

“Where’s My Money?”

Analysis of Federal
COVID-19 Rent Relief in
Washington Local
Governments

Art Lansing

Master of Urban Planning

Committee Chair: Christopher Campbell

Committee Member: Andrew Dannenberg

Department of Urban Design and Planning,
University of Washington

© Copyright 2022

Art Lansing

University of Washington

Abstract

“Where’s My Money?”

Analysis of Federal COVID-19 Rent Relief in Washington Local Governments

Chair of the Supervisory Committee:

Christopher Campbell

Department of Urban Design and Planning

The COVID-19 pandemic upended the nation and triggered the largest approval and release of Federal rent relief since the 2008 Great Recession. However, in 2020 and 2021 only a small fraction of the Federal rent relief was disbursed to the renters and landlords who needed it; only 37% of the nearly \$1.1 billion total aid in Washington. This program analysis uses a qualitative method of semi-structured interviews with staff in three Washington counties and the Washington Department of Commerce to better understand the challenges and strategies used to deploy emergency rent relief in Washington and to prepare a set of recommendations for future emergency rent relief programs.

Challenges experienced in the development and deployment of emergency rent relief programs included general workplace struggles amid COVID-19 disruptions (such as moving to working from home, losing staff to burnout or illness, etc.), ambiguous and shifting requirements from the U.S. Department of the Treasury, lack of suitable infrastructure and systems to manage emergency rent relief applications and disbursement, and difficulties scaling programs to the size and budget demanded.

Recommendations to address these issues include reducing ambiguity for program requirements and applicants, providing an option for a unified and supported system to manage aid programs, managing expectations regarding scale and expansion of programs with budget increases, and providing a single point-of-entry for applicants.

Table of Contents

Introduction	1
Author’s Disclaimer of Interest	5
Research Questions	6
Literature Review	6
Key Themes	7
Impacts of Federal Relief on Local Economies.....	7
Hypothetical Future Impacts of COVID-19 on Housing.....	9
Equity Issues of COVID-19 Rent Relief	11
Issues in Distributing COVID-19 Rent Relief	12
Methods	14
Data Needs	15
Collection Process	17
Recording & Treatment	18
Decision & Interpretation	18
Definitions and Findings	19
Defining Programs and Departments.....	19
Direct Award versus Department of Commerce-Managed Funds.....	20
Department Selection to Manage COVID-19 Emergency Funds	23
Case Studies	25
Snohomish County	26
Kitsap County	32
Yakima County	38
Washington State Department of Commerce	44
Department of Commerce: Community Relief Fund	44
Department of Commerce: Landlord COVID Relief Program	47
Department of Commerce: Rental Assistance Team	49
Analysis.....	52
Issues.....	53
Industry Practices and Recommendations.....	62
Conclusion.....	70
References.....	73
Acknowledgements	1

Introduction

The COVID-19 pandemic completely upended the nation in 2020, cascading failures across every sector, region, and social stratum. In the United States, among those hit hardest were renters, who were disproportionately likely to contract COVID-19, lose their job, lose their home, or some combination of the above when compared to homeowners (Reina et al. 2021). The federal government has provided billions of dollars of relief funding targeted directly for renters and their landlords, but two years on, only a small fraction of that money has made it to the people who need it most. As of January 1, 2022, only 37% of the total nearly \$1.1 billion of aid in Washington has been distributed (Dodge 2021a). What barriers exist in the local government rent relief program operations, and what mechanisms are in place to connect relief to those who need it?

2020, 2021, and 2022 were dominated by descriptions of huge aid programs falling flat on their face, governments and agencies trying and failing to adapt, and a sense of overwhelming frustration and confusion about *why*.



Figure 1: Seattle Times headline highlighting frustrations with pandemic rent assistance programs. (Groover, 2021)

In a phenomenon as infrequent as a visit from Halley’s Comet, both landlords and tenants were unified. They speak in one voice with a demand for transparency, explanation, and above all, access to the financial assistance they so desperately need to recover from the economic effects of a world-altering pandemic. These two groups, typically at odds at best and

outright adversarial at worst, asked for the same thing – an explanation for why their state, county, and city have struggled to connect renters and landlords to the billions of dollars set aside for them at the federal level.

As part of the Federal programs to provide COVID-19 relief to renters and landlords, billions of dollars have been earmarked for states and agencies to distribute, yet only a small fraction has been disbursed. The perceived lethargy of aid deployment has created hostile headlines and soured public opinion towards the departments working to provide for their constituents. In Washington, just short of \$400 million has been distributed of the total nearly \$1.1 billion allocated in the state (Washington State Department of Commerce n.d.). The intent of this analysis is, first, to examine barriers to aid disbursement in Washington state, and second, to understand why so little of the aid has been capitalized upon, and to create a set of takeaways that may help municipalities disburse Federal rent relief more effectively in the future.

These two general themes inform the four primary research questions for this analysis, below:

- 1) How are rent relief programs implemented in Washington counties?
- 2) What are characteristics of counties that are successful at distributing Federal rent relief?
- 3) What is slowing or stopping counties from distributing Federal rent relief funds as quickly as desired?
- 4) What mechanisms or bottlenecks support or slow disbursement of rent relief funds?

This analysis is extremely contemporary, and a serious knowledge gap exists particularly in how ongoing aid funding is being used. A key problem in distributing Federal rent relief funds is the opacity of the process and a lack of understanding or communication between affected parties. Only by examining the current setting can the situation be improved; the severity and intensity of this pandemic-intensified rent crisis shapes this program analysis as a comparatively urgent and important one.

Several features make this rent crisis unique. First, the onset of the pandemic was *incredibly* rapid, and the lockdowns and economic impacts were sudden and severe. Seemingly overnight, a virus that seemed isolated to a few international communities abroad landed in the United States and took off like wildfire. The country shut down, with all but ‘essential workers’ asked to stay home and prevent the spread of disease. These lockdowns caused interruptions to daily life for a huge proportion of Americans, and unemployment skyrocketed in spring and summer 2020. In response to these sudden changes to daily life, the Federal government passed a series of emergency relief bills, some of which was targeted directly at addressing the forthcoming rent concerns where renters couldn’t pay their rent, and landlords couldn’t pay their mortgage. Instead, these programs became mired in issues that slowed and stymied release of these funds.

Unlike a conventional economic collapse which can be forecasted months, or years ahead of time, COVID-19’s disruptions to daily life were abrupt and complete. Second, whereas past housing crises affected primarily one group (e.g., mortgage foreclosures on homeowners in 2007-2008), the COVID-19 rent crisis hit both renters and landlords across the board, regardless of their position in the housing market. These two differences make the Federal COVID-19 rent relief problem unique and critical for investigation into the shortcomings in

execution. In part because of the uniqueness of this situation, and the extensive research on mortgage aid, the focus of this program analysis is on the rent relief specifically.

This analysis identifies and defines some of the major challenges of effective deployment of federal relief funds to combat COVID-19 related housing insecurity from the perspectives of renters and landlords in 2020 and 2021. The program analysis seeks to create case studies to provide insight into why state and local governments have found it so challenging to utilize the massive amounts of money dedicated for use to help renters and landlords and create best practices for deployment of these funds.

One major difficulty in this project was the ambiguous and shifting context in which the research questions are asked. Because the time-period in question is open-ended and still ongoing in 2022, the research was bracketed from March 2020 to February 2022. Using open-ended qualitative interviews, this research examined three counties in Washington and three teams within the Washington Department of Commerce (DOC). The original purpose of this project was to identify deficiencies with the disbursement process. However, as the project developed, a bifurcated approach was used instead, to examine both effective strategies utilized, and challenges experienced by the counties and departments.

The result of this analysis is a synthesis of issues that challenged local governments in distributing COVID-19 emergency rent relief, and an associated set of recommendations to streamline and improve the process for future emergency rent relief programs. These findings are summarized in table 1, below.

Table 1: Synthesized issues and proposed solutions for emergency rent relief programs in Washington

Key Challenges	Recommended Practices
<ul style="list-style-type: none">▪ Local governments experienced a general struggle to adapt to a COVID-19 workplace▪ Inconsistent and frequently changing program requirements at Federal level▪ Insufficient and incomplete internal systems designed to support deployment of aid▪ Issues scaling a team at the local government level to meet the increased demand and funding	<ul style="list-style-type: none">▪ Create clear and consistent requirements for funding streams▪ Establish and use a unified data and application system to manage distribution of aid▪ Manage expectations from the public, policymakers, and aid recipients▪ Establish and develop local partnerships to assist in deployment of aid programs▪ Create a single point-of-entry application to minimize overhead and friction in accessing aid programs

Author’s Disclaimer of Interest

The author discloses these interests that are directly or indirectly related to the work submitted here. No funding or compensation was provided for this research, and no consideration was offered nor given for interviews. The author is the solo practitioner for his law firm, Lansing Law, PLLC, but identifies no relationships, conflicts, or competing interests with the subjects, matters, or potential future claims stemming from the research, situations, or interviews conducted for this research. Further, the author comports with American Bar Association and Washington Bar Association standards for professional conduct and intends to recuse himself from any future matters which may pose conflicts of interest or any appearances of impropriety resulting from this research. The author has not directly benefitted from any COVID-19 rent relief programs, nor intends to seek aid from the programs

in the future; he has however, received and accepted the direct award funding (“stimulus checks”) provided nationwide for individual use.

Research Questions

The four primary research questions are posited below and are the foundation for the program analysis. These questions emerge from the two primary guiding questions that are described above.

- 1) How are rent relief programs implemented in Washington counties?
- 2) What are characteristics of counties that are successful at distributing Federal rent relief?
- 3) What is slowing or stopping counties from distributing Federal rent relief funds as quickly as desired?
- 4) What mechanisms or bottlenecks support or slow disbursement of rent relief funds?

Literature Review

The literature used for this project is diverse and covers over a century of American economic crises. Spanning from the Great Depression through the Great Recession and up to as recent as September 2021, this literature review includes peer reviewed academic articles, news releases, government guidance and legislation, pre-peer reviewed research, projections for the near future, and more.

The categories of research highlighted in this literature review fall into four categories: contemporary COVID-19 related research, Great Recession (2009 Foreclosure Crisis) research, other academic research (including Great Depression), and non-academic research. Of the four categories, non-academic research is the most diverse. This category includes everything from the text of Federal Relief bills published in the Federal Register to U.S. Department of the Treasury guidance for cities, to newspaper articles describing present-day situations.

Some of the most critical research for this literature review come from the first and last categories. Research from the Great Recession and Great Depression speak more towards the general systems in place and at work in the disbursement of federal relief money, such as the multiplier effect of Federal relief in local economies. Conversely, many articles published in the last twenty months are prospective, looking ahead at the situations brewing beneath the surface or focusing on the present-day issues becoming apparent to researchers.

Key Themes

The literature for this topic can be organized under four categories: the impacts of Federal relief on local economies; hypothetical future impacts of COVID-19 on housing; equity issues in COVID-19 relief programs; and issues with distribution of COVID-19 relief funds.

Impacts of Federal Relief on Local Economies

First and most foundational, there is the theme of how federal relief (of any kind, not limited to just rent) influences local economies. This theme includes much of the historical and older research discussed and contributes to the baseline understanding of how municipalities and thus planners respond to Federal relief funds. This theme is more-or-less chronologically ordered, as each paper builds from the developments since the last.

Emerging from the wreckage of the early 20th century’s Great Depression, Benjamin Glassberg (1937) discusses how Milwaukee, Wisconsin experienced economic turmoil, and how emergency financial relief influenced rent policies. This paper focuses primarily on the housing impacts of the Great Depression, and highlights that both landlords and renters were suffering in the housing crisis (Glassberg 1937). Glassberg describes a bitter irony of how the discontinuation of federal aid for direct relief immediately undid many of the positive impacts earlier relief efforts successfully implemented (Glassberg 1937). The paper concludes by

identifying that when renters were no longer rent-burdened, they contributed to the local economy with greater ease, and that providing housing security generally improved Milwaukee’s economy in the short-run (Glassberg 1937).

In the 21st century, the setting for much of the research into these impacts of Federal relief come from the Great Recession in 2008 and the subsequent legislation passed to create relief aid for state residents. One chief theme discussed in several articles is that of the “flypaper effect” of Federal funds; that grants “stick where they are targeted” (Lutz 2010; Dupor and McCrory 2018). The research in this topic suggests that highly targeted federal grants will have a powerful multiplier effect in the local economy around their “landing zone,” far larger than the grant itself (Lutz 2010; Linsmeier 2020). For example, \$100 million in Federal funding targeted at a Michigan highway improvement project created greater than \$100 million of economic benefit for the region (Linsmeier 2020; Lutz 2010).

These government funds are not limited to past economic crises in creating a multiplier effect on the local economies. In their 2020 study, Coibion et al. explored how Federal relief funding in large one-time transfers directly to consumers (via the CARES Act) affected their spending decisions, labor market decisions, and thus, how those consumers affected their local economies (Coibion, Gorodnichenko, and Weber 2020). Compared to the 2008 fiscal stimulus payments, average households were spending a greater proportion of the stimulus, and with greater uniformity (i.e., most people either saved it all or spent it all, rather than a combination of both) (Coibion, Gorodnichenko, and Weber 2020). However, these researchers did not directly discuss the current context of how *housing* decisions are made and if they are affected by federal stimulus.

Hypothetical Future Impacts of COVID-19 on Housing

The second major theme emerges from the earlier days of the COVID-19 pandemic, where academics, planners, economists, and others were conjecturing and theorizing how COVID-19 was likely to impact America. Much of the research focused on how small businesses, renters, and landlords were likely to be affected by the pandemic. This theme includes several major categories of sources; most preferred were academic papers, but these were generally few and far between. Government releases and inter-governmental letters are also included, as they reflect some concerns for policymakers, housing advocates, and planners. Lastly, this also includes newspapers and other journalistic-type sources.

Basing their theories on past economic crises, many researchers suggested that the sudden and enormous economic hardship presented by the COVID-19 pandemic would have dire effects on the housing market, both rental and owner-occupied. While this quickly overlaps with themes of the equity impacts of the pandemic, such as a disproportionate percentage of BIPOC (Black, Indigenous, and People of Color) being renters rather than homeowners, the primary focus here analyzed future housing impacts (Goodman and Magder 2020). The researchers found that these historically marginalized groups tended to have greater vulnerability to disruptions in pay (i.e., living paycheck to paycheck), as well as less stable housing arrangements overall, such as shorter lease terms with less stability and continuity (Goodman and Magder 2020).

Circa April 2020, researchers had no idea of the scale of the pandemic or the duration, but were quick to predict that measures like eviction and foreclosure moratoriums and deferrals on rent and mortgage payments would be crucial for preventing an acute housing and subsequent public health issue (Goodman and Magder 2020; Versey 2021). Goodman and

Magder were early writers on this topic and projected that renters specifically would be hit hardest by COVID-19; outstanding leases averaging only six months (e.g., only six months remaining before the lease lapses) indicates that simple rent deferral would merely forestall their eventual eviction when the three- to six-month rent forbearance lapsed (Goodman and Magder 2020).

They simultaneously note that most forms of traditional housing cost relief shift the burden onto the property owner or landlord, both groups also being hit hard by the pandemic. Ultimately, they, and several other researchers, suggested that the already delicate housing situation in most cities would be dramatically worsened and in many cases plunged into disaster should the federal and state governments not increase their aid programs to address these issues (Goodman and Magder 2020; Wolf 2020).

In addition to academic research, there are also government releases from various agencies, legislation entered into the Federal Register, and news articles that describe ongoing struggles of COVID-19-affected renters and landlords. To begin, there were three COVID-19 relief bills passed into law: the Coronavirus Aid, Relief and Economic Security Act (CARES, March 2020), Consolidated Appropriations Act (CAA, December 2020), and American Rescue Plan Act (ARPA, March 2021) (Bramhall, Fedorowicz, and Randall 2021; The Department of the Treasury 2021). Each of these have been entered into the Federal Register, and the text of the laws speak to the projected harms they are designed to address. However, a more digestible version of the impacts these laws are seeking to have can be found in the related agencies releases – usually providing a “translated” version of the Act for consumers and non-lawyers to understand the implications and purpose of the Act. For example, the Consumer Financial Protection Bureau and the White House both have help articles, guides to rent relief measures,

and directions on how to find the local agencies someone might need to speak with to get more help (White House Statement 2021; Consumer Financial Protection Bureau n.d.).

Equity Issues of COVID-19 Rent Relief

The third theme in this research addresses the equity issues of COVID-19 rent relief. Equity concerns are identified in more generic terms in the body of literature surrounding government aid more generally (Bettinger and Williams 2014; Zedlewski 2008). Equity and access to relief funds is a huge issue for any government relief, and COVID-19 rent relief is no exception (Bettinger and Williams 2014; Zedlewski 2008). Bramhall et al. go into some detail on the existing equity issues that predated COVID-19, including that non-white businessowners have disproportionately difficult times accessing credit, building economic wealth, and that disproportionately large percentages of BIPOC groups are renters rather than homeowners. Further, that BIPOC individuals are more likely to be noncommercial landlords (owners of two-to-four unit or smaller rentals), making them more vulnerable than larger institutional landlords or property owners (Bramhall, Fedorowicz, and Randall 2021).

The Bramhall paper is likely the most complete analysis of the existing equity issues pertaining directly to COVID-19 relief currently available. The authors do not focus specifically on housing and include a discussion of businessowners as well as renters and landlords. They focus on six cities as examples of equity design and challenges in COVID-19 relief, finding them to be more-or-less representative of general trends nationally (Bramhall, Fedorowicz, and Randall 2021). They found that the design of relief programs was a trade-off between speed and targeting benefit distribution, between targeting and accessibility in the application process, and between balancing local needs with federal regulations (Bramhall, Fedorowicz, and Randall 2021). Not every relief program has the same requirements and stipulations; even

among the three federal programs, they each had unique requirements for how the municipality was supposed to disburse relief. For instance, the more means-testing (requiring proof of income, or loss thereof), the less accessible the relief becomes. However, the researchers did not consider any one prioritization of the above listed tradeoffs to be more or less equitable, and they point out that each city's different needs are served (or not served) by the specifics of the program (Bramhall, Fedorowicz, and Randall 2021).

Issues in Distributing COVID-19 Rent Relief

Emerging directly from the equity discussion of COVID-19 rent relief, Bramhall et al. and Reina et al. remain the primary sources for known issues facing disbursement of pandemic-related Federal relief money. However, the conversation here is further informed and influenced by newspapers, government letters, and a select few other sources from prior economic crises.

Bramhall et al. demonstrate in their 2021 research that some issues that slow down the disbursement of COVID-19 rent relief are well understood and sometimes even intentional – for example, the decision to use less efficient or speedy methods to improve equitable outcomes from the disbursement (Bramhall, Fedorowicz, and Randall 2021). Some considerations they note include the use of screening measures like requiring applications to prove loss of income or employment related to COVID-19. These measures are sometimes done to comport with program requirements, but sometimes to serve planning or policy goals of targeted and equitable relief (Bramhall, Fedorowicz, and Randall 2021).

The next seminal writing on the known issues in COVID-19 rent relief disbursement comes from Reina et al., who discuss specific elements of the programs in place nationally for rent relief in 2020 and 2021. Not every program utilizes Federal funding for the rent relief, and

not every program existed before COVID-19 became a pandemic (Reina et al. 2021). Only 72% of the surveyed rental assistance programs were created in response to COVID-19 (Reina et al. 2021). The researchers identified the stated program goals, the overwhelming majority of which were stated as “avert evictions” and “prevent homelessness,” both of which align to public health recommendations from the CDC and other agencies (Reina et al. 2021; Centers for Disease Control and Prevention 2021; Greenberg 2021). Interestingly, the researchers noted that some programs exceeded the minimum administrative requirements for the Federal funding, which they suggest might have stemmed from Department of Treasury guidance to verify “that such assistance is necessary” (Reina et al. 2021; The Department of the Treasury 2021). For example, the researchers noted that while the language of the Act did not require specific proof of income loss resulting directly from COVID-19, some programs interpreted the Treasury’s guidance to require them to demand such proof regardless (Reina et al. 2021).

Some of the most prominent program limitations revealed in research by Reina et al. and through interviews with news agencies and newspapers include incomplete applications, staff capacity, funding timelines, lack of landlord cooperation with the program or agency, technology limitations of the agency, funding level, and data sharing (Reina et al. 2021). From the existing research, it is clear that a diversity of issues has been slowing the disbursement of Rent Relief to landlords and tenants, and that not all of it is required by statute or Act – that some roadblocks may have been created at a local level without being explicitly required by law.

Besides the existing research contributing to these understandings, some local governments have taken to petitioning the state directly for assistance with speeding up the disbursement of rent relief (Waller and Witter 2021). Many local agencies know there is public

outcry at the apparent lethargy in disbursing aid and are attempting to grease the wheels of the process (Waller and Witter 2021; Siegel 2021a; Greenberg 2021; Groover 2021; Siegel 2021b).

Having reviewed the existing literature landscape, it is clear that there is an opportunity for Federal relief funding to make a big impact in the lives of landlords and renters. However, the research is inconclusive and unclear on how best to leverage the mechanisms of Federal relief funds to impact the housing and rent crisis resulting from the pandemic. The uneven impact of the pandemic leads researchers to suggest that there is a balance between speed of fund disbursement and the targeting for equity and effectiveness in these programs. To understand the issues better and create recommendations for how to make programs more effective, the research questions described above are asked.

Methods

The bulk of work for this program analysis involved gathering qualitative data for analysis and review. Below is an outline of the sampling criteria, data collection method, and structure of interpretation and analysis used. A qualitative approach was used to conduct this study. The original proposal suggested using a survey sent to additional counties or cities, but this approach was discontinued early on. While the overall approach to this study is qualitative, small amounts of quantitative data collection was collected and used, such as amounts and percentages of rent relief received from the Federal government, amounts disbursed, etc. However, the area of focus was on the processes and systems that are functioning or malfunctioning in distributing these funds and studied using a qualitative approach.

Data Needs

The primary goal of this study was to examine the period between March 2020 and December 2021 to produce site studies for the counties and departments interviewed, and to use those site studies to produce recommended practices for rapid deployment of federal relief funds for housing purposes. To compile these site studies and recommended practices, this program analysis focused on departments that directly handled the creation, modification, or administration of systems and initiatives to deploy the federal and state funding from both the U.S. Department of the Treasury and the Washington Department of Commerce. In addition to interviewing staff from counties who received funding from these sources, the research also included interviews with several teams within the Washington Department of Commerce to better understand the perspective from the other side of the process.

Selection of interviewees was done using preliminary research to determine a rough scale of “success” in deployment of COVID-19 housing relief. To be considered for an interview, a county must have received funding both directly from the Department of the Treasury and from the Washington State Department of Commerce. They also needed to have substantially complied with the reporting requirements for both funding sources. These two requirements were to serve several purposes: first, to isolate as many variables as possible, such as having disparate or differing funding sources. Second, to allow for pre-research on each county to form a baseline impression of the housing relief funding deployment.

Candidate counties were limited to Washington state to control for the legislative and procedural frameworks across multiple states. To reduce potentially confounding variables, counties that contained cities that received and administrated their own COVID-19 emergency

rent relief programs were eliminated from consideration (King, Pierce, and Spokane counties; Seattle, Tacoma, and Spokane respectively operate their own city-scale programs)

Using publicly available data from the Washington Department of Commerce dated December 2021, counties were ranked by percentage amount of aid distributed relative to their overall amount of COVID-19 specific funding. From this ranked list, counties who did not receive a direct award from the Department of the Treasury were removed, and then three counties were selected: one each from the top, middle, and bottom third. The intent with this structure for selection was to interview a diverse spread of counties with a range of experiences. Because this selection was done before any interviews were conducted, disbursement percentages were used as a proxy for “success in administrating the rent relief programs.”

The figure below shows the percentage of funds distributed relative to the overall COVID-19 housing relief funds awarded in Washington counties as of the end of 2021 – the over 25%, 10-25%, and below 10% cutoffs were selected by the Department of Commerce. In addition to the three counties identified and interviewed (Snohomish, Kitsap, and Yakima



Figure 2: Department of Commerce Statistics of Percentage of Award Spent by County (Dodge, 2021)

counties), three Department of Commerce departments were interviewed (Community Relief Fund, Landlord COVID Relief Program, and the Rental Assistance Program).

Collection Process

Data collection was done through interviews with individuals or groups of individuals serving in their professional capacity. There was no sampling method used – instead, after selecting candidate counties and departments, interviews with key informants from each office were conducted. However, some inherent difficulties in both determining the correct individuals and departments to interview and the difficulties scheduling with busy public servants meant that some potentially valuable insight was not documented. This approach is limited in that only respondents with the time, energy, bandwidth, and interest in responding to an invitation to be interviewed by a graduate student are ultimately interviewed. This may have the effect of screening out the busiest, most overwhelmed, or distracted potential respondents, who may have insight unique to their position and role. An anticipated issue was that some interviewees may have hesitation or recalcitrance about sharing sensitive information with the interviewer, for fear of being painted in a bad light or receiving further negative attention – however, this proved not to be the case, and all interviewees were extremely forthcoming and open during the interviews.

Because the individual respondents are professionals being interviewed in their capacity as such, it was determined that no IRB approval for this study was required. This determination was completed in part by review and discussion on the IRB revised Common Rule (45 CFR 46.104(d)(2)), and in part on deliberation and advice by the thesis committee for this project (Code of Federal Regulations 2022).

Performed one-on-one or with a pair of respondents in one interview, the research interviews were semi-structured and informal, using open-ended questions to allow the respondent to provide as much or little detail as they wish, allowing them to direct the conversation flow. The interviewer began the conversation with one or several general questions and allowed the respondent to guide the direction through their own experiences. The main reason for this is the relatively small amount of research on this topic and to avoid injecting bias with targeted questions. However, some key topics that were considered necessary to discuss included asking about the pathway for the department to manage the rent relief programs, asking about the county’s rent relief program, and asking how different funding mechanisms affected the rent relief programs.

Recording & Treatment

The interviews were recorded using Zoom cloud recording software, which also produced a transcript of the interview for later review. This cloud recording was critical for the analysis and treatment of data, as the interviews often moved too quickly for the interviewer’s notetaking to keep up. Consent to record was obtained at the outset of each interview before the questions began. Once completed, each interview was reviewed and synthesized into high-level themes for descriptive analysis.

Decision & Interpretation

The analysis of the data was primarily descriptive, rather than causal. Interpreting the descriptive analysis illustrates answers to the research questions and support or reject hypotheses about roadblocks to Federal rent relief disbursement. As true with many open-ended and ambitious qualitative studies, there are possibilities for several “correct” answers to be present simultaneously. Once the preliminary research and interviews were completed,

analysis of general themes that describe best practices of municipalities, major issues that slow down their efforts to disburse funding, and any pertinent correlations were produced to illustrate the experiences of each respondent as case studies.

Definitions and Findings

Defining Programs and Departments

There are three necessary components to define the programs in this study: first, identifying and understanding the types of assistance offered by the departments interviewed. Second, reviewing the difference between Treasury (direct award) and Department of Commerce funding sources that provided the foundation for these municipal and county programs. Third, determining how each department was selected to manage the T-RAP and E-RAP programs, as Washington’s named COVID-19 emergency housing relief programs (defined further below). Each factor influenced both how aid was distributed *to* each municipality and how aid was disbursed *within* each municipality. This study revealed that while there are commonalities between the respondents and their rent relief programs, each municipality approached the situation in distinct and unique ways; common funding and directives resulted in diverse responses.

The specifics of each county’s programs, challenges, and experiences are in the site study for each respective county. The findings here are broad and describe the types of assistance offered from the federal and state level to the county and municipal level, the differences between each funding source, and how each department was selected to manage the COVID-19 housing relief funding. This section also describes the changes from a pre-COVID-19 setting to present day, and the general trends with a post-COVID-19 housing relief context.

Direct Award versus Department of Commerce-Managed Funds

In no small part due to the haphazard and rapid deployment of COVID-19 emergency relief, the funding landscape at a State and local government level is fragmented and discontinuous. However, two primary funding streams for COVID-19 rent relief are used in Washington: Treasury Rent Assistance Program (T-RAP), Federal funding provided from the U.S. Department of the Treasury, and Eviction Rent Assistance Program (E-RAP), funds provisioned and managed by the Washington State Department of Commerce.

The size and scope of the Federal COVID-19 relief packages is far too large to consider in a project of this scope. Nationally, over \$3.7 trillion was allocated as of April 2022, mostly administered by the U.S. Department of the Treasury for disbursement to states to further disburse to their residents in need (Office of Management and Budget 2022). In Washington state, over \$10.9 billion was received by the Office of Financial Management, and the Department of Commerce charged with the distribution of these funds (Washington State Office of Financial Management 2021).

Once received by the Department of Commerce, the funding was funneled into three programs. First, T-RAP 1.0, the first iteration of the Treasury Rent Assistance Program, which was established by the Washington House Bill 1368 and appropriates \$2.2 billion that Washington received from the Treasury as part of the Coronavirus Response Relief Supplemental Appropriations Act (CRRSA) (Lowell 2021). Second, T-RAP 2.0, the second iteration of the Treasury Rent Assistance Program, created from funding appropriated from the American Rescue Plan Act. Third, E-RAP, the Eviction Rent Assistance Program, Washington’s first version of COVID-19 related rent assistance, funded primarily through state programs. The Sankey diagram in Figure 3 illustrates the flow of funding from Federal Acts,

Washington Acts, and some smaller (40% maximum) direct funding for local governments from the Treasury.

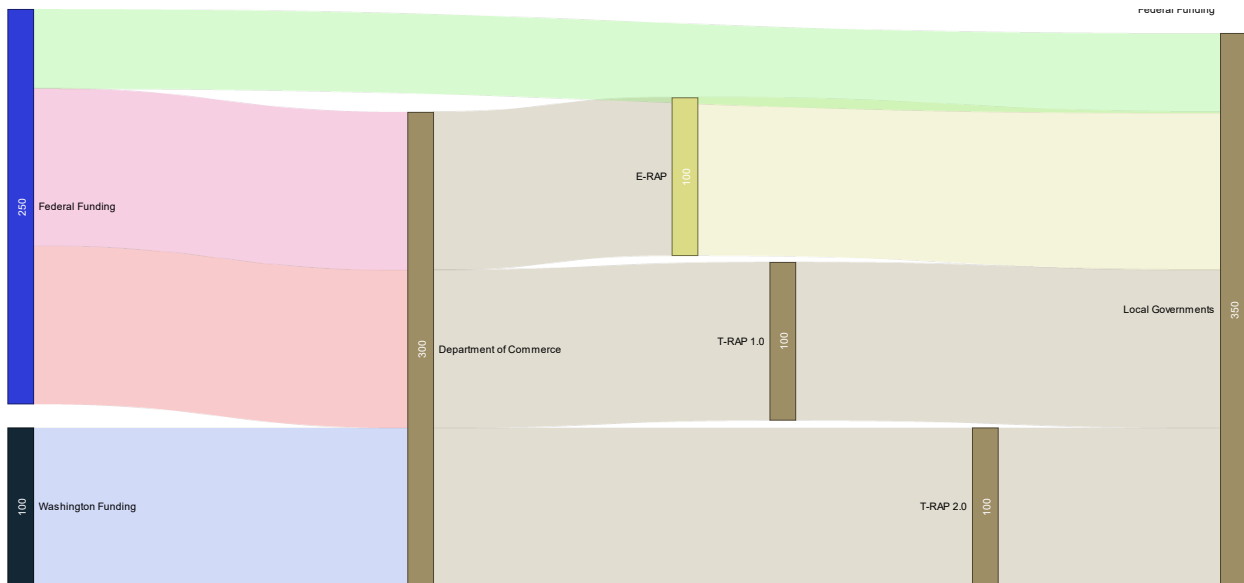


Figure 3: Funding Sources and Program Destination. Federal funds flow both directly to local governments and the Department of Commerce for later disbursement to local governments. Washington funds exclusively flow through the Department of Commerce.

Each program has had several iterations, but the two most used by respondents in this study were E-RAP and T-RAP 1.0 and 2.0. While T-RAP 1.0 and 2.0 programs were funded by federal dollars, respondents received those dollars through both direct award and through the state DOC. Figure 4, below, was prepared by the Department of Commerce to help municipalities better understand the differences between the two T-RAP programs – it is only one of several documents that were prepared to assist the Washington DOC and counties to better understand and apply the myriad funding streams to the pandemic rent relief. E-RAP is not included because the program had expired by the time the “crosswalk” diagram was produced by the Department of Commerce.



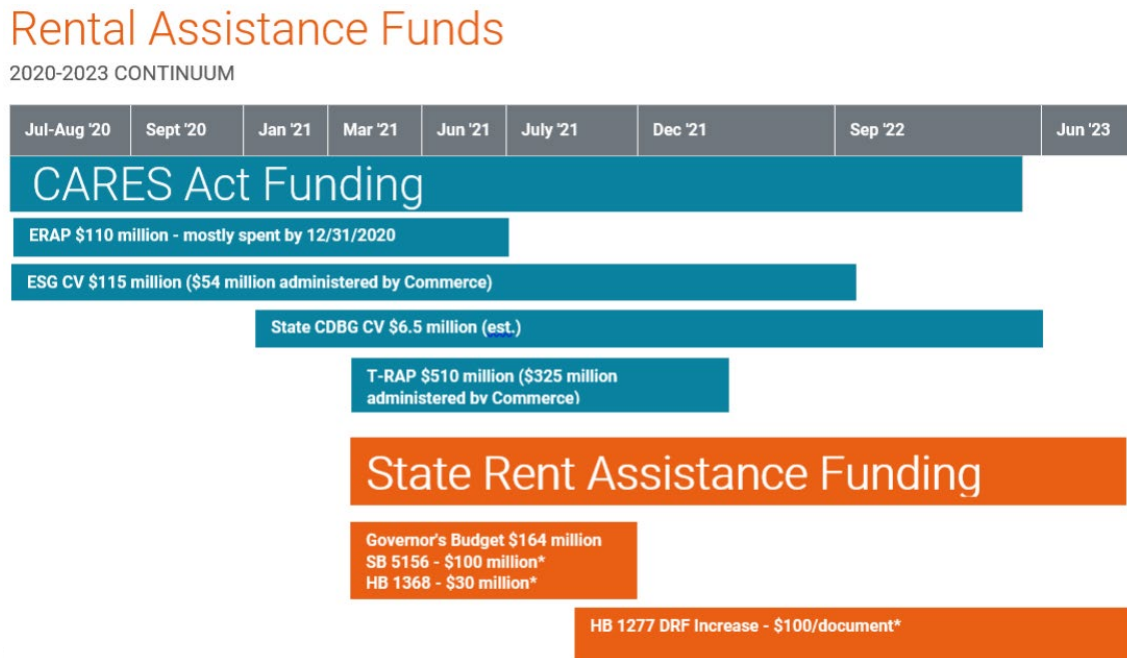
T-RAP 1.0 and 2.0 Crosswalk

Program	Eligibility & Documentation Differences	Allowable Expense Differences	Other Differences
T-RAP 1.0 <i>(Consolidated Appropriations Act of 2021)</i> (3/1/21-9/30/22)	<ul style="list-style-type: none"> Financial hardship due to the pandemic. Income eligibility can be determined using income for 2020 or current monthly income. If using current income, household must be recertified every three months to receive ongoing assistance. 	<ul style="list-style-type: none"> 10% allowed for grant administration Other Housing Costs must be directly or indirectly related to the pandemic. Housing stability services must be related to the pandemic (per Treasury FAQ) Financial assistance may not exceed 15 months. 	<ul style="list-style-type: none"> Payments can be made directly to households when landlords are unresponsive, outreach to landlord is required before doing so.
T-RAP 2.0 <i>(American Rescue Plan Act)</i> (7/1/21-9/30/25)	<ul style="list-style-type: none"> Financial hardship during the pandemic or due to the pandemic. Income eligibility can be determined using the same methodology or a different one as long as it’s applied consistently. “Fact-based proxies” can be used for income eligibility. 	<ul style="list-style-type: none"> 15% allowed for grant administration Other Housing costs do not need to be related to the pandemic. Housing stability services do not need to be related to the pandemic. Financial assistance may not exceed 18 months (inclusive of T-RAP 1.0) 	<ul style="list-style-type: none"> Payments can be made directly to households without outreach to landlord. Grantees <u>must</u> make payments directly to the household if the landlord/utility provider is not cooperative.

Figure 4: T-RAP 1.0 and 2.0 Comparison. From the Washington State Department of Commerce (Dodge, 2021)

All interviewees used their own characterizations for the funding streams for their COVID-19 emergency rent relief funds, and frequently used their own acronyms, labels, and descriptions for funding sources, not uniformly referring to them by their formal or legal name. When necessary for clarity, and when discussing the specifics of a given program or funding mechanism, most respondents would use the acronym and refer directly to the program name. However, when speaking more generally or when the program name wasn’t specifically needed, respondents tended to use more generic terms like “direct funding” or “state funding.” Thus, for clarity and concision in this program analysis, the program names will be used only when necessary to distinguish between them; the more generic terms will be used like the respondents.

The figure below illustrates the funding mechanism timelines; some programs were targeted as extremely short-term bridge funds, others are designed for more long-term pandemic response.



*Pending legislative action

Figure 5: Rental Assistance Funds 2020-2023 Timeline (Dodge, 2021)

Department Selection to Manage COVID-19 Emergency Funds

The pre-research for these interviews often failed to reveal a specific point of contact or even a department confirmed to manage the COVID-19 rent relief funds. Thus, to determine the correct party to interview, each county was directly contacted using a combination of emails, phone calls, and online contact forms. Statewide, counties do not have a uniform structure of departments and not every county used the same departments to manage their COVID-19 rent relief funds. Pre-research revealed a list of contacts for “COVID-19 Housing Grantee Contact Information” dated April 9th, 2020, but only approximately half of the contacts listed there were ultimately the correct point of contact (Washington State Department of Commerce 2020). Ultimately, a cold-contact approach was used, reaching out directly to

departments that were likely or possible charges for their county’s emergency housing assistance programs. This approach yielded about 50% success directly connecting to the correct department or individual, and about 40% success being referred to the correct department or individual. Some contact attempts were unsuccessful due to complete non-responsiveness, particularly in attempting to contact the U.S. Department of the Treasury. The non-responsiveness of these parties was often consistent with trends identified by respondents.

Many counties (at least 24 of the 33) in Washington used one of two department types to manage their COVID-19 housing relief programs: a Health Department or a Human Services Department. A minority of counties used other departments such as Emergency Management or generic “Action Programs” departments (Washington State Department of Commerce 2020). The county-level respondents for this study were entirely Human Services departments, consistent with the state-wide trends.

While all the county-level respondents were Health or Human Services departments, each county took a slightly varied approach to distributing their funding to sub-grantees. All respondents stated that they used a grantee and sub-grantee model to distribute funding, wherein their award from the Treasury and DOC was further allocated to community partners and distribution channels. A minority of programs indicated that they use direct distribution model in addition to this sub-grantee model, where the county department directly managed and distributed funding to landlords and tenants in need (Dodge 2022; Magasis 2022). It is unclear whether this difference in approach has any direct affect on the effectiveness of the department’s rent relief programs.

From a high-level review of these programs, some common themes emerge – some counties had existing programs under health departments, but it was generally unclear who was managing the programs at the local level. This made it difficult for state offices to know who was doing what, as even the Department of Commerce lists of contacts were not kept up to date or comprehensive. Programs were inconsistent between counties, and work was not managed consistently; someone applying for emergency rental assistance in one county may go through one department with a specific set of requirements, but their friend in another county would not be able to use the advice and experiences in their own county. In the next section, these general characteristics are examined in more depth by looking more closely at the experiences of three counties and three Department of Commerce departments.

Site Studies

Every interview revealed additional context, layers, and detail to understanding the landscape of COVID-19 housing relief in Washington. Site studies for each respondent summarize and distill from each interview the salient lessons, takeaways, and industry practices. For legibility and coherency in each site study, it should be assumed that unless otherwise cited, the information and assertions are attributed to the author’s interviews with the county department responsible for management of the county’s COVID-19 housing relief funding. When a claim or comment is attributable to other sources or research, citations will be provided in-line.

Each county site study is described in four themes: the responsibilities assigned to the department; the challenges experienced in adapting to, developing, and managing the COVID-19 emergency rent relief programs; the funding sources used for each county’s programs and their associated challenges and advantages; and the strategies used to address

the issues and challenges described. The Department of Commerce case studies center on the respondent’s specific area of expertise and experiences with the pandemic aid relief programs and describe their roles within the COVID-19 relief programs, perspectives on the challenges experienced both by their clients and their own departments, and the strategies used to address and resolve problems in the deployment of the programs. The three counties selected for interviews were Snohomish, Kitsap, and Yakima Counties.

Six interviews were conducted for this study, one for each of the three county and DOC representatives. The site studies are presented in order from highest percentage of rent assistance distributed to least, followed by the DOC departments. In addition to the six direct interviews, the author also observed and analyzed one inter-departmental meeting for Kitsap County, a program implemented to address issues experienced early in the relief management process; while this observation was not a site study, it provided additional context and information to analyze Kitsap County’s program.

Snohomish County

Snohomish County is a midsized county of 811,000 people located just north of King County and is considered part of the greater Seattle metropolitan area, with a population of just over 800k. The interview was conducted in mid-March 2022 and was unique in that there were two interviewees on the single interview video call rather than the more typical single respondent. The Snohomish County Human Services department is currently the department managing COVID-19 rent relief programs (Trosvig and Yoon 2022). Snohomish County ranked in the top third of Washington counties at the end of 2021 for percentage of total aid award disbursement, with 68% of their total funding received having been disbursed.

Responsibilities

The Snohomish County Human Services department is responsible for the county’s Emergency Rental Assistance program (ERA). This program is targeted at providing grants to local partner organizations who in turn distribute the funding to landlords and tenants in need of emergency aid. Prior to 2020, the Human Services department had no formal rent relief program in place, instead focusing more on homelessness and placement services. When the pandemic aid packages were approved, the department’s housing relief budget swelled to almost 400 times their pre-COVID amount.

The Human Services department was not the original target and recipient for COVID-19 related housing aid funding. The original county-level owner of the ERA was selected initially because the program felt small and time-limited at first, but they quickly found that they were not well suited for scaling to county needs and the sheer quantity of funding. Once this shortcoming was realized, the county’s Division Manager stepped in and moved the ERA program to the Human Services department, where the program remains today. This was unusual compared to the other counties interviewed, who did not experience their programs moving between departments.

The County was described by the interviewees as “big enough to have stuff, but still nimble,” referring to Snohomish’s position as a mid-sized county with several dense population centers, but still far smaller than the state’s most populous counties (King, Pierce, and Spokane counties). In addition to the COVID-19 aid packages, the Human Services department is also generally responsible for the other “social safety net” programs run by the County, primarily homelessness prevention and outreach.

Funding

Providing the bulk of the increase in emergency housing aid, T-RAP accounted for \$117 million of Snohomish County’s Emergency Rental Assistance program funding. The ERA program also received increased funding by the County budget, swelling from \$300,000 per year pre-COVID to nearly \$5.4 million during the pandemic, not inclusive of T-RAP and E-RAP funding. This explosion of funding was not purely beneficial in the short term, as the team struggled to handle the grant management and budget expectations; these challenges are explored in greater depth below.

In addition to the County budget increases, the ERA was funded by both DOC and Treasury awards. The County aggressively pursued all available funds regardless of their provenance or perceived difficulty to manage. The interviewees described a push to maximize the funding available to the programs:

“We’ve taken everything we can, and we worked and worked to spend and meet the targets that the feds have set for those so that we don’t lose any [funds] for our community. We want to do everything in our power to get resources to the vulnerable.” (Trosvig and Yoon 2022)

During the pandemic, the interviewees described feeling like they would not know when, what, or how the next batch of relief might come in – this encouraged a “get while the getting is good” mentality, maximizing the amount of funding that the County was eligible for and thus received.

Challenges

Snohomish County experienced a huge diversity and scale of challenges in assembling, managing, and operating the COVID-19 emergency rent relief programs in 2020 through 2022.

At the foundational level, the department struggled to adapt to the COVID-19 workplace environment. As true for most organizations in early 2020, the department needed to make a hasty change to working from home (WFH), and this disruption triggered slow-downs in existing programs while COVID-19 related aid programs were spinning up. The department’s office closure was extremely sudden and disrupted nearly every administrative system designed to support the department’s missions.

Even before the pandemic began, the department was already operating on a staff deficit, and were actively hiring to backfill emptied positions and fill newly created ones. When the pandemic triggered the shift to working from home, these staffing issues became more pronounced, with worker attrition and hiring difficulties intensifying. However, despite these difficulties backfilling, the department was able to hire aggressively, and the team added almost twenty new employees. This rapid growth created its own strain on the county’s HR and administrative systems, compounding the other challenges adapting to a work from home environment.

Systems and strategies were not in place to support a remote working team in the early stages of the pandemic. One of the interviewees describes a situation where they were trying to hire a new employee to assist with the expanded workload:

“We didn’t even have a process for the candidate. Like, electronic signatures; we didn’t allow that for contracts or anything. So, we had to figure out how to make things PDF and email things, and how to get invoices remotely. But our other accounting staff were [saying] ‘so how do we get invoices, hard copies, approved to our staff working remotely?’

Our staff working remote, their staff working remote, we had to figure these things out.” (Trosvig and Yoon 2022)

Integrating solutions for these problems wasn’t a straightforward process either – many attempts to solve one problem created additional ones. Snohomish County reached out to private-sector companies to assist with the growth and to integrate systems to better manage both their mission of emergency rent relief and the growth of the department and team itself. However, these partnerships were not always fruitful – Snohomish County did not end up purchasing or partnering with a third party, and instead decided to create their own reporting management system in-house. The respondents identified that it was “difficult to create good tech partnerships in a huge rush.” Specifically, the high cost of the systems, the higher standards and requirements for upkeep, and the already-spread-thin staff made for an inhospitable foundation on which to make a good partnership with an outside firm.

Reporting, tracking, and invoicing were tremendous challenges for Snohomish County, with each funding source requiring a different internal process to comport with the program requirements. For example, the terms and conditions used to identify targets for Treasury funds are different than the targeting terms for DoC or County funding. Because the eligibility differences between funding sources were so diverse, the department struggled to create a set of targeting requirements to balance speed of deployment (which would incentivize first come, first serve) against need-based (which slows deployment but more carefully targets the aid):

“We were [preparing to start sending out aid] and saw that we had four to six thousand people queued up that had lower income and higher needs. Instead of doing first-come first-serve, at the highest and broadest eligibility, we really wanted to target those folks who had been impacted

by COVID and were most likely to have deeper housing stability issues if we didn’t help them.” (Trosvig and Yoon 2022)

Strategies

To respond to the myriad issues and challenges created by the pandemic and subsequent rapid growth of aid program demands, the Human Services department attempted to leverage several strategies. The initial challenge of accommodating the shift to WFH and addressing the workforce shortfall was tackled first by dramatically increasing the budget for staff and aggressively hiring. Prior to COVID-19, the onboarding process was very high-touch and relied heavily on in-office operations; through the pandemic, the department instead implemented digital solutions to onboarding and workflow to speed up the process.

Tracking and managing the application process was a critical component of the terms and reporting requirements for most of the funding mechanisms for the ERA programs. Snohomish County opted to assume the most restrictive and conservative terms for the ambiguous and unclear requirements and required the applications for ERA to be more comprehensive than many other counties. Their reasoning was that “documentation was key to covering our butt,” and that when Treasury inevitably modified or clarified their requirements, their own internal requirements would already be compliant due to the thoroughness and completeness of applications.

The department opted to create a SharePoint site to handle reporting. This decision allowed for collaboration with outside partners, such as sub-grantees and the Department of Commerce. While the creation of this internal tool was described as a “massive time sink,” it allowed for more efficient scaling of the systems later in the aid process. The interviewees noted that “we know and expect on all our covered funds that there’s going to be extensive

monitoring,” and that if they were to start from scratch again, they would have implemented the database management on day one rather than partway into the pandemic.

Kitsap County

On the west side of the Puget Sound, Kitsap County has a population of around 270,000 with several population centers with Bremerton as the largest at almost 42,000 people. While not typically considered part of the Seattle metropolitan area, Kitsap County has been experiencing tremendous population growth over the last several years as residents seek lower cost of living while remaining within a commutable distance from Seattle. The interview was conducted in mid-March 2022 and was followed by observation of a cross-functional “Eviction Defense Working Group” meeting, attended by multiple non-governmental organizations (NGO) and County departments. The Kitsap County Department of Human Services is the department responsible for managing COVID-19 rent relief programs in the county (Jewell 2022). Kitsap County ranked in the middle third of Washington counties at the end of 2021 for percentage of total aid award distributed, at 29% of aid disbursed.

Responsibilities

Like Snohomish County’s Human Services Department, the Kitsap County Department of Human Services is responsible for nearly all the county’s management of emergency rental aid and housing support. Prior to the pandemic, the department was focused primarily on homelessness prevention, with a strong emphasis on unsheltered individuals. In 2019, the department had two employees and a budget of approximately \$3.5 million per year – by the middle of 2021, the headcount had doubled to four employees, and the budget swelled to over \$20 million per year. The Department of Human Services was determined to be the most logical recipient for state and federal funding for pandemic-related housing services,

particularly funding that was coming from sources besides the U.S. Department of Housing and Urban Development (HUD).

The Department of Human Services serves as a grant manager, contracting to other county organizations, non-profits, legal aid groups, and the like. Their responsibilities include both management and disbursement of COVID-19 housing aid, and the subsequent recording and reporting of the programs to the funding sources. This responsibility was very similar to the department’s mission prior to COVID-19. The department split its responsibilities into two primary categories: distribution of funds, and outreach for programs. The distribution of funds was the direct movement of aid funding downstream, and outreach included assistance for partner organizations as well as marketing the relief programs.

Funding

As described above, the Kitsap Department of Human Services receive funds from the county, state, and federal governments. All recipients of federal funding through the DOC were additionally eligible for up to 40% of the funding award directly from the U.S. Department of the Treasury. However, each funding stream brought unique challenges, including unique reporting requirements and targeting/eligibility standards for the rent relief programs being funded. The challenges are described further in the section below, but the interviewee stated that they likely wouldn’t recommend accepting direct award from the Treasury until the issues with that funding stream were resolved – her perception was that it added a huge amount of complication and challenges without tremendous benefits.

Challenges

The single largest challenge from the last two years that the respondent from the Department of Human Services described was the sheer speed and scale of the team and

processes. She described an unprecedented demand and subsequent volume of applications. Alongside this outsized demand and volume of funding, the pressures to deliver on the department mission have grown in step:

“The speed at which we’re trying to move, and the pressure [has] been constant from the state and federal government, and the local government to get that money spent, and yet the tension we hold as public servants is to be good stewards of the public funding. So we’re trying to move fast, but we’re trying to be good stewards of public funds, and sometimes it’s hard to find the right balance” (Jewell 2022)

The expectation from both the public and government bodies with whom the department worked was to deploy a record-shattering amount of funding using the pandemic-strained resources available to the department, all at breakneck speed. Compounding this pressure was the department’s commitment to reducing the risks of fraud, misuse, or misappropriation of government funds. Like the other two counties interviewed, the respondent from Kitsap County described a direct tradeoff between the speed of deployment and the precision and safeguarding used to target the deployment of funding.

“When you’re trying to push money out really fast and you don’t have a lot of requirements around verifying eligibility or means testing [...] you run into the risk of having more fraud possible.” (Jewell 2022)

Fraud and misuse were significant challenges for the Department of Human Services. The respondent shared examples of cases where a landlord applied for and received emergency rent relief, only to later see the same address used in an application for additional

rent relief in the same program – an investigation revealed that the first applicant was in fact a tenant who was illegally subletting the property to a subtenant. This placed the Department of Human Services in a tricky situation where they are unable to legally provide double funding for the same unit, but the legitimate landlord still required some sort of aid. The interviewee insisted that these cases of fraud represented a very small proportion of cases but informed the department’s decision to balance targeting and means testing against the highest-possible speed of deployment for funds.

Similar to the experiences of other counties, the Department of Human Services struggled with the inconsistent and rapidly changing guidelines from the Department of the Treasury. Each funding source had its own requirements and rules, and the Treasury had both the most ambiguous and most intense requirements for reporting and distribution. As described in the funding section above, the interviewee described the Treasury as being intensely opaque and difficult to work with.

“Even though the underlying allowable uses of the funds are the same, and we’ve essentially modeled [our programs] on the Treasury program [...] keeping track of multiple funding streams in multiple different contracts with multiple different reporting requirements – which are all different – has just been an extra layer of work” (Jewell 2022)

The final and likely most foundational challenge described was the issue scaling the program from pre-pandemic to a form compatible with the COVID-19-informed expectations by the public and government partners. The pre-pandemic mindset was described as that of a “scarcity model,” where funding was extremely limited and had to be rationed out in careful

and highly targeted ways. COVID-19 triggered a sea change in how housing relief programs were funded, and this was not immediately helpful:

“We’ve always been focused on a ‘scarcity’ model, where we had to prioritize funding and we had to do vulnerability screenings to try to get the funding out to do the most good [per dollar]. It wasn’t until we had almost more funding than we knew what to do with that we realized in a very visceral way that just having more funding doesn’t solve your problem.” (Jewell 2022)

The county quickly realized that more funding alone doesn’t resolve the capacity and distribution issues underpinning the programs. Kitsap County specifically expressed hesitation to add more staff, knowing that the COVID-19 programs would be time-limited, and they would eventually lose the metaphorical firehose of funding; the department wanted to avoid overgrowing their long-term sustainable size and then needing to cut jobs further down the line.

Strategies

At the outset of the pandemic aid programs, the Department of Human Services decided to map the new programs onto existing unsheltered aid and outreach programs. This allowed them to utilize existing relationships with nonprofits and other organizations already familiar with the regulatory and judicial structures that affect housing relief. Kitsap County (and Washington, on a national level) is regarded as a leader for homeless resources even before the pandemic, and so they were able to leverage a tremendous amount of the systems already in place.

Once it became clear that the emergency rent relief programs were going to last more than a few months, and the housing crisis was going to worsen, Kitsap County Department of Human Services created an every-other-weekly meeting of local NGOs, county departments, legal aid services, and caseworkers, called the “Kitsap County Eviction Planning Working Group.” This regular meeting allowed for organizations who shared a unified goal of reducing evictions and bolstering housing insecurity to brainstorm solutions to ongoing issues, share their successful strategies for program management, and generally foster strong community partnerships. The Working Group has continued to meet bi-weekly, and the interviewee stated that other counties in Washington have taken notice of the group and begun to implement similar strategies to network and collaborate with their own local partners:

“[The] Eviction Planning Working Group is made up of the Dispute Resolution Center, the Kitsap Legal Services – which is our local legal aid organization – and the Superior Court – which handles evictions – and Kitsap County, [who is] the largest distribution organizer of rental assistance funding. And we’ve been meeting every two weeks for [...] at least nine months now.

“I would recommend to other counties to convene this type of working group; we’ve been able to troubleshoot problems, resolve issues, get everyone on the same page, make sure everybody knows who to call when they have a problem, it’s just been incredibly valuable.” (Jewell 2022)

Finally, the most important strategy used by the Department of Human Services to address the unique challenges of the COVID-19 emergency rent relief was to create a unified single point of entry for applications to the county for rental aid. Because each funding stream

had different requirements and information collection for every applicant, the unified application was able to dramatically simplify the work necessary by renters, landlords, and case managers. Instead of trying to direct applicants to specific programs based on their stated needs and eligibility, the “Kitsap Eviction Protection Application” collected the highest level of information needed by the most rigorous and detailed of the five funding sources available and handled the determination on the back end of the application. This application meant that any Kitsap resident seeking emergency rent relief only had to complete one application to be eligible for up to five different funding streams and programs, dramatically streamlining the application process.

Yakima County

The only of the three interviewed counties on the east side of the Cascades, Yakima County is about 69 miles southeast of Mount Rainier, in the fertile and agriculturally significant Yakima Valley. Yakima County is also the eighth largest county by population in Washington, but smallest of the counties interviewed – their population in 2020 was just over 250,000. The interview was conducted in late March of 2022. The Yakima County Department of Human Services is the department responsible for managing COVID-19 rent relief programs in the county (Magasis 2022). Yakima County ranks in the lower third of Washington counties at the end of 2021 for percentage of total aid award distributed, with 22% of total funding disbursed.

Responsibilities

Like the other counties interviewed, the Yakima County Department of Human Services is responsible for all emergency housing aid except for direct services, which are subcontracted to community partners and nonprofits as sub-grantees. At the end of 2019, the department was comprised of two staff. Prior to the pandemic, the department already had a

program in place for emergency housing aid. The Homeless Management System integrated with the state’s Homeless Management Information System and was modeled after the HUD requirements for federal homelessness prevention and aid funding. This program was heavily utilized to manage the COVID-19 emergency rent relief, as the programs were analogous and often mapped closely to the existing program practices.

The primary responsibilities of the department for the COVID-19 emergency rent relief were to act as the application and management facilitator for all the programs and funding streams. Within this capacity, the department contracted with local partners and additional local agencies.

Funding

Like the other counties interviewed, the funding streams for Yakima County’s emergency rent relief program were bifurcated between state-managed and Treasury direct award. The interviewee described that the direct award was pursued because the county intended to absolutely maximize the level of funding that they had access to during the pandemic – the scarcity model on which the department operated prior to COVID-19 resembled a “feast or famine” mentality, resulting in pursuit of every possible funding stream.

Unlike the funding and programs in place prior to the pandemic, the COVID-19 aid packages encouraged and required a shift towards prevention of eviction rather than response to homelessness. Some landlords expressed trepidation about this change in approach (and the associated administrative process to apply for such aid), believing that combined with the eviction moratorium, renters may not perceive enough incentive to jump through hoops to receive rent help. The interviewee described this funding shift as reflecting a broader philosophical question posed by the changing landscape of housing aid, where programs were

being asked to decide between serving the sheltered versus unsheltered homeless or pursuing eviction prevention versus acute relief.

Challenges

Among the other challenges, the Department of Commerce highlighted how difficult it was to work with the Treasury on county-scale issues:

“The communication with the Department of the Treasury is, to this day, negligible. We’ve never been provided a contact for who we should talk to about this program. We have a generic email address that we can send emails to, which to as far as I’m aware, is the generic email address that anyone in the country can send emails to. You’ve got the primary grant manager and director of the department that thirteen million Treasury dollars are running through having the same access to communicate with Treasury as a landlord who hasn’t been paid yet. That’s been problematic for us.” (Magasis 2022)

The Treasury was not only difficult to communicate with, but their ambiguous and incomplete guidelines posed additional challenge for the department. In part due to this challenge, the county was unable to utilize all the Treasury funds awarded before the money was returned. For example, the first round of Treasury direct award required that sixty percent of funds be committed or allocated by September 30th, 2020 – the county did not become aware of this requirement until September 14th and was unable to revise their reimbursement-based grant structure in time to satisfy the requirement. This failure to satisfy requirements and therefore being forced to relinquish funding happened at least one more time.

Yakima County’s inability to fully apply funding did not stem exclusively from missed deadlines for award allocation. The uncertainty in how specific terms would be interpreted compounded with the difficulties communicating with Treasury to result in situations where the County made a good faith effort to comply but ended up assuming incorrectly – differences in terminology resulted in a direct revocation of funding. The interviewee described that ambiguity in the terms of the award were major contributors to the low proportion of funding deployed:

“We reached out [to Treasury] and [asked] ‘when you say ‘allocate’ does that mean spent or under contract, because we’re contracting.’ We didn’t get a response, and in the past, we’ve interpreted ‘allocate’ to mean ‘under contract.’ When we didn’t hear back from the federal government, and [we determined] we’re doing the right thing, and then two weeks before the deadline, Senator Murray’s office reached out and said [Treasury] is going to pull your funds because you haven’t allocated them.” (Magasis 2022)

Echoing a nearly unanimous sentiment from other interviewees, the Department of Human Services described growing pains associated with reporting, databases, and case management. At the outset of the pandemic, the department did not have a robust external-facing process to gather the information required from applications to apply to the housing relief programs. The workflow more closely resembled traditional grant process, where the lead grantor (the County) would utilize case managers from the sub-grantees and those case managers would facilitate the application and later disbursement of housing aid funding to the renter or landlord in need. This process was difficult to reconfigure to respond to the increased

volume of applications and demand. Specifically, the reporting and tracking requirements for each COVID-19 emergency rent relief program were unique from the programs the County was operating pre-2020 and could not be used as-is for management of the new aid programs. A deficit of case managers to facilitate applications meant that applicants were frequently struggling to figure out how to apply for emergency rent relief and track their application progress.

The Department of Human Services struggled to work with private sector partners. In many cases, the tech industry partners were unfamiliar with government process and requirements and would make suggestions or changes that were either inadequate for the County needs, or even outright impossible given the regulatory and legislative framework in which the programs were operating. The interviewee gave one such example working with a tech partner to revise the Department of Human Services’ website to improve the workflow for new applicants. The tech partner rebuilt the website, but lacked the intimate knowledge of the client base to be served – it failed to include bilingual options in a county with one of the largest Hispanic and Spanish-speaking population in the state, and was “built from the perspective of a tech company, not a case manager” (Magasis 2022).

Strategies

Stemming from the geographically large service area in the county, as well as limited department capacity to manage the programs, the Department of Human Services partnered with local nonprofits and aid organizations, as well as with other government agencies. These local partners were heavily relied upon to network and communicate with the target population – each partner had specific competencies and deep knowledge in specific areas of

the target population. For example, a local radio station, Radio KDNA, was a crucial partner to serve the Spanish-speaking residents of Yakima County:

“Radio KDNA, they’re a Spanish-language radio station and a subsidiary of Sea-Mar – another health services organization – and we were working with them. They had other organizations reach out to them and said, ‘can you help us promote this rental assistance program on the radio’ and [KDNA] said ‘hey we can do this rental assistance program.’ So they came to us and said ‘can we get in on this’ and we partnered with them.” (Magasis 2022)

Strategic local partnerships were described as the most critical success factor for the deployment of Yakima County’s emergency rent relief programs. The five “keystone” partners were operating as both de facto and literal case managers, providing a point-of-entry for renters and landlords seeking assistance to begin and manage their application.

To manage the complicated and constantly changing reporting and application requirements for the myriad funding streams, the Department of Human Services created an in-house application and client management structure using consumer-grade cloud-based form and spreadsheet software. While this homemade system struggled to scale later in the lifecycle of the pandemic housing relief programs, it was implemented extremely quickly, and the tools were familiar to the department staff:

“We created a system for de-duplication and data tracking. This was early on, when there was nothing [available to other counties] – the State was sending other counties to me to ask how I was doing things,

and I was coaching them, saying ‘this is what we’ve done, this is what has worked for us.’ Early on, we were – as far as I’m aware – one of the only counties that was able to solve that deduplication [issue] across providers issue and had good data. The data ended up being a lot easier for us to collect because it was part of our intake process.” (Magasis 2022)

While the process was hands-on and used comparatively rudimentary tools like Google Forms and Google Sheets instead of database and case management software, the process was implemented extremely quickly, and the department found early successes in managing intake and adapting to changes in program requirements and reporting. Only later in the program life cycle did the form-and-spreadsheet system pose issues with scaling and managing tens of thousands of rows of applicants.

Washington State Department of Commerce

The Washington State Department of Commerce is a state-level agency responsible for managing Washington’s state- and federal-funded COVID-19 relief programs. This broad goal contained myriad sub-programs, each targeted at a specific sector of the state that has been negatively affected by the pandemic. Among the diverse programs given the overarching goal of “COVID-19 Relief,” three departments were interviewed. These departments were selected because of their relation to the specific emergency rent relief research questions, as well as their responsiveness to interview requests.

Department of Commerce: Community Relief Fund

The DOC Community Relief Fund primarily handles non-residential aspects of the CARES Act, with an emphasis on direct appropriations and disbursement to counties and

municipalities. While this department does not deal directly with the emergency rent relief programs that are the primary study focus of this project, the program relates closely and shares many of the same challenges and strategies used. The Community Relief Fund is managed by the Local Government Division, the deputy assistant director of which was interviewed for this research.

The DOC Community Relief Fund (CRF) is one of the state’s largest COVID-19 relief programs, serving over three hundred contacts in counties, municipalities, and organizations state-wide. Like many counties, the CRF struggled to grow the staff capacity to match the needs of the program. The program grew consistently, and the staff fatigue and burnout were considerable. The CRF team was attempting to scale with the increasing demand while simultaneously dealing with the team’s own internal struggles to adapt to the COVID-19 landscape. The shift to working from home was challenging, particularly in how it impacted the team’s ability to reach out to other groups within the DOC for collaboration. Despite being a challenging transition, the pandemic-induced move to working from home presented an unexpected advantage; it shrank the division’s administrative costs, freeing up budget to be allocated to other projects that were more mission-driven.

The sheer scope of the funding was also a challenge for the CRF:

“Those funds and administration of those funds [are] some of the most broad federal funding that you’ll ever see – the most broad I’ve ever seen in my lifetime – which is one of the reasons it was such a challenge to try to manage those funds in such a short period of time.” (Hanson 2022)

Huge amounts of money were being sent to State governments with very little guidance on how it was to be deployed. What little guidance was provided was constantly changing and the challenges were compounded by the opacity of the Treasury. In response, the CRF made good faith efforts to interpret the context, legislation, and scant communication they received to promulgate recommendations to their local government partners. The interviewee expressed concern about the chilling effect that the current approach that the Federal government is taking towards local governments; he is concerned that the challenges of managing the COVID-19 relief programs may affect how local governments approach future funding:

“Some of these local governments are now starting to struggle through audits. In the future, [I fear how] they might view or approach funds like this that come to help with an emergency or crisis situation. [...] Maybe in the future [they might] not utilize the funds for services that are truly needed because of the liability, of potential other risks, and having to pay back costs and things like that. They may just choose to go for the safer uses, even though that’s not going to rise to meet the needs of that community at that particular moment in time.” (Hanson 2022)

The CRF and Local Government Division worked closely with their grantees, running regular question and answer sessions, and meeting one-on-one to address specific needs. This strategy, while effective, is costly from a staff overhead and efficiency perspective. Despite these costs, the CRF considers their key relationships with grantees to be a cornerstone of their strategy and influential in the success of the end recipients of these COVID-19 emergency funds.

Department of Commerce: Landlord COVID Relief Program

The Landlord Mitigation Program is comprised of four sub-programs, all targeted to provide financial aid for landlords during the pandemic. Landlords are eligible for emergency rent relief through both their county-level programs as well as in some situations from the Landlord Mitigation Program (LMP) directly from the DOC. The LMP existed before the pandemic, but aggressively ramped up in response to the increased volume of clients and need for landlord assistance. The Tenancy Preservation program, a zero-percent loan given to landlords to allow their tenants to maintain tenancy, completely ground to a halt in March 2020 when the first wave of eviction moratoria took effect.

The Tenancy Preservation program was a cornerstone of the landlord assistance portfolio of programs for the DOC, and the eviction moratorium and halted access to the courts slammed the brakes on its operations. The interviewee expressed grave concern about the effects of the moratorium and reduced court access creating a high-impact backlog:

“What happens [with the Tenancy Preservation program] is that [the program] requires that a judge finds the tenant eligible for the program, and landlords couldn’t get access to courts. For the purposes of eviction for non-payment of rent, the judges could not determine eligibility and create access to this program. We are starting to see claims come in now, [...] we are anticipating very large claims because technically the entire amount of rent that was owed for the pandemic period is eligible in this program.” (Yuva 2022)

In addition to the backlog impacts of emergency tenant protections, the LMP experienced issues managing their own funding streams – while the division did not handle

direct awards of COVID-19 rent relief, their legislative charge included consideration of E-RAP and T-RAP funding to qualify landlords for aid. However, this was muddied by the unclear and constantly changing requirements for those funding mechanisms, creating confusion for both the staff administrating the program as well as landlords seeking assistance.

Landlords in Washington do not have any sort of training, credentialing, licensing, or the like. Additional challenges in managing LMP cases stemmed from this open opportunity for almost anyone, institutional or individual, to become a landlord. The division found it extremely challenging to work with small-scale, non-commercial landlords (also called “mom and pop” landlords) and tenants. Collecting information to complete applications was difficult, and the case-management systems being used internally often struggled to scale with the needs of the LMP applications. The single biggest challenge identified by the interviewee was that landlords often submitted incomplete applications with missing information, but the division tools were inadequate to identify the issue at the time-of-entry to the program, and therefore required considerable hands-on education, outreach, and communication to remediate applications and move them along in the program.

The LMP was also responsible for taking ownership of some county landlord assistance programs when those counties struggled to keep up with the volume of pandemic-related relief requests. This responsibility was assigned directly by the Governor’s Office, and the DOC was charged to start a pilot program to help struggling counties deploy their aid more efficiently. The first county to take part in this pilot program, Clark County, has been successful in improving their deployment and has been attracting the attention of other counties in the state. However, the interviewer noted that scale once again becomes a concern:

“Right now, we’re running six people on that team for just Clark County, and it’s working fine. But if [the Department of Commerce] opened that window [to other counties], we would quickly be overcome.”
(Yuva 2022)

Instead of expanding the pilot program to other counties at this point, the interviewer suggested that expanding the access to the tools being used by the pilot program would be a more effective way to improve county-scale relief deployment. Tools like claim portals, which allow landlords to track the status of their aid application, landlord resource portals, and Q&A sessions for county program administrators would likely improve those counties’ ability to rapidly deploy aid funds.

Department of Commerce: Rental Assistance Team

The Rental Assistance Team is the division of the Department of Commerce responsible for managing housing programs at the state level. The primary focus of this team is eviction prevention, which is accomplished through primarily through contracts with local governments and by facilitating effective programs with knowledge sharing, troubleshooting, and directly assisting counties or municipalities in administrating their own programs. This team did not exist prior to the pandemic triggering the release of federal COVID-19 rent relief funding to states and is now comprised of four employees (three grant coordinators, and the program manager).

The interviewee identified four primary challenges faced by her team: an enormous and unprecedented amount of funding; difficulty scaling internal capacity for local governments; unstandardized infrastructure poorly suited for aggressive deadlines; inconsistent and unclear reporting requirements that repeatedly changed throughout the

programs. The Rental Assistance Team was responsible for nearly \$1 billion in funding and was expected to not only deploy that money rapidly but also do so while complying with the reporting requirements from both the state and federal governments.

To facilitate the deployment of this funding, the Rental Assistance Team created a huge variety of resources for Washington citizens, program managers, and local government officials. These resources range from the graphics and reporting used for this project and even pictured in earlier sections, to Q&A and knowledge-sharing events, and a variety of other methods to keep open communication with both program applicants and the local governments operating them. The interviewee identified that the team was already well practiced at operating in the sort of murky and unclear environment that plagued COVID-19 relief programs:

“My unit at Commerce is used to managing complicated Federal funds sources. It’s not the first time we’ve had to create a program out of very minimal guidance and implement it quickly, so we have that historical knowledge, and we had just completed the administration of another emergency rent assistance program before the E-RAP funds came to us. We had the bones of a program to utilize already, we had the bones of the program forms, guidance.” (Dodge 2022)

The Rental Assistance Team also strove to keep open dialogues with grantees to provide reassurances, answer questions, and provide clarification on common issues like reporting guidelines and “what does the Treasury mean by this...” However, the Rental Assistance Team quickly realized that they alone could not handle the scope and level of questions and requests for program implementation assistance, so they facilitated opportunities for grantees (mostly

local governments) to get help not just from the DOC but from other counties. The interviewee described that “we were all learning this together,” and facilitating the peer-to-peer program development was crucial in supporting local government emergency rent relief programs.

The lack of clarity, communication, and consistency from the Treasury was highlighted as a major issue for not just the Rental Assistance Team, but for any program accepting federal award. Like the interviewed counties, the interviewee described struggles interpreting and contacting Treasury:

“We just had what Treasury had provided us, which was a simple Q&A document with answers to situations – very complicated situations, and the answers were written in a way that you could interpret it differently. So we did the best with what we had, and we would send emails [asking for clarification] to this generic email address that felt like it was just going into a black hole.” (Dodge 2022)

The communication issues were not the only problem that the Treasury was causing for the Rental Assistance Team. The extremely particular requirements for targeted Treasury funds (which required documentation proving proof of need, affectedness, etc.) was at odds with what was also perceived as a “flexible and open” goal for the emergency rent relief set by Treasury. The interviewee described this tension of the situation:

“Treasury was positioning [the programs] as flexibility and freedom, but in reality, it was more of an ambiguity and resulted in restriction. Because you don’t want to misinterpret something and then end up in

hot water because Treasury says ‘well, actually what we meant was this...’” (Dodge 2022)

The ambiguity around the Treasury programs was seemingly intended to provide local governments with the opportunity and freedom to target the funds how they believe would best serve their community. Instead, the ambiguity created friction, hesitation, and concerns about future punishment or investigation for using the funds in a way that didn’t comport with what the Treasury *later* changed the requirements to specify. The DOC attempted to address this chilling effect of ambiguity by installing their own reporting requirements and providing education and outreach for program administrators. The additional advantage of promulgating their own requirements was that the DOC could also address state-specific goals, such as promoting equity in the emergency rental assistance programs – in late 2020, the Rental Assistance Program was tasked with starting dialogues with grantees with an emphasis on equity. Later in the programs, these equity goals were enshrined in law, and codified as a requirement to allocate a certain portion of funds towards “by-for organizations.” “By-for organizations” is a term used by the Department of Commerce to describe nonprofits that are operated and administrated by members of the community that the nonprofit seeks to serve directly; the nonprofit is “by” the community, and “for” the community.

Analysis

Initial Funding Recipients

One major trend identified across several interviews was that the counties did not always have a department that was prepared to accept and manage the Federal funding targeted at housing and rent relief. In some cases, the programs moved from department to

department until the program “found a home” with a team. However, in other cases, the funding was placed into a department that was already managing the county’s rent relief or housing aid programs. In two cases, this created an order-of-magnitude change in their funding or program capacity, posing unique challenges and concerns.

Within the three site studies, there was not an observed correlation between pre-COVID-19 program existence and effective aid disbursement. Notably, Snohomish County experienced far greater than the state average proportion of funding distributed, but stated that the funding had bounced between several departments before being solidified in the Human Services Department (Trosvig and Yoon 2022). Illustrating a similar phenomenon, Yakima County did not have any issues with the initial targeting of COVID-19 funding; the same department manages the aid today as did when it was first distributed (Magasis 2022). Unlike Snohomish County, which was in the top-third of WA counties for proportion of aid distributed, Yakima County sits in the bottom-third, reflecting the disconnect between apparent success connecting the aid to the department and then connecting the aid from the department to the clients and sub-grantees. This research originally hypothesizes that municipalities with existing robust housing aid programs would have greater success in management of COVID-19 related rent relief, this appears not to hold true when analyzing the data.

Issues

The issues local governments experience with distribution of the enormous and unprecedented amounts of COVID-19 relief funding can be summarized by synthesizing the results of interviews and applying available research. To be considered a “general issue” and indicative of the broader experiences of other municipalities in Washington, trends and

themes must be identified in at least two-thirds of the interviews collected. Other salient points more specific to individual counties and departments may be considered and integrated, but the “big picture” issues facing Washington municipalities must be more broadly applicable. In other words, while individual municipalities and departments experienced their own unique challenges and issues while managing and disbursing COVID-19 emergency rent relief, the shared issues that challenged multiple respondents are likely the ones also shared by other municipalities and are more likely to produce useful and usable recommendations when analyzed more deeply. Unless specifically noted, these summarized and synthesized issues are attributable to the interviews conducted for this research and in-line citations will be omitted for clarity and legibility. When necessary, citations directly to literature or individual interviews are included.

Generalized Challenges Adapting to COVID-19 Workplaces

COVID-19 has dramatically changed the way that work is done, from where workers are located, to the public health challenges associated traditional office buildings and workspaces, to forcing departments to confront their personnel constraints and limitations. While this program analysis did not focus on the effects of COVID-19 on the workplace, it is valuable to understand the baseline changes from pre- to mid-COVID-19 offices.

Starting in March and April 2020, fears of the then-poorly understood respiratory disease sent the country into lockdown. It was not clear how COVID-19 spread, how aggressively, and the extent to which the spread could be addressed, so many organizations opted to shutter or shift their workforce to a work from home (WFH) arrangement to reduce risk of the virus spreading within the workplace. This WFH shift caught many organizations flat-footed, and governments were no exception. Universally, all respondents identified that

the abrupt change to working from home was a very early symptom of COVID-19 induced strains on their office. Several respondents stated that prior to COVID-19, their office had no stated WFH policy, nor any specific tools in place to help accommodate the practice. Home offices were not universal, and many workers struggled to balance their own work with their dependents’ presence at home (children taking classes online, partners or spouses also making the change to WFH, etc.).

These challenges associated with the pandemic workforce are not exclusive to the departments interviewed, nor are they immune from the more universal and general issues. In addition to the WFH challenges, the simple fact that COVID-19 was a dangerous, incompletely understood, and highly contagious disease contributed to staff attrition and burnout. All respondents stated that they experienced workforce shortages stemming from a variety of issues: staff contracting COVID-19 and the resulting complications or death; mental distress from the 24/7 news cycle and then-current events; burnout resulting from the dramatically and suddenly increased workload, which will be explored in a later section (Society for Human Resource Management 2021). These factors contribute to a nation-wide crisis for workplaces, from which these municipal entities were hardly immune.

The general workforce impacts from COVID-19 were a major contributor to the delayed or incomplete disbursement of COVID-19 emergency rent relief. Even absent any other challenges, the impacts of burnout, illness, and a sudden shift in work strategy and function would be issue enough to slow the smooth functioning of any organization. Even when the department responsible for the management and disbursement of this aid adapted smoothly and quickly, and did not suffer employee attrition or illness, the sub-grantees downstream were struggling with the same issues.

Inconsistent and Frequently Shifting Program Requirements

The expression “like trying to build the plane midflight” came up in the majority of the interviews conducted for this research. The regulatory and statutory frameworks on which the funding streams are based consistently shifted beneath the feet of program managers and departments. While the sentiment captured by this expression was more intense in some departments than others, it was universally felt. Some respondents described finishing with work on one day, knowing that when they wake up the next morning, the Treasury would have new reporting requirements, spending requirements, or other details that they would have to integrate into their program structures. This constantly in-flux environment is not conducive to building sturdy and robust aid programs, particularly when in the context of the additional challenges related to the pandemic.

Complying with the requirements of a given program is not new to the organizations interviewed – all of them receive regular funding through the Department of Housing and Urban Development and other agencies. The COVID-19 emergency rent relief was unique from these more traditional funding streams in that it was managed by the Department of the Treasury rather than HUD. As described by the respondents, the Treasury had never been tasked with directly managing such a rapidly deployed, high-volume, and extremely direct program, the kind typically tasked to HUD or similar agencies with an existing relationship with grantees, existing sub-structures to support distribution, etc. While it is not clear why the Trump administration decided that the Treasury was the correct agency to manage this emergency aid distribution process, one respondent hypothesized it was a political decision (Jewell 2022).

The Treasury being responsible for the bulk of Federal funding on these programs compounded issues with other parts of the program. Respondents describe intense difficulty reaching representatives from Treasury for clarification on promulgated requirements; even at time of this writing, the Treasury does not have a dedicated grantee support email or phone line in place. Instead, there is a general “help email” that is provided for everyone from state commerce agencies like the Department of Commerce, to municipal housing aid departments, and even individuals seeking housing aid. Whenever a representative from one of the program-managing organizations sent an email to this general inbox, they frequently described the experience akin to shouting into the void; they had no way to know if a human would see, read, and respond to their inquiry in a timely manner. This lack of responsiveness meant that DOC and municipal organizations were left to interpret the often-ambiguous and constantly changing requirements and simply hope that their interpretation would stand up to interrogation from a later audit (Hanson 2022; Dodge 2022; Yuva 2022).

The struggles working with the Treasury were amplified when accepting direct awards from the department, rather than remaining entirely within the DOC award system. Each of the interviewed counties had received direct awards, many of them up to the maximum 40% allowable by program standards. All the issues identified above were exacerbated when working directly with the Treasury: difficult to receive feedback or clarification, rapidly and constantly changing standards and reporting requirements, etc. Most municipalities were accustomed to working with HUD on grants and funding for housing related programs, and the shift to working with the Treasury was unexpected and rife with friction in communication, processes, and even logistics to disburse funding from the Treasury to the agencies.

Mission Poorly Supported by Internal Systems

Not every local government recipient of COVID-19 emergency rent relief funding had a program or system in place to manage and distribute housing relief at the time that the pandemic began. About two-thirds of counties interviewed stated that there was some sort of county-operated housing aid program in place at the time of the first round of pandemic housing relief, and the remaining third stated that they needed to create a new program on the fly to accommodate the Treasury and DOC programs. Nearly all respondents, both DOC and counties, stated that their program dramatically changed in structure, form, or content through the pandemic.

At the time the pandemic aid began to be sent out, there was no uniform or consistent system in place to manage the aid on a county or state level; each organization used their own systems, some developed in-house, some commercial or industrial. A consistent sentiment from both DOC and county respondents was that they would have preferred if there was a top-down provisioned system to use for these huge aid packages. Each county handled the aid packages in unique ways, with about half of the respondents starting off with a home-brewed or in-house software or database solution.

One critical issue with the diverse and fractured systems used by counties was that it made troubleshooting, knowledge sharing, and scaling difficult on a state level. Knowledge sharing was identified as one of the most critical factors in successfully operating *any* aid program, let alone one of this magnitude and speed. A fractured ecosystem means that each county is essentially duplicating work that may have already been done in substantial part by other organizations. The DOC reported that they would regularly have counties or municipalities call or email in to ask for help making sure their systems were compliant with

the ever-changing reporting and disbursement requirements, only for DOC to find that the solutions being used were inconsistent and unique. This meant that each request for help from DOC was essentially bespoke, rather than extensible and building on work from other agencies or counties.

Further, many counties opted to expand upon and build from software that their staff was already familiar with, which typically meant using solutions for tasks that they were not designed for. For example, using Google Forms and an associated Google Sheet to track tens of thousands of aid applications; the lack of a robust case management and database system meant that inadequate solutions were made to work, thus reducing efficiencies, and diluting the opportunities to create robust and durable solutions for future aid programs. Some counties that did not have an existing database management tool at the outset did not realize that they would *need* one until weeks or months into the COVID-19 relief program rollout; this problem of “we don’t know what we don’t know” is difficult to navigate through, and typically required a concerted effort to knowledge share or provide systems and tools from several steps up the pipeline.

The issues with existing and bootstrapped systems were often overcome by the respondents. Several counties noted that while their homemade systems were imperfect and many struggled to scale, the critical factor was that they were in place *fast* and early and were able to adapt to changes in program requirements and reporting. Problems like deduplication (removal of duplicate applications and entries) and data management grew into more pronounced difficulties as the programs continued to grow in scale, but the fact remained that there would likely have been even more severe issues if the program deployment was forestalled to integrate or implement a more formal or top-down system.

Scaling

Simply put, effective housing aid programs do not scale linearly when funds are rapidly allocated to those programs. One interviewee described the experience akin to being on the receiving end of a fire hose; an overwhelming and borderline frightening amount of money being sent out with seemingly very little targeting and guidance. Several respondents described a dissonance associated with the rapid expansion of their budgets (sometimes several orders of magnitude compared to 2019):

“The focus was much more on spending the money, [rather] than how you’re spending money. And that was not the way that most public servants think about spending money. We’re all about results, and scarcity, and prioritization of funds. And here they’re just throwing gobs of money, saying ‘spend it as fast as you can.’” (Jewell 2022)

Government aid programs typically operate on extremely tight budgets, with a constant looming threat of reduced budget hanging overhead quarter after quarter. The COVID-19 aid packages represented a tremendous and unprecedented scale of budget increases unlike anything the counties or DOC had seen before and were not prepared to accommodate. One critical fallacy that the public seems to hold about government aid programs is that more money directly equates to more work and therefore increased output and results. The colloquial attitude about the COVID-19 programs is that “government bureaucracy is getting in its own way” (Siegel 2021a). While it’s difficult to disprove such an assertion, particularly because such a claim is oversimplified to the point of caricature, it is true that county and state level agencies struggled to mesh the “firehose of money” with their often highly-targeted and

high-touch programs designed to maximize the impact of every dollar budgeted (Bramhall, Fedorowicz, and Randall 2021; Leduc and Wilson 2017).

This problem represents the single largest gap between the public perception of COVID-19 emergency rent relief programs and the actual reality of the programs being managed by counties and municipalities. To a lay person, it does not immediately make sense that an organization cannot immediately capitalize on an increased budget and produce higher levels of output. Further compounding the dissonance of the situation, two diametrically opposed goals were simultaneously assigned to local government recipients of federal COVID-19 emergency rent relief funding. They were not only expected to distribute the funding at breakneck speed to address the acute risks of eviction and housing insecurity, but they were also expected to do so in a highly targeted and needs/means-tested way. Many respondents described these two goals as mutually exclusive; requiring a high level of verification that the end recipient was impacted by COVID-19 in some way, or even that they are in fact a bona fide renter or landlord, will necessarily slow down disbursement relative to taking an extremely permissive and open approach in a first come, first served model.

The expectations for this balance between permissiveness and ability to target shifted throughout the lifecycle of each funding stream and aid package. Notably, the Treasury never provided specific targeting guidelines or instructions for the direct award, while still requiring extensive and greater-than-average amounts of recipient tracking and reporting. This lack of direct guidance left the recipients in a nebulous and often-uncomfortable position of needing to make their own determination as to what the intent of Treasury was for the aid packages (Dodge 2022; Hanson 2022; Yuva 2022). There were two competing pressures on counties: the threat of a Treasury or DOC audit in the future, and expiration dates on Treasury funding

(often called “use it or lose it” funding). Several counties described pressures from elected officials and the public to deploy funding aggressively but feeling held back due to the unclear requirements and guidelines that could later result in an unfavorable audit outcome.

Scale for agencies like those interviewed is not one-to-one, where dollars to a program turn directly into rent relief checks being written to landlords and tenants at the same rate or pace. The challenges associated with an extremely rapidly increased budget to several times what they were accustomed to working with creates an environment where competing goals are simultaneously demanded. Faced with these mutually exclusive goals, counties and municipalities were left to read between the lines, consult with one another and the DOC, and simply hope that when confronted with the outcomes of their decisions, they would be granted an understanding that “well, they did the best they could with the information they had.”

Industry Practices and Recommendations

It is naive to believe that 2022 signals the end of the COVID-19 induced housing crisis, and irrational to think that the nation has seen the last of situations that require urgent, rapid, and often unprecedented amounts of aid to provide housing security and protect the most vulnerable Americans. Many issues catalogued in this research are not isolated or specific to COVID-19, and many were latent problems waiting for a catalyst. The case studies and analysis of issues are used to create a set of Industry Practices and Recommendations to be considered to improve readiness and responsiveness for future crises. Because these recommendations are not empirically tested against a baseline, it is impossible to describe them as “best practices.” Instead, they are presented as potential factors in a solution for some issues experienced by counties and departments responsible for aid distribution.

Create Clear and Consistent Requirements

Establish transparent and consistent requirements for funding mechanisms and programs to reduce ambiguity and encourage efficient deployment of funding management systems.

The most unified complaint about the deployment of COVID-19 emergency rent relief programs was the opacity and inconsistency of reporting and administrative requirements for the funds that sit at the bedrock of each program. While this was particularly pronounced when discussing funding provided by the U.S. Department of the Treasury, similar challenges existed on a state and local level. Agencies and departments responsible for administering and deploying the emergency funding faced regular slowdowns to divine the meaning from ambiguous or unclear language to which they were legally obligated to remain consistent.

Ambiguous, unclear, or open-ended language may have been specifically chosen to give the grantees freedom and flexibility in how they deploy the funds to serve their communities. However, regardless of the intent of the language, the uncertain and poorly defined requirements instead acted as brakes on the program, forcing them to interrogate each decision they made to determine if it is defensible should their interpretation turn out incorrect.

Ambiguity creates friction, not freedom. To improve the efficiencies of emergency aid programs, clear and consistent requirements should be laid out and widely disseminated. Areas where discretion and flexibility are intended to be granted to the program managers should be specifically highlighted as such. These changes should be made at the highest level possible to make the greatest impact, allowing for feedback to be integrated as the money funnels downwards towards the end recipient.

Once terms and conditions are set for a given funding stream, they should not be fundamentally modified or revised midway through deployment of the programs without significant notice and good cause. Most systems and structures used to administrate emergency rent relief programs are momentum-oriented, with the effectiveness of the program negatively correlated with the amount of hands-on data manipulation and management needed for applications midstream. This suggests that when the requirements for a program are changed once the program is operational, it can cause inefficiencies. Applications may be rejected despite being once approved, or applicants may be re-contacted to provide additional information. This directly harms the efficiency and credibility of the program and slows effective deployment of emergency funds. However, there are situations where modifying and iterating programs is necessary to address issues or failings with the original structure; these changes should be promulgated with as much notice as possible and communicated extremely thoroughly to avoid creating uncertainty.

Besides creating inefficiencies, ambiguity and constantly changing requirements create an environment of discomfort and uncertainty among program administrators. If the program administrators are unclear on what the expectations and conditions for funding are, and perceive them as a moving target, they operate more cautiously for fear of interpreting the conditions incorrectly and losing funding, or worse, punishment by the upstream agencies. In contrast, providing clear and consistent requirements creates an environment where administrators can be secure in the programs deployed and the decisions they make, while still having flexibility to address loopholes, iterate on the program performance, and resolve existing inefficiencies.

Standardize or Unify Data Management and Application Systems

Promote or require the use of a supported and uniform system for data and case management to streamline troubleshooting, minimize duplication of efforts, and improve knowledge sharing between local governments.

Many local governments reinvented the wheel when designing and implementing their application and data management systems in response to the COVID-19 housing crisis. Some counties had a version of case management and database in place pre-pandemic because there was an extant housing aid program, or because they adapted an existing system from another program or division. Others, however, were rapidly bootstrapping in response to the pandemic, often resulting in suboptimal systems early in the program lifecycle.

Providing a standardized system to manage emergency rent relief programs would address several issues. First, it would allow for local governments to rely more on one another to troubleshoot, share tips, and develop processes more efficiently and effectively than building isolated systems individually. Besides the cooperative knowledge sharing, a standardized system would allow for the higher administrative body, likely the DOC or similar state-level organization, to work with local governments from a shared baseline, reducing the friction of moving data from one organization or system to another.

A standardized system would additionally save local governments the cost and labor to solicit quotes, develop relationships, and troubleshoot with private tech sector partners. Several interviewed counties tried unsuccessfully to partner with tech sector companies, but none were satisfied with the level of integration, efficiency, or feature-set, and most ultimately pursued their own in-house-created systems. Providing a unified and standardized system

would allow local governments to focus on the actual program administration and deploying aid, rather than interfacing with tech companies.

Manage Expectations

Communicate frequently and transparently with policymakers, the public, and aid recipients to ensure that expectations about speed and scale of deployment are realistic and to reduce surprises.

The COVID-19 pandemic was a shock to the entire world, and the subsequent responses included one of the nation’s largest relief packages ever produced. With this sharp increase in funding came equally increased expectations and demands: an unprecedented amount of funding should correspond to an equally unprecedented distribution of that funding, and it should happen rapidly. These demands and expectations came from all sides: from division leads to legislators working on the aid packages, to news agencies reporting on the programs, to struggling tenants and landlords seeking a remedy, the demand was astronomical and the expectations for the programs to deliver matched that demand.

Failing to effectively manage expectations does not land exclusively on any one group or party. Many local government housing aid teams were not accustomed to having a post-scarcity funding stream, and gratefully accepted every possible dollar they were offered. Most were not aware of the consequences of accepting the budget orders of magnitude larger than their prior year and underestimated the difficulty of scaling the program and team to accommodate the increased budget. Managing the public perception of what can realistically happen in a given timeframe is crucial to increasing satisfaction with the program. Much of the expectation management can be accomplished with transparency and communication from the program administrators; sharing their short-, medium-, and long-term plans for emergency

housing relief can inform the public and prevent animosity from building up from a perceived opacity of the operations of the program. Similarly, the department or team responsible for the program management should coordinate and collaborate with other emergency response agencies in their jurisdiction to utilize unique skills, such as Incident Command Structure and communication strategies inherited or trained by the Federal Emergency Management Agency (FEMA).

The expectations that need to be managed are also not exclusively external to the departments administrating the emergency rent relief programs. As was done by the counties analyzed for this project, the expectations of the department or team itself should also be managed carefully to ensure that decisions are being made consistent with the actual capability to manage the program. Many programs saw their budgets increase by orders of magnitude during the pandemic but did not have a clear expectation of how they would scale to use all the funding they had committed to deploying. Establishing and communicating these expectations will likely reduce the likelihood of receiving bad press, burning out team members, and improve goodwill with the public being served by the program.

Develop and Maintain Relationships with Local Partners

Create strong relationships with local partners to leverage their deep knowledge of the problem area, and to minimize the amount of overhead required to efficiently deploy emergency aid.

Relationships with local partners, both private and public, formed the backbone of most programs analyzed in this research. Few programs provided direct aid to renters and landlords, and instead partnered with sub-grantees to provide case management, application assistance, and integration with existing housing relief programs in the county. These

relationships sometimes existed before the pandemic, but many were developed because of aggressive outreach by the program administrators. The outreach was a direct consequence of the scale issue described above, as the programs could not adequately manage the level of funding and subsequent demand for aid themselves.

Relationship building should be a priority for any local government seeking to distribute emergency rent relief efficiently and effectively in their communities. Most departments do not have the staff to provide the case management, legal aid, application assistance, and other related services to tenants and landlords, and should not try to reinvent the wheel when community partners dedicated to those tasks exist. Program administrators should also not limit themselves to “traditional” or typical NGO and sub-grantees. Non-traditional partners like the municipal or county court system, local radio stations, and other social safety net nonprofits can effectively broker links between their own clients and the emergency rent relief programs and provide expertise on community issues.

Reduce Friction for Point-of-Entry for Rent Relief

Put a simple, single point-of-entry application in front of the bureaucratic funding processes to reduce friction and improve client outcomes.

Government aid applications are infamous for their bureaucratic and sometimes repetitive processes, but the COVID-19 emergency rent relief programs implemented by several counties in this study demonstrate that the cliché need not hold true for future programs. While the recommendation of reducing friction and using a single-point-of-entry for any applicant to any generic aid program is sensible, it is especially important when the aid program is utilizing such diverse and nuanced funding mechanisms as the COVID-19

emergency rent relief programs. For the pandemic funding sources, each required a slightly different set of personal information from each applicant, and the qualifications, terms, and conditions of the aid varied from funding source to source.

Interviewees and their sub-grantees described challenges matching individual landlords and tenants to the proper and most appropriate funding source. The requirements for each were sometimes confusing and may have been incomprehensible to someone experiencing a stressful and acute housing crisis. Some counties found tremendous success by moving these determinations “behind the screen” from the applicant, and instead utilizing a single-point-of-entry application then used to allocate funding from the myriad sources. Applicants no longer needed to wade through complex Q&A documents, ambiguous applications, or simply give up and submit incomplete or improperly completed applications; by submitting a single application, they would be considered for any programs they were found eligible for.

This point-of-entry system also reduced the inefficiencies and friction of passing data and applications between agencies, partners, and programs. This relates closely to the recommendation to use a standardized infrastructure to manage the data and applications, but even absent that implementation, the single-application structure will improve client outcomes by reducing duplication of applicant and applicant information, aiding in determination of qualification, and streamlining handoffs to program partners.

Conclusion

COVID-19 fundamentally and permanently changed how this country experiences day-to-day life. The pandemic created unbelievable suffering and struggle, as the most vulnerable people were hit hardest by economic and employment impacts, health and safety risks, and housing insecurity. In response to this crisis, the nation created one of the largest aid packages ever produced in absolute record time. The COVID-19 relief packages created opportunities for local governments to provide an unprecedented level of rent relief for their communities, but not without challenges and issues.

Housing insecurity was already a huge challenge for many communities across the country, and Washington was no exception. The state was already considered a national leader in homelessness management and prevention, and expectations were sky-high for how the state would implement and deploy the astronomical amount of emergency rent relief. But counties and municipalities struggled to maximize the deployment of that money. Laudable commitment to maximizing the impact of each dollar and minimizing fraud or misuse were outright incompatible with the demand to shovel money out the door as fast as it was coming in from the federal and state agencies.

The departments responsible for the aid programs were struggling to adapt to a pandemic life as every American struggled; the sudden shift to working from home, burnout, illness, stress, and uncertainty created a challenging environment to work within. At the same time, expectations were sky-high, and soon, bad press and judgement began to come out about how these programs were administered or operated. The Treasury was simultaneously demanding and particular without being specific and clear about their demands and particularities and the ambiguity created slowdowns as the programs tried to decipher and

divine meaning from cryptic standards. And all the while the public had demands and expectations that “these programs have so much money, why isn’t it coming out as fast as it’s going in?”

Despite the myriad challenges and pressures, most departments adapted, leveraging local partners and sub-grantees to streamline and improve efficiency of their funding deployment. While scaling program to the increased funding would never be one-to-one, the programs implemented strategies to scale more quickly than they had ever done before. By the end of 2021, counties and the Department of Commerce had spent a year and a half scrambling to craft programs that supported their communities through one of the most acute housing crises in American history.

COVID-19 is likely not the last pandemic we will experience, and it is even less likely that it is the last cause of housing security emergencies these programs will need to deal with. Using the lessons learned from the last two years to develop recommendations and practices to better prepare for the next time will reduce the chances that programs are underdeveloped or nonexistent when needed most urgently. Maintaining an efficient and unified infrastructure for case management and applications for emergency aid, complete with clear and consistent requirements from funding sources will improve local government confidences in the deployment of funds and improve client outcomes during one of the most difficult periods of housing insecurity they are likely to experience. Managing expectations and increasing communication with the public, internal, and external partners can help to reduce the dissonance of money-in versus money-out for these aid programs and create an environment in which transparent and regular communication keeps surprises to a minimum.

COVID-19 did not create America’s first housing crisis, and America has not seen its last housing crisis. As the most acute and uncertain impacts of the COVID-19 pandemic gradually fade into the distance behind us, we must carefully examine what happened in the last two years, identify what went right, what went wrong, and what we can fix for the next time.

Because there will be a next time, and people will still ask “Where’s my money?”

References

- Bettinger, Eric, and Betsy Williams. 2014. *Federal and State Financial Aid during the Great Recession*. University of Chicago Press.
<https://www.degruyter.com/document/doi/10.7208/9780226201979-010/html>.
- Bramhall, Emily, Martha Fedorowicz, and Megan Randall. 2021. “Equity Trade-Offs in the Design of COVID-19 Emergency Assistance.” *Urban Institute*, July.
<https://www.urban.org/research/publication/equity-trade-offs-design-covid-19-emergency-assistance>.
- Centers for Disease Control and Prevention. 2021. “Coronavirus Disease 2019.” Centers for Disease Control and Prevention. September 16, 2021.
<https://www.cdc.gov/media/releases/2021/s0803-cdc-eviction-order.html>.
- Code of Federal Regulations. 2022. “45 CFR Part 46 -- Protection of Human Subjects.” May 6, 2022. <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-46?toc=1>.
- Coibion, Olivier, Yuriy Gorodnichenko, and Michael Weber. 2020. “How Did U.S. Consumers Use Their Stimulus Payments?” Working Paper 27693. National Bureau of Economic Research. <https://doi.org/10.3386/w27693>.
- Consumer Financial Protection Bureau. n.d. “Emergency Financial Assistance to Help Renters and Landlords – Resources.” Consumer Financial Protection Bureau. Accessed October 13, 2021. <https://www.consumerfinance.gov/coronavirus/mortgage-and-housing-assistance/renter-protections/emergency-rental-assistance-for-renters/>.
- Dodge, Kathryn. 2021a. “Commerce Rent Assistance Programs.” January 26.
———. 2021b. “T-RAP 1.0 and 2.0 Crosswalk.” June 10, 2021.
<https://deptofcommerce.app.box.com/s/xxgujafuzvd176qltq84s8nslitlep0/file/820673729786>.
- . 2021c. “T-RAP Program Summary.” July 23, 2021.
<https://deptofcommerce.app.box.com/s/xxgujafuzvd176qltq84s8nslitlep0/file/837653424733>.
- . 2022. Interview with Washington State Department of Commerce Treasury Assistance Program Video Interview.
- Dupor, Bill, and Peter B. McCrory. 2018. “A Cup Runneth Over: Fiscal Policy Spillovers from the 2009 Recovery Act.” *The Economic Journal* 128 (611): 1476–1508.
<https://doi.org/10.1111/eoj.12475>.
- Glassberg, Benjamin. 1937. “Rent Policies under Emergency Relief: Milwaukee’s Experience.” *Social Service Review* 11 (3): 419–33. <https://doi.org/10.1086/632062>.
- Goodman, Laurie, and Dan Magder. 2020. “Avoiding a COVID-19 Disaster for Renters and the Housing Market.” *Urban Institute*, April.
https://www.urban.org/sites/default/files/publication/102013/avoiding-a-covid-19-disaster-for-renters-and-the-housing-market_1.pdf.
- Greenberg, Kalie. 2021. “King County Lags on Rental Assistance Distribution Just Weeks before Eviction Ban Expires.” *King5.Com*, September 11, 2021.
<https://www.king5.com/article/news/local/king-county-lags-on-rental-assistance-distribution-just-weeks-before-eviction-ban-expires/281-9ba06beb-dff0-44e4-9594-b98a381d15fe>.
- Groover, Heidi. 2021. “Where’s the Money? Landlord and Tenant Groups Threaten to Sue King County.” *Seattle Times*, September 2, 2021. <https://www.seattletimes.com/business/real->

- estate/in-rare-partnership-landlord-and-tenant-groups-demand-king-county-speed-up-rent-assistance/.
- Hanson, Tony. 2022. Interview with Washington State Department of Commerce Local Government Coronavirus Relief Fund Video Interview.
- Jewell, Kirsten. 2022. Interview with Kitsap County Department of Human Services - Housing and Homeless Division Manager Video Interview.
- Leduc, Sylvain, and Daniel Wilson. 2017. “Are State Governments Roadblocks to Federal Stimulus? Evidence on the Flypaper Effect of Highway Grants in the 2009 Recovery Act.” *American Economic Journal: Economic Policy* 9 (2): 253–92.
<https://doi.org/10.1257/pol.20140371>.
- Linsmeier, Charles. 2020. “Shock, Stimulus, and Upheaval: The Great Recession, The American Recovery and Reinvestment Act, and Mayoral Coalitions in Brooklyn, NY 2009–2013.” *Dissertations, Theses, and Capstone Projects*, February.
https://academicworks.cuny.edu/gc_etds/3558.
- Lowell, Eric. 2021. “MRSC - New Federal Funding for Rent and Utility Assistance.” March 1, 2021. <https://mrsc.org/Home/Stay-Informed/MRSC-Insight/March-2021/New-Funding-for-Rent-and-Utility-Assistance.aspx>.
- Lutz, Byron. 2010. “Taxation with Representation: Intergovernmental Grants in a Plebiscite Democracy.” *The Review of Economics and Statistics* 92 (2): 316–32.
<https://doi.org/10.1162/rest.2010.12258>.
- Magasis, Esther. 2022. Interview with Yakima County Department of Human Services - Director of Human Services Video Interview.
- Office of Management and Budget. 2022. “COVID Relief Spending | USAspending.” April 30, 2022. <https://usaspending.gov/disaster/covid-19>.
- Reina, Vincent, Claudia Aiken, Julia Verbrugge, Ingrid Ellen, Tyler Hauptert, Andrew Aurand, and Rebecca Yea. 2021. *COVID-19 Emergency Rental Assistance: Analysis of a National Survey of Programs*. <https://doi.org/10.13140/RG.2.2.13239.65449>.
- Siegel, Rachel. 2021a. “‘Five-Alarm Fire’: Slow Trickle of Rental Aid Heightens Concern about Eviction Crisis.” *Washington Post*, July 7, 2021.
<https://www.washingtonpost.com/business/2021/07/07/rental-aid-eviction-moratorium-housing/>.
- . 2021b. “Rental Relief Programs Ramped up in June, but Fears Mount That Momentum May Be Coming Too Late.” *Washington Post*, July 21, 2021.
<https://www.washingtonpost.com/business/2021/07/21/rental-relief-cdc-eviction-moratorium/>.
- Society for Human Resource Management. 2021. “The COVID-19 Labor Shortage: Exploring the Disconnect between Businesses and Unemployed Americans.” July.
https://advocacy.shrm.org/wp-content/uploads/2021/07/SHRM-Research_The_Employment_Picture_Comes_Into_Focus.pdf.
- The Department of the Treasury. 2021. “Coronavirus Relief Fund for States, Tribal Governments, and Certain Eligible Local Governments.” January 15, 2021.
<https://www.federalregister.gov/documents/2021/01/15/2021-00827/coronavirus-relief-fund-for-states-tribal-governments-and-certain-eligible-local-governments>.
- Trosvig, Debbi, and Ji Yoon. 2022. Interview with Snohomish County Human Services Department - Grant Specialist, Emergency Rental Assistance Program; Supervisor of the Office of Community and Homeless Services Video Interview.

- U.S. Department of the Treasury. n.d. “Emergency Rental Assistance Program.” U.S. Department of the Treasury. Accessed February 10, 2022. <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program>.
- Versey, H. Shellae. 2021. “The Impending Eviction Cliff: Housing Insecurity During COVID-19.” *American Journal of Public Health* 111 (8): 1423–27. <https://doi.org/10.2105/AJPH.2021.306353>.
- Waller, Brett, and Edmund Witter. 2021. “RE: King County Treasury Rental Assistance,” September 2, 2021.
- Washington State Department of Commerce. 2020. “COVID Grantee Contact List 4.9.2020 V2.”
- . n.d. “CARES Act and State Rent Assistance.” Washington State Department of Commerce. Accessed February 10, 2022a. <https://www.commerce.wa.gov/serving-communities/homelessness/cares-act-and-state-rent-assistance/>.
- . n.d. “Housing/Rent Assistance.” Washington State Department of Commerce. Accessed February 10, 2022b. <https://www.commerce.wa.gov/housing-assistance/>.
- . n.d. “Washington State Department of Commerce Emergency Rental Relief Distribution | LiveStories.” Accessed May 2, 2022c. <https://insight-editor.livestories.com/s/v2/washington-state-department-of-commerce-emergency-rental-relief-distribution/ce5d59f3-36fe-4633-8768-759eca2ea077>.
- Washington State Department of Financial Institutions. n.d. “Financial Resources for Washington Residents Impacted by COVID-19.” Washington State Department of Financial Institutions. Accessed February 10, 2022. <https://dfi.wa.gov/coronavirus/financial-resources>.
- Washington State Office of Financial Management. 2021. “Federal COVID-19 Response Funding Distributed through State Government | Office of Financial Management.” August 31, 2021. <https://ofm.wa.gov/budget/covid-19-budget-information-agencies/federal-covid-19-response-funding-distributed-through-state-government>.
- White House Statement. 2021. “FACT SHEET: Biden-Harris Administration Announces Initiatives to Promote Housing Stability By Supporting Vulnerable Tenants and Preventing Foreclosures.” The White House. June 24, 2021. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/06/24/fact-sheet-biden-harris-administration-announces-initiatives-to-promote-housing-stability-by-supporting-vulnerable-tenants-and-preventing-foreclosures/>.
- Wolf, Michael Allan. 2020. “COVID-19 Pandemic and Real Property Law: An Early Assessment of Relief Measures for Tenants and Residential Mortgages.” SSRN Scholarly Paper ID 3623281. Rochester, NY: Social Science Research Network. <https://papers.ssrn.com/abstract=3623281>.
- Yuva, Nicholas. 2022. Interview with Washington State Department of Commerce Landlord FundVideo Interview.
- Zedlewski, Sheila R. 2008. “The Role of Welfare during a Recession.” *Urban Institute*, December.

Acknowledgements

Thank you to my family, friends, and colleagues for supporting me through this research, and through this Master program. Thank you to Anna Passey Trevino and Claire Farrington for being my sounding board, editors, and teammates through this project. Thank you to all the friends, peers, and family who helped me brainstorm, edit, and prepare.

Thank you to my committee and the faculty of the College of Built Environments for shepherding me through a tumultuous and difficult two years amidst the pandemic.

Especially thank you to my partner, Amy, for consistently being my stalwart through this project and all others. I love you and I appreciate you. Extra thanks to her for being the original inspiration for this project topic.

This research was conducted on the unceded ancestral lands of the Coast Salish People. I would like to express my respect and gratitude to this land and to the countless generations of Duwamish, Suquamish, Tulalip, Puyallup, and Muckleshoot People who continue to call this place home.