources, program timelines, and the geographic distribution of rental assistance programs; and 3) challenges and lessons learned/recommendations for administering rental assistance programs.

North Carolina Emergency Rental Assistance Need

Since the onset of COVID-19, abundant evidence has illustrated widespread need for rental assistance. Estimates have predicted that 30-40 million renters nationally could face eviction without ample protections and monetary assistance. Though the exact number of renters experiencing housing insecurity in North Carolina is difficult to predict, the extreme demand for rental assistance programs illustrates this profound need. For example, after only being open for one month, North Carolina’s statewide HOPE rental assistance program closed – receiving over 42,000 applications.³⁰ In February, officials in Durham had administered approximately \$7.7 million of the HOPE program, but had been inundated with requests, predicting they would need between \$50 and \$60 million to actually meet the need.³¹ In February, officials in Guilford County noted they expected high demand for their rental assistance funds; 10,000 individuals had already reached out for help.

Even as funding was dispersed, the demand for rental assistance continued to grow. The Charlotte Housing Partnership distributed \$26 million in rental assistance funds in 2020, closing their application in early January, but when they reopened applications in February, demand soared. The program received 4,439 applications from February 9th to the 19th. Over a period of 10 days, they had exceeded the number of applications received for any previous month.

Though this anecdotal evidence underscores the overall need for rental assistance in North Carolina, it is also critical to acknowledge that the pandemic has affected certain populations differently. Since the onset of the pandemic, the U.S. Census Bureau has collected data on household experiences through the Household Pulse Survey (HPS).³² This data provides a snapshot of renter experiences. Data collected from February 17 to March 1 reveals demographic trends in housing insecurity in North Carolina.

Analysis of demographic data shows that Black and Hispanic/Latino households are experiencing housing insecurity at rates far higher than their white counterparts. In North Carolina, 27% of Latino households and 18% of Black households reported not being currently caught up on rent payments, compared to 4% of white households.³³

Figure 2. Percent of N.C. Renter Households Behind on Rent, by Race and Ethnicity

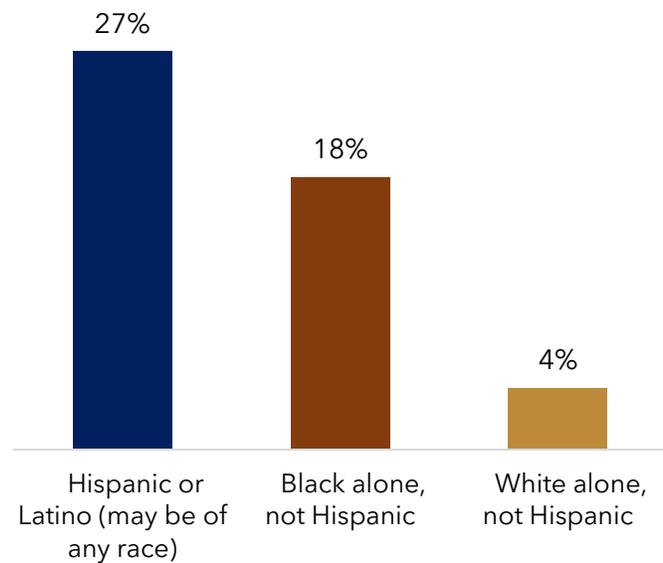
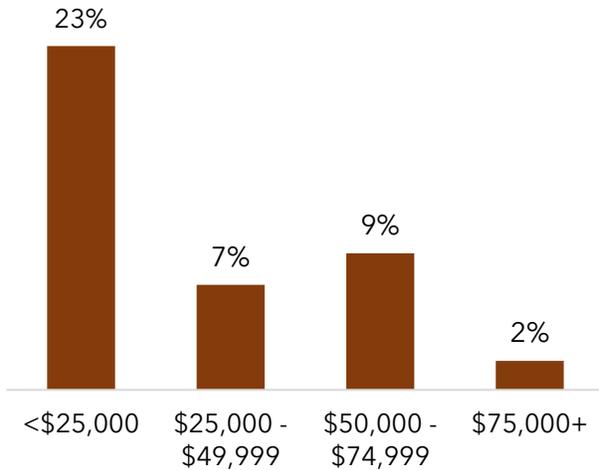


Figure 3. Percent of N.C. Renter Households Behind on Rent, by Income



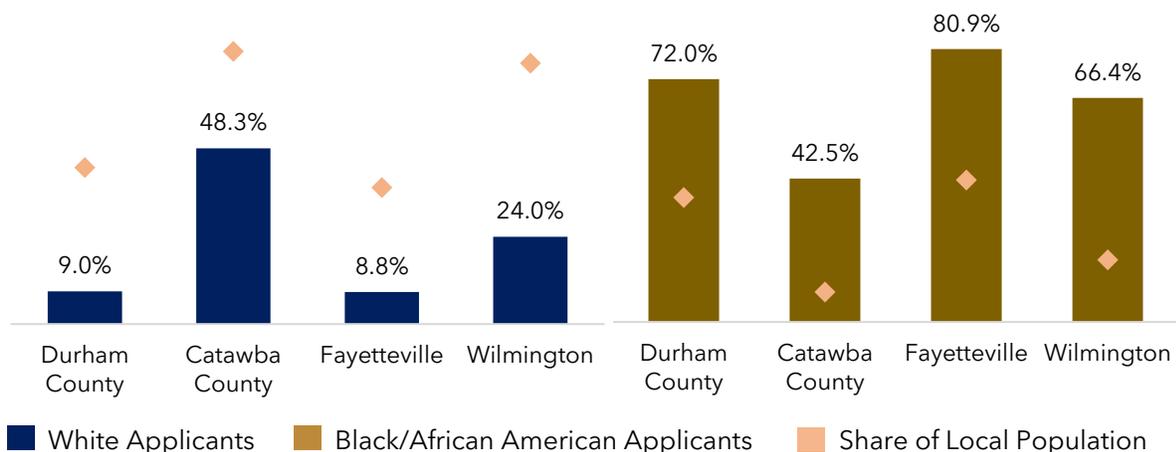
Housing security also varies across income levels, with nearly a quarter of those making less than \$25,000 most likely to be behind on rent (23%). Despite this disparity, those making moderate incomes, are still behind on their rent at moderately high rates, 7% and 9% respectively. North Carolina renters making over \$75,000 are the least likely to be behind on their rental payments (2%).³⁴

These trends largely align with patterns observed across a selection of North Carolina ERA programs. Durham County, Catawba County, Cooperative Christian Ministries (serving Kannapolis and Concord), Fayetteville, and Good Shepherd Inc. (serving Wilmington), provided data on the households they served in the latter half of 2020. Programmatic and demographic data from these programs are

reported in *Table 1*. This data included all households who received funding, not all that applied.

Though each of these localities differs in its demographic makeup and geographic context, several trends emerged across all programs. First, the Area Median Income in North Carolina is \$54,602, and programs are mostly serving families below 30% of the AMI. This finding largely aligns with the HPS data, showing households making less than \$25,000 are behind on rents at the highest rate. Programs are also serving a large proportion of households of color, especially relative to their overall demographic makeup. For example, Black individuals make up 8.9% of Catawba County’s population but make up 42.5% of households receiving rental assistance funding. In Durham County, 36.9% of residents are Black, but the rate receiving rental assistance program is nearly double that, at 72%. Lastly, all programs are serving a high proportion of female head-of-households. Specifically, female head-of-households make up more than 75% of households served in Durham County, Fayetteville, and Wilmington.

Figure 4. Racial Makeup of ERA Program Applicants Compared to Local Population



These trends highlight the fact that households are being financially impacted by COVID-19 in profoundly different ways. The high rates of extremely low-income households, racial and ethnic minorities, and female heads of households receiving rental assistance underscore the need to design and implement programs with an equity framework, and regularly evaluate these programs to ensure funding is reaching those most in need.

Table 1. Demographic and Program Characteristics for Select Jurisdictions

	Durham County	Catawba County	Kannapolis/Concord	Fayetteville	Wilmington
PROGRAM INFO					
# Households Served	*	87	411	299	286
Avg. Assistance Amount	\$1,029.12	\$1,040.99	\$1,518.84	*	\$2,054.85
RACE/ETHNICITY					
White	9%	48.30%	22.90%	8.80%	24.00%
African American/Black	72%	42.50%	65.90%	80.90%	66.40%
Asian	3%	*	*	*	0.40%
American Indian	5%	*	1.00%	*	0.70%
Multi-Racial/Other	8%	*	0.20%	8.20%	8.50%
Hispanic	3%	9.20%	7.80%	2.10%	3.5%**
INCOME					
Avg. Household Income	\$17,784.72	\$8,739.71	\$8,756.88	*	*
Below 30% AMI	*	*	86.40%	49.8%	60.30%
30-50% AMI	*	*	10.90%	19.7%	23.00%
51-80% AMI	*	*	2.70%	30.4%	12.20%
Avg. Percent of Area Median Income	24.40%	*	*	*	29%
OTHER DEMOGRAPHICS					
Avg. Household Size	2.4	2.8	3	*	2.6
Female Head of Households	*	39.10%	81.80%	79.90%	75.60%

** Hispanic included as a separate ethnicity category, so column total does not sum to 100%

* Data not reported from program administrator for these fields

North Carolina Emergency Rental Assistance Landscape

ERA Funding & Timeline

Following a federal disaster declaration on March 13th, 2020, existing local and philanthropic programs provided initial assistance as households started to feel the pandemic's financial impacts. Jurisdictions like Orange County and Cary already had small-scale rental assistance programs, and other jurisdictions had more general financial assistance programs to fill the gap. The CARES Act, passed March 27, 2020, provided the first federal relief funding to states and localities. Four sources of funding from the CARES Act could be used to provide rental assistance: Community Services Block Grants (CSBG), Community Development Block Grants (CDBG-CV), Emergency Solutions Grants (ESG-CV), and Coronavirus Relief Funds (CRF). Details about each of these, and subsequent funding sources, can be found in *Table 2*. North Carolina grantees by funding source can be found in *Appendix B*.

All 100 counties received CSBG funds for their local community action agencies and 28 localities and the state of North Carolina received funding from other CARES sources. Though all of these sources could be used to provide rental assistance, none of them were exclusively intended for rental assistance. CDBG-CV and ESG-CV funding was distributed in separate tranches, with the first tranche distributed on April 2, 2020. News sources and local government documents (e.g., city council agendas, funding plans, Requests for Proposals) show that most localities used this first tranche for more immediate pandemic needs, such as PPE, hand sanitizer, and crisis intervention. Local programs largely started opening in late summer and early fall with CRF funds and the next tranche of CDBG-CV funds. Simultaneously, Community Action Agencies in all 100 counties received CARES CSBG funds on June 15th to administer general financial assistance programs to those experiencing economic hardship. Many local emergency rental assistance programs and financial assistance programs closed by the end of 2020, either because they had run out of funds or because the timeline to spend funding had expired.

Governor Roy Cooper announced North Carolina's statewide emergency rental and utility assistance program, Housing Opportunities to Prevent Evictions (HOPE), in late August. HOPE opened the week of October 12th, seven months after the pandemic began.³⁵ North Carolina was one of the last states to roll out a statewide rental assistance program.³⁶ The program, funded at \$117 million and using a combination of CARES Act CDBG-CV and CRF funds, was administered through the N.C. Office of Recovery and Resilience (NCORR). Funding was distributed to local community agencies who helped process applications and disburse the funds.³⁷

Soon after the application opened, applications were being submitted at a rate of over 100 per hour.³⁸ A week after the program opened, more than 11,000 individuals had applied. The HOPE program closed one month after opening, receiving over 42,000 applications. NCORR faced difficulties distributing funding for the first round of HOPE funding in 2020 – as of March 2021, many approved households were still waiting for their payments.

In addition to the CARES funds allocated in 2020, additional funding from the state's CDBG-CV non-entitlement funding was open to localities with populations smaller than 50,000 (non-Entitlement jurisdictions). The N.C. Department of Commerce accepted applications from eligible jurisdictions starting in the fall of 2020 but did not announce the grantees until February 2021. As of March 15th, 2021, the CDBG-CV funding had not yet been distributed to awarded jurisdictions.

Funding from the Emergency Rental Assistance Program, passed by the Consolidated Appropriations Act of 2021 and administered by the Department of Treasury, reached the state of North Carolina and eligible localities in early January 2021. The program allocated \$25 billion for emergency rental assistance nationally, including \$546 million to be distributed throughout the state of North Carolina. Some local programs – particularly those with existing infrastructure – were able to hit the ground running, opening their programs in early February. Other localities are still in their planning stages.

The state has experienced a slow start to their Treasury ERA program as the North Carolina General Assembly (NCGA) has imposed several implementation roadblocks. Specifically, the NCGA passed a bill (HB 196) to lower the amount that programs can spend on administrative costs, such as staffing, outreach efforts, and program software. HB 196 cut the federally permitted administrative funding cap in half, lowering it from 10% to 5%. The bill also forces NCORR to administer all of the funding itself, rather than allowing larger jurisdictions with their own programs funnel funding through their existing infrastructure.³⁹ HB 196's policies mean that though this new funding is almost five times the size of the HOPE program (\$117 million vs. \$546 million), it will be administered with even fewer supports.

Lastly, the state and local jurisdictions will be receiving significant emergency rental assistance funds allocated under the \$21.6 billion American Rescue Plan Emergency Rental Assistance Program, though these have yet to be distributed. The following table details the uses for each funding source, eligible grantees, and funding amounts. *Appendix B* includes a table listing N.C. jurisdictions and which funding sources they have been allocated.

Table 2. Funding Source Chart¹

Funding Source	Authorizing Legislation	Funding Amount	Housing Related Uses	Jurisdiction Eligibility
Local funds (e.g., general funds, pre-existing emergency assistance funds)	Dependent on local jurisdictions	Unknown	<ul style="list-style-type: none"> Flexible funding depending on locality (e.g. rental assistance, utility assistance, first month's deposit) 	Dependent on local jurisdictions
Emergency Solution Grants - COVID-19 (ESG-CV)	Coronavirus Aid, Relief, and Economic Security Act (CARES Act); Public Law 116-136	\$3.96 billion (U.S.); \$77.7 million (N.C.)	<ul style="list-style-type: none"> Street outreach Rapid re-housing Homelessness prevention Shelter operations 	Current ESG grantees at time of passage
Community Development Block Grants - COVID-19 (CDBG-CV)	Coronavirus Aid, Relief, and Economic Security Act (CARES Act); Public Law 116-136	\$4,990,000,000 (U.S.); \$122.4 million (N.C.)	<ul style="list-style-type: none"> Housing assistance payments (rent, mortgage, utilities) Housing maintenance and rehabilitation Hotels and motel acquisition 	Entitlement: State, local, and territorial governments with populations 50,000+; Non-Entitlement: States pass through funds to localities with populations <50,000
Community Services Block Grants (CSBG)	Coronavirus Aid, Relief, and Economic Security Act (CARES Act); Public Law 116-136	\$1 billion (U.S.); \$26.2 million (N.C.)	<ul style="list-style-type: none"> Essential services for low-income households (e.g. transportation, food, housing) 	Community Action Agencies (CAAs)
Coronavirus Relief Funds (CRF)	Coronavirus Aid, Relief, and Economic Security Act (CARES Act); Public Law 116-136	\$150 billion (U.S.); \$4.13 billion (N.C.)	<ul style="list-style-type: none"> Flexible funding used for necessary expenditures resulting from COVID-19 	State and tribal governments; local governments with populations greater than 500,000
Department of Treasury Emergency Rental Assistance Program (ERAP)	Consolidated Appropriations Act, 2021, Public Law 116-260	\$25 billion (U.S.); \$727.5 million (N.C.)	<ul style="list-style-type: none"> Housing assistance payments for rent (arrears and current/future rent) and utilities 	States, territories, and tribal governments; local governments with populations greater than 200,000
American Rescue Plan Emergency Rental Assistance	American Rescue Plan	\$21.6 billion (U.S.); \$556.2 million (N.C.)	<ul style="list-style-type: none"> Housing assistance payments for rent (arrears and current/future rent) and utilities 	States, territories, and not yet identified "high-need" locations

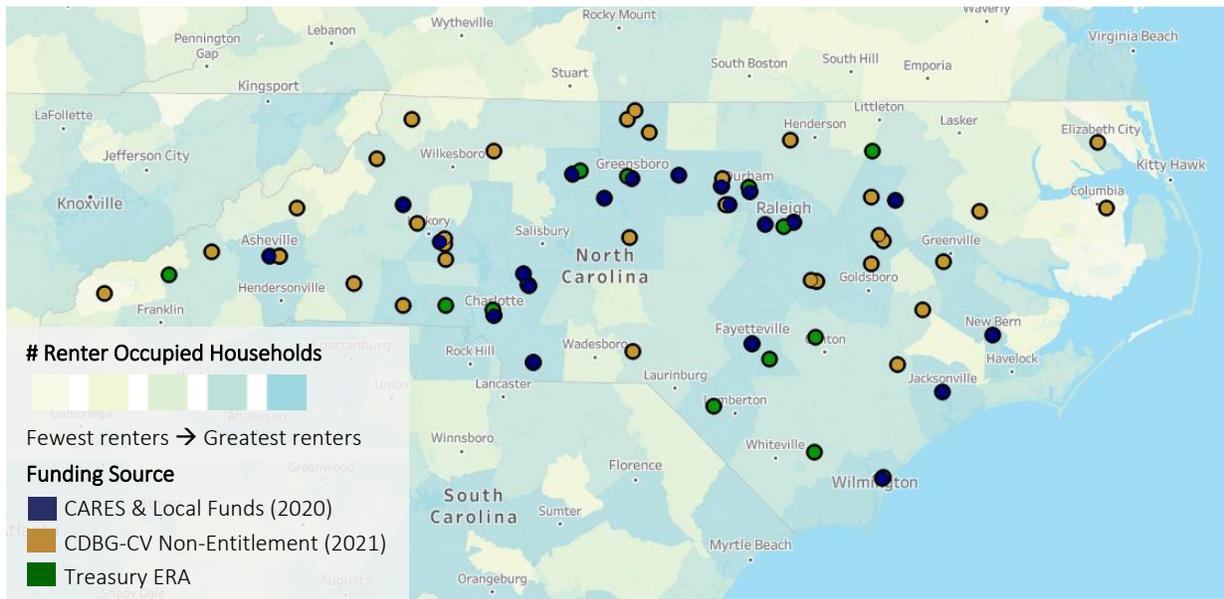
¹ See table of North Carolina's recipient jurisdictions in *Appendix B*.

ERA Geographic Distribution

In order to better understand where North Carolina's rental assistance programs have opened, I superimposed ERA program locations onto a state map. An underlay depicts the number of renter-occupied units per county and the program locations are color-coded by funding stream. The following maps show: 1) programs funded in 2020 with CARES Entitlement or local funds; 2) programs funded in 2021 by the N.C. Department of Commerce with CDBG-CV non-entitlement funds, and 3) programs funded in 2021 with Department of Treasury Emergency Rental Assistance funding. These maps do not include the statewide HOPE program, which was open to eligible renters in every jurisdiction. While the following images show where programs have opened, this [interactive mapping visualization](#) also allows users to see the location names and other information for each program.

Figure 5. N.C. Emergency Rental Assistance Programs, by Funding Source

Map is overlaid on number of renter-occupied units by county, yellow indicates the least number of units and blue indicates the greatest number of units.



This map illustrates that in 2020, most programs opened in metropolitan areas with high numbers of renter occupied households. This makes sense given CARES Entitlement funding, including CDBG-CV and CRF, was distributed based on population size. However, some smaller jurisdictions, such as Orange County, were able to leverage existing local funds to provide assistance as well.

Though the CDBG-CV non-entitlement funds were awarded to the state in fall of 2020, local awards were only announced in February 2021. As a result, most of those programs are not up and running yet. Because these grants were open to jurisdictions that did not receive CDBG-CV entitlement funds, the geographic distribution covers many areas that were not served in the 2020 programs, particularly areas in the more rural eastern and western parts of the state. Finally, funds from the Treasury ERA program are being distributed to similar areas as the initial CARES funds because awards are based off of population size. However, this funding also went to five tribal governments.

Program Challenges & Recommendations

ERA programs across the state differ widely in their program design and administration, which can greatly affect how funds are distributed and who ultimately receives assistance. Further, funding for emergency rental assistance has been disbursed quickly. Many localities do not have experience administering these programs previously, and none have done it at the scale or speed required in these exceptional times.⁴⁰ Using qualitative data from nine program administrator interviews, this section investigates variation in N.C.’s emergency rental assistance programs, common challenges, and recommendations. A list of interviewees can be found in *Appendix C*. Though most recommendations are targeted toward program administrators, some of the challenges must be solved on the local, state, and/or federal policy making level. Challenges are indicated in white text, and relevant recommendations follow. Each recommendation is labeled with the intended audience and whether it addresses enhanced equity, efficiency, or both.

AO = Advocacy Organizations, **LG** = Local Government, **PA** = Program Administrator, **PM** = State/Federal Policy Makers

Intended Audience	Program Phase
Cross-Program Collaboration	
LG	Collaborate with nearby jurisdictions to form county-city or cross-city rental assistance programs.
AO, PM	Create an online resource hub that directs tenants to applicable programs.
Program Outreach & Referrals	
PA	Partner with diverse organizations and networks to reach households who need assistance most and to reach households wary of government programs
PA	Conduct outreach through a variety of channels, including social media, radio, television, and posters/billboards.
PA	Target outreach to populations who have a demonstrated need.
PA	Streamline referral processes to enhance clarity and efficiency.
PA	Conduct landlord engagement and outreach early to increase buy-in.
Tenant Application Support	
PA	Provide alternative application options to ensure the process is widely accessible.
PA	Simplify and streamline applications as much as possible, making real-time modifications as needed.
PA	If permitted under authorizing legislation, allow diverse forms of documentation, such as self-certification.
PA, PM	Eliminate any unnecessary barriers to eligibility.
PA	Provide applications and other resources in languages that are responsive to your community.
Assistance Distribution	
PA	Remain flexible to program changes based on need.
LG, PA	If federal/state program guidelines are inflexible, allocate funding or resources from other sources to ensure the tenant maintains housing stability.
PA, PM	Explicitly allow for direct-to-tenant payments when landlords refuse to participate.
Program Capacity	
PA	Ensure adequate capacity to respond to non-English speakers’ inquiries.
PM	Allot appropriate program funds to be used for administrative purposes.
PA	Automate processes to minimize increased need for temporary staff.

1. Different programs across the state can cause confusion for applicants.

Rental assistance programs are available on the city, county, and state level, but applicants may only be eligible for specific programs depending on their location. If a city received direct funding, for example, some county programs restrict eligibility to residents in unincorporated areas or smaller towns within the county. These nearby yet distinct programs may have different eligibility requirements, funding amounts, or program durations which can cause confusion for renters trying to navigate complex systems. A program administrator in Cary, for example, explained that they directed some applicants to the Wake County program because it had more available funding, but the renters came back, explaining they were ineligible since they were Cary residents. A government official in Asheville explained that with all of the different programs and websites, “it just gets confusing for the average Joe who doesn’t live in this world.”

1.1 Collaborate with nearby jurisdictions to form county-city or cross-city rental assistance programs.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Prior to the pandemic, Carrboro, Chapel Hill, and Hillsborough all ran similar rental assistance programs separately. This was causing confusion for renters across Orange County who were unsure which program to apply to. Shortly before COVID-19, the towns and Orange County came together to streamline their programs, rebranding it into the Orange County Emergency Housing Assistance program. Other counties and cities have also decided to administer their COVID-19 allocations together, simplifying the process for renters. These include Charlotte and Mecklenburg County, and Raleigh and Wake County.

1.2 Create an online resource hub that is updated regularly and directs tenants to applicable programs.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Several states have websites that clearly outline where residents can apply depending on where they reside. For example, the [state of Pennsylvania](#) launched a new website that allows residents to select their city/county from a dropdown menu and directs them either to their local program or to the state program. Similarly, [California’s new website](#) directs applicants to either their local program or the state program before they are able to begin the application. This process is incredibly helpful to renters so that they know where they are eligible to apply from the outset.

Though NCORR links to some local programs on their own website, the list is far from comprehensive, and does not direct applicants to specific program(s) that they maybe be eligible for. The onus is on the applicant to sift through the programs and determine which they can apply to. NCORR should create a comprehensive resource hub that tracks all funding streams and applicable localities to ensure tenants know what their options are and where they can apply. If NCORR is unable or unwilling to house such a website, a local advocacy organization, such as North Carolina Housing Coalition, should consider the possibility of housing such a resource hub.

PROGRAM OUTREACH & REFERRALS

2. Outreach efforts did not always reach those who needed assistance most.

Performing program outreach is a large part of ensuring assistance gets to those who need it most. Morgan Mansa of Cary acknowledged that their program’s “touch points” for residents were limited, and they needed to figure out how to reach more vulnerable populations. While they performed proactive outreach to those who were behind on their water bills, Mansa noted this was an imperfect method because residents may not be responsible for their water bill directly. Asheville expressed a similar concern, as they have had a very slow take-up of their program. The Asheville program is in fact very difficult to find online; performing a cursory search for assistance in Asheville turns up very little. Limited outreach efforts can hinder funding disbursement if few residents know about the program. Further, targeted outreach efforts are necessary to ensure program information gets to people who need it most.

2.1 Partner with diverse organizations and networks to spread the word.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Community-based organizations have existing contacts with households experiencing hardship. Many ERA programs – especially those without an existing network – partnered with these organizations to reach potentially affected households. Orange County partnered with organizations primarily serving Spanish speaking families, since this was a population they had not traditionally reached. Both Charlotte and Wilmington partnered with grassroots organizations and churches. They also reached out to service industry employers and landlord networks to get the word out.

Orange County also highlighted their success reaching some of the lowest-income families through their continuum of care. ERA programs generally have expressed concern that a first-come first-served model was problematic because they were not always able to reach the most vulnerable households before the funding ran out. Orange County’s strong partnership with the local continuum of care allowed them to efficiently reach individuals who were struggling with housing insecurity.

2.2 Conduct outreach through a variety of channels, including social media, radio, television, and posters/billboards.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Local ERA programs reached potential applicants through an impressive variety of means, including local news channels, Spanish-language television networks, and radio. Most programs used their program websites and social media, including Twitter and Facebook, to publicize their programs. Durham County created a billboard outside of their offices with information about the rental assistance program as well, so that individuals who stopped by for assistance could access the information even when the offices were closed. The city of Charlotte also created a marketing campaign with bus wraps and billboards to get the word out more broadly.

PROGRAM OUTREACH & REFERRALS

2.3 Target outreach to populations who have a demonstrated need.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Most programs seemed cognizant of the fact that targeting outreach to populations most affected by the pandemic – including low-income communities and communities of color – was critical to ensuring equitable program delivery. Wilmington targeted churches to reach Black households, Charlotte targeted certain marketing efforts in minority neighborhoods, and Orange County partnered with their continuum of care to reach the lowest-income households.

“We partnered with the city of Charlotte, to create a beautiful marketing campaign, in which we had bus wraps. We had billboards, and we had we had radio ads that were taken out in both Spanish and English, and we utilized our social media pages, as well as the city of Charlotte's website...We hit more broadly to the people that needed it, while also being very targeted. Disproportionately Black and Brown communities have been impacted by COVID-19, so we targeted our marketing in those areas.”

Erin Barbee
Charlotte Housing Partnership

3. Complex referral processes caused confusion for tenants, more work for administrators.

When more than one party is responsible for administering funds, tenants may get confused about who to contact with questions. Constant triaging of referral calls and sharing responsibilities can also cause more work for administrators. This was most apparent in Durham, where both the county’s Social Services Department and Legal Aid played different roles in processing applications and dispersing funds – with applications going back and forth from Legal Aid to Durham County several times. Their process was a vestige of an eviction diversion program that existed pre-COVID, but it quickly became clear that this process was inefficient amid the increased demand caused by COVID. As a result of this process, it initially took Durham between three and five weeks to disperse funding.

Localities cited inefficiencies with the state HOPE referral process as well. Though the state had a centralized 211 number for calls and questions, this was set up *after* some localities had already implemented local housing referral lines. Orange County, for example, used their local Housing Helpline as a primary referral pipeline since shortly after COVID began. The state, however, could not find a way to integrate this into their 211 system. As a result, these lines created a “circular referral process” that caused confusion for applicants and administrators.

3.1 Streamline referral processes to enhance clarity and efficiency.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Prior to the HOPE program opening, Orange County found that having a dedicated phone line (the Housing Helpline) as their primary point of referral worked particularly well. This line helped connect residents with different services and provided updates to callers on new versions of the rental assistance program.

When new programs open in overlapping jurisdictions, programs should work together to devise a referral system that is as streamlined as possible, minimizing confusion for administrators and tenants alike. Having a single primary contact/phone number for tenants to check on their application status or ask questions can ensure transparency in the applicant process. This set-up can also help jurisdictions get money out to tenants faster.

4. Some demographic groups lack trust in government programs.

Though many programs were able to serve undocumented populations, program administrators acknowledged that undocumented households often lack trust in government programs. Barbee of Charlotte Housing Partnership explained undocumented households were unsure if it was safe for them to apply. Mansa of Cary noted that, more generally, communities of color may lack trust in government programs.

4.1 Partner with trusted community organizations to reach households wary of government programs.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Several localities suggested that programs can reach a broader population, including communities of color, undocumented individuals, and non-English speaking populations by forming community partnerships. Charlotte Housing Partnership worked with the Latin American Chamber of Commerce and the Latin American Coalition. Orange County worked with El Centro, the Family Success Alliance, and a refugee community partnership to expand the populations they served.

“In terms of an equity perspective, communities of color lack trust in government often, and so you want to partner with nonprofits so that you can be more accessible to those populations.”

Morgan Mansa
Town of Cary

5. The digital divide limited access to applications and resources.

COVID-19 has highlighted the country’s significant digital divide – the differential access that certain individuals and groups have to computers and internet. With public access points for computer use mostly closed, such as libraries or social service agencies, individuals without computers or internet had few options for accessing online resources. This divide proved to be a major challenge for individuals trying to access online rental assistance applications, particularly when the applications required scanning or copying documentation. Lee Little, a rental assistance administrator with Durham County, noted that prior to the pandemic, the county offices had their doors wide open, making it easy for individuals to receive information or referrals. COVID-19 has almost completely wiped out this form of assistance, requiring programs and offices to quickly adapt.

The digital divide disproportionately impacts some populations, including low-income residents and seniors. Erin Barbee, program administrator for the Charlotte Housing Partnership, explained that those at lower income levels may have a harder time accessing computers to download or upload documentation. Barbee noted, “we had some bias there and assumed that because it's online, it's going to be easy for everybody, but it just wasn't.” This sentiment was echoed by representatives in Cary and Durham. Morgan Mansa, a program administrator in Cary, explained that the digital divide was a constant concern that they have yet to reconcile.

5.1 Provide alternative application options to ensure accessibility.

Audience:	Program	Local	State/Federal	Advocacy	Purpose:	Equity	Efficiency
	Administrators	Govts.	Policymakers	Orgs.			

COVID-19 limited face-to-face interaction, requiring innovation on the part of program administrators to ensure no one was left out of the application process. To overcome the digital divide, many programs allowed applications to be submitted over the phone. An ERA administrator would read the application to the applicant and the application could be completed on the administrators end. Barbee of the Charlotte Mecklenburg Housing Partnership noted that this process has been particularly helpful for seniors, many of whom did not feel comfortable using the online system.

Wilmington also created a dedicated mailbox in front of their building where people could take a blank paper application, complete it, and return it in the same mailbox. Katrina Knight of Good Shepherd, the ERA program administrator, says the mailbox has seen a lot of activity and has proven very useful as an alternative to the online application.

Lastly, several programs, including Charlotte and Orange County, have partnered with local volunteer organizations who have offered to help residents safely complete the application one-on-one. This has had multiple benefits; in addition to helping bridge the digital divide, it also allows residents to work with organizations that they know and trust.

6. Applicants faced long applications, burdensome documentation, and unrealistic program requirements.

Many rental assistance program administrators believe their applicants faced some level of administrative burden. Charlotte and Concord mentioned that applicants struggled with the long applications for assistance. Barbee noted that some people struggled from a literacy level. Roxanna Books, an administrator at Cooperative Christian Ministries in Concord, also expressed wanting to find a way to shorten their application, asking questions and collecting data more efficiently.

In addition to the application itself, most programs require applicants to submit supporting documentation to prove income eligibility and COVID-19 impact. Forms of documentation may include leases, pay stubs, letters from employers, benefit letters, rental ledgers, eviction notices, and more. Karen Harrington, an administrator with Catawba County, noted that applicants often don't have copies of this information, so while they might complete an application in one day, it could take many additional days for the applicant to collect the needed supporting documentation.

Harrington expressed, "that's the bureaucracy, with almost all the funds we administer, there's these processes...for people who are struggling or in crisis or don't have a lot of support or resources, those processes can often be complex." Knight of Wilmington echoed this sentiment, noting that for households who are already struggling, asking a landlord or employer for documentation can be a source of embarrassment. Finding and providing all of this documentation is also made more difficult given the fact that many of these families are in crisis and are worried about potentially losing their homes.

Finally, some programs imposed unrealistic program requirements that severely limited who could access funds. Union County expressed over email that they had restricted applicants to adult households with no minor children. This requirement leaves out many households that have been most severely impacted by the pandemic – single mothers with children. Durham County's program required that households prove they are "sustainable," or will be able to pay rent going forward once they are assisted. Someone who has been unable to pay rent because they lost their job due to COVID-19, however, may not be able to demonstrate their eligibility if they don't yet have future employment lined up. These types of requirements are particularly restrictive during an economic recession when many jobs have not yet returned.

"I mean, it's a real project for somebody who's really stressed out to gather all that stuff or to or to give us the information we need so that we can try to gather it...it's a real effort. And I get it, you know, we want to be good stewards...but it's just really hard. It's just really hard. And folks when they are already just at their wits end, and that just, it pains us because we know we need it [documentation]. We know we can't cut that check without it."

Katrina Knight, Good Shepherd Inc.

6.1 Simplify and streamline applications as much as possible, making real-time modifications as needed.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Wilmington launched a website for their Eviction Prevention Program that was essentially just the application, attempting to make the simplest form possible while still gathering all of the necessary information for grant requirements. Charlotte’s application portal has also been simplified to only require the most necessary information. The portal also provides helpful reference forms to let applicants know what will be expected up front. Durham County noted that in the future, they would try to eliminate any documentation that was not needed.

6.2 If permitted under authorizing legislation, allow diverse forms of documentation, such as self-certification.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

To mitigate burdensome documentation requirements, some programs have moved to a self-certification/self-attestation model, which allows tenants to provide a signed statement that they meet certain eligibility requirements rather than providing concrete documentation. For example, individuals can sign a form that attests they make below a certain income, or that they have been financially impacted by COVID. This can be helpful for all applicants, but particularly those who are self-employed or work in informal sectors, such as childcare.

Barbee of Charlotte Housing Partnership noted that their program started allowing self-certification because they noticed that some applicants were unable to provide all of the documentation needed to comply with the program requirements. Their program allows a self-certification for both income and COVID hardship. Barbee noted that the self-certification model decreases barriers for applicants and allows the program to disburse funds more efficiently.

Some localities expressed concern that self-certification would not be allowable under the funding guidelines and that this could open up the door for fraud. Recent guidance from the U.S. Department of Treasury, however, specifically states that self-certification is a valid way for applicants to demonstrate eligibility. Further, large state and local programs that have allowed self-certification elsewhere – including the state of Washington and Santa Clara, CA – found nearly no fraudulent instances when they allowed self-certification.⁴¹

6.3 Eliminate any unnecessary barriers to eligibility.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Imposing unnecessary eligibility requirements, such as only allowing adult households to apply or requiring households prove sustainability, can severely limit access to programs. These requirements can be imposed on the state or local level, as well as by program administrators. These can have unequitable consequences, leaving out renters who may need the assistance most. Program administrators should critically assess their eligibility requirements – removing any unnecessary barriers – to ensure those most in need are able to receive the assistance.

7. Programs lacked support for non-English speaking households.

Many localities expressed concern that non-English speakers experienced undue burdens completing the application. Further, many places lacked adequate resources to serve non-English speaking populations as quickly and efficiently as those who did speak English. Some localities, such as Concord, lacked translated applications or resources at all. Cary also expressed concern that they have a high number of Asian residents, but no translated resources to serve those individuals. Charlotte did not have translated resources at the beginning of their program, so they were only able to serve English-speaking populations.

After adding a Spanish application, Charlotte received a high volume of Spanish applications and did not have enough Spanish-speaking counselors to quickly process those applications. Similarly, Orange County had a language phone line for non-English-speaking residents, but their staff was unable to do intake fast enough for the high volume of Spanish-speaking applicants.

7.1 Provide applications and other resources in languages that are responsive to your community.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

While language needs will vary by locality, it is crucial for places to assess their local needs and have appropriate resources available to non-English speakers from their program’s outset. Wilmington noted that they worked very hard to translate everything into Spanish at the beginning of the program. They received a high number of applications from Spanish speaking households when the program opened, but this eventually tapered off. Knight, of Good Shepherd Inc., felt validated by this because it meant they were able to efficiently respond to the community’s needs.

7.2 Ensure adequate capacity to respond to non-English speakers’ inquiries.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Translated websites and applications are helpful, but applicants may still have questions or concerns that require one-on-one conversations. Localities took several approaches to ensure applicants of all languages could get their questions answered. Charlotte has hired a service so that if someone needs translation, they can complete the application and ask questions with someone in the language of their choice.

Orange County, which had no Spanish-speaking staff in-house, partnered with other community organizations that primarily serve Spanish-speaking populations. These groups are able to perform outreach to Spanish speakers and help them complete their applications.

8. Applicant need exceeded per-household funding allotments.

As the pandemic continued, many households who needed assistance at the beginning of the pandemic needed assistance again. At the same time, the amount of arrears applicants owed continued to grow. Cooperative Christian Ministries explained that tenants may owe \$7,000, but their program policy was to only pay up to \$2,000. Tenants could access an additional \$600 from Salvation Army, but a total of \$2,600 still left the tenant owing a significant amount.

In particular, localities that had rental assistance programs prior to COVID-19 felt apprehension about continuing to increase the amount of assistance provided. Cary expressed that, despite additional need, there was “anxiety” about throwing out protocols they used for a decade.

8.1 Remain flexible to program changes based on need.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

As it became apparent that the amount of rent households owed was increasing, several programs adapted their guidelines to responsive to this additional need. Prior to the pandemic, for example, Orange County had a lifetime assistance cap of \$2,000. During the pandemic, this has gradually increased to \$6,500. As soon as they receive recently allocated CARES funds, they are planning on eliminating the cap entirely. Cary also started off only providing funds to cover a month of rent, which they have since increased to six months.

Though allocating funds to households can be a balance between serving more households at lower amounts vs. serving fewer households at higher amounts, arbitrary caps about how much a household may need should be reconsidered amid COVID-19. The intent of rental assistance is to maintain housing security, and programs should be flexible and open to changing program guidelines based on community need.

9. Some landlords were unwilling to participate, and there was a lack of flexibility to provide assistance to tenants if landlords refused.

Though renters typically apply directly to rental assistance programs, landlords and property management companies generally receive the assistance money. Some landlords, however, refuse to participate in these programs, or fail to respond to requests for payee information. As a result, renters are left at a dead end for assistance.

Program administrators cited a number of reasons that landlords refused to participate, including not wanting to participate in government-funded programs or not wanting to provide their W-9s. Orange County noted resistance, especially among smaller landlords, around providing financial information. Some programs required landlords to forgive a portion of their rent in order to receive the funding, which was not well-received either. Charlotte, for example, quickly rescinded their landlord rental concession requirement when a local apartment association opposed it. Some programs also restricted the timeframe and grounds on which landlords could evict tenants once they received emergency rental assistance, which was also a cause for concern among landlords. The statewide program had this requirement, and administrators in both Durham and Charlotte noted that these

ASSISTANCE DISTRIBUTION

eviction requirements made landlord hesitant to participate. The Apartment Association of North Carolina lobbied against this requirement.⁴²

9.1 If federal/state program guidelines are inflexible, allocate funding or resources from other sources to ensure the tenant maintains housing stability.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Several programs used general funds that could be dispersed in exceptional cases when applicants were clearly in need but didn't exactly meet the eligibility criteria. This included tenants whose landlords refused to accept funding. Orange County, for example, has a general fund from their pre-COVID Emergency Housing Assistance program which allows them to fund tenants in exceptional situations. Orange County also devised a system to cut checks to landlords that were not from the government and did not require the landlords to provide financial information.

Good Shepherd Inc., Wilmington's program administrator, also relies on their existing housing services to assist renters whose landlords refuse to participate. If a household is at risk of losing their housing, Good Shepherd uses Rapid Re-Housing funds to move the family and set them up in a different apartment.

9.2 Explicitly allow for direct-to-tenant payments when landlords refuse to participate.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Local program administrators are often apprehensive about using funds in ways that may go against the funding guidance employed by the authorizing legislation. Current federal guidance, however, explicitly states that programs can administer funding to tenants directly if the landlord is unresponsive after three outreach attempts. Localities can have comfort in knowing they do not need to turn away families in need, nor will they get in trouble later on for paying tenants directly. Charlotte has incorporated this direct payment model into their most recent rental assistance program phase.

9.3 Conduct landlord engagement and outreach early to increase buy-in.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Both Durham and Wilmington emphasized the need to engage landlords earlier in the process. Durham lacked the capacity to do so early on but has begun an engagement process to better understand landlord needs and how the rental assistance process could be made easier for them. Wilmington also hopes to conduct more outreach to landlords in the future, particularly to improve tenuous landlord-tenant relationships, thereby improving housing stability.

10. Programs did not have staff capacity to meet demands.

Nearly every program expressed the need to increase staff capacity in order to adequately respond to program demand. For example, Cary would typically assist 20 residents in a month prior to COVID-19. In March 2020, Cary received 300 requests for assistance. These requests had to be split up over the next several months because Cary did not have the staff capacity to respond to all requests.

Orange County faced similar staffing issues. As a result, program staff spent nights and weekends reviewing and processing applications to ensure quick disbursement of funds. Wilmington's Good Shepherd noted that without additional staff, they would have had to drop all of their other homelessness programming activities.

This challenge was exacerbated by the fact that some programs were not allocated any administrative funds, making it difficult for programs to hire new staff at all. In these cases, programs had to reallocate existing staff away from their positions to work on emergency rental assistance or enlist volunteers to help review applications.

10.1 Allot appropriate program funds to be used for administrative purposes.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

The federal government sets caps that programs can use for administrative purposes, such as staff pay, training, and hiring. However, these caps can be whittled down when the funding gets to the state or local level. As a result, many localities were running programs of an unprecedented size, but were not able to scale up their capacity.

For the Treasury ERA program currently being rolled out, the North Carolina General Assembly has already lowered the administrative funding allotment from the federally permitted 10% to 5%. This severely limits the speed and quality at which programs can operate. Policymakers must consider the significant costs it takes to operate programs of this magnitude and allow an appropriate percent of program funds to be spent for administrative purposes. As funding from the American

Rescue Plan comes to the state, the NCGA should maintain the federal 10% administrative funding cap to allow the program to run as smoothly as possible. Further, the NCGA should restore the administrative funding cap for current Treasury ERA funds to 10%.

"Fight for those admin dollars. There's no way to do this program without scaling your staff, or it will basically swallow you. And sometimes, cities and counties are a little bit hesitant to come up with 10% of the award amount in order for you to survive."

Erin Barbee
Charlotte Mecklenburg Housing Partnership

10.2 Automate processes to minimize increased need for temporary staff.

Audience: Program Administrators Local Govts. State/Federal Policymakers Advocacy Orgs. **Purpose:** Equity Efficiency

Though scaling up staff is necessary to administer large amounts of funding, this also introduces additional constraints. For example, hiring, onboarding, and training temps can be time-intensive, and temps can leave at a moment’s notice. Both Durham County and the Charlotte Housing Partnership noted it was difficult to train people quickly and confidently enough to keep up with growing demand.

To mitigate the use of temporary workers, programs should automate their application processes as much as possible. The Charlotte Housing Partnership, for example, used a streamlined Smartsheet application, and trained other localities to do the same. Charlotte/Mecklenburg County has recently upgraded to a Salesforce system that does much of the eligibility screening and income calculations on the back-end. Though this system is likely cost-prohibitive for smaller locations, programs should identify where free/low-cost services could automate their processes. For example, some programs were asking applicants to email them applications. This greatly increases time spent reviewing emails, saving files, and conducting data entry when free survey software could save significant time. Potential software includes SurveyMonkey, Google Forms, Smartsheet, and Trello.

The state of North Carolina could also use some of its federal funding to provide a common software platform for localities that opt in. For example, most localities in Pennsylvania are using the state’s common Compass website to accept initial applications. As more programs scale up service delivery for the Treasury ERA and American Rescue Plan funding, they should specifically look to streamline their technological and software systems.

Immediate Next Steps

Though the previous section offered an array of policy and programmatic recommendations, several immediate steps are necessary to ensure equitable and efficient disbursement of the current \$727 million in Treasury ERA funds and forthcoming American Rescue Plan ERA funds that North Carolina will receive.

- 1. The NCGA should restore the administrative funding cap to 10% for current Treasury ERA funds and should maintain this cap for forthcoming American Rescue Plan funds.** The scale of current ERA programs is unprecedented, and programs need ample funds to conduct essential activities including program outreach, increasing staff, improving technological infrastructure, and performing monitoring and evaluation.
- 2. NCCORR should create a resource hub that directs tenants to applicable programs.** The recent passage of federal funding will profoundly help North Carolina's renters, but only if they can easily access programs in their area. The ERA landscape can be difficult to navigate, and this would severely lessen the barrier to entry for renters.
- 3. Program administrators should assess outreach and application processes to ensure the program is able to serve those most in need.** COVID-19 has impacted groups in profoundly different ways. To mitigate the differential impact of COVID-19 and existing housing disparities, programs should assess internal process to ensure the program is accessible to households of color, extremely low-income households, elderly households, non-English speakers, and female head-of-households.

Affordable Housing & Program Delivery Post-COVID

COVID-19 has shone a light on some of the country's most pressing problems. The financial impact of the pandemic has specifically highlighted the high number of households that are at risk of eviction or homelessness in the face of an unexpected cost, loss of income, or other financial shock. Several interviewees spoke to the fact that this pandemic has spotlighted the country's deepening affordable housing crisis and our woefully inadequate policy responses.

Emila Sutton of Orange County asserted that COVID "really revealed that there is this huge underlying need that just hasn't been addressed." Lee Little, of Durham County, echoed this: "everyone has to understand that we, the country, actually has a problem with affordable housing...We do not have affordable housing for individuals." As did Harrington of Catawba County: "Our community doesn't have a lot of affordable housing. So even if...we're helping people get caught up on their rent and those types of things, you know, there's going to be a struggle for families who've lost some income." Karen also highlighted the persistent need for rental assistance, noting that amid COVID-19, she suspects housing instability will be the most pressing issue families continue to face.

Though the pandemic is far from over, this reckoning with policy shortcomings has also spurred innovation, an expanded social safety net, and a reprioritization of the country's needs. As a result, many localities are already considering how they can integrate new policy solutions from COVID-19 into permanent program models. The Charlotte Mecklenburg Housing Partnership, which only served homeowners prior to the pandemic, has already decided that rental assistance will be an ongoing part of the organization's activities. The organization is also considering other program options, such as eviction prevention and rental readiness, to address rental access from several angles. Orange County said that after scaling their program up so much, they can't imagine returning it to its original size. Though they ran a rental assistance program pre-COVID, they will keep many features of the new program, including partnerships with surrounding towns and their streamlined referral process through the Housing Help Line.

Other administrators acknowledged that COVID helped them better understand the barriers individuals face applying for programs, and how their programs pre-COVID may have been inaccessible to some. Cooperative Christian Ministry acknowledged that though their preference is operating in-person, providing online and phone options for households to apply can open up the program to those who may otherwise be unable to make a workday appointment. Though lasting change must come from all levels – federal, state, local, and grassroots – these examples provide promise for a future that prioritizes housing stability through innovative policy solutions.

Appendix A. Methodology

To begin this research, I used data from federal awards allocations and various news articles to create a database of North Carolina emergency rental assistance programs.² This database included publicly available information on how the program was funded, who administered the program, implementation details, and eligibility requirements. This process allowed me to assess program variation and provided insight into both quantitative and qualitative data that would be helpful to collect.

To assess the statewide program landscape, I used legislative information, funding data, and news articles to construct a narrative about the emergence of N.C. rental assistance programs since the onset of COVID-19. Specifically, this section outlines the funding sources, implementation timeline, and geographic distribution of ERA programs.

To assess housing need across North Carolina, I collected anecdotal evidence from news stories, analyzed state-level survey data from the Census Bureau Household Pulse Survey, and analyzed applicant data from select programs across the state. I requested administrative data from 20 program administrators in mid-December, but many programs lacked the infrastructure or capacity to send the requested data. As a result, data was only received for five localities. Durham County and Fayetteville sent aggregate-level data, and Catawba County, Wilmington, and Kannapolis/Concord sent individual-level data. The data from all five localities is reported as averages to illustrate demographic trends in rental assistance need across the state.

Lastly, I sent interview requests to program administrators and local government officials requesting to discuss their programs, challenges, and lessons learned. The final interview sample included nine individuals, each from different localities. A list of interviewees can be found in *Appendix B*. Interviews were conducted between February 9th and March 18th, 2020.

Interviews were divided into two parts. The first part asked about programmatic details, such as outreach initiatives, eligibility requirements, landlord participation, capacity, and program monitoring. The second part asked more broadly about challenges facing administrators and applicants, lessons learned, program modifications, and recommendations. The interview protocol can be found in *Appendix C*. All interviews were recorded and transcribed using Otter.ai. Interviews were then coded using Grounded Theory technique to iteratively identify patterns and themes across interviews. These interviews serve as the foundation for the section *Program Challenges & Lessons Learned*.

² This database largely excluded general financial assistance programs run through 100 community action agencies funded by CARES CSBG dollars. An exception to this is Catawba County, a unique program where the county administered the CSBG funding. Though I aimed to make this database as comprehensive as possible, the decentralized nature of these programs means it is possible some were missed.

Appendix B. ERA Funding Sources and N.C. Recipients

Geographic Level	Geography	ESG-CV	CDBG-CV (Entitlement)	CDBG-CV (Non-Entitlement)	CRF	CSBG (All Counties)	ERAP (Treasury)
State	North Carolina			X	X		X
City/Town	Asheboro			X			
City/Town	Asheville		X				
City/Town	Beulaville			X			
City/Town	Burlington		X				
City/Town	Carrboro			X			
City/Town	Cary		X				
City/Town	Chapel Hill		X				
City/Town	Charlotte city	X	X		X		X
City/Town	Concord		X				
City/Town	Conover			X			
City/Town	Durham city	X	X				X
City/Town	Eden			X			
City/Town	Elizabeth City			X			
City/Town	Fayetteville city		X				X
City/Town	Four Oaks			X			
City/Town	Fremont			X			
City/Town	Gastonia		X				
City/Town	Goldsboro		X				
City/Town	Granite Falls			X			
City/Town	Greensboro city	X	X				X
City/Town	Greenville		X				
City/Town	Hickory		X				
City/Town	High Point		X				
City/Town	Hillsborough			X			
City/Town	Jacksonville		X				
City/Town	Jonesville			X			
City/Town	Kannapolis		X				
City/Town	Kinston			X			
City/Town	Lenoir		X				
City/Town	Maiden			X			
City/Town	Morganton		X				
City/Town	New Bern city		X				
City/Town	Newton			X			
City/Town	Oxford			X			
City/Town	Raleigh city	X	X				X
City/Town	Reidsville			X			
City/Town	Rocky Mount		X				
City/Town	Salisbury		X				
City/Town	Shelby			X			
City/Town	Wilmington		X				
City/Town	Wilson City			X			
City/Town	Winston-Salem city	X	X				X
County	Alamance County					X	

Geographic Level	Geography	ESG-CV	CDBG-CV (Entitlement)	CDBG-CV (Non-Entitlement)	CRF	CSBG (All Counties)	ERAP (Treasury)
County	Alexander County					X	
County	Alleghany County					X	
County	Anson County					X	
County	Ashe County			X		X	
County	Avery County					X	
County	Beaufort County					X	
County	Bertie County					X	
County	Bladen County					X	
County	Brunswick County					X	
County	Buncombe County			X		X	X
County	Burke County					X	
County	Cabarrus County					X	X
County	Caldwell County					X	
County	Camden County					X	
County	Carteret County					X	
County	Caswell County					X	
County	Catawba County					X	
County	Chatham County					X	
County	Cherokee County					X	
County	Chowan County					X	
County	Clay County					X	
County	Cleveland County					X	
County	Columbus County					X	
County	Craven County					X	
County	Cumberland County		X			X	X
County	Currituck County					X	
County	Dare County					X	
County	Davidson County					X	
County	Davie County					X	
County	Duplin County					X	
County	Durham County					X	X
County	Edgecombe County					X	
County	Forsyth County					X	X
County	Franklin County					X	
County	Gaston County					X	X
County	Gates County					X	
County	Graham County			X		X	
County	Granville County					X	
County	Greene County					X	
County	Guilford County				X	X	X
County	Halifax County					X	

Geographic Level	Geography	ESG-CV	CDBG-CV (Entitlement)	CDBG-CV (Non-Entitlement)	CRF	CSBG (All Counties)	ERAP (Treasury)
County	Harnett County					X	
County	Haywood County			X		X	
County	Henderson County					X	
County	Hertford County					X	
County	Hoke County					X	
County	Hyde County					X	
County	Iredell County					X	
County	Jackson County					X	
County	Johnston County			X		X	X
County	Jones County					X	
County	Lee County					X	
County	Lenoir County					X	
County	Lincoln County					X	
County	Macon County					X	
County	Madison County					X	
County	Martin County			X		X	
County	McDowell County					X	
County	Mecklenburg County		X		X	X	X
County	Mitchell County					X	
County	Montgomery County					X	
County	Moore County					X	
County	Nash County			X		X	
County	New Hanover County					X	X
County	Northampton County					X	
County	Onslow County					X	
County	Orange County			X		X	
County	Pamlico County					X	
County	Pasquotank County					X	
County	Pender County					X	
County	Perquimans County					X	
County	Person County					X	
County	Pitt County			X		X	
County	Polk County					X	
County	Randolph County					X	
County	Richmond County			X		X	
County	Robeson County					X	
County	Rockingham County			X		X	
County	Rowan County					X	
County	Rutherford County			X		X	

Geographic Level	Geography	ESG-CV	CDBG-CV (Entitlement)	CDBG-CV (Non-Entitlement)	CRF	CSBG (All Counties)	ERAP (Treasury)
County	Sampson County					X	
County	Scotland County					X	
County	Stanly County					X	
County	Stokes County					X	
County	Surry County					X	
County	Swain County					X	
County	Transylvania County					X	
County	Tyrell County			X		X	
County	Union County		X			X	X
County	Vance County					X	
County	Wake County	X	X		X	X	X
County	Warren County					X	
County	Washington County					X	
County	Watauga County			X		X	
County	Wayne County					X	
County	Wilkes County					X	
County	Wilson County			X		X	
County	Yadkin County					X	
County	Yancey County			X		X	
Tribal Entity	COHARIE INTRA TRIBAL COUNCIL INC.						X
Tribal Entity	EASTERN BAND OF CHEROKEE INDIANS						X
Tribal Entity	HALIWA-SAPONI INDIAN TRIBE						X
Tribal Entity	LUMBEE TRIBE OF NC DBA LUMBEE LAND DEVELOPMENT						X
Tribal Entity	WACCAMAW SIOUAN TRIBE						X

Appendix C. Interviewee List

Name	Position & Affiliation	Geographic Area Served
Erin Barbee	Senior Vice President Programs and Fund Development, Charlotte Mecklenburg Housing Partnership, Inc.	Charlotte & Mecklenburg County
Lee Little	Program Manager, Aging and Adult Services, Durham County	Durham County
Katrina Knight	Executive Director, Good Shepherd Center Inc.	Wilmington
David Harris	Homeless and Prevention Services Division Director, Department of Housing Affordability and Community Revitalization, Wake County Government	Wake County & Raleigh
Morgan Mansa	Housing & CDBG Manager, Town of Cary	Cary
Roxanna Books	Financial Assistance Program Manager, Cooperative Christian Ministry	Kannapolis & Concord
Paul D'Angelo	Community Development Program Director, Town of Asheville	Asheville
Karen Harrington	Director, Catawba County Department of Social Services	Catawba County
Erika Brandt & Emila Sutton	Housing and Community Development Manager & Housing and Community Development Director, Orange County	Orange County

Appendix D. Interview Protocol

Thank you so much for taking the time to speak with me today. My name is Emma, and I am a second year Master of Public Policy Student at Duke University's Sanford School. I am working with NC Housing Coalition to better understand how North Carolina emergency rental assistance programs in response to COVID-19 were implemented, including challenges, lessons learned, and recommendations for future programs. I'll start the interview just asking you to describe key components of your program, including program outreach, the application process, landlord participation, monitoring and accountability, and capacity. Then, I'll ask you more broadly about challenges, program modifications, lessons learned, and recommendations.

I am hoping to record our conversation so that I can reference it in the future. If I create any public-facing briefs for NC Housing Coalition, I will not use any identifying information without getting permission from you first. Is that okay with you?

[Start recording.]

Great! Do you have any questions before I get started?

- 1. First, could you just provide a high-level overview of your rental assistance program, including when it launched, how it was funded, and the services it provided (e.g. rent, mortgage, utilities)?**
 - a. How much was the program funded for?
 - b. Did the program just cover arrears, or also current/future rent?
 - c. How much funding were renters able to receive and for how many months?
 - d. Did this program exist pre-COVID or was it expanded in response to COVID?
 - e. What geographic area did it cover?

- 2. What OUTREACH activities did you conduct to let potential applicants know about the program?**
 - a. Outreach to other community services?
 - b. Newspapers? Radio?

- 3. Could you provide an overview of the program's INTAKE procedure, including the application process and eligibility requirements?**
 - a. APPLICATION
 - i. Offered on paper and online?
 - ii. Different languages?
 - iii. What documentation was required?
 - b. ELIGIBILITY REQUIREMENTS
 - i. COVID hardship?
 - ii. Income?
 - iii. Eviction or evidence of past due rent?
 - iv. Current lease?
 - v. Citizenship status?

- 4. How were LANDLORDS involved in the rental assistance program?**

- a. Were there any requirements for participating landlords (e.g. had to waive late fees, had to agree not to evict for a certain amount of time)?
 - b. Were there options for renters to receive funding if landlord refused to participate or were non-responsive?
- 5. Once applications were received, could you describe the process for processing applications and distributing funds?**
- a. On average, how long did it take to distribute funds after an application was received?
 - b. Approximately what proportion of applicants were denied aid?
 - c. Were there common reasons applicants were denied aid?
 - d. Were you able to serve all eligible applicants that applied without running out of funding?
- 6. Do you have processes in place for program MONITORING and data storage?**
- a. Are you able to track which populations are being served?
 - b. Have you used this data to inform program changes?
- 7. I am interested in hearing about your program's CAPACITY. How many full-time staff do you have working to administer this program?**
- a. Have you had to increase capacity since the program launched?

Great, next I am going to ask about challenges your program experienced, changes you made to address those challenges, and lessons learned/recommendations for future programs. I am interested in any insight you have, but I am particularly interested in challenges and lessons learned related to efficiency (or how quickly funds were able to be distributed to renters in need) and equity (or the extent to which the most vulnerable renters were able to access the program).

- 8. So, with that in mind, what were some of the key challenges you experienced as program administrators administering the rental assistance program?**
- a. This could deal with any phase we talked about, including outreach, intake, landlord participation, funding distribution, program monitoring, or capacity.
- 9. FOR EACH CHALLENGE LISTED: Have you made any program modifications to address [X] challenge?**
- a. How successful was this change?
 - b. IF NO: Are there any changes you would like to make moving forward?
- 10. What do you think were the most common challenges renters faced in accessing/applying for/receiving rental assistance funds?**
- a. E.g. finding out about the program, documentation, application requirements/eligibility, not enough funding
 - b. Do you think this affected who could access the program?
- 11. FOR EACH CHALLENGE LISTED: Have you made any program modifications to address [X] challenge?**
- a. How successful was this change?
 - b. IF NO: Are there any changes you would like to make moving forward?

- 12. Are there any changes we have not discussed that you think would make your ERA program more equitable or efficient?**
- 13. *[If time permits]:* Are there any local/state/federal factors that you think either enhanced or inhibited the rental assistance program?**
 - a. This could include things like political will/support, eviction moratoriums, or requirements imposed that you don't have control over.
- 14. There are a lot of programs starting up for the first time, and programs that will soon restart with the infusion of \$25 billion in the recent COVID Relief Package. What recommendations would you make to new programs/program re-opening with new funding?**
- 15. Lastly, do you plan on continuing to run your rental assistance program after COVID?**

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