

Evaluation of the Eviction Protection Grant Program

Interim Report



ABOUT THIS REPORT

This interim report is for the evaluation of the Eviction Protection Grant Program (EPGP). In 2021, the U.S. Department of Housing and Urban Development (HUD) launched EPGP, a federal program designed to expand the reach of legal services to low-income tenant households facing eviction at no cost to the household. 2M Research was contracted in September 2021 to evaluate the program and deliver the final report by late 2024.

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Interim Report

Prepared for
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Foreword

In 2021, HUD's Office of Policy Development and Research (PD&R) launched the Eviction Protection Grant Program (EPGP) as part of HUD's continued work and broader whole-of-government approach to support families recovering from the public health and economic impacts of the COVID-19 pandemic. Following the end of the pandemic-era emergency rental assistance and most federal, state, and local eviction moratoria, eviction filings by landlords have rebounded and, in some places, exceed pre-pandemic levels. With rising rents, persistent inflation, and a shortage of affordable housing, the legal assistance services provided through EPGP come at a critical time for families across the country.

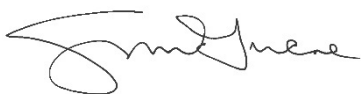
HUD's EPGP funds organizations to provide legal assistance and other services at no cost to low-income tenants facing eviction. Since the program's inception, PD&R has awarded \$40 million in funding to 21 grantees across 19 states. Of the 21 grantees, 9 provide statewide coverage to households facing eviction in 11 states, 5 provide regional coverage, and 7 provide local coverage. Funding has helped meet the needs of households facing or at risk of eviction in target service areas by enabling grant recipients to scale up existing activities, expand the range of services offered, and strengthen partnerships with other organizations and service providers.

EPGP helps prevent evictions and mitigates the destabilizing effects of eviction by defending households against eviction in court, facilitating education and outreach activities, connecting households to other services, and providing households with diverse forms of legal support—ranging from mediating mutually beneficial agreements between households and landlords to preventing discrimination against households. As of June 2023, EPGP had served 14,260 households, including 17,972 adults and 10,703 children. More than one-half of the households served had at least one child, 18 percent had limited English proficiency, 29 percent had a disability, and 7 percent resided in rural areas.

HUD has worked closely with grant recipients to ensure successful program implementation and strengthen program design. For instance, in response to direct feedback that HUD received from grant recipients, HUD contracted a firm to provide technical assistance and posted training sessions and other resources on the program website.

Evaluation of the Eviction Protection Grant Program: Interim Report documents early program implementation and describes the organizations funded through and the households served by the program as of June 2023. The forthcoming final report will include an analysis of program outcomes and a more complete discussion of the experiences of program grantees and the households served.

The U.S. Congress has funded EPGP every year since its inception, authorizing an additional \$20 million in fiscal year 2023 and \$20 million in fiscal year 2024 for the program's continuation. The evaluation will offer valuable lessons for the program moving forward, enabling it to extend its reach and impact on families facing eviction across the country.



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Glossary

The glossary categorizes terms thematically rather than alphabetically, grouping similar terms together. For instance, all services and outcomes are consolidated.

Name	Description
General Terms in this Report	Explanation for Each Term
At risk of eviction [#]	<p>A tenant is at risk of eviction when the tenant—</p> <ul style="list-style-type: none"> (1) Has been given one or more formal or informal warnings by an Evicting Party. (2) Has been notified by formal or informal means that the Evicting Party has commenced, or intends to commence, formal or informal eviction actions through the courts, self-help, or other means, or (3) Is being harassed, threatened, discriminated against, neglected, or treated differently than other tenants or other protected classes under the Fair Housing Act or tenants by the Evicting Party or the Evicting Party's agents in a manner that appears calculated to result in the tenant's vacating of the property.
Closed case	A closed case is when a grant recipient concludes engagement with tenants receiving legal services.
Emergency Rental Assistance (ERA) program*	The U.S. Department of Treasury's ERA programs supported housing stability by providing funds to communities during the COVID-19 pandemic. ERA programs assist eligible households with financial assistance (including payment of rent, rental arrears, or utility costs) and housing stability services and help cover costs, as applicable, for other affordable rental housing and eviction prevention activities.
Evicting Party [#]	Evicting Party refers to a landlord, owner of a residential property, or other person or entity (including corporations, companies, associations, firms, partnerships, societies, joint ventures, joint stock companies, franchises, and individuals) that has, or purports to have, a legal right to pursue eviction or possessory action.
Grant recipient	For the purposes of this report, grantees and subrecipients are collectively referred to as grant recipients.
Grantee	Grantees are organizations that are primary recipients of Eviction Protection Grant Program funding.
Subject to eviction [#]	<p>A tenant is subject to eviction when—</p> <ul style="list-style-type: none"> (1) The tenant has been notified that they will be removed from the property by a sheriff, marshal, or other law enforcement or private agent enforcing a civil eviction order or engaging in self-help on behalf of the Evicting Party. (2) The tenant has been notified that they will be removed from the property by the Evicting Party or its agent, or (3) The Evicting Party has begun the eviction process, pursuant to local law.

Name	Description
Subrecipients	Organizations with which some grantees partner that receive a portion of the grant funding.
Tenant households or households	A tenant household or household includes all people occupying the rental housing unit at issue in a pending or potential eviction matter. Household counts are based on the number of HUD Form 52698 submissions for closed matters. The presenting tenant is the person seeking legal assistance, equivalent to the term “client” used in HUD Form 52698. The presenting tenant responds to questions 1b–1f on HUD Form 52698. As such, limited English proficiency, gender identity, race, ethnicity, and disability status classifications indicate characteristics of the presenting tenant. If a respondent declines to answer or does not know the answer to those questions, the response is entered as such. All other questions apply to all members of the household and require a response.
Specific Service Provided to a Household	Definition of Service Provided
Administrative agency decision [#]	Representation of a household in an administrative agency action that results in a case-dispositive decision by the administrative agency or body after a hearing or other formal administrative process.
Court decision [#]	Representation of a household in a court proceeding resulting in a case-dispositive decision made by the court.
Extensive service not resulting in settlement, court, or administrative action [#]	Assistance involving high level of factual complexity, highly sophisticated legal analysis, drafting of nonroutine original pleadings or legal documents, or significant legal research.
Limited action or brief service [#]	Communications to a third party, preparation of a simple legal document, or assisting a pro se household with preparation of court or other legal documents.
Limited counsel and advice [#]	Ascertained or reviewed facts, exercised judgment in applying relevant law, and counseled household concerning their legal problem.
Mediated settlement agreement [#]	Resolution of household’s problem through negotiation and settlement and memorialized by a settlement agreement mediated by a trained, impartial third-party mediator, whether or not a court or administrative agency issues an order memorializing the settlement.
Mediation representation [#]	Representation of a household in a mediation process involving a trained, impartial third-party mediator, whether the decision to mediate was voluntary or ordered by a court.
Negotiated settlement without litigation [#]	Resolution of the household’s problem through negotiation and settlement without any court or administrative actions pending.
Negotiated settlement with litigation [#]	Resolution of the household’s problem through negotiation and settlement while a court or formal administrative action

Name	Description
	was pending, including when the court or administrative agency issues an order memorializing the settlement.
Service Categories	Services Included in the Specific Category
Brief representation	For the purposes of this report, the evaluation team defines brief representation to include providing limited counseling and legal advice, or a limited amount of legal action, on behalf of a tenant household.
Extensive representation	For the purposes of this report, the evaluation team defines extensive representation to include negotiating a settlement without litigation, negotiating a settlement with litigation, and representing tenant households in an administrative agency action that results in a decision or in a court proceeding that results in a decision.
Informational and education services	For the purposes of this report, the evaluation team defines informational and education services to include informational services or education in a group setting and providing legal information during one-on-one sessions with tenant households through a court-based helpdesk, direct outreach to households, and referrals to other service providers (both legal and nonlegal).
Other forms of legal services	For the purposes of this report, the evaluation team defines other forms of legal services to include pretrial, trial, and post-trial activities related to eviction defense, such as filing pretrial motions, filing fair housing complaints, and enforcing the terms of a settlement agreement. Other forms of legal services also include alternative dispute resolution services and advocacy activities, such as connecting tenants with rental assistance, promoting eviction diversion programs, and finding solutions that can satisfy both tenants and landlords.

Notes: The evaluation team defined the broader categories for services, including extensive representation, brief representation, informational services, and other legal services. They are not HUD definitions.

Sources: #HUD Form 52698; *Emergency Rental Assistance program definition from <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program>

Executive Summary

Evictions are detrimental to housing stability and employment and to household members' physical and mental health, particularly that of mothers and their children. Evictions disproportionately affect women, Blacks and African-Americans, and families with children (Graetz et al., 2023). Research indicates that implementing a tenant's right to counsel effectively reduces evictions and ultimately benefits both individual households and entire communities.¹ Legal representation during eviction proceedings is crucial because it significantly reduces eviction rates, prevents illegal evictions, and helps tenant households access available legal services. Tenants facing evictions in the United States have historically had legal representation in less than 5 percent of cases (NCCRC, 2023).

In response to the unmet need of legal representation for low-income tenants, HUD received an appropriation to launch the Eviction Protection Grant Program (EPGP) in 2021.² This program provides legal services to low-income tenant households facing eviction at no cost.³

Program objectives include—

1. Distributing federal financial support to nonprofit and government entities to provide legal assistance at no cost to low-income renters facing eviction or at risk of eviction in areas with high rates of evictions or risk of evictions.
2. Providing eviction protection services to historically underserved populations, including people of color, persons with limited English proficiency, and persons with disabilities.
3. Ensuring a proportionate distribution of funding amounts for rural areas, including Tribal lands, to the extent possible.
4. Building the evidence base for the activities most effective at preventing evictions and mitigating negative outcomes that result from evictions.

To date, EPGP has awarded 2-year, \$1 to 3 million grants to 21 legal service providers, nonprofit organizations, and local governments in 19 states. Organizations received grants in two rounds of funding, with the first round of 10 grants awarded in November 2021, and a second round of 11 grants awarded in May 2022. Some grantees have partnered with organizations (referred to as subrecipients) that receive a portion of the grant funding. Subrecipients include legal services or legal aid providers, marketing consultancy organizations, advocacy organizations, and other nonprofit entities. The grantees and subrecipients (collectively referred to as grant recipients) provide legal services, conduct outreach and marketing to tenant households, and carry out educational activities, among other efforts. This grant program provides crucial services that aid tenant households by

¹ Implementing right-to-counsel programs has resulted in positive outcomes in Baltimore, Cleveland, Minnesota, New York, and San Francisco by preventing evictions, increasing mediation, and positively affecting the housing situation of vulnerable tenants. Reports on each of these programs are available at Stout's Eviction Right to Counsel Resource Center at <https://www.stout.com/en/services/transformational-change-consulting/eviction-right-to-counsel-resources>.

² The U.S. Congress has appropriated funds for EPGP every year since 2021.

³ The program considers various eviction tactics landlords use to remove tenants, including court-ordered or lawful, extra-legal or unlawful (such as changing locks, taking tenants' belongings, removing front doors, or turning off heat or electricity), and administrative evictions (an option used to evict public housing residents).

protecting their rights, helping them avoid eviction. The grant also facilitates finding effective solutions deemed acceptable to both landlords and tenants, particularly with respect to addressing rent arrears.

In September 2022, HUD contracted 2M Research (the “evaluation team”) to evaluate EPGP and comprehensively document program implementation for the initial 21 grantees. The evaluation team is conducting this study using a mixed-methods, multiphase approach designed to achieve the following objectives:

- Describing the characteristics of grantees, subrecipients, and other community partners.
- Understanding how grantees worked with other social service providers to deliver assistance.
- Documenting the services offered, service takeup, types of households served, and program outcomes.
- Understanding the successes and challenges that grantees faced in program implementation and how they addressed these challenges.

The full program evaluation will take place over 2 years and will consist of two rounds of grant recipient interviews, program reporting data analyses, and focus groups and interviews with a sample of tenant households. This report details findings from a review of information submitted by grant recipients as of June 2023 and from the initial round of interviews with HUD program and grant recipient staff. This report has three main objectives, aligning with the overall aims of the study:

- To describe the characteristics of the organizations funded through the program.
- To describe the characteristics of the households served as of June 2023.
- To describe program rollout and implementation for all 21 grants.

This report draws on two sources of information: (1) documents that grant recipients provided as part of their grant reporting activities for the quarter ending as of June 2023⁴ and (2) primary data collected via interviews with HUD program staff and staff of the 21 grantees and a subset of their subrecipients.⁵ This interim report does not include data on households’ experiences with the program, as this topic will be addressed in the final report. The final report will also present descriptive data on the services households received and the effects these services had on households’ eviction outcomes from the program’s inception to June 30, 2024. Submission of the final report to HUD is expected in late 2024.

The program serves low-income tenant households facing eviction. Each household the program serves is categorized by their eviction risk in one of two categories per HUD Form 52698—

1. **At risk of eviction** means the tenant: (1) has been given one or more formal or informal warnings by an Evicting Party, (2) has been notified by formal or informal means that the Evicting Party has commenced or intends to commence formal or informal eviction actions through the courts, self-help, or other means, or (3) is being harassed, threatened,

⁴ Grantee documents encompass grant applications, action plans for administering the grant, and quarterly performance reports that include summaries of households served, services provided, and outcomes for cases closed during the quarter ending as of June 2023.

⁵ This data collection began on September 1, 2023, and concluded on November 30, 2023. Grant recipient staff described implementation activities from the start of the grant up to the date of interview.

discriminated against, neglected or treated differently than other tenants or other protected classes under the Fair Housing Act by the Evicting Party or the Evicting Party's agents in a manner that appears calculated to result in the tenant's vacating of the property.

2. **Subject to eviction** means (1) the tenant has been notified that they will be removed from the property by a sheriff, marshal, or other law enforcement or private agent enforcing a civil eviction order or engaging in self-help on behalf of the Evicting Party, (2) the tenant has been notified that they will be removed from the property by the Evicting Party or its agent, or (3) the Evicting Party has begun the eviction process pursuant to local law.

Key Findings

Grant recipients strategically developed programs to provide comprehensive services that holistically address multifaceted challenges facing the households they serve. The program funds 69 diverse organizations (21 grantees and 48 subrecipients) across 19 states. Of that, 57 organizations are either Legal Services Corporation (LSC)-funded providers of legal services or non-LSC-funded, nonprofit legal aid providers. The remaining 12 organizations provide complementary eviction-related services using various support staff to engage in education and outreach, tenant organizing, and fair housing defense, among other efforts. Of the 21 grantees, 9 provide statewide eviction protection services in 11 states, 5 implement regional eviction protection programs, and 7 implement local eviction protection programs, all aimed at serving low-income households facing eviction.⁶ Many of these entities strategically combine funds from multiple HUD, federal, and private grants to enhance service delivery, making necessary adjustments in reporting and operations to comply with program requirements. Although legal aid provision is the primary focus of HUD-funded activities, grantees have partnered with other organizations to offer comprehensive services that address challenges associated with housing instability and the threat of eviction. These complementary eviction-related services often involve leveraging community networks of service providers to holistically meet the multifaceted needs of the households they serve.

As of June 30, 2023, EPGP served 14,260 households, including 17,972 adults and 10,703 children. The characteristics of the households served are similar to the demographics identified in research as facing higher rates of eviction, including women, Blacks and African-Americans, and families with children. Analysis of more than 14,000 households with closed cases that were served by any of the 21 grantees revealed that—⁷

- Nearly three-fourths (71.1 percent) of presenting tenants were women.
- Almost one-half of the presenting tenants (47.6 percent) identified as non-Hispanic Black or African-American, 32.9 percent as non-Hispanic White, and 12.4 percent as Hispanic.
- Almost one-third (28.5 percent) of the presenting tenants reported having a disability.
- One in 5 (17.8 percent) presenting tenants had limited English language proficiency. This statistic varied by eviction status: 30.7 percent of presenting tenants at risk of

⁶ Idaho Legal Aid Services partnered with organizations in Montana and Idaho to provide services to tenants in those states.

⁷ One of the grantees has not served any individuals or families as of June 2023.

eviction had limited English proficiency, whereas 9.0 percent of presenting tenants subject to eviction had limited English proficiency.

- More than one-half (52.7 percent) of the presenting tenants reported living in a household with at least one child.
- Nearly two-thirds (65.1 percent) of households were classified as extremely low-income, with an average reported annual family income of \$22,794.⁸
- Most households (92.9 percent) receiving services lived in urban areas, and 7.1 percent lived in rural areas.
- Six in 10 (60.8 percent) households had not received any form of emergency rental assistance at the time of intake for legal services.

The demographic characteristics of tenant households served are similar across the two eviction-risk groups defined by the study: the at-risk eviction group and the subject-to-eviction group. Their demographic characteristics closely resemble those of households against which eviction cases had been filed, as documented by the Eviction Lab, despite substantial differences in study populations, further explained in Chapter 3 (Graetz et al., 2023). Analyzing court records from 2007 through 2016 in 39 states, the Eviction Lab found higher rates of eviction filings against women, Blacks and African-Americans, and families with children.

Grant recipients faced challenges with staff recruitment, partnership coordination, data reporting, and household outreach. An analysis of data from the first round of interviews with grant recipient staff revealed four key challenges faced during program implementation.

- **During the initial program rollout**, many grant recipients struggled with staff recruitment, exacerbated by post-COVID-19 hiring difficulties. For example, a shortage of experienced personnel and the inability to offer competitive salaries prompted some grant recipients to use internal staff, advocates, and paralegals to deliver services.
- **During ongoing grant implementation**, many grant recipients noted that staff capacity constraints at the grantee and partner organizations made it difficult to coordinate activities with partners. They also experienced challenges when sharing data and referrals and when organizing meetings and debriefing sessions. For example, government agency partnerships faced delays due to occasional instances of nonresponsiveness.
- **While conducting outreach and participant engagement**, many grant recipients experienced difficulty reaching households with inconsistent phone service or that lived in remote areas. Grant recipients also had to navigate communication barriers because some tenant households had limited English proficiency or were deeply skeptical and mistrustful of government aid. Another frequent challenge to effective representation occurred when tenant households connected with grant recipients

⁸ HUD Form 52698 asks grantees to select one category that represents the family's income relative to the local Area Median Income based on the number of persons in the household. See HUD's income limits webpage at <https://www.huduser.gov/portal/datasets/il.html>.

late in the eviction process. For households having yet to receive formal eviction filings, grant recipients have more time to explore alternative resolution strategies and to prepare for necessary legal proceedings. Once a household receives an eviction notice, the grant recipient has limited time to prepare for hearings or explore alternative options. This difficulty emphasizes the need to increase awareness of available legal services.

- **While reporting performance data**, many grant recipients noted the need to adjust case management systems to meet program requirements. These adjustments included adding new data elements and revising intake forms, a time-consuming process that sometimes caused discomfort among tenant households. Periodic financial reporting requirements for the program necessitated alignment of case management systems with HUD data requests, which was an additional reporting burden to grant recipient staff.

Staff appreciated the flexible aspects of program funding, which reportedly helped grant recipients leverage existing partnerships and expand services. Staff noted that the program is uniquely flexible, particularly regarding the relative ease of accessing grant funds because it has no cost-sharing or fund-matching requirements. This flexibility expedited access to funds and empowered organizations to extend services to individuals who would otherwise lack access to legal and eviction-related support services. Some staff expressed that the program's less restrictive eligibility criteria for households broadened the program's impact and prevented organizations from having to fit a narrowly defined set of eligibility requirements, which is often a problem with other grant programs. The ability to fund subrecipients enabled grantees to strategically use established relationships with other organizations to expand or enhance their existing services and to offer new and complementary services. Grant recipients also underscored the flexibility they had to fund various staffing positions, including community navigators. Although some grantees initially faced hiring challenges, the flexibility of the grant enabled grant recipients to use the funds to hire new staff, including lawyers, advocates, and paralegals to work directly with tenants, administrative assistants to help legal services organizations operate smoothly, and social workers and navigators to complement the legal work by connecting tenants with other supportive services in their communities.

Lessons Learned Related to Program Implementation

At this stage in the evaluation study, one could glean several lessons about the successes and challenges of the program's implementation. These lessons include the value of collaborating with organizational partners, the importance of funding flexibility, and the importance of helping grant recipients fulfill their reporting obligations. These insights provide valuable information to HUD for any potential future rounds of grant funding.

- **Based on what the evaluation team observed, the success of grant recipients underscores the importance of a comprehensive approach to program implementation during the initial rollout phase.** For grantees to address the diverse needs of households, it is essential to prioritize the recruitment of new staff (including lawyers, paralegals, and administrative assistants) while establishing working relationships with subrecipients and other community organizations. This approach to grant rollout stresses the importance of combining internal capacity-building with external collaboration for more effective and holistic program implementation.

Recommendations include selecting applicants who prioritize internal capacity-building and external collaboration. For instance, during the grant application phase, HUD can stress in webinar sessions the importance of having a comprehensive approach to implementing grant activities. Once HUD awards the grants, it can provide technical assistance to grant recipients having difficulty hiring staff or seeking to improve communication and relationships with subrecipients. These efforts would contribute to the success of future grantees.

- **Partners are critical for the successful implementation of grant activities.** Partnerships with preexisting networks of service providers were vital to the success of grant activities. These partnerships were often cultivated for years, but the program also acted as a catalyst to solidify these networks and even facilitated new partnerships to expand services to additional communities. Specifically, grantees highlighted how these partnerships enabled them to provide legal aid services more effectively, reach out to a larger audience, build trust within communities, and organize collective action among tenants.

Recommendations include selecting grant applicants who emphasize partnerships during the grant application stage to foster new collaborations with providers that offer complementary eviction-related services. This additional focus can enhance the success of grant-funded activities related to community outreach and improve outcomes for tenant households seeking assistance.

- **Through EPGP funding, grant recipients were able to combine diverse outreach and engagement methods with technological innovation, which were key components of successful program implementation.** Multiple grant recipients attributed the success of initial program implementation to a diverse outreach strategy that incorporated traditional nondigital methods of communication (radio interviews, flyers, and billboards) and contemporary digital tools (websites, social media, and mobile applications). Successful community events (such as educational seminars and legal clinics) and office placement in high-traffic community areas (like local courts and grocery stores) bolstered access and assistance for households. Moreover, these efforts took place in the preferred settings of grant recipients' clients. Employing such a comprehensive outreach and engagement approach can maximize reach, accommodating various audience preferences and access points. Grant-funding flexibility enabled use of innovative technologies (including specialized software applications), enhanced capacity, and improved outreach to underserved populations.

Recommendations include establishing a conference or a community of practice within the grant framework, thereby enabling grant recipients to share knowledge, pool resources, solve problems collaboratively, and celebrate successful outreach initiatives. This information can be shared on a public website, benefiting both funded and nonfunded organizations while enhancing sector capacity through shared insights, collaboration, and improved outreach effectiveness.

- **Further assistance might be needed to help grantees fulfill the program's reporting requirements.** Smaller organizations and organizations providing nontraditional legal aid services faced challenges with reporting requirements and found it difficult to navigate the Disaster Recovery Grant Reporting (DRGR) System.

Staff raised concerns about privacy and households' hesitancy to provide personal information to a federal agency.

Recommendations include developing resources for grant recipient staff, such as training on data relevance, materials guiding privacy-related discussions with households, and a comprehensive Frequently Asked Questions guide to answer households' queries. Alternatively, HUD could align the program's data requirements and definitions with that of LSC because most grant recipients receive funding from LSC. For smaller grant recipients without a standardized case management system, HUD can provide access to a standardized system with preprogrammed definitions. These measures would reduce operational delays and ensure consistent application of definitions to grant-related activities and accurate data recording. Independent of this evaluation, as of February 2024, HUD contracted a firm to provide technical assistance to the grantees and already plans to implement some of these recommendations in response to grant recipients' direct feedback to HUD.

- **The flexibility EPGP affords can help grant recipients continue providing services to tenant households that may not be eligible for services through other grant programs.** Although overall experience with EPGP is not the primary focus at this stage of the evaluation, it is worth noting that most grant recipients reported positive experiences with the program. In interviews, grant recipient staff frequently praised the grant's flexibility and noted its significant impact on legal aid service provisions for tenant households.

Recommendations include maintaining funding flexibility and eligibility criteria for services and beneficiaries to ensure that program goals and objectives continue to be met effectively.

Next Steps for the Evaluation Study

The next phase of the evaluation will involve collecting additional qualitative data in March and April 2024 through a second round of interviews with grant recipients and continued interviews with tenant households. These interviews will focus on overall experience with the program. The information gathered in the second round of data collection will complement the data collected in the first round and analyzed in this report.

Alongside the primary data collection work, the evaluation team will continue to analyze program data submitted by grantees through August 2024 for the reporting period ending June 30, 2024, to describe the characteristics of tenant households served, the services provided, and the associated outcomes. The analysis of the services provided and the associated outcomes will inform a comprehensive understanding of the program's potential impact. The evaluation team plans to conduct a multi-regression analysis and assessment of potential associations between services provided and households' outcomes.

In late 2024, the evaluation team will produce a final report that will include a complete analysis of grant recipients' experiences with implementing the grant and the experiences of tenant households served from the program's inception to June 30, 2024. This analysis will address the perceptions of these stakeholders regarding the most beneficial and challenging aspects of the program. The final report will also present characteristics of the tenants served, including data on the effects that services had on households' eviction outcomes from the program's inception to June 30, 2024.

Chapter 1: Introduction

This interim report is the first of two reports documenting the evaluation of the Eviction Protection Grant Program (EPGP). This report describes the characteristics of organizations funded through EPGP and presents characteristics of the households served as of June 2023. The report also describes grant implementation as of November 2023.

U.S. Congress authorized EPGP in 2021, enabling HUD to establish a program that helps low-income tenant households facing eviction. HUD provided funding to experienced legal providers, not limited to organizations funded by the Legal Services Corporation (LSC). EPGP-funded organizations may assist households with legal matters and other related services. These services include providing pretrial, trial, and posttrial activities, facilitating alternative dispute resolutions, educating tenants about their rights, and helping tenants identify other social services like rental assistance programs.

Program objectives include—

1. Distributing federal financial support to nonprofit and government entities to provide legal assistance at no cost to low-income renters facing eviction or at risk of eviction in areas with high rates of evictions or risk of evictions.
2. Providing eviction protection services to historically underserved populations, including people of color, persons with limited English proficiency, and persons with disabilities.
3. Ensuring a proportionate distribution of funding amounts for rural areas, including Tribal lands, to the extent possible.
4. Building the evidence base for the activities most effective at preventing evictions and mitigating negative outcomes that result from evictions (HUD, 2021).

In September 2022, HUD contracted 2M Research to evaluate EPGP and comprehensively document its implementation. To that end, this study aims to achieve the following—

- Describing the characteristics of grantees, subrecipients, and other community partners.
- Understanding how grantees worked with other social service providers to deliver assistance.
- Documenting the services offered, service takeup, types of households served, and program outcomes.
- Understanding the successes and challenges that grantees faced in program implementation and how they addressed these challenges.

This chapter provides context for EPGP, with a review of the existing research concerning the provision of legal representation to low-income households facing eviction. This chapter also includes an overview of the grant program, discusses why these services matter, the purpose of this study, and the data collected and analyzed in this report, and concludes with an outline of the report's overall organization.

Program beneficiaries are low-income tenant households facing eviction. HUD Form 52698 categorizes each household served by one of two eviction risk categories:

3. **At risk of eviction** means the tenant: (1) has been given one or more formal or informal warnings by an Evicting Party, (2) has been notified by formal or informal means that the Evicting Party has commenced or intends to commence formal or informal eviction actions through the courts, self-help, or other means, or (3) is being harassed, threatened, discriminated against, neglected or treated differently than other tenants or other protected classes under the Fair Housing Act by the Evicting Party or the Evicting Party's agents in a manner that appears calculated to result in the tenant's vacating of the property.
 4. **Subject to eviction** means (1) the tenant has been notified that they will be removed from the property by a sheriff, marshal, or other law enforcement or private agent enforcing a civil eviction order or engaging in self-help on behalf of the Evicting Party, (2) the tenant has been notified that they will be removed from the property by the Evicting Party or its agent, or (3) the Evicting Party has begun the eviction process pursuant to local law.
-

1.1 Background and Research on Eviction

Eviction encompasses various processes landlords use to remove tenants, including court-ordered or lawful, formal or informal, extra-legal or unlawful (such as changing locks, taking tenants' belongings, removing front doors, and turning off heat or electricity), and administrative evictions (an option to evict public housing residents).

Eviction remains a critical issue in the United States, stemming from an affordable housing shortage that particularly affects low-income households (Goplerud, Pollack, and Sage Computing, 2021). In 2021, more than 40 percent of very low-income tenant households allocated more than 50 percent of their income to housing, up by nearly 10 percent from 2019 (Alvarez and Steffen, 2023). At the same time, the number of households paying more than one-half of their income for rent or living in severely inadequate conditions was the highest on record. The COVID-19 pandemic, which severely affected the finances of low-income households, likely exacerbated this trend. HUD's *Worst Case Housing Needs: 2021 Report to Congress* indicated a significant lack of affordable housing, leading low-income tenants to sacrifice basic essentials and contributing to millions of evictions annually (Alvarez and Steffen, 2021). Eviction Lab statistics showed that more than 3.6 million eviction filings were filed in 2018 and that nearly 6 out of 100 renting households were threatened with eviction, with most cases heavily concentrated in low-income communities (Graetz et al., 2023).

Quantifying Eviction is Challenging. Eviction encompasses various processes landlords use to remove tenants, including court-ordered, informal, extra-legal, and administrative evictions. Rent nonpayment is the primary trigger, and landlords may file for eviction as a last resort or use tactics like changing locks to force tenants to leave. Research suggests that 3.6 million cases for court-ordered evictions were filed across the United States in 2018. Extra-legal evictions are harder to measure but may be twice as common (Desmond and Shollenberger, 2015). Similarly, informal evictions are hard to measure but could account for up to one-half of all forced moves. The demographic characteristics of households most likely to face extra-legal and informal evictions differ from those most likely to face formal evictions, with foreign-born and Hispanic households experiencing informal evictions at disproportionately higher rates (Greenberg, Gershenson, and Desmond, 2016).

Before the pandemic, the United States was already grappling with high eviction rates. In 2018, eviction filings reached record highs, and a significant portion of Americans lacked the financial stability to handle a \$400 emergency (Chen et al., 2019; Desmond and Shollenberger, 2015). The emergence of COVID-19 worsened the situation as widespread

shutdowns and work stoppages left many low-income individuals and families struggling to pay rent (Acosta, Bailey, and Bailey, 2020). In September 2020, the Centers for Disease Control and Prevention (CDC) announced a nationwide eviction moratorium for nonpayment of rent through January 31, 2021. This order did not stop tenants' rent from accruing due to nonpayment. Once the eviction moratorium expired, low-income households that owed significant back-rent faced housing instability and increasing threat of eviction (Cunningham, Hariharan, and Fiol, 2021).

Evictions affect many communities, from small rural towns to large urban areas, but have disproportionately affected certain demographics. Evictions are not just an urban problem, as housing instability has followed the growth of poverty in the suburbs (Hepburn et al., 2023). However, the impact of evictions is not uniform. Research reveals that certain demographics—such as Blacks and African-Americans, women-headed households, and families with children—experience higher formal eviction rates, raising concerns about fair housing and civil rights (Graetz et al., 2023; Hepburn, Louis, and Desmond, 2020). As a public policy issue, eviction has far-reaching consequences for housing stability, physical and mental health, and socioeconomic outcomes (Collinson et al., 2024; Desmond and Gershenson, 2016; Desmond, Gershenson, and Kiviat, 2015; Hatch and Yun, 2021). Studies show that evictions significantly increase the risk of homelessness, residential instability, and health issues for affected families (Desmond and Kimbro, 2015; Holdener et al., 2018).

Legal representation during eviction proceedings can prevent evictions and mitigate the negative effects resulting from evictions. Legal representation provides a critical defense against tenant exploitation by landlords engaging in extra-legal evictions or filing fraudulent claims (Stout, 2018). Notable asymmetries exist in legal representation. Most landlords have representation, whereas most tenant households lack legal counsel, leaving them vulnerable. Tenants who are represented by an attorney are much more likely to avoid disruptive displacement.

Research emphasizes that implementing tenants' right to counsel effectively reduces eviction rates. For example, in 2017, New York City passed the right to counsel legislation for low-income tenants, which was phased in over 3 years, starting with ZIP Codes with high eviction rates. Overall evictions in New York City decreased 15 percent from 2018 through 2019, with even more significant declines in ZIP Codes where initial implementation of the provision occurred (New York City HRA, 2020). Other jurisdictions—such as Baltimore, Cleveland, Minnesota, and San Francisco—that implemented right-to-counsel programs had similar results, namely fewer evictions, more mediation, and positive effects on the housing situation of vulnerable tenants overall.⁹ The American Bar Association supports the finding that giving eviction defendants the right to counsel results in positive outcomes (ABA, 2006). It helps to create a more fair and equitable eviction process, reach mutually beneficial resolutions with landlords, and prevent illegal evictions.

Considerable variation exists in eviction laws across the country (Nelson et al., 2021). States offering more tenant protections generally have lower eviction rates (Gromis et al., 2022). Whereas some states offer opportunities for tenants to remedy nonpayment

⁹ Reports on each of these programs are available at Stout's Eviction Right to Counsel Resource Center at <https://www.stout.com/en/services/transformational-change-consulting/eviction-right-to-counsel-resources>.

violations before eviction, others like Texas allow landlords to initiate the eviction process without further notice.¹⁰

In response to the pandemic, various federal, state, and local governments implemented eviction moratoria, including those outlined in the CARES Act and CDC Order, but these measures provided only temporary relief.¹¹ Most of these moratoria have now expired, shifting the focus to long-term interventions like eviction prevention and diversion programs, financial aid, counseling, and legal assistance for at-risk households.

Emergency Rental Assistance (ERA) Program. During the pandemic, ERA programs were crucial to providing support to low-income tenants facing financial hardship. These initiatives aim to prevent evictions and ensure housing stability for vulnerable populations. Administered at both federal and state levels, these programs offered direct financial assistance to eligible households to cover rental payments, rental arrears, utilities, and other housing-related expenses. Some of these programs have set end dates, while others continue to operate based on available funding and ongoing need.

Specifically, the U.S. Department of Treasury's ERA programs provided more than \$46 billion to communities through two distinct ERA programs—

- ERA1, authorized by the Consolidated Appropriations Act of 2021, provided \$25 billion for financial assistance and housing stability services.
- ERA2, authorized by the American Rescue Plan Act of 2021, provided more than \$21 billion for financial assistance, housing stability services, and other affordable rental housing and eviction prevention activities.

ERA funds were allocated directly to states, U.S. territories, and other local governments. These funds have enabled participating governments to make more than 10 million direct cash assistance payments to tenants facing eviction or at risk of housing instability, particularly benefiting low-income renters and renters of color (GSA, 2022). ERA1 award funds expired by the end of 2022, whereas ERA2 funds will expire by September 30, 2025, unless extensions are granted.

As local governments and HUD move to implement tools and programs to protect vulnerable populations and address discriminatory practices, it is important that they act on a sound, evidentiary basis. Federal spending on organizations that served tenant households during the COVID-19 pandemic yielded valuable data and policy lessons that researchers can use to recommend best practices for future program implementation.

1.2 Introduction to the Eviction Protection Grant Program

In response to the lack of sufficient resources for legal representation of tenant households facing eviction, HUD published a Notice of Funding Opportunity (NOFO) in July 2021. This NOFO announced the availability of \$20 million in funds for experienced legal service providers.¹² To be eligible for funding, nonprofit or government organizations were required to have in-house staff, contractors, or consultants who were legal service providers with at least 3 years of experience. Potential grantees were also required to provide services to

¹⁰ See the LSC Eviction Laws Database for details at <https://www.lsc.gov/initiatives/effect-state-local-laws-evictions/lsc-eviction-laws-database>.

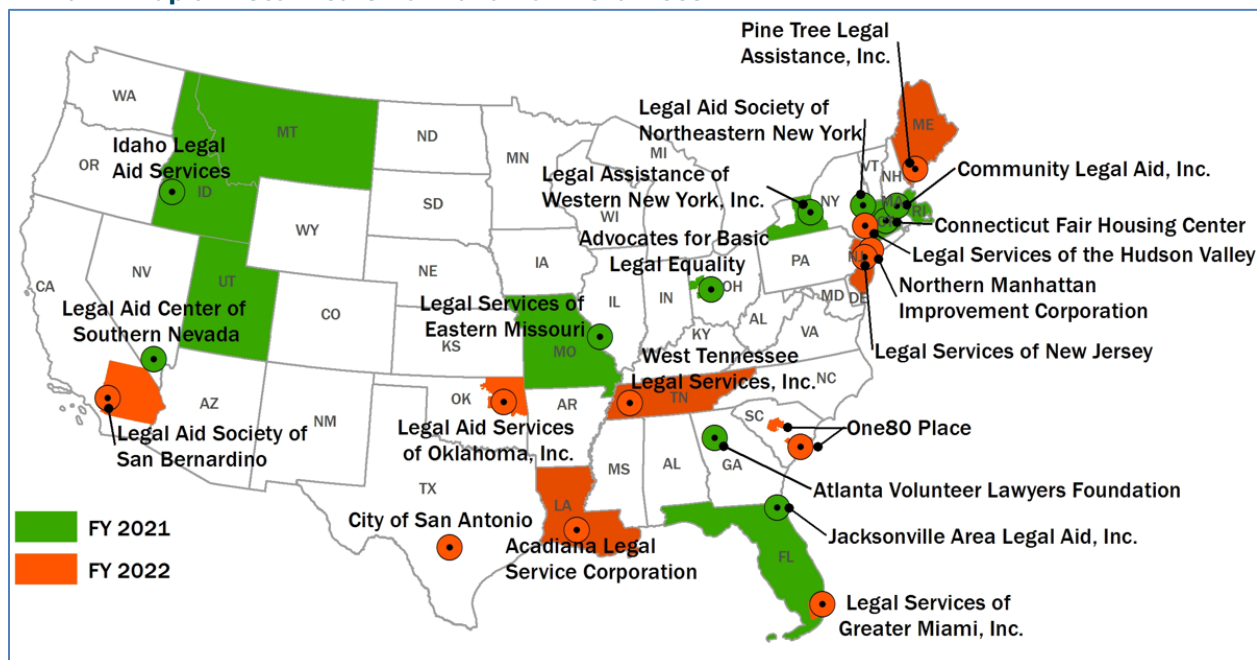
¹¹ See the Eviction Lab's COVID-19 Housing Policy Scorecard at <https://evictionlab.org/covid-policy-scorecard/>.

¹² The NOFO is available at <https://www.hud.gov/sites/dfiles/SPM/documents/EvictionProtectionGrantProgramFR-6500-N-79.pdf>.

low-income tenant households in areas with high eviction or prospective eviction rates, including rural areas. Each grantee was awarded between \$1 and \$3 million for a 24-month period, with the possibility of an extension.

In November 2021, HUD selected 10 grantees to receive funding to support efforts to expand eviction protection and diversion services for low-income households facing eviction (organizations highlighted in green in exhibit 1). The first cohort of grantees implemented five statewide programs in Connecticut, Florida, Idaho, Massachusetts, Missouri, Montana, and Utah; two regional programs in Northwestern Ohio and Western New York; and three local programs in Albany, New York; Atlanta, Georgia; and Las Vegas, Nevada.¹³

Exhibit 1. Map of Fiscal Years 2021 and 2022 Grantees



In early 2022, HUD announced an additional allocation of \$20 million for program grants, doubling the amount initially allocated. In May 2022, HUD selected 11 new organizations to receive grants (organizations highlighted in orange in exhibit 1). This second cohort of grantees are implementing four statewide programs in Louisiana, Maine, New Jersey, and Tennessee; three regional programs in Northeastern Oklahoma, Southern California, and South Carolina; and four local programs in Miami, Florida, New York City, New York, White Plains and Hudson Valley, New York, and San Antonio, Texas.

Some grantees have partnered with organizations that receive a portion of their grant funding. Referred to as subrecipients, these organizations provide legal services, conduct outreach and marketing to attract potential tenant households, conduct educational activities, and more. Subrecipients include but are not limited to LSC-funded organizations, advocacy organizations, and other nonprofit organizations. For the purposes of this report, the evaluation team refers to grantees and subrecipients collectively as grant recipients.

¹³ One grant organization and its subrecipients are implementing programs in three states: Idaho, Utah, and Montana.

Each grantee could offer a variety of services to eligible low-income tenant households facing eviction, including—^{14, 15}

- Legal representation, including negotiation and mediation with landlords.
- Housing court navigation.
- Legal information hotlines and legal advice.
- Education, outreach, and “know your rights” campaigns.
- Mass eviction response and prevention.
- Fair housing defense related to eviction.
- Service provider referrals and benefits assistance.
- Self-help technology such as online form builders to respond to eviction notices.
- Eviction diversion programs developed through the collaboration of courts, judges, and others.

1.3 Overview of the Evaluation of the Eviction Protection Grant Program

The EPGP evaluation aims to understand how grantees implemented the program. The evaluation also aims to assess how effectively the program supports low-income households facing eviction, particularly those living in high-risk areas, people of color, those with limited English proficiency, persons with disabilities, and those living in rural areas.¹⁶

This evaluation employs a mixed-methods and multiphase approach to comprehensively document EPGP implementation. The evaluation team is gathering qualitative and quantitative data to understand and document how the program reduces or prevents eviction among low-income tenant households. The evaluation will include the full set of 21 grantees funded under the initial two rounds of funding.

The evaluation discusses the characteristics of the grant recipients and the existing collaboration between grantees and other housing service providers. One area of particular interest is how the program has increased grantees’ capacity to provide eviction protection and prevention services. The evaluation also seeks to describe who the program served and the types of services program beneficiaries received. For ease of reference, exhibit 2 provides a timeline of key dates for the four main program implementation and evaluation activities.

HUD announced the first cohort of 10 grantees in November 2021 and spent several months entering grant agreements. This first cohort began implementing the program between January and March 2022. Although the 2-year grants end between January and March 2024 for most grantees, some may be extended beyond the 2 years. HUD announced the second cohort of grantees in May 2022, with program implementation beginning between July and September 2022. Funding for the second round of awards ends between July and September 2024, with the possibility of extension.

¹⁴ The NOFO defined low income as households earning less than or equal to 80 percent of local Area Median Income. For additional details, see the NOFO.

¹⁵ The NOFO provides a list of services that each grant could offer. The list of services is from <https://www.huduser.gov/portal/eviction-protection-grant.html#programDetails>.

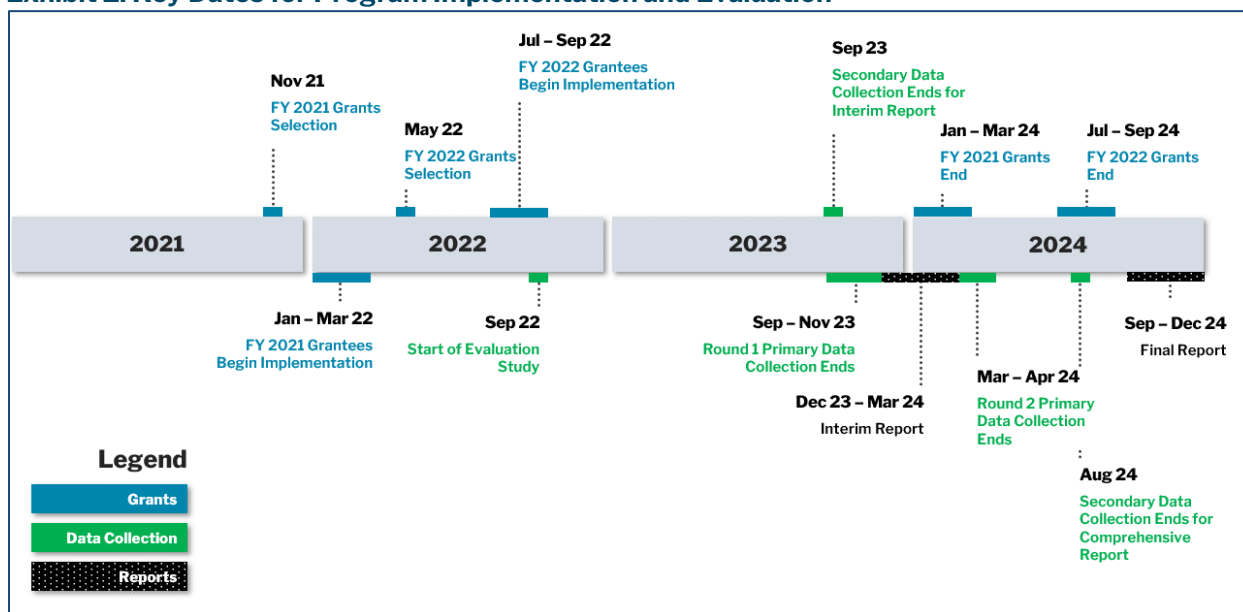
¹⁶ The NOFO defines a rural area as a statistical geographic entity delineated by the U.S. Census Bureau that does not meet the definition of an urbanized area. See the NOFO for additional details at <https://www.hud.gov/sites/dfiles/SPM/documents/EvictionProtectionGrantProgramFR-6500-N-79.pdf>.

In late September 2022, HUD contracted 2M Research to evaluate the program.

Primary data collection takes place with all grants at two separate points in time. The first round of primary data collection focused on assessing the program rollout and takeup and understanding early program implementation for all grants. November 30, 2023, marked the end of the first round of primary data collection and analysis (approximately 20 to 23 months after the first cohort began program implementation and approximately 14 to 16 months after the second cohort began program implementation). The secondary data collection period ended in September 2023 for the first round of data collection, culminating in this report.

The second round of primary data collection will focus on the overall experience of grant recipients and program participants. The evaluation team will supplement the two rounds of primary data collection with an analysis of secondary program data. The second round of primary data collection began in March 2024 and lasted for 2 months. The second round of secondary data collection period will end in August 2024 and include data up to the reporting period ending on June 30, 2024. The final report will be submitted to HUD in late 2024.

Exhibit 2. Key Dates for Program Implementation and Evaluation



Notes: Grant recipients funded in November 2021 requested and were granted extensions on grant end dates as of January 2024. Some grant recipients funded in May 2022 have also requested extensions.

Exhibit 3 provides a summary of the study’s primary data collection approach.

Exhibit 3. Study’s Primary Data Collection Efforts

Primary Data Collection	First Round of Data Collection	Second Round of Data Collection
Objective	<ul style="list-style-type: none"> Assess program rollout and implementation for all grantees. Understand the successes and challenges that grant recipients faced and their solutions to these challenges. 	<ul style="list-style-type: none"> Examine the overall experience of grant recipients and households. Understand how the program facilitated collaboration between the grantees and other housing service providers.

Primary Data Collection	First Round of Data Collection	Second Round of Data Collection
	<ul style="list-style-type: none"> Describe the services that grant recipients provided and how recipients partner with other organizations. 	<ul style="list-style-type: none"> Document grant program outcomes.
Time Period	September through November 2023	March through April 2024
Data Collection Method	<ul style="list-style-type: none"> Interviews with HUD staff, staff from all grantees, and staff from select subrecipients. Focus groups or one-on-one interviews with tenant households for nine of the grants funded in November 2021.* 	<ul style="list-style-type: none"> Interviews with HUD staff, staff from all grantees, and staff from select subrecipients. One-on-one interviews with tenant households for 11 of the grants funded in May 2022.

*The evaluation team planned to conduct focus groups with tenant households for all 10 grants funded in November 2021. However, as of March 2024, one grantee, the Legal Aid Society of Northeastern New York, did not serve any tenant households using Eviction Protection Grant Program funds. As a result, no focus groups or one-on-one interviews with tenant households will occur for that grantee. The evaluation team conducted one interview with grantee staff from the Legal Aid Society of Northeastern New York during the first round of data collection and plans to conduct an additional interview with grantee staff during the second round of data collection.

The evaluation team will use **secondary data analysis** to supplement the primary data collection. Secondary data include information already submitted to HUD for the purpose of grant application or administration. The objectives of the secondary data analysis include describing grant recipients and tenant households served, describing other stakeholders, and describing planned and conducted activities. The secondary data also document services offered, service takeup, types of households served, and associated outcomes. The secondary data analysis consists of—

- **Document Review:** A review and analysis of the HUD NOFO and terms and conditions along with grantee applications, action plans, and quarterly and final reports (exhibit 4).
- **Quantitative Analysis:** An analysis of grantees’ quarterly client activity reports (exhibit 4), which include aggregate household-level data from HUD Form 52698— Client Services and Outcomes Report (a copy of the report is in appendix E). The data extracted from HUD Form 52698 contain information on household demographics, socioeconomic status, housing status, the highest level of services provided, and outcomes.¹⁷

Exhibit 4. Primary and Secondary Data Sources for the Interim Report*

Data Source	Data Collection Timeframe	Data Description
Interviews with grantee and subrecipient staff	September through November 2023	<ul style="list-style-type: none"> Interviews with staff from all 21 grantees and a subset of subrecipients. Details are available in appendix A.
Interview with the HUD program team	September 2023	<ul style="list-style-type: none"> Interviews with HUD program staff monitoring the grant program.

¹⁷ The final report will include data on services provided and outcomes for tenant households.

Data Source	Data Collection Timeframe	Data Description
HUD grant program materials	August 2021 through May 2022	<ul style="list-style-type: none"> The HUD Notice of Funding Opportunity provides the eligibility criteria and the grantee selection process. The Terms and Conditions of the grant provide the required content of the quarterly performance reports, including quarterly narrative reports, quarterly client activity reports, and Federal Financial Report Standard Form 425 submissions.
Grantee documents**	November 2021 through June 2023	<ul style="list-style-type: none"> Applications submitted by organizations while applying for funding include an overview of planned activities, summaries of staff qualifications and proposed budgets, planned project evaluation services, planned outreach and marketing efforts, planned household intake, and proposed provision of legal representation. Action plans submitted by grantees detail planned activities for grant administration as they relate to marketing and outreach efforts and service provision. Quarterly performance reports include narrative reports and a quantitative summary of households served, services provided, and outcomes for cases closed during the quarter.
Grantee Client Services and Outcomes Report (from HUD’s Disaster Recovery Grant Reporting System)	April 2022# through June 2023	<ul style="list-style-type: none"> The quarterly client activity reports include de-identified individual and household-level data for cases closed during each quarter using HUD Form 52698—Client Services and Outcomes Report. Each grant recipient serving tenant households submitted an Excel spreadsheet that captures details about each household served (including demographic, socioeconomic, and housing information), the highest level of service received, and outcomes when the cases were closed. The evaluation team extracted reports for each grantee, available as of September 2023. The most recent report covers activities conducted in the second quarter of 2023, ending in June 2023.

*The evaluation team will analyze data from the focus groups and one-on-one interviews with households for the 10 grants funded in November 2021 and report the findings in the final report.

**HUD provided grantees’ applications to the evaluation team, with HUD’s Disaster Recovery Grant Reporting System supplying other grantee documents.

#The report that grantees submit each quarter covers activities they conducted in the previous quarter. For instance, the report submitted in April 2022 includes activities grantees conducted from January through March 2022.

1.4 Purpose and Focus of the Interim Report

This interim report, the first of two reports from this evaluation, describes—

- The characteristics of organizations funded through the program.
- The characteristics of tenant households served from program inception to June 30, 2023.
- The experience of program rollout and early implementation for all 21 grantees.

This report provides an overview of the grant recipients’ organizations, types of areas and populations served, services offered, and management structures. Moreover, it details the

number and characteristics of tenant households served thus far. This report also presents early observations related to staff experiences during grant implementation, including the beneficial and challenging aspects of program rollout and activities conducted.

This report's findings draw on two main sources of information: (1) primary data collection with staff from grant recipients via interviews conducted in the fall of 2023 and (2) secondary data analysis of documents grantees provided as part of their grant reporting activities as of September 30, 2023. Exhibit 4 presents the main data sources for this interim report. Primary data collection methods included interviews with five HUD program staff members, 21 interviews with grantee staff, and 21 interviews with staff from a subset of selected subrecipients. This data collection began on September 1, 2023, and concluded on November 30, 2023. Grant recipient staff described implementation activities from the start of the grant up to the date of interview.

Grantee documents reviewed as part of the secondary data analysis include grant applications, action plans for administering the grants, and quarterly performance reports that contain summaries of households served, services provided, and outcomes for cases closed during the quarter ending in June 2023.

Although some focus groups and one-on-one interviews with tenant households were conducted during the first round of data collection, this report does not include data on tenant households' program experiences. Similarly, this report does not include data on services provided and the outcomes for tenant households whose cases have been closed. The evaluation team will present these data in the final report.

1.5 Purpose and Focus of the Final Report

Following the second round of data collection and analysis, the evaluation team will produce a final report that will include a complete analysis of grantees' experiences with grant implementation, including grant recipient staff's perspectives regarding the most beneficial and challenging aspects of the program, spanning the full 2-year grant period, although some grants may extend beyond 2 years. The final report will draw on data from interviews conducted during the second round of data collection in March and April 2024. The evaluation team will also conduct an additional round of secondary data analysis to further analyze the program's implementation.

Importantly, the final report will also document the perspectives of the tenant households to better understand the program's implementation and outcomes. The final report will draw on data gathered through focus groups with tenant households during the first round of data collection and one-on-one interviews with tenant households during the first and second rounds of data collection. The final report will also present data on the effects that services had on households' eviction outcomes from the program's inception to June 30, 2024. Finally, the final report will integrate the findings from primary data across the two rounds of data collection to contextualize the quantitative findings. The final report will be submitted to HUD in late 2024.

1.6 Report Organization

This report consists of five chapters and five appendixes.

- Chapter 1 provides an overview of EPGP and the evaluation design.
- Chapter 2 describes the **characteristics of the organizations funded through EPGP**, using information recipients provided in grantee documents.

- Chapter 3 presents the **characteristics of tenant households served** from EPGP funds. Specifically, the chapter provides descriptive data on demographic, socioeconomic, and housing characteristics for households with closed cases as of June 2023, using grantee-reported HUD Form 52698—Client Services and Outcomes Report data.
- Chapter 4 documents the **early observations on grant implementation** from the start of each award through November 2023. The evaluation team extracted these key themes from interviews with staff of funded organizations.
- Chapter 5 summarizes the **key findings** and details **next steps for the evaluation**.
- Appendix A details the study’s main data sources and the evaluation team’s approach to data collection.
- Appendix B describes the steps taken to analyze the quantitative and qualitative data.
- Appendix C provides the grantee and subrecipient interview protocols and tenant households focus group protocol.
- Appendix D provides supplemental tables for chapters 2 and 3.
- Appendix E provides a copy of HUD Form 52698.

Chapter 2: Characteristics of Eviction Protection Grant Program-Funded Organizations

This chapter provides an overview of the organizations funded through the Eviction Protection Grant Program (EPGP). It includes general information about grantees and subrecipients (collectively referred to as grant recipients for the purposes of the report), such as organization type, service areas, and populations served. This chapter also explores commonalities in management structure and the types of services that grant recipients offer. The evaluation team primarily used grantee documents such as grant applications, action plans, and quarterly narrative reports each grant recipient submitted to prepare this chapter. The evaluation team supplemented the findings in this chapter by using data from interviews conducted with grant recipient staff in the first round of data collection. Chapter 4 discusses the grant recipient interviews in more detail and provides early observations about program implementation.

The evaluation team notes that the grant recipients continued to implement program activities during the writing of this interim report. As such, this report does not include an analysis of planned program activities versus actual program implementation. This report does not include an analysis of data that could provide further insight into the characteristics of grant recipients' service areas, such as American Community Survey data. The final report will include these analyses.

Main Findings Regarding Characteristics of Funded Organizations and Their Planned Activities

- The program funded 69 different organizations, including legal aid and complementary legal service providers. These organizations cover a vast range of service areas that differ in terms of geography and proximity to metropolitan centers.
- Grant recipients frequently planned their programs to incorporate funding from multiple grants to better serve their communities. They adapted service delivery to meet program requirements.
- Although grant recipients focus on providing legal aid services, many organizations also planned their programs to provide supportive services that help address challenges accompanying a threat of eviction.
- Organizations developed their grant programs to holistically address tenant households' needs by leveraging existing networks of service providers within their communities.

2.1 Grant Recipients Funded Through the Program

EPGP funds 69 organizations, 21 grantees, and 48 subrecipients. Exhibit 5 contains a full list of grant recipients. Grantees are the primary recipients of HUD funds. Some grantees distribute a portion of their funds to partner organizations, known as subrecipients. Often, grantees and subrecipients provide overlapping or complementary services, as discussed in the following sections of this chapter. Of these 69 organizations, 57 are either Legal Services Corporation (LSC)-funded providers of legal services or non-LSC-funded, nonprofit legal aid providers. The remaining 12 organizations provide complementary legal services. These organizations include—

- **Three fair housing organizations:** Intermountain Fair Housing Council, Metropolitan St. Louis Equal Housing Opportunity Council, and the Connecticut Fair Housing Center.

- **One organization that assists with grant monitoring and reporting:** Boise State University.
- **One local government:** The City of San Antonio.
- **Seven organizations that conduct tenant and community outreach:** Fox Strategies, Community Voices Heard, TakeRoot Justice, Community Action for Safe Apartments, the Metropolitan Council on Housing, the Northwest Bronx Community and Clergy Coalition, and SC Thrive.

Exhibit 5. List of Funded Grant Recipients

Grant Recipient (Organization Location)	Subrecipients
Fiscal Year 2021 Grantees	Fiscal Year 2021 Subrecipients
Advocates for Basic Legal Equality (Toledo, Ohio)	Legal Aid of Western Ohio
Atlanta Volunteer Lawyers Foundation (Atlanta, Georgia)	None
Community Legal Aid, Inc. (Worcester, Massachusetts)	Greater Boston Legal Services MetroWest Legal Services Northeast Legal Aid South Coastal Communities Legal Services
Connecticut Fair Housing Center (Hartford, Connecticut)	Connecticut Bar Foundation Connecticut Veterans Legal Center, Inc. Statewide Legal Services of Connecticut University of Connecticut Law School
Idaho Legal Aid Services (Boise, Idaho)	Boise State University Intermountain Fair Housing Council, Inc. The Jesse Tree of Idaho, Inc. Montana Legal Services Association Utah Legal Services
Jacksonville Area Legal Aid, Inc. (Jacksonville, Florida)	Florida Legal Services, Inc. Gulfcoast Legal Services, Inc. Legal Aid Service of Broward County, Inc. Legal Aid Society of Palm Beach County, Inc. Northwest Florida Legal Services, Inc.
Legal Aid Center of Southern Nevada (Las Vegas, Nevada)	None
Legal Aid Society of Northeastern New York (Albany, New York)	None
Legal Assistance of Western New York, Inc. (Geneva, New York)	Legal Aid Society of Rochester JustCause
Legal Services of Eastern Missouri (St. Louis, Missouri)	Legal Aid of Western Missouri Legal Services of Southern Missouri Mid Missouri Legal Services Corporation Metropolitan St. Louis Equal Housing Opportunity Council*
Fiscal Year 2022 Grantees	Fiscal Year 2022 Subrecipients
Acadiana Legal Service Corporation (Lafayette, Louisiana)	Southeast Louisiana Legal Services Corporation

Grant Recipient (Organization Location)	Subrecipients
City of San Antonio (San Antonio, Texas)	St. Mary's School of Law's Center for Legal and Social Justice Texas RioGrande Legal Aid
Legal Aid Services of Oklahoma, Inc. (Oklahoma City, Oklahoma)	Fox Strategies
Legal Aid Society of San Bernardino (San Bernardino, California)	None
Legal Services of Greater Miami, Inc. (Miami, Florida)	Community Justice Project, Inc.
Legal Services of New Jersey (Edison, New Jersey)	South Jersey Legal Services Legal Services of Northwest Jersey Northeast New Jersey Legal Services Central Jersey Legal Services Essex-Newark Legal Services
Legal Services of the Hudson Valley (White Plains, New York)	Community Voices Heard, Inc. Hudson Valley Justice Center, Inc.
Northern Manhattan Improvement Corporation (New York City, New York)	TakeRoot Justice Community Action for Safe Apartments Metropolitan Council on Housing Northwest Bronx Community and Clergy Coalition, Inc.
One80 Place (Charleston, South Carolina)	Charleston Pro Bono Legal Services, Inc. Charleston Legal Access South Carolina Legal Services SC Thrive**
Pine Tree Legal Assistance, Inc. (Portland, Maine)	None
West Tennessee Legal Services, Inc. (Jackson, Tennessee)	Legal Aid of East Tennessee Legal Aid Society of Middle Tennessee and the Cumberland Memphis Area Legal Services, Inc.

*The Metropolitan St. Louis Equal Housing Opportunity Council was initially a subrecipient but became an unfunded partner organization due to staffing issues and changes in the scope of services provided.

**The relationship with SC Thrive was terminated on June 30, 2023, because the organization was unable to conduct outreach and marketing activities to reach and recruit the priority population (communities of color and other groups that would not ordinarily seek services).

Sources: HUD press releases <https://archives.hud.gov/news/2021/pr21-193.cfm>;
<https://archives.hud.gov/news/2022/pr22-091.cfm>

Experience was a key factor in selecting grantees as documented in the Notice of Funding Opportunity. The grantee organizations had an average of 40 years of experience providing legal services to low-income households, with experience ranging from 15 to 60 years.

2.2 Service Areas

The grantees are located in 19 states (see exhibit 1). Of the 21 grantees, 9 grantees, together with their subrecipients, provide statewide eviction protection services in 11 states, while 12 grantees, together with their subrecipients, implement regional or local eviction protection programs. The 21 grantees provide services across diverse areas, including urban and rural and metropolitan and nonmetropolitan communities. Most grantees cover multiple counties, necessitating an approach to service delivery that

addresses differences among communities in housing market environments, tenant expectations, and availability of supportive services.

Grantees differ in terms of their target service areas:

- **Nine grantees provide statewide coverage, with states or regions of the state divided among a network of legal aid service providers.** For example, the state of Tennessee is divided between West Tennessee Legal Services and its various subrecipients. Idaho Legal Aid Services partnered with legal service providers in Montana and Utah to serve households in those states.
- **Five grantees target specific regions of their state.** For example, Advocates for Basic Legal Equality serves Western Ohio.
- **Seven grantees provide services locally.** For example, the Atlanta Volunteer Lawyers Foundation covers the City of Atlanta and Fulton County.

Across all service areas, grant recipients described persistently high rates of eviction.

Many service areas have seen a spike in housing demand both prior to and during the COVID-19 pandemic, resulting in increased housing prices and decreased availability of affordable housing. Tenant households' lack of access to legal services and knowledge concerning their legal rights have exacerbated these trends. Thus, many households face evictions in communities unable to accommodate their housing needs fully.

In addition to these general trends, different service areas face unique challenges that can present barriers to serving households effectively. These challenges include—

- **Differences in the Availability of Public Infrastructure and Public Services.** Limited public infrastructure can hamper tenant households' efforts to retain housing or access new housing in cases of eviction. Moreover, limited public infrastructure makes it more difficult for grant recipients to interact with households and conduct outreach efforts. For example, the lack of public transportation in rural Idaho makes it more difficult for grant recipients to connect with potential tenant households, thereby impeding eviction protection services.
- **Differences in Housing and Tenant Laws.** Housing and tenant laws vary across service areas, with some laws considered more landlord friendly than others. For example, Nevada's system of summary evictions enables landlords to remove tenants, with little recourse available to tenants who tend to be less familiar with the system. Although the degree to which local laws favor landlords varies, none of the grant recipients described their service areas as particularly tenant friendly, with most describing their service areas as decidedly landlord friendly.
- **Differences in the Characteristics of Particular Courts or Individual Judges.** Courts may exhibit idiosyncrasies that can either aid or hinder the work of grantees. For example, grantees mentioned that rural courts may employ justices of the peace instead of judges. A justice of the peace may have less familiarity with housing and tenant laws, which sometimes makes it harder for legal aid providers to defend tenant households. Furthermore, some judges and justices are less amenable to grantee activities and outreach efforts. For example, one grantee described difficulty setting up a satellite legal aid desk to provide advice to tenants in one court because the judge was less open to their presence.

2.3 Populations Served

Grant recipients serve a variety of populations, and eviction rates vary across demographic groups. As a result, grant recipients tend to serve some groups more than others. During interviews with grant recipient staff members, they frequently described making changes to better accommodate the needs of specific groups, especially those vulnerable to eviction, and taking additional steps to reach these groups. According to the action plans grantees submitted with their grant applications and that detailed the kinds of services they intended to provide, grantees indicated that they planned to prioritize or target the following groups.

- All 21 grantees intended to target outreach to tenant households with low incomes (as the grant required).
- Sixteen grantees intended to target outreach to persons with disabilities.
- Fourteen grantees intended to target outreach to racial and ethnic minorities.
- Fourteen grantees intended to target outreach to persons with limited English proficiency.
- Eleven grantees intended to target outreach to vulnerable populations, such as survivors of domestic violence and child abuse.
- Seven grantees intended to target outreach to veterans.
- Six grantees intended to target outreach to Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) individuals.
- Three grantees intended to target outreach to Tribal populations.

The grant recipients sought to tailor their services to those at high risk of eviction. For many grant recipients, that effort begins with recruiting a diverse staff representing multiple backgrounds. A diverse team facilitates effective communication with tenant households and ensures that relevant perspectives are accounted for when developing and implementing grant activities. Furthermore, by hiring multilingual staff, grantees could serve tenant households with limited English-speaking proficiency without needing to hire translators. Other grantees provided written materials in multiple languages. For example, Pine Tree Legal Assistance had educational materials on housing rights translated into 10 languages and made them available on its website. In addition, some grantees had their staff undergo sensitivity training to ensure that they can work and communicate effectively with tenant households.

Grant recipients also fostered relationships with other service providers working within the same community to deliver services to tenant households vulnerable to eviction. These other providers may be able to accommodate tenant households that grant recipients may not be able to accommodate, thus addressing potential gaps in service provision.

2.4 Grant Management Structure

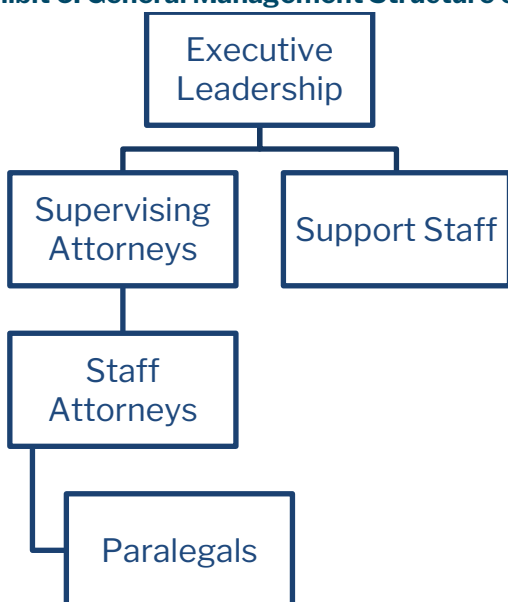
Most grant recipients leveraged existing management structures to administer EPGP. For example, the Legal Aid Center of Southern Nevada organized its eviction protection program around its existing management system, consisting of the executive director and financial officer, and then hired new attorneys and support staff to implement grant activities. Thus, grant recipients were able to use their prior grant management experience

and minimize the time needed to plan and prepare for program implementation. Chapter 4 discusses the challenges that grant recipients encountered during program rollout and initial implementation.

The general management structures of grant recipients typically include executive leadership, supervising attorneys, staff attorneys, paralegals, and support staff. Exhibit 6 shows the general management structure.

- **Executive leadership** includes executive directors, deputy directors, directors of litigation, and program directors/project managers. Executive leaders frequently assist with program reporting and legal representation.
- **Supervising attorneys** oversee the caseloads of staff attorneys.
- **Staff attorneys** are responsible for directly advising and representing households.
- **Paralegals** play crucial roles in legal support, administrative services, intake, and referrals. In specific instances, such as with Jacksonville Area Legal Aid, paralegals fill supervisory roles and provide legal representation.¹⁸
- **Support staff** typically include coordinators, case and intake workers, and housing navigators who guide households through the court processes, provide administrative services, and conduct outreach.

Exhibit 6. General Management Structure of Grant Recipients



Each of these roles can have a major impact on grantees' ability to provide services to tenant households. Although one may expect attorneys to have the largest impact on the scope and effectiveness of service delivery, grantees expressed that support staff also play a critical role and that their contribution should not be underestimated. Support staff often help connect tenant households with necessary supportive services and navigate eviction-

¹⁸ States vary in terms of the allowable scope of paralegal activities, with some allowing paralegals to provide legal representation in a limited capacity and within a specific context. As the scope of paralegal activities was not the focus of the first round of data collection, this information is not available for every grant recipient.

related challenges. Consequently, these staff members have a lasting impact on the wellness of individuals and families.

Grant recipients draw from a wide range of talent to support their activities under EPGP. This talent pool includes lawyers (both career and volunteer), law students, social service workers, and other professionals. Grant recipients value diversity when building their teams, frequently hiring bilingual staff or staff from diverse backgrounds to better address the needs of tenant households.

2.5 Funding Sources Prior to the Eviction Protection Grant Program

Prior to receiving EPGP funds, most grantees had already received funding from other sources to conduct eviction protection and related services, such as—

- **Other HUD Funding.** Seven grantees were prior recipients of other HUD funding, including funds from Community Development Block Grants, the Fair Housing Initiative Program-Private Enforcement Initiative, Continuum of Care, the Emergency Solutions Grants Program, and the Homelessness Prevention and Rapid Re-Housing Program.
- **Other Federal Funding.** Many grantees received grants from other federal agencies, including various offices of the U.S. Department of Justice, such as the Office for Victims of Crime and the Office on Violence Against Women’s Legal Assistance for Victims. The U.S. Department of Veterans Affairs also provided funding, specifically through programs like Supportive Services for Veteran Families and the Grant and Per Diem Program.
- **Private Donations.** Grant recipients have also received funding from private organizations, foundations like United Way, or bar foundations.

Although grant recipients expressed how funding sources were vital to their service delivery capacity, they stressed an unmet need for legal aid services in their communities, prompting grantees to apply for additional HUD funding. Because most grantees already had prior experience applying for grants from and designing programs with other government funding sources, many modeled their EPGP-funded programs on previous grant programs. This knowledge facilitated applying for and implementing EPGP.

Grantees’ ability to combine multiple funding sources allowed them to extend their EPGP activities and to integrate complementary services with those activities. For example, one grantee described being able to use EPGP funds for direct legal representation while drawing from another funding source to provide rental assistance. These services complement each other because they address different aspects of the challenges that households at risk of or subject to eviction face. This grantee used the availability of rental assistance as leverage on behalf of tenant households because landlords are more likely to come to a mutually satisfactory agreement with the assurance of direct rental assistance. Thus, multiple sources of funding not only help grantees provide more comprehensive services to tenant households but can also improve program efficiency and effectiveness.

However, combining different funding sources to provide a more comprehensive set of services has its disadvantages when it requires collaborating with other organizations. Although grantees were sometimes able to provide rental assistance directly, in other cases, it was available only through partnerships with outside organizations. Grantees expressed the opinion that providing the assistance directly would have been more

efficient. For example, one grantee described the process of providing legal services to a tenant household while coordinating with a partner organization to provide rental assistance as “very unwieldy.” Collaboration with another organization can slow down responding to an impending eviction when a timely response is critical.

2.6 Services Provided and Organization Activities

As noted previously, 57 of the 69 organizations (82 percent) that EPGP funds are either LSC-funded providers of legal services or non-LSC-funded, nonprofit legal aid providers. As part of their grant applications, grantees submitted action plans detailing the kinds of services they intended to provide with the funding. The evaluation team aligned these planned services with the 19 legal services described on HUD Form 52698 and then classified them into five broad categories: extensive legal representation, brief legal representation, mediation and diversion, information and education, and other forms of legal services.^{19, 20}

- **Extensive legal representation services** include negotiating a settlement without litigation, negotiating a settlement with litigation, and representing tenant households in an administrative agency action that results in a decision or in a court proceeding resulting in a decision.^{21, 22}
- **Brief legal representation services** include providing limited counseling and legal advice, or a limited amount of legal action, on behalf of a tenant.
- **Mediation and diversion services** include mediating between landlords and tenants as a neutral party, advocating on behalf of tenants during mediation, or performing other forms of advocacy to avoid litigation.
- **Information and education services** include informational services or education in a group setting and providing legal information during one-on-one sessions with tenant households through a court-based helpdesk, direct outreach to households, and referrals to other service providers (both legal and nonlegal).
- **Other forms of legal services** include pretrial, trial, and post-trial activities related to eviction defense, such as filing pretrial motions, filing fair housing complaints, and enforcing the terms of a settlement agreement. Other forms of legal services also include other resolution services and advocacy activities, such as connecting tenants with rental assistance, promoting eviction diversion programs, and finding solutions that can satisfy both tenants and landlords.

Although housing-related legal services tend to be the primary focus of most grant recipients, many also provide services related to domestic violence, public benefits, consumer law (such as debt reduction and legal action for those harmed by unfair business

¹⁹ See exhibit D-4 for a detailed overview.

²⁰ These five types of legal services concern the types of activities grantees planned for at the program's outset. The final report will include an analysis comparing planned program activities with actual program implementation.

²¹ Grantees represent tenant households in administrative agency actions that, after a hearing or other formal administrative process, result in case-dispositive decisions made by the administrative agency or body. The evaluation team drew this definition from HUD Form 52968, which is in appendix E.

²² Grantees represent tenant households in court proceedings that result in case-dispositive decisions made by the court. The evaluation team drew this definition from HUD Form 52968, which is in appendix E.

practices), and family law. These other services complement grantees' housing and legal services because tenant households facing eviction often experience concurrent challenges that can undermine their ability to seek or retain housing.

2.7 Service Networks and Referrals

Most grant recipients refer tenant households to other available service providers in their communities. These outside service providers offer complementary services that may address eviction-related challenges and barriers.²³ These referral networks between grant recipients and service providers often predate EPGP. Drawing on their longstanding mutual trust, grant recipients leverage the positive relationships between peer service providers and the communities they serve. For example, to enhance trust-building with the community, the Northern Manhattan Improvement Corporation in New York hires from the community and works with peer providers to conduct outreach.

Service partnerships and networks connect different types of service providers and organizations, including—

- Legal aid services providers.
- Healthcare providers.
- Local faith-based organizations or nonprofit organizations (such as advocacy groups, homeless and women's shelters, immigrant and migrant service providers, and food banks).
- Public institutions (such as housing departments, libraries, courts, schools, government benefits offices, and federal agencies like the U.S. Department of Veterans Affairs).
- Community-based groups (such as tenant organizers and housing advisors).
- Social service providers.

Many of these partnerships provide a foundation for grant recipients to build working relationships and effectively implement planned program activities. Grant recipients frequently engage with networks of service providers in their local communities. Each of these entities offers complementary services that can help address the challenges and barriers that often accompany the threat of eviction. These networks build organically over time as organizations partner to provide complementary services and make referrals to each other. Naturally, partnerships strengthen relationships between service providers and build trust between organizations and communities.

Beyond expanding community access to services and developing more effective advertising and outreach strategies through their networks, grant recipients planned to increase their visibility and communicate with the public by using local radio, news, press conferences, and public institutions. For example, the Atlanta Volunteer Lawyers Foundation partnered with the Housing Justice League to mobilize renters and homeowners to conduct community outreach. Similarly, the Legal Aid Center of Southern Nevada established a network of working relationships with staff at courts, state agencies, and nonprofit organizations to facilitate the implementation of their grant-funded activities.

²³ The outside service providers discussed in this section are not funded under EPGP.

Partners can use a referral system to collaborate effectively and address the varied challenges that tenant households may face. The first step in the referral process often occurs during tenant household intake as staff assess each household’s needs and determine service eligibility. The intake step allows organizations to connect households to a network of other programs and services offered by grantees and other organizations for needed legal or nonlegal assistance. Organizations within these networks often provide overlapping eviction and supportive services that benefit tenant households, such as—

- Finance and employment-related services (such as special education support, financial counseling, and employment services).
- Healthcare-related services (such as Medicaid, mental health services, support and counseling for people living with human immunodeficiency virus [HIV], disability advocates that facilitate service provision and coordination, and other wellness services).
- Family services (such as support for older adults and survivors of domestic violence).
- Housing services (such as housing transition services, rapid re-housing, rental assistance, and permanent supportive housing assistance).
- Support for migrants and immigrants.
- Other nonprofit services (such as food banks, fundraising, and other community-based programming).

We’re a settlement house, so we have a large variety of services. We have immigration services, wellness services, public benefits, education, and tax services. When people come in, particularly during the legal intake process, during that interview, people mention different types of issues. ‘I’m having this housing issue, but I’m also dealing with an immigration issue, or I’m dealing with a tax issue, or I might need to speak to someone about a wellness issue.’

—Grantee staff member

Service integration allows multiple providers to collaboratively address the direct threat of eviction and the factors that increase the likelihood of eviction by connecting tenant households with—

- Legal services that may enable households to stay in their homes.
- Financial services that may help households avoid future eviction.
- A community of service providers dedicated to promoting households’ best interests from which they can receive a variety of supports that ideally fit their needs.

For example, Legal Services of Greater Miami partners with Miami-Dade’s Ryan White Part A Program, which provides a range of programs to support people living with HIV. They also partner with the Advocacy Network on Disabilities, an agency in Miami that provides and coordinates services for those living with a disability. These partnership networks are a major source of support for grant recipients, and they facilitate an adaptable approach to service delivery. Given the ability to rely on outside organizations with expertise in related areas, grant recipients are better equipped to address the diverse needs of individuals and families in their community.

Chapter 3: Characteristics of Households the Program Served Through June 2023

This chapter examines the socioeconomic and demographic characteristics of households that received services from the Eviction Protection Grant Program (EPGP). This chapter also highlights the characteristics of households that existing research associates with a higher risk of eviction filing and judgement (Graetz et al., 2023). The findings presented in this chapter were drawn from an analysis of 14,260 households for which data are available as of June 30, 2023. The evaluation team will continue collecting additional data grantees submit through August 2024 for the reporting period ending on June 30, 2024, and will present the findings from the data analysis in the final report. The final report will also include findings related to the services households received and the associated outcomes.

Data informing this chapter were extracted from the HUD Form 52698—Client Services and Outcomes Report, which each grantee submits to HUD on a quarterly basis, containing information on household demographics, the types of services provided, and the outcomes for tenant households with cases closed in the preceding quarter. A copy of HUD Form 52698 is available in appendix E.

The demographics and characteristics of households reported in this chapter are based on information captured in Section A of HUD Form 52698 (fields 1 through 5). Section A of the form includes a unique identifier for each client household, the demographics of the presenting tenant, the number of household members, family income, eviction status, and housing situation. The demographic information is documented at the time of the presenting tenant’s first interaction with the grantee. Based on the grantee’s submitted information, the evaluation team made the following assumptions to clean and process the data.²⁴

- One grantee did not report ethnicity, and another grantee merged ethnicity and race. To ensure consistency in reporting race and ethnicity data across grantees, the evaluation team constructed a combined ethnicity and race variable. This recoding structure assumed that those presenting tenants with missing ethnicity information were non-Hispanic. As a result, the report may have underestimated the percentage of Hispanic tenants.
- Tenant households had the option to not provide their gender, race, disability status, and ethnicity. In such cases, grantees reported them as “Prefer not to respond” or “Unknown.” If the grantee chose these response options, the evaluation team treated them as missing values. The evaluation team excluded missing values from the calculation of percentages for gender, disability status, and race and ethnicity. Grantees were encouraged not to make assumptions about demographic characteristics based on the appearance of presenting tenants.
- If households reported negative family income in HUD Form 52698, the evaluation team excluded them when reporting average family income. Some grantees also reported family income as zero for tenants. The evaluation team could not assume that all missing and 0 values represented \$0 annual income. So, the evaluation team calculated the average family income for values greater than 0 and average family

²⁴ See appendix B for more details.

income, including 0, assuming that the true average family income lies within these two values.²⁵

- For the question on whether a household resides in a federal housing program-subsidized unit, some grantees reported HUD Housing Choice Voucher (Section 8) and HUD Project-Based Section 8 as a single category, or simply mentioned Section 8. To maintain consistency, the evaluation team combined these categories into a single category and called it “HUD Housing Choice Voucher (Section 8)/HUD Project-Based Section 8.”²⁶

It is possible that certain tenant households sought services from the same grantee one or more times after their initial case was closed, resulting in a degree of double counting. Grantees assigned identifiers for every tenant household seeking services. Although some grantees assigned identifiers unique to a particular household, other grantees assigned identifiers unique only to a particular case.

- For grantees that used the same unique identifier for households seeking services more than once, multiple records of the same household would have been reported in the HUD Form 52698, thereby inflating the reported number of households served. To mitigate this potential error, the evaluation team reports only on household characteristics from the most recent record to avoid double counting households with a unique household identifier.
- For grantees that used multiple identifiers for households seeking services more than once, the evaluation team was not able to identify and account for these households. Thus, although expected to be small in number, households seeking services more than once that lacked a unique identifier were likely double counted, potentially inflating the reported number of households served.

As a final step, the evaluation team constructed the overall descriptive statistics for the 21 grantees presented in this chapter.²⁷

Main Findings Regarding the Characteristics of Households With Closed Cases as of June 30, 2023

- The 14,260 households served included 17,972 adults and 10,703 children.
- Nearly 3 in 4 (71.1 percent) presenting tenants were women.
- Almost one-half (47.6 percent) of presenting tenants were non-Hispanic Black or African-American, one in three (32.9 percent) were non-Hispanic White, and 12.4 percent were Hispanic.²⁸
- Almost 3 in 10 (28.5 percent) presenting tenants had a disability.²⁹

²⁵ Exhibit D-2 presents this information.

²⁶ Exhibit D-3 presents this information.

²⁷ One grantee, the Legal Aid Society of Northeastern New York, did not serve any households using EPGP funds as of November 2023, and therefore, it was excluded from the quantitative analysis.

²⁸ The evaluation team categorized presenting tenants identifying as other race and those identifying as more than one race as other race (4.5 percent).

²⁹ The percentage of households that had at least one member with a disability is likely greater because disability status information was not available for all household members.

- Nearly 2 in 10 (17.8 percent) had limited English proficiency, and 30.7 percent of presenting tenants residing in households at risk of eviction had limited English proficiency compared with 9.0 percent in households subject to eviction.
 - More than one-half (52.7 percent) of households had at least one child.
 - Two in 3 (65.1 percent) households were extremely low income. For households with reported income, the average annual family income was \$22,794.
-

This chapter also provides national statistics available from the Eviction Lab. Based at Princeton University, the Eviction Lab is one of the leading research organizations that focuses on understanding the causes, consequences, and patterns of eviction in the United States. They collect court records on eviction filings from states and counties or purchase comprehensive datasets of public eviction records from LexisNexis Risk Solutions and American Information Research Services, Inc.

Although a comparison of EPGP and Eviction Lab demographic data could help identify characteristics associated with households at higher risk of eviction, the population and time period of the program data and Eviction Lab data are substantially different. First, the Eviction Lab data are based on eviction filings across 39 states, whereas EPGP data cover a broader group of households—households at risk of eviction and households subject to eviction—in only 19 states. Households subject to eviction are most similar to the households against which evictions were filed, as the Eviction Lab’s data captured. Second, the Eviction Lab presents findings on household demographics from 2007 to 2016. A recent study also examined the demographics of households against which eviction cases were filed during the pandemic from January 2020 through August 2021. By comparison, EPGP data analyzed in this chapter are for households facing eviction from January 2022 through June 2023.

Beneficiaries that the grant recipients served are low-income tenant households facing eviction. HUD Form 52698 defines eviction risk as—

At risk of eviction, meaning the tenant:

- (1) Has been given one or more formal or informal warnings by an Evicting Party.
- (2) Has been notified by formal or informal means that the Evicting Party has commenced or intends to commence formal or informal eviction actions through the courts, self-help, or other means.

Or—

- (3) Is being harassed, threatened, discriminated against, neglected, or treated differently than other tenant or other protected classes under the Fair Housing Act by the Evicting Party or the Evicting Party’s agents in a manner that appears calculated to result in the tenant’s vacating of the property.

Subject to eviction, meaning:

- (1) The tenant has been notified that a sheriff, marshal, or other law enforcement or private agent enforcing a civil eviction order or engaging in self-help on behalf of the Evicting Party will remove the tenant from the property.
 - (2) The tenant has been notified that they will be removed from the property by the Evicting Party or its agent.
 - (3) The Evicting Party has begun the eviction process pursuant to local law.
-

Through the end of June 2023, 14,260 households, consisting of 17,972 adults and 10,703 children, received services funded through EPGP. These households included individuals at risk of eviction and those subject to eviction.³⁰ Of the total number of households served, 56.6 percent were subject to eviction, and 41.1 percent were at risk of eviction.³¹ The evaluation team examined the household characteristics of these two groups separately because the needs of each group and the services that organizations provide them differ significantly.

3.1 Demographic Characteristics of Households Served

Gender: Nearly three-fourths (71.1 percent) of presenting tenants were women (exhibit 7). Among households at risk of eviction or subject to eviction, 69.6 and 72.0 percent, respectively, were women.

Race and Ethnicity: Almost one-half (47.6 percent) of presenting tenants were non-Hispanic Black or African-American. The other two major ethnic and race categories were non-Hispanic White at 32.9 percent and Hispanic at 12.4 percent. Tenants at risk of eviction and subject to eviction had similar racial and ethnic distributions; both groups included more non-Hispanic Blacks and African-Americans at 48.1 percent of those at risk of eviction and 47.4 percent of those subject to eviction.

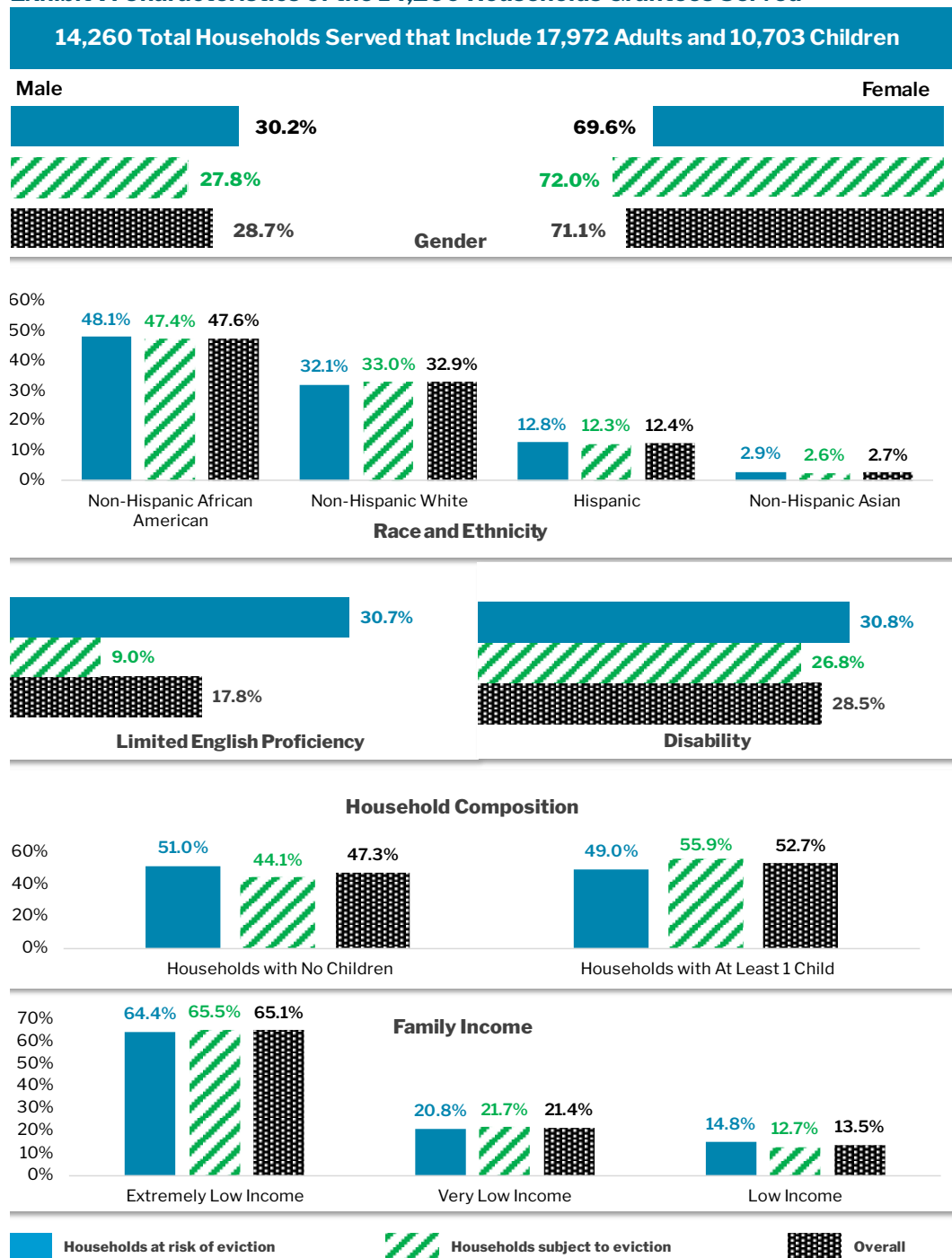
Limited English Proficiency Status: Nearly 18 percent of presenting tenants had limited English proficiency. Distribution varies by eviction status. Nearly a third (30.7 percent) of presenting tenants at risk of eviction had limited English proficiency, and 9.0 percent of those subject to eviction had limited English proficiency.

Disability Status: Nearly 3 in 10 (28.5 percent) presenting tenants had a disability, with comparable distribution between the two eviction status groups—30.8 percent of presenting tenants at risk of eviction had a disability, and 26.8 percent of presenting tenants subject to eviction had a disability.

³⁰ Following HUD Form 52698's guidance, the study defines the evicting party as a landlord, owner of a residential property, or other person or entity, including corporations, companies, associations, firms, partnerships, societies, joint ventures, joint stock companies, franchises, and individuals who have or purport to have a legal right to pursue eviction or possessory action.

³¹ Data on households' eviction status were not collected for 2.3 percent of households.

Exhibit 7. Characteristics of the 14,260 Households Grantees Served



Notes: This demographics exhibit provides the overall characteristics of presenting tenants, their households, and their eviction status. The overall percentages include households with no information on their eviction statuses (2.3 percent). More than 4 percent of presenting tenants chose 'Other' as their race and ethnicity or chose more than one race. Grantees could select multiple categories for the gender identity of the presenting tenant.

Source: HUD Form 52698 data submitted by 20 grantees through June 2023, including data from the first quarter of 2022 through the second quarter of 2023, with data reported for 14,260 tenant households

Household Composition: More than one-half (52.7 percent) of presenting tenants lived in a household with at least one child. Forty-nine percent of households at risk of eviction had at least one child, and 55.9 percent of households subject to eviction had at least one child. Among households with children, the average number of children per household was two for households in both groups.

Family Income: All households receiving services were low income.³² Nearly two-thirds (65.1 percent) of households had extremely low incomes, with similar distribution across the two groups by eviction status at 64.4 percent of at-risk households and 65.5 percent of households subject to eviction. The average annual family income for households reporting income was \$22,794. The average income decreased to \$17,938 when including households with zero reported income.³³

Analyzing 38 million court records of eviction filings between 2007 and 2016, the Eviction Lab highlights key demographic groups at greater risk for eviction:

- An estimated 54 percent of evictions were filed against women.
- More than one-half (51 percent) of all evictions were filed against Blacks and African-Americans.
- Slightly more than 50 percent of evictions were filed against households that had at least one child in the household (Graetz et al., 2023).

The study also found that these proportions were stable across the years of the study. A second study examined 282,000 eviction filings during the COVID-19 pandemic from January 1, 2020, through August 31, 2021, and found relatively similar demographic characteristics (Graetz et al., 2024).

Synthesizing the Eviction Lab findings with EPGP household data show consistency in the demographics of households facing eviction.

3.2 Geographical Location of Households Served

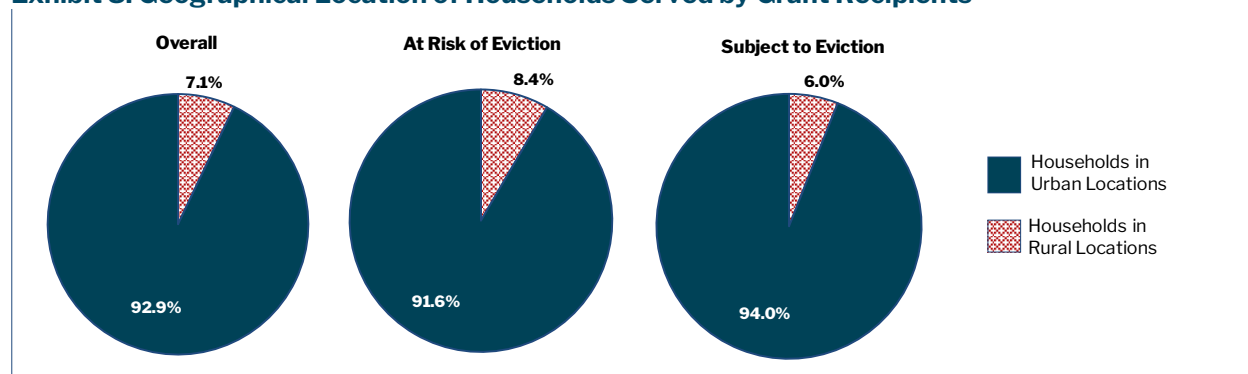
Geographical Location: 93 percent of households receiving services lived in urban areas, and 7 percent lived in rural areas.³⁴ One objective of EPGP was to increase access to legal assistance for low-income tenant households in rural areas. Based on the interviews, grant recipients have conducted activities or made a concerted effort to reach households in rural areas (exhibit 8).

³² Income categories are described at <https://www.huduser.gov/portal/datasets/il.html>.

³³ The evaluation team excluded households from the average family income if they reported negative family income on HUD Form 52698. Some of the grantees also reported family income as zero for tenants. The evaluation team could not verify that all missing and 0 values represented \$0 annual income, so they calculated the average family income for values greater than 0 and the average family income, including 0, assuming that the true average family income lies within these two values.

³⁴ Because HUD Form 52698 did not capture whether households were in urban or rural areas, the evaluation team used the Census shape file to geocode the addresses provided, which may further limit the interpretation of this variable. Exhibit 8 notes explain the process for constructing this variable.

Exhibit 8. Geographical Location of Households Served by Grant Recipients



Notes: To identify urban or rural regions, the evaluation team geocoded the households based on the geographical information provided (namely ZIP Code, city, county, and state). The evaluation team overlaid this geocoded information with urban area shapefiles to determine whether households were in an urban or rural area. However, 67.90 percent of households that received services from grantees funded in 2021 and 48.89 percent of households that received services from grantees funded in May 2022 did not provide street address information, thereby hampering the precision of geocoding. Thus, the geographical mapping approximates their precise location. The variable constructed is a binary variable that takes the value 1 for urban and 0 for rural. The urban-rural definition used to identify areas is described in more detail at <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>.

Sources: HUD Form 52698 data submitted by 20 grantees through June 2023, including data from the first quarter of 2022 through the second quarter of 2023, with data reported for 14,260 tenant households; urban-rural definition—U.S. Census Bureau

An Eviction Lab study found that approximately 6 percent of evictions are filed against rural households (Gershenson and Desmond, 2024). Similarly, EPGP data indicate that 7 percent of rural households received services, suggesting that rural renters did not experience undue difficulties accessing assistance in grant recipient service areas.

3.3 Housing Situation of Households Served

Living in a Subsidized Unit: Less than one-fourth of households that received services lived in federally assisted housing. Of the households that received services, 16 percent, or one in six households, lived in federally assisted housing at the point of intake for legal services, with nearly 11 percent living in HUD’s Housing Choice Voucher or Project-Based Section 8 housing programs and 3 percent living in public housing. There was no variation in tenants’ housing situation by eviction status.

In 95 percent of cases, the evicting party was a private landlord, and the remaining 5 percent were public housing authorities. There was no variation in the evicting party by eviction status.

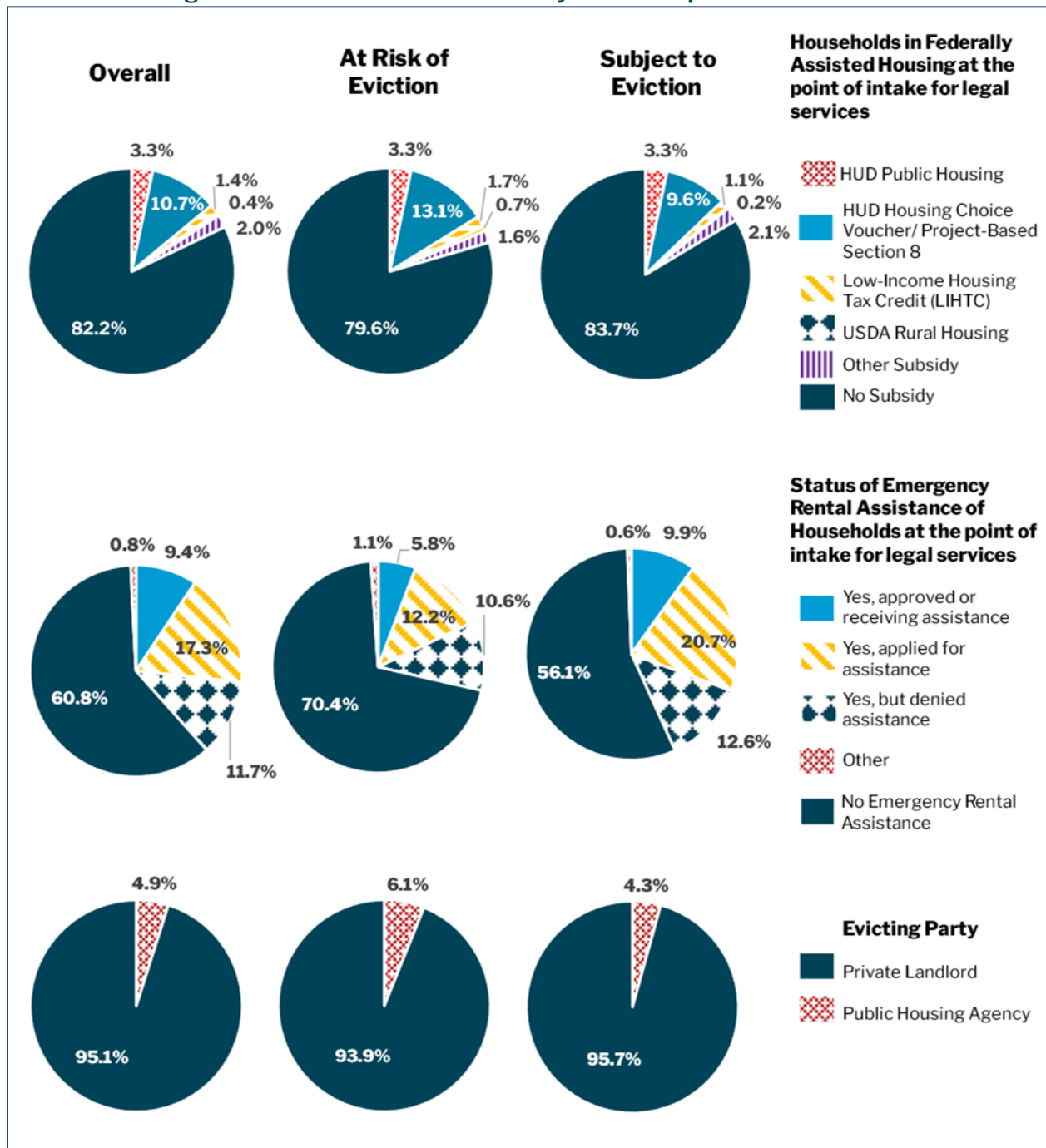
Recipient of Emergency Rental Assistance: More than 60 Percent of households had not received any form of emergency rental assistance at the point of intake for legal services. At the time of intake, 9.4 percent or nearly 1 in 10 households had been approved for or received emergency rental assistance, 17.3 percent had applied, and 11.7 percent had sought assistance and been denied. Most households (60.8 percent) had not applied for any form of emergency rental assistance.

- Among households at risk of eviction, nearly 70 percent had not sought rental assistance, 18 percent had either applied for or been approved for rental assistance, and nearly 11 percent had been denied.

- Among households subject to eviction, 56 percent had not sought any rental assistance, nearly 30 percent had either applied for or been approved for rental assistance, and nearly 13 percent had been denied.
- At the point of intake for legal services, households subject to eviction sought rental assistance at a higher rate compared with those at risk of eviction (exhibit 9).

The findings discussed in this chapter support previous findings showing that women, Black and African-American households, and households with children face a greater threat of formal eviction nationally.

Exhibit 9. Housing Situation of Households Served by Grant Recipients



Notes: The overall group includes households with no information on their eviction status (2.3 percent of total households). Households that reported having emergency rental assistance, but did not select any of the options reported in HUD Form 52698, were classified as 'Other'.

Source: HUD Form 52698 data submitted by 20 grantees through June 2023, including data from the first quarter of 2022 through the second quarter of 2023, with data reported for 14,260 tenant households

Chapter 4: Eviction Protection Grant Program Early Implementation Observations

This chapter documents early observations about grant recipients' implementation of the Eviction Protection Grant Program (EPGP) during the first 18 to 24 months from November 2021 (for fiscal year 2021 Grantees) and May 2022 (for fiscal year 2022 Grantees) to November 2023. This chapter discusses contextual factors that influenced grant recipients' program design, focusing on eviction-related concerns or needs within target service areas; initial rollout activities that grant recipients considered during program implementation, including fostering partnerships and selecting what services to offer clients; challenges that grant recipients faced during program implementation and strategies to address some of these challenges; and successful approaches to providing services to households. This chapter ends with details of the key successes that grant recipients attained during early program implementation.

This chapter is based on interviews conducted with staff for the 21 grantees and a subset of subrecipients (collectively referred to as "grant recipients"). Interview participants received assurances that their responses would remain confidential. To that end, the evaluation team did not disclose the names of specific grant recipients and kept quotes anonymous in this report. As chapter 2 mentioned, this report does not present an analysis of grant recipients' planned program activities and actual implementation nor tenant households' experiences with the program. This analysis will be presented in the final report.

Early Observations Regarding Grant Implementation

- Prior to implementing EPGP, most grant recipients noted that their states faced a consistently high number of eviction filings. Households' lack of access to legal services and limited knowledge concerning their legal rights exacerbated this issue.
- During the initial rollout period, grant recipients focused on hiring new staff, including lawyers, social workers, paralegals, and administrative assistants. Grant recipients also developed partnerships with community organizations (like legal aid service providers, nonprofits, public institutions, social service providers, and community-based groups) to help meet the needs of tenant households facing eviction.
- The most common challenges grant recipients experienced during initial program rollout and ongoing implementation included hiring staff with the appropriate experience and expertise, coordinating activities with partner organizations, staff capacity, compliance with HUD data reporting requirements, and outreach challenges, including difficulty reaching households in remote areas, communication barriers, and mistrust of government aid.
- Multiple grant recipients have successfully developed and implemented several strategies to reach tenant households and help them navigate legal processes and access relevant information. These strategies include community outreach activities (using nondigital and digital formats and technologies), tenant advocacy services (through legal clinics), and leveraging of high-traffic community areas.
- Grant recipients reported that they used the program to leverage existing relationships with other organizations, thereby expanding their service reach and capacity and offering new and complementary services.
- Grant recipients noted that EPGP is unique in its flexibility. These flexibilities—including the absence of a cost-sharing or matching funds requirement, the program's broad household eligibility requirements, the ability to fund new staff (legal and nonlegal), and the ability to

fund subrecipients—allowed grant recipients to reach more households that otherwise would not have access to legal and supportive services.

4.1 Contextual Factors That Influence Grant Recipients' Program Design

The evaluation team examined eviction-related concerns and needs within target service areas prior to grant recipients receiving the grant. This analysis was done to understand how grantees implemented EPGP and the contextual factors that influenced program design at the grantee level. Interviews with grant recipient staff revealed three primary eviction-related concerns that tenant households experienced across nearly all service areas: a persistently high number of eviction filings against tenant households, tenant households' lack of access to legal services, and tenant households' limited knowledge of their legal rights.

4.1.1 Tenant Households in Several Grant Recipients' States Experienced a High Number of Eviction Filings Prior to the Grant Program.

Eviction [cases] filed in [my state] were 19,106 in 2019. It dropped to 6,400 in 2020, 9,300 in 2021, and then, once all the moratorium expired, 2022 saw 22,745 evictions, which surpassed the previous high in 2017.

—Grant recipient staff member

Several grant recipient staff members consistently described their service areas as suffering from persistently high numbers of eviction filings prior to the award of HUD Eviction Protection Grants. A staff member for one grant recipient anecdotally reported that eviction filings in their state numbered more than 19,000 cases in a single year. Staff from another grant recipient recalled, “The reason we started focusing on eviction so much is because [this area] was rated as having the highest eviction rate per capita.” Grant recipient staff reported that eviction rates have risen and remain high due to the expiration of both the eviction moratorium and Emergency Rental Assistance (ERA) program.³⁵ Moreover, they noted that in many areas other factors like gentrification exacerbated eviction rates.

According to grant recipient staff, rent nonpayment was the primary cause of eviction filings, with other secondary causes including rent hikes and tenants' refusal to pay rent due to landlords not making needed repairs. The following examples from interviews reflect these causes.

- A grant recipient staff member reported, “A lot of eviction filings were fueled through the pandemic and people losing their work but also just rent increases—significant increases that we've seen. Forty percent over the last couple of years.”
- Staff from another grant recipient stated, “The eviction-related needs in our service area have always revolved largely around the lack of enough affordable housing in the area and steadily increasing rents due to gentrification.”

³⁵ The eviction moratorium and ERA program were two of the policies that the federal government implemented in response to the COVID-19 pandemic, both aimed at reducing eviction filing rates (Hepburn et al., 2023).

- A staff member from yet another grant recipient noted that beyond the lack of affordable, accessible housing, and high rents, the issue was “landlords’ complete neglect of buildings with the intent of getting people to vacate their units.”

4.1.2 Many Tenant Households Lacked Access to Legal and Nonlegal Services Prior to the Grant Program

There are about a million people in the state, and of those [about a quarter] are eligible for free legal services. Even now with increased capacity and increased number of housing attorneys, the ratio of attorney to eligible clients is around 1:13,000.

—Grant recipient staff member

Most grant recipient staff mentioned that households within their target service areas lacked access to legal and nonlegal services before the implementation of EPGP. In reference to a study conducted in their state, one staff member observed that, “While landlords have representation in 80 percent of eviction cases, tenant households have representation in only 20 percent of the cases.” Some tenant households, unaware that legal services were available, did not seek legal assistance when faced with threats of eviction. Others were aware that legal services were available in their areas but could not access them due to attorney shortages and the high cost of legal representation. Staff from one grantee reported that the volume of tenant households requiring eviction-related services exceeded the available resources. All these factors hampered tenant households’ access to legal and other support services that can prevent eviction.

4.1.3 Many Tenant Households Were Unaware of Their Rights Against Unlawful Evictions Prior to the Grant Program

...A lot of landlords engage in self-help evictions where they’re not even going to court.³⁶ A lot of tenants are moving out without going to court because of fear of the impact on their credit and the impact on ability to get future housing. The biggest concern was the lack of representation for clients because they weren’t even aware of their eviction-related rights.

—Grant recipient staff member

Staff members of several grant recipients noted that before (and even after) the grant program’s implementation, many households were unaware of their rights concerning unlawful evictions. Consequently, many tenant households faced unlawful eviction from their homes at the landlords’ will. One grant recipient staff noted, “The tenants lack [an] understanding of housing rights in the public, about what can happen to them when they are notified of eviction, what they can do about it, and what happens if they don’t show up at court.” They highlighted that limited awareness about tenant rights was prevalent among tenant households seeking services, and accessing legal representation could help households better understand their rights as tenants.

³⁶ “Self-help evictions, also known as illegal evictions, are when a landlord forces a tenant to leave their rental property without going through the proper legal channels. This can include changing the locks, shutting off utilities, or even physically removing the tenant’s belongings from the property”
<https://www.doorloop.com/blog/self-help-evictions>.

4.2 Initial Program Rollout Activities

The evaluation team examined the activities that grant recipients considered during the initial program rollout after grant award. Interview questions focused on the process grant recipients used during the grant rollout, including how they selected activities to conduct or services to offer and how they chose partners to be involved in implementing their grant. The following details two key considerations that emerged among several grant recipients.

4.2.1 Grant Recipients Hired Staff Attorneys and Other Support Staff to Help Implement the Grant

At the start of the grant, our goal was to hire some attorneys and create a subunit that is just for the representation for folks who were eligible under the HUD grant guidelines.

—Grant recipient staff member

During the initial program rollout, staff members of several grant recipients noted that they planned to hire attorneys, paralegals, and other administrative workers to support planned services and activities. One grant recipient staff mentioned the need to create a new subunit in which newly hired staff would deliver services to tenant households. Based on a review of grant recipients' quarterly narrative reports, grant recipients hired on average 6.5 full-time equivalents (FTEs) with the support of grant funding. Nearly all grant recipients reported hiring between 0.5 and 11 FTE staff attorneys; 17 recipients mentioned hiring between 0.5 and 12 FTE paralegals; and 10 recipients reported hiring between 0.5 and 4 FTE administrative staff roles, including managing attorneys, management personnel, social workers, court and eviction navigators, and mediators.

4.2.2 Grant Recipients Collaborated With Other Community Stakeholders to Determine Implementation Plans

When we started collaborating with other legal aid programs and bringing all of the intellectual capital together to think about things we could do differently, that is when the idea for a technology solution we have been working on implementing emerged.

—Grant recipient staff member

To deliver assistance to tenant households, grantees developed partnerships with other organizations. These partnerships were established in the form of subrecipient relationships with other legal aid service providers and collaborative partnerships with public institutions and nonprofit organizations.

Subrecipient Relationships. Grantees engaged other legal service providers to provide services for tenant households facing eviction in their service areas. Several grantees noted that they strategically selected potential subrecipients, aiming to partner with organizations that could address existing service delivery gaps. For example, one grantee noted that it collaborated with other legal aid programs to build expertise and devise effective strategies for the grant program's implementation. As a result of discussions with subrecipients, the grantee developed "an online document engine to build a file-ready pleading for a nonrepresented tenant household party." This online form is intended to expand eviction protection services among users while reducing the need to hire additional lawyers and social workers.

Grantees also partnered with subrecipients to ensure extensive coverage of their services. Staff of one grantee mentioned that collaborating with a subrecipient helped to divide coverage of the state to ensure that legal representation was available to tenant households facing eviction throughout the entire state. A staff member stated, “We provide services to 42 of the 64 counties, while [our partner] covers the other 22. By putting together a state[wide], collaborative effort, we knew that we were going to reach the entire state.” Furthermore, grantees partnered with subrecipients to support specific aspects of grantee activities, like helping with outreach to tenant households and marketing of services.

Collaborative Partnerships. Grant recipients partnered with public institutions and nonprofit organizations to offer complementary eviction-prevention and other supportive services to tenant households using mutual referrals. Types of supportive services include access to housing; social benefits such as the Supplemental Nutrition Assistance Program; and medical, financial, and employment services. An example of this form of partnership is between housing departments and grant recipients, whereby grant recipients connect tenant households with rental assistance programs. Several grant recipients reported involvement with either state or local implementation of rental assistance programs, especially during the COVID-19 pandemic. One grantee noted that such partnerships allowed more than 30 families to stay in their homes by making payments between \$500 and \$3,000 from other funding sources. Staff of another grantee stated, “We’ve also made a lot of referrals around rental assistance programs, like [ERA].”

Grantees partnered with community institutions, such as the courts, to create and promote eviction protection programs that reduce the burden of eviction cases on the docket. Moreover, grantees partnered with public libraries to bring education and outreach events close to tenant households so that they learn about their rights and available resources.

4.3 Challenges Grant Recipients Faced During Program Implementation and Effective Solutions

Interviews with grant recipient staff revealed several challenges faced during grant program implementation and the solutions devised to address them. This section presents the challenges according to the following themes: challenges during initial program implementation, partnership challenges during grant implementation, challenges reporting performance data, and challenges with outreach and participant engagement.

4.3.1 Challenges With Hiring Staff During Initial Program Implementation

I think that [especially] since the COVID-19 pandemic, it’s something that has affected everyone. Staffing has been a challenge, even getting applicants to apply. It has been difficult.

—Grant recipient staff member

At the initial stage of grant implementation, many grant recipients that aimed to hire staff to implement the grant faced recruitment challenges for various positions. This challenge coincided with the general hiring challenges experienced after the COVID-19 pandemic eased. Staff of one grantee noted the difficulty of finding and hiring staff with appropriate experience and job expertise. Staff of other grant recipients reported that their remote location and inability to provide competitive salaries added to the challenge of hiring new staff. Due to this staffing shortage, some grantees temporarily worked with internal staff, advocates, and paralegals to provide services.

Two examples illustrate the staffing challenges that grant recipients experienced.

- One grant recipient staff member stated, “The whole reason that I came over half-time on this grant was because we were never able to fill that position, and we needed an experienced housing attorney to also be involved.” This person noted that hiring turned out to be a greater challenge than anticipated, as attorneys were not applying for positions, particularly experienced attorneys.
- Another grant recipient staff expressed, “One challenge was in this climate where it’s very difficult to hire attorneys, especially at the rates at which legal aid attorneys are paid.” They further noted that fully staffing the grant, particularly with subrecipients, was difficult to execute in a prompt manner.

According to staff of one grant recipient, the personnel shortage hindered their capacity to execute some of their planned activities. This shortage limited the number of tenant households that grant recipients could reach and limited the extent of the services they could provide. Staff of one grant recipient indicated that because of their staffing shortage they initially struggled to start providing services within the timeframe HUD required. Furthermore, several grant recipients had to adjust project roles and redistribute responsibilities among existing staff.

4.3.2 Challenges With Partnerships During Grant Implementation

Most grant recipients have experienced few, if any, challenges in their interactions with partners. However, some grantee staff experienced difficulty coordinating activities with partner organizations. In terms of coordination, staff experienced some difficulty with organizing meetings, debriefing sessions, and communicating effectively with partners. Grant recipients found it challenging to create systems to share data and knowledge effectively, quickly, and efficiently between partners and to ensure the timely communication of cases and referrals between partners. According to grant recipient staff, these issues caused inefficient service delivery. For instance, one grantee noted that some partners refer tenants to them at the very last minute, sometimes a day before the lockout date, making it difficult for them to remedy the situation.

4.3.3 Challenges With Reporting Performance Data

Several grant recipients needed to adjust their existing case management systems to fulfill the reporting requirements of the grant program. Such adjustments involved creating additional data points (such as the home address of a tenant household, family income, and landlord information) and revising intake form questions to comply with HUD data reporting requirements. Some grant recipients found it hard to make these system adjustments because they were time consuming. One grant recipient staff noted that some questions made some tenant households uncomfortable. Indeed, some tenant households wondered how the questions were relevant to their housing situations. Four such examples illustrate the challenges of collecting these data.

- A staff member of one grant recipient noted that even though the staff understand the importance of collecting this information, the tenant households may not, making it hard to explain the reason for collecting the data. The staff member also noted that tenant households are often unaware they are receiving services with funds from EPGP and that the program requires grantees to collect this information.

- Another grant recipient staff also emphasized challenges in tenant household data collection: “It takes time, and people have questions. They ask, ‘Why do you need information on my income? Why my address, my landlord’s information?’” Staff noted that overcoming data collection barriers became a focus of the organization, with significant effort made to improve data collection since its first quarterly report.
- Concerning the physical address requirement, one grantee explained that their system had a five-digit ZIP Code system, but HUD requires the five-digit Zip Code plus the four-digit code. The grantee noted that even though it seemed like a minor detail, they had to hold several meetings to change the way they conducted intake. They also trained staff to do intake differently to meet these data reporting requirements.
- Another grant recipient staff reported, “When data is going into this black box, there are always questions about that, especially when collecting data from community members [who are considered] vulnerable.” Staff expressed that tenant households’ hesitation to provide this information partly stems from their awareness that the data are collected for a federal agency. Consequently, staff recommended clearer communication regarding how the federal agency will use the data or, alternatively, collecting less personal information from tenant households.

Grant recipients also noted the burden of periodically reporting financial data into the Disaster Recovery Grant Reporting System and the associated challenge of ensuring that tenant household information conformed with HUD reporting guidelines. Grant recipients acknowledged that the financial reporting process became less cumbersome and more user friendly with regular use.

4.3.4 Challenges With Outreach and Tenant Household Engagement

Other implementation challenges that grant recipient staff commonly cited involved their outreach efforts. More specifically, they experienced difficulty reaching out to tenant households in remote areas, faced communication barriers, and encountered households skeptical and mistrustful of government aid.

Difficulty Reaching out to Tenant Households in Remote Areas. One grantee staff member noted that some outlying areas are several hours away from their offices. This issue was exacerbated by the struggle to fill attorney positions in those areas. Another grant recipient staff pointed out that some courts are so far away that their attorneys must travel great distances to reach the courts.

Communication Barriers. Several grantees mentioned communication barriers to outreach, especially among tenant households with limited English proficiency, elderly persons with dementia, individuals with mental health issues, and individuals with inconsistent phone service. Still, grant recipients sought to use translation services and to communicate effectively with households with limited English proficiency. For tenant households with inconsistent phone service, staff had difficulty maintaining regular communication because these households could be out of phone service for long periods due to unpaid phone bills.

Skepticism or Mistrust Among Tenant Households. Grant recipients mentioned that some tenant households found the notion of “free legal representation” suspicious, especially in areas where grant recipients do not already have an established presence. One grant

recipient staff member stated, “I think there’s just generally a skepticism in a lot of these communities where we haven’t been previously, like it sounds too good to be true. ‘All of a sudden, there’s somebody who’s going to show up and be my lawyer for free?’” According to grant recipient staff, this concern makes some people unwilling to apply for assistance.

4.4 Strategies Grant Recipients Used to Address Outreach Challenges

Grant recipients used HUD grant funding to expand their existing outreach efforts, increasing the scope of their outreach and using new outreach methods to better reach and serve potential tenant households. Some of the most effective approaches included using diverse nondigital and digital media, participating in community events, and establishing temporary office stations in high-traffic community areas. Increased community outreach resulted in serving more tenant households. One grant recipient staff member reported that expanding outreach efforts increased the amount of legal advice they provided by 85 percent and the amount of document preparation by 40 percent. The evaluation team observed that the effectiveness of outreach methods varied across grant recipients, depending on the level of community awareness of their services and whether the communities are in urban or rural areas. For example, door-to-door knocking was less effective in certain rural communities where community awareness of these services was limited. In contrast, door-to-door events proved to be more successful in urban communities that were more familiar with the program.

Nondigital Media. Nearly all grant recipients used local media to publicize their services, including giving media interviews and broadcasting their services through radio stations, billboards, public service announcements, alternative and ethnic media, user-friendly printed materials, flyers, yard and community signs, door hangers, news articles, and television advertisements. Materials were often displayed in libraries, churches, and other venues open to the public.

Digital Media and Technological Solutions. Several grant recipient staff noted using digital media and technologies for their outreach efforts, including social media, websites, videos, streaming radio, Google Ads, and listservs. They also conducted intake interviews in multiple ways (such as in-person, by phone, or online) and used geographic mapping and eviction data to identify low-income areas at greater risk of eviction. One grant recipient developed a software application to increase awareness of tenant household rights, legal services available to tenants, and how to self-represent in court. Another grant recipient used HUD grant funds to build an online interview form—referred to as the “Eviction Defense Form-Builder”—which can construct a customized case file for the individual without legal representation, helping them represent themselves in court. These technologies helped to expand grant recipients’ reach to households that would otherwise lack access to information that an attorney would normally provide. Staff mentioned that these tools help educate tenant households about their rights and effective self-representation.

Community Events. Several grant recipients conducted in-person or virtual community events, either independently or with community partners. These events included educational seminars and workshops designed to deliver services to tenant households. Examples of these gatherings are—

- Ask-a-Lawyer events.
- Tenant’s rights courses.

- Fair housing workshops.
- Door-to-door walks to increase awareness.
- Legal clinics.
- Grantee presentations at community events like neighborhood planning unit meetings.

Many of these activities existed prior to the grant program, but the additional program funding enabled organizations to expand these activities. For example, grant recipient staff used these funds to adapt legal clinics to the needs of tenant households that struggled to find rental units because of past evictions.

Leveraging High-Traffic Community Areas. Another popular outreach strategy involved setting up information desks, conducting presentations, and distributing informational pamphlets in high-traffic community areas like festivals, markets, grocery stores, hospitals, and fairs. These forms of outreach allowed grant recipients to engage with the community and provide firsthand information about available services, thus fostering direct and impactful connections with tenant households and better and deeper understanding of the program and its services. Some grant recipients placed their offices near local courts, providing easy access to legal representation for households during eviction dockets and housing court days. Being close to courts makes it easy for these grant recipients to conduct household intake and other court-related administrative tasks. As one staff member noted, “Because we are housed in the courthouse, one of our strategies is to inform the Superior State Court and Magistrate Court Clerks of the services we offer. We let them know we are here for tenants, so they know where to direct tenants who are facing evictions.” Several grant recipients noted that meeting tenant households in these high-traffic areas—which may be close to their homes, partner agencies, community centers, or courthouses—has increased the communities’ awareness of available eviction-related legal services.

4.5 Successes Grant Recipients Experienced During Program Implementation

Grant recipients reported a variety of successes during the grant implementation process. This process often leveraged a multifaceted approach to enhance the impact of legal aid and supportive services. Such an approach involves use of digital technologies, community collaboration, outreach efforts, data management, and commitment to diversity and accessibility. This section presents staff perceptions of the grant program’s early implementation successes.

4.5.1 Grant Recipients Scaled up Existing Services

Like I said, we were partnering with a [local legal aid] before the HUD grant program but just on a smaller scale...We were familiar with how we needed to scale up...if there was some expanded funding. We understood that we needed to reach out to property managers and landlords and develop those relationships...

—Grant recipient staff member

Most grant recipients used funding to scale up services. According to several grant recipients, they were able to scale up by hiring more staff and allocating more resources for services to tenant households. Grant recipients also leveraged their community partnerships, especially with property managers and landlords, to notify tenant households of eviction-related services. One grant recipient staff underscored the need to establish

relationships with property managers and landlords, who sometimes play a role in informing residents of available services. Three examples illustrate the extent to which grant recipients collaborated with landlords and housing agencies to increase awareness of their services and prevent eviction.

- One grant recipient staff member stated, “We have developed relationships with landlords where we informed them of our resources so that when they do encounter pro se tenants who are not well-informed or know about the eviction process, they can tell them: ‘Well, go to this place where you can find free legal services.’”³⁷ The staff member noted that, “That’s the way we partner up and market our program to new clients and strategize just to let our presence [be] known across the board.”
- Another grant recipient staff member expressed, “We were familiar with how we needed to scale up or what we would do if there was some expanded funding. We understood that we definitely needed to be able to reach out to property managers and landlords and develop those relationships. We wanted to be out in the community more, reaching out to residents on property.” According to the staff member, the aim of engaging with landlords and property managers is to reach tenant households facing eviction well before their court dates to reduce the default rate of approximately 40 percent for households.
- Owing their strong presence in the community to their relationship with landlords, a staff member of yet another grant recipient noted, “We are constantly meeting with different agencies about our services. We just had a landlord focus group last week, so we’re always trying to get input from landlord partners on our services and things we can do to improve and enhance relations.”

4.5.2 Partnerships Were Used to Offer Grant Services and Ensure Successful Implementation

Partnerships with other organizations have been key to successfully implementing most grant activities. As stated in chapter 2, prior to EPGP, most grant recipients operated within a network of service providers, and partnerships were built over years or even decades of collaboration. Staff of several grant recipients reported that the program helped expand collaborative networks between various service organizations in multiple communities, allowing new partnerships to form and solidify. Indeed, one grant recipient staff reported that HUD grant funding allowed them to leverage multiple partnerships, giving them the capacity to provide legal aid services to more tenant households. Another grant recipient staff expressed that this expansion and the efforts made to strengthen partnerships led to improved service delivery.

Ultimately, better partnerships have allowed organizations to increase the number of people they reach. Staff of several grant recipients emphasized that their partnerships significantly enhanced their ability to reach new tenant households, connect these households with essential supportive services to holistically address their needs, foster trust in the grant recipients’ communities, and mobilize tenant households to educate them

³⁷ A pro se litigant is someone who decides to represent himself or herself before a court without the assistance of a trained and licensed attorney: <https://psc.sc.gov/publications/pro-se-litigant-guide>.

about tenant rights and available legal services. Staff provided insights on how better partnerships have led to improvements in service delivery in the following ways.

- One grant recipient staff member noted that they partnered with community institutions like the courts to establish and promote eviction protection programs that reduce the burden of eviction cases on the docket. They further noted partnerships with institutions like public libraries helped to bring education and outreach events close to tenant households to inform them about their rights and available resources. As a result of these new partnerships, outreach events are well attended, proving to be a viable way to reach tenant households.
- Staff for another grant recipient noted that partnerships have helped to broaden their reach, expanding their service coverage to more remote areas “with less access to essential services and infrastructure.”
- Another grant recipient staff member mentioned that partnerships helped them to identify other services they can offer tenant households and to adopt a more holistic approach to serving tenant participants. This individual further stated that cross-referral between partners helped increase outreach and the number of tenant households participating in the program.
- A grant recipient staff member noted that they use two hotlines (one for legal aid and one for housing) administered by a partner through the grant funds. These lines are used to answer questions about legal representation and provide general information to households.

4.5.3 Flexibility in the Implementation Process Ensured Efficient Service Delivery

This grant is really one of the first funding sources where there’s staff dedicated just to evictions instead of dedicated to evictions and 12 other different types of law.

—Grant recipient staff member

Most grant recipients noted several flexible aspects of EPGP that contributed to the program’s effectiveness and adaptability. Although not exhaustive, the list highlights the main ones that grant recipients touted.

- **No Cost-Sharing or Matching-Funds Requirement.** Many grant recipient staff noted that the absence of a cost-share or fund-match requirement streamlines the process of accessing grant funds, saving staff the time and effort required to secure funds to meet the grant application requirements (GAO, 2022).
- **Broad Household Eligibility Requirements.** Staff of several grant recipients noted that the program’s broader eligibility criteria for tenant households significantly expanded their reach. Households qualify for services if they are tenants, low income, and at risk of or subject to eviction. The staff emphasized that this flexibility enabled them to circumvent the constraints imposed by rigid eligibility requirements—such as citizenship and income requirements—which are often encountered in other grant programs. EPGP defines “low income” as family income less than or equal to 80 percent of the local Area Median Income (AMI), which differs significantly from other funding programs, such as Legal Services Corporation (LSC) grants in which the low-income eligibility threshold is set at family income less than or equal to 125 percent of the local poverty level. For example, in Dallas County,

Texas, where the local AMI was \$70,871 in 2022, household income must be less than \$56,697 for EPGP eligibility (U.S. Census Bureau, 2024). Based on the poverty level of \$29,950 for a family of four in Texas in 2022, eligibility for the LSC-funded programs in Dallas is limited to households with family income not exceeding \$37,437.³⁸ The grant recipient staff emphasized that EPGP's higher income eligibility threshold enabled them to extend services to tenant households that otherwise would not be eligible to receive legal and eviction-related support.

- **Ability to Hire New Staff.** Grant recipients underscored the program's flexibility in how they allocate the funds to various aspects of their programs, including hiring new staff. Grant recipients frequently reported using grant funding to hire staff, such as lawyers, advocates, and paralegals to work directly with tenants, administrative assistants to help legal services organizations operate smoothly, and social workers and navigators to complement the legal work by connecting tenants with other supportive services in their communities. The EPGP Notice of Funding Opportunity's definition of legal services encompasses a broader range of services. For example, under EPGP, grant recipients can use the funds to hire case managers and navigators, whereas LSC grants typically restrict the hiring of staff to attorneys, legal assistants, and paralegals.
- **Ability to Fund Subrecipients.** The ability to fund subrecipients was another flexible aspect of the program that grant recipients hailed. It enabled grantees to strategically use established relationships with other organizations to expand or enhance their existing services and to offer new and complementary services.

Overall, grant recipients largely agreed that the grant presented an opportunity to offer services that were satisfactory to all parties involved, leading to higher success rates.

³⁸ U.S. Department of Health and Human Services Guidelines for 2022 poverty income for a family of four: <https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf>.

Chapter 5: Conclusion

This interim report describes the implementation of the Eviction Protection Grant Program (EPGP) through November 2023. It describes the characteristics of the 21 grantees and 48 subrecipients and the households they served with closed cases as of June 2023. This report includes early insights into the initial program rollout from the perspective of grant recipient staff, and this chapter summarizes the key findings at this stage of the evaluation, discusses lessons learned during implementation, and describes next steps.

5.1 Key Findings

To date, EPGP has funded 69 diverse organizations across 19 states, offering a combination of legal assistance and complementary services (such as education, outreach, and fair housing defense) to low-income tenant households facing eviction. Since June 2023, these organizations have collectively served more than 14,000 tenant households with demographic characteristics similar to groups identified as experiencing a higher risk of formal eviction nationally, including women, Blacks and African-Americans, and households with children.

Challenges grant recipients experienced during initial program implementation included hiring experienced staff, coordinating activities with partners, complying with HUD data reporting, and reaching certain populations (such as households in remote areas, non-English speakers, and people with misgivings about government aid). Grant recipients employed various outreach strategies to extend their reach and services to a broader spectrum of tenant households. Successful approaches included leveraging nondigital and digital media, participating in community events, and establishing temporary office stations in high-traffic community areas. Grant recipients highlighted the flexible aspects of the program, such as the absence of a cost sharing or matching funds requirement, the broad eligibility requirements for households receiving services, and allowing grant recipients to use the funds to hire new legal and support staff. This flexibility enabled grant recipients to expand service reach, collaborate with new or existing partners, and provide crucial legal and complementary services to a broader range of households.

5.2 Lessons Learned Related to Program Implementation

At this stage in the evaluation, the evaluation team has drawn key insights from the program data available as of June 2023 and the interviews with grant recipients to highlight implementation successes and challenges. Lessons learned include acknowledging the significance of collaborating with organizational partners, the value of funding flexibility, and the need to support grant recipients in meeting reporting obligations. Five key insights to inform HUD's future grant funding are—

- **The successes of grant recipients underscore the importance of a comprehensive approach to program implementation during the initial rollout phase.** Grantees prioritized recruiting new staff (such as lawyers, social workers, paralegals, and administrative assistants) and pursuing partnerships with subrecipients and other community agencies and institutions to address the diverse needs of households. Grantees that developed a comprehensive approach to grant planning during rollout, combining internal capacity-building with external collaboration, saw more effective results and enhanced service delivery during implementation.

Recommendations include selecting grant applicants that adopt a comprehensive approach, combining internal capacity-building and external collaboration to achieve effective implementation of grant-funded activities. For example, HUD can emphasize the importance of a comprehensive approach during webinar sessions in the grant application phase. Once HUD awards the grants, it can provide technical assistance to grant recipients with regard to hiring new staff and establishing effective communication strategies and collaborative partnerships.

- **Partners are vital to successfully implementing grant activities.** The success of grant activities often hinges on partnerships with other organizations. Collaborating with existing networks of service providers, usually cultivated over decades, played a crucial role. EPGP acted as the catalyst for these collaborative networks to expand to multiple communities. Grantees stressed how these partnerships enhanced legal aid services, expanded reach, and built trust in communities, demonstrating the impact of strategic collaboration on service delivery and community engagement.

Recommendations include selecting grant applicants that have robust partnerships with community organizations at the application stage and encouraging collaborations that significantly contribute to the success of grant activities. For example, HUD should consider strategies that encourage and enable grant applicants to cultivate and leverage such collaborations during the application phase of future grants.

- **A combination of diverse outreach methods and technological innovation is crucial to successful program implementation.** Multiple grant recipients diversified their outreach efforts, using both traditional nondigital media (interviews, radio, and billboards) and modern digital tools (websites, social media, and specialized software applications). This comprehensive approach maximized outreach to various audiences based on audience preferences and access points. Direct community engagement was invaluable to the program's implementation as the success of educational seminars, legal clinics, and offices in high-traffic community areas demonstrates. Grant recipients leveraged the grant to scale up existing activities, tailoring them to increase access. Offering remote services in convenient, busy locations (such as local courts and grocery stores) helped grant recipients reach tenant households in places where they are likely to frequent or seek assistance. Outreach efforts and their effectiveness varied significantly among grantees, possibly due to factors like organization size, outreach experience, staffing, and local political climate.

Recommendations include creating a conference or community of practice for grant recipients to share knowledge (such as best practices and lessons learned), pool resources, solve problems collaboratively, and celebrate successful outreach initiatives and community engagement. Information from the conference or community of practice can be hosted on a public website that is accessible to other nonfunded organizations. Such a resource not only builds the capacity of these organizations but also contributes to the wider sector by providing valuable insights, fostering collaboration, and improving outreach for similar organizations.

- **Further assistance might be needed to help grantees fulfill the program's reporting requirements.** Grant recipients faced challenges with reporting requirements. Smaller organizations and organizations in nontraditional legal aid

services had difficulty navigating the Disaster Recovery Grant Reporting (DRGR) System and completing Form 52698, which requires households to provide personal information and information in formats that required grantees to adapt existing case management systems, such as nine-digit ZIP Codes. Staff raised concerns about privacy intrusion and tenant households' reluctance to provide personal information to a federal agency.

Recommendations include training staff on the relevance of collecting personal data, providing them with resources to aid in privacy-related discussions with tenant households, and developing a comprehensive Frequently Asked Questions guide to answer queries. Independently of the evaluation, as of February 2024, HUD has already contracted a firm to provide technical assistance to the grantees and plans to implement some of these items in response to the direct feedback HUD received from grant recipients. Alternatively, as most grant recipients receive funding from Legal Services Corporation (LSC), aligning HUD data requirements and definitions with those of LSC can further reduce the monitoring and staff training burden on grantees. For smaller grantees without a standardized case management system, HUD can provide access to a standardized system with preprogrammed definitions, which would reduce operational delays due to purchasing and implementing a new system. Both efforts can ensure that definitions are consistently applied to grant-related activities and that data recording is accurate.

- **The broader EPGP household eligibility requirements helped grant recipients provide services to tenant households that may not be eligible otherwise.** Early indications reveal grantees' positive reception of the grant program. During interviews, grant recipient staff often praised the flexibility of the grant and described the significant impact the funding had on the ability to offer legal aid services to tenants in their communities.

Recommendations include retaining funding flexibility in future grant awards and maintaining the same eligibility criteria for grant awards, services, and beneficiaries.

5.3 Next Steps for the Evaluation Study

In the next phase of the evaluation, the evaluation team will collect more qualitative data by conducting a second round of interviews with grant recipients to take place between March and April 2024. The evaluation team will conduct one-on-one interviews with tenant households served through grants funded in May 2022 and will combine this information with data collected during the first round of focus groups and one-on-one interviews with tenant households served from grants funded in November 2021. Together, the findings will document the perspectives of tenant households and help the evaluation team better understand the program's implementation and impact.

The two rounds of primary data collection will allow the evaluation team to capture information on the overall experience of grant recipients and tenant households to determine which services both parties found to be most effective, what other implementation challenges emerged, and what strategies grant recipients used to address them. The evaluation team also expects to learn more about the HUD program team's role in monitoring the grant program.

Beyond the qualitative work associated with primary data collection, the evaluation team will analyze program data that grantees submitted to the DRGR System. Specifically, the

evaluation team will continue analyzing the demographic, socioeconomic, and housing characteristics of the households that received services through June 30, 2024.

The evaluation team will conduct a quantitative analysis of the information related to services and outcomes collected in HUD Form 52698 to characterize the services that household received and the effect of those services on household outcomes in relation to the eviction matter. This quantitative research will include a multi-regression analysis to identify any services that resulted in positive or improved outcomes for low-income tenant households.

Following the second round of data collection and analysis, the evaluation team will produce a final report that will include a complete analysis of grantees' experiences with grant implementation spanning the period from when HUD awarded the grant through June 30, 2024. Expected submission of the final report to HUD is late 2024.

Appendix A: Data Collection

This appendix discusses data sources and the data collected to date. In collecting and analyzing primary program data and analyzing secondary program data completed as of November 15, 2023, the interim report addresses the following research questions (exhibit A-1).

Exhibit A-1. Research Questions Addressed in the Interim Report and Associated Data Sources

Research Questions	Primary Data Collection Round 1: Semi-Structured Interviews: HUD Staff	Primary Data Collection Round 1: Semi-Structured Interviews: Grant Recipient Staff	Document Review: Using Grantee Applications, Grantee Action Plans, and Quarterly Performance Reports	Analysis of Households' Characteristics, Services, and Outcomes Data: Using HUD Form 52698
RQ1. What are the experiences of program staff, grantees, and subrecipients* in the implementation of the Eviction Protection Grant Program?	✓	✓	-	-
RQ1a. What are the successes and challenges experienced by program staff, grantees, and subrecipients?	✓	✓	✓	-
RQ3. What are the characteristics of the grantees and subrecipients?	-	-	✓	✓
RQ3a. What types of organizations received grant funding?	✓	-	✓	✓
RQ3b. What are the characteristics of the service areas of grantees and subrecipients?	✓	✓	✓	✓
RQ4. How do grantees work with housing providers, legal service providers, and other social service providers to deliver assistance?	-	✓	✓	✓
RQ4a. How do grantees support tenants by connecting them to, or leveraging, other social services not offered through the Eviction Protection Grant Program?	-	✓	✓	✓
RQ5. What were the successes and challenges grantees and subrecipients experienced while administering the grant from a financial management perspective?	✓	✓	✓	✓
RQ6. How do grantee organizations identify and market the program to clients?	-	✓	✓	-
RQ6b. What challenges, if any, did the grantees face in conducting outreach and providing services to groups at high risk of eviction? Why?	-	✓	-	-
RQ9. What are the characteristics of tenant households?	-	-	✓	✓
RQ9a. Do the tenant households reflect the characteristics of people at a high risk of eviction nationwide?	-	-	✓	✓
RQ9b. To what extent was legal assistance delivered to high-need groups at risk of eviction, including low-income individuals, people of color, persons with limited English proficiency, persons with disabilities, and those living in rural areas?	-	✓	✓	✓
RQ10. How many households were served over the course [to date] of the Eviction Protection Grant Program?	-	-	✓	✓

Notes: A checkmark (✓) means that a data source addressed the research question. A dash (-) means that a data source did not respond to the research question.

Primary Data Collection

Primary data collection takes place at two separate points in time. This interim report covers the first round of data collection, which includes one interview with HUD staff, 21 interviews with grantee staff, 21 interviews with staff from a subset of selected subrecipients, and focus groups or one-on-one interviews with tenant households from nine grantees funded in November 2021.³⁹ The first round of data collection concluded on November 30, 2023. Appendix C includes the instruments for the interviews and focus groups.

Primary Data Collection Process Related to the Interim Report

The evaluation team received approval for primary data collection from the Office of Management and Budget on August 31, 2023.

HUD Staff Recruitment and HUD Staff Interview. The HUD Contracting Officer's Representative helped the evaluation team identify and contact HUD program staff that had knowledge of program design and implementation. The evaluation team conducted an interview with five HUD staff members on October 12, 2023.

Grantee Staff Recruitment and Grantee Staff Interviews. HUD sent an initial outreach e-mail, using a template that the evaluation team provided, to each grantee point of contact. The evaluation team scheduled an initial call with all 21 grantees, to provide details about the study and to allow grantees to ask questions. Finally, the evaluation team worked with each grantee to create a list of appropriate grant recipient staff members for interview. The evaluation team also worked with nine of the grantees that received funding in November 2021 to strategize ways to recruit households for the focus groups. An evaluation team member was assigned to each grantee to streamline the recruitment and scheduling processes for the interviews and focus groups.

To facilitate the recruitment of grantee staff, subrecipient staff, and households that received services through grants funded in November 2021, the evaluation team maintained ongoing communication with grantees through their point of contact throughout the data collection process.

Once grantee staff were identified, the evaluation team sent an outreach e-mail to recruit them. Exhibit A-2 provides details of grant recipient staff interviews. The evaluation team conducted a single interview attended by one to six grantee staff members (at the discretion of the grantee point of contact or respondents, or both) in this round of data collection. Individuals selected for interviews had specific knowledge of the program that the evaluation team needed to help address the research questions. They included the point of contact, grant manager, lead legal aid counselor, housing service provider, and finance staff or monitoring staff.

³⁹ The evaluation team will analyze the data from the household focus groups during the next phase of the study and will report the findings in the final report (expected early to mid-2025). One grantee, the Legal Aid Society of Northeastern New York, did not serve any households as of November 15, 2023. As a result, the evaluation team could not conduct a focus group with households from this grantee.

Exhibit A-2. Details of Grantee and Subrecipient Staff Interviews Conducted for Round 1 of Data Collection and Included in the Interim Report

Grantee	Subrecipient	# of Participants	Date Conducted
Advocates for Basic Legal Equality	-	3	October 22, 2023
-	Legal Aid of Western Ohio	1	October 31, 2023
Atlanta Volunteer Lawyers Foundation	-	6	October 26, 2023
Community Legal Aid, Inc.	-	2	September 28, 2023
-	Combined Interview with Greater Boston Legal Services (1), MetroWest Legal Services (1), Northeast Legal Aid (1), and South Coastal Communities Legal Services (1)	4	October 4, 2023
Connecticut Fair Housing	-	3	October 12, 2023
-	Combined Interview with Connecticut Bar Foundation (1) and University of Connecticut Law School (2)	3	October 16, 2023
-	Combined Interview with Statewide Legal Services of Connecticut (2) and Connecticut Veteran Legal Center (2)	4	October 22, 2023
Idaho Legal Aid Services	-	3	October 2, 2023
-	Combined Interview with Jesse Tree of Idaho (3) and Intermountain Fair Housing Council (3)	6	October 4, 2023
-	Combined Interview with Utah Legal Services Association (2) and Montana Legal Service (2)	4	October 23, 2023
Jacksonville Area Legal Aid	-	4	September 27, 2023
-	Legal Aid Society of Palm Beach County, Inc.	1	September 26, 2023
Legal Aid Center of Southern Nevada	-	3	October 23, 2026
Legal Services of Eastern Missouri	-	6	October 22, 2023
-	Metropolitan St. Louis Equal Housing Opportunity Council (EHOC)*	1	November 13, 2023
-	Legal Aid of Western Missouri	3	October 26, 2023
-	Legal Services of Southern Missouri**	1	November 14, 2023
-	Mid-Missouri Legal Services Corporation**	2	November 9, 2023
Legal Aid Society of Northeastern New York	-	1	October 25, 2023

Grantee	Subrecipient	# of Participants	Date Conducted
Legal Assistance of Western New York	-	5	October 12, 2023
-	Combined Interview with Legal Aid Society of Rochester (2) and JustCause (2)	4	October 11, 2023
Acadiana Legal Service Corporation	-	3	October 19, 2023
-	Southeast Louisiana Legal Services Corporation	1	October 16, 2023
City of San Antonio	-	2	October 12, 2023
-	Combined Interview with St. Mary's School of Law's Center for Legal and Social Justice (2) and Texas RioGrande Legal Aid (2)	4	October 27, 2023
Legal Aid Services of Oklahoma	-	2	October 23, 2023
-	Fox Strategies	1	October 26, 2023
Legal Services of Greater Miami	-	3	October 12, 2023
-	Community Justice Project, Inc.	3	October 31, 2023
Legal Services of Hudson Valley	-	3	October 19, 2023
-	Combined Interview with Community Voices Heard (1) and Hudson Valley Justice (1)	2	October 12, 2023
Legal Services of New Jersey	-	3	October 20, 2023
-	Southern Jersey Legal Services	1	October 24, 2023
Legal Services of San Bernardino	-	2	October 10, 2023
Northern Manhattan Improvement Corporation	-	3	September 29, 2023
-	Combined Interview with TakeRoot Justice (2) and Community Action for Safe Apartments (1)	3	October 17, 2023
-	Combined Interview with Met Council (1) and Northwest Bronx Community and Clergy Coalition, Inc. (1)	2	October 13, 2023
One80 Place	-	3	October 16, 2023
-	Charleston Legal Access	2	October 25, 2023
Pine Tree Legal Assistance	-	3	October 30, 2023

Grantee	Subrecipient	# of Participants	Date Conducted
West Tennessee Legal Services	-	2	October 9, 2023
-	Combined Interview with Legal Aid of East Tennessee (1), Legal Aid Society of Middle Tennessee and the Cumberland (1), and Memphis Area Legal Services (1)	3	October 25, 2023

*EHOC changed from the role of subrecipient to contractor because of the type of work they provided the grantee. Due to staffing constraints, EHOC could no longer provide direct legal representation to households. They are now contracted to provide legal training and support for public legal education and outreach efforts.

**Due to a scheduling conflict, the combined interview with Legal Services of Southern Missouri and Mid-Missouri Legal Services Corporation was split into two interviews.

Selection of Subrecipients. Of the 21 grantees, 16 grantees partnered with between one and five subrecipients to help implement the program. Five grantees had no subrecipients. The evaluation team worked with each of the 16 grantees to determine if it was appropriate and possible to interview two or more subrecipients at the same time.

Subrecipient Staff Recruitment and Subsequent Interviews. Recruiting subrecipient staff followed the same recruitment protocol for grantee staff. The grantee was the point of contact who identified suitable subrecipient staff for interview and sent an e-mail to make the introductions. Alternatively, the grantee shared subrecipient staff contact information with the evaluation team so that they could contact subrecipient staff members. Overall, the evaluation team interviewed 34 subrecipients through 21 interviews involving one to six subrecipient staff members (at the discretion of the grantee point of contact or respondents, or both). Like the grantee staff, subrecipient staff members were selected based on their specific knowledge of the program, which the evaluation team needed to help address the research questions.

Secondary Data Collection

Process for Collecting Reports and Documents

This report contains information from HUD program documents, such as the Notice of Funding Opportunity (NOFO) and Terms and Conditions and documents submitted by grantees as of September 30, 2023. HUD provided the evaluation team with the NOFO, Terms and Conditions, and grantee applications. The evaluation team gathered the reports and documents that the 21 grantees submitted to the Disaster Recovery Grant Reporting (DRGR) System. Exhibit A-3 lists these data sources.

Exhibit A-3. Types of Documents Reviewed for the Interim Report

Document Type (Number)	Document Description
Grantee Applications (21)	<p>Grantees submit this document to apply for the grant. Grantee applications include—</p> <ul style="list-style-type: none"> ▪ An overview of the activities that each grantee planned to undertake. ▪ Summaries of staff qualifications and budgets. ▪ Project evaluation services. ▪ Outreach and marketing efforts. ▪ Household intake and provision of legal representation. <p>The grantee applications detail grantee experience in providing eviction-related services.</p>

Document Type (Number)	Document Description
<p>Grantee Action Plans (21)</p>	<p>Action plans include—</p> <ul style="list-style-type: none"> ▪ Activity descriptions. ▪ Procedures for administering the grant. ▪ Data collection approach. ▪ Details on the allocation of services. <p>Action plans summarize the grantees' approach to program implementation and provide information regarding the—</p> <ul style="list-style-type: none"> ▪ Target population. ▪ Activity descriptions on marketing and outreach efforts. ▪ Types and methods for providing services to households. ▪ Budgets. ▪ Data collection approach. <p>Grantees develop and submit action plans once HUD executes the grant agreement. They submit action plans at the beginning of the project and update them quarterly to report performance accomplishments (HUD, 2022).</p>
<p>Quarterly Performance Reports (93 reports)</p>	<p>The quarterly performance reports consist of quarterly narrative reports, quarterly client activity reports, and Federal Financial Report Standard Form 425 (FFR SF-425). The evaluation team reviewed the quarterly narrative reports and the quarterly client activity reports for this interim report.</p> <p>The quarterly narrative reports reflect activities undertaken, obstacles encountered, solutions found, and accomplishments. These reports also include summative information such as—</p> <ul style="list-style-type: none"> ▪ A quantitative summary of households served, including for outreach events. ▪ Description and distribution details of outreach materials or technology products. ▪ Services provided included outreach events. ▪ Outcomes for cases closed during the quarter. <p>The quarterly client activity reports include individual and household-level data for cases closed during each calendar quarter using the HUD Form 52698—Client Services and Outcomes Report.</p> <p>Grantees submit a performance report for all quarters but the eighth/last quarter in which they submit a final report. Altogether each grantee submits at least eight reports: seven quarterly reports and one final report.*</p>
<p>Program Notice of Funding Opportunity (NOFO)</p>	<p>The evaluation team reviewed the program description and grantee selection (described in the NOFO). The NOFO describes the program, the objectives, and the applicant eligibility criteria. This document is available at https://www.hud.gov/sites/dfiles/SPM/documents/EvictionProtectionGrantProgramFR-6500-N-79.pdf.</p>
<p>Grant Terms and Conditions</p>	<p>The Terms and Conditions provide the program requirements, an overview of award implementation, and terms associated with the program. The evaluation team reviewed the Terms and Conditions to identify information to support data from the quarterly performance reports and action plans submitted by grant recipients.</p>

*The evaluation team will review final reports when they are available. Final reports summarize the full range of program activities, along with plan execution, success stories, and lessons learned during implementation.

Quantitative Data Sources

Each quarter the grantee submits a spreadsheet aggregating data from the HUD Form 52698—Client Services and Outcomes Report for all households that completed participation in the program and had their cases closed within the past quarter. This tenant and household-level data capture many details about presenting tenants and their

household members, such as demographic, socioeconomic, and housing information, the highest level of service received, and household outcomes. Appendix E provides a copy of HUD Form 52698, including a data dictionary of the variables captured by the grant recipients and submitted to HUD.

The grantee submits de-identified household data using HUD Form 52698. Each form is associated with a specific client ID. Each household's data are completed and submitted at the end of each quarter. By collecting and merging the quarterly client reports of each grant period for each grantee, the evaluation team will have complete information for all households the grant recipients served.

To determine which households live in urban or rural communities, the evaluation team geocoded household addresses and overlaid their locations with U.S Census Bureau's urban-rural classifications. However, the evaluation team could only geocode geographical information (ZIP Code, city, county, and state) the grantees provided. Thus, the geographical mapping approximates the precise location.⁴⁰

The evaluation team collected data that the grantees submitted as Excel spreadsheets from the DRGR System. The number and format of the data spreadsheets varied among grantees.

For the descriptive analysis in chapter 3, the evaluation team extracted this household-level data from 122 Excel spreadsheets for 20 grantees and subrecipients with HUD Form 52698 data that were available on the DRGR System as of September 30, 2023.⁴¹

⁴⁰ Some grantees, like the Atlanta Volunteer Lawyers Foundation and Connecticut Fair Housing Center, provided only ZIP Code information and not the full address. Northern Manhattan Improvement Corporation and West Tennessee Legal Services did not provide any ZIP Code information.

⁴¹ Some of the subrecipients submitted the data from HUD Form 52698 separately from the grantee. In other cases, the grantee collated the information from the subrecipients and submitted the data in one spreadsheet. As a result, the evaluation team downloaded 122 Excel spreadsheets from the DRGR System instead of 104 for the 21 grantees.

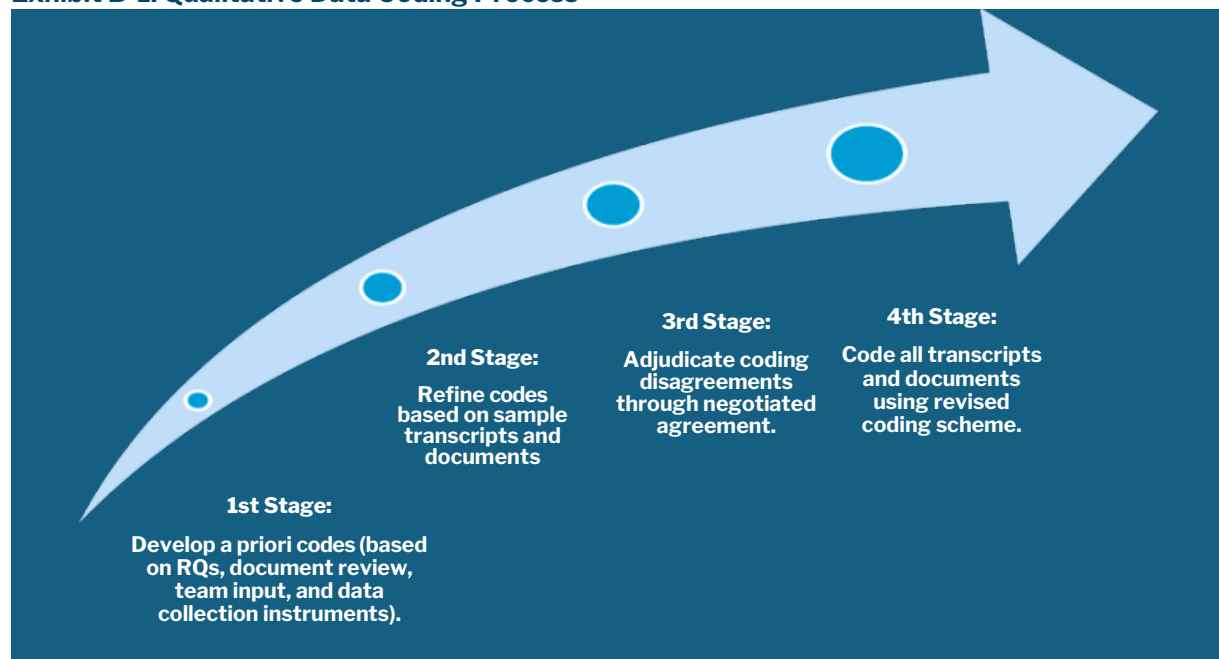
Appendix B: Analytical Methods

This appendix discusses the analysis methods for the data collected in the first round and presented in this interim report.

Analysis of Primary Data and Document Review

This section describes the multistep coding process that the evaluation team used to conduct a rigorous qualitative analysis of all data collected from interviews with HUD staff and grant recipient staff (exhibit B-1). The evaluation team followed a similar process when reviewing data from documents that grantees submitted. These materials included grantee applications, action plans, and quarterly narrative reports.

Exhibit B-1. Qualitative Data Coding Process



RQs = research questions.

Prior to coding, the evaluation team imported the data into the NVivo qualitative analysis software. The team classified the transcripts and program documents and assigned them to the appropriate source (for example, document review and document type; and role as grantee staff, subrecipient staff, or HUD program staff). The data analysis was designed to align with the associated research questions outlined in exhibit A-1.

First, the team established themes or topics based on the research questions (for the document review) and interview guides (for HUD staff and grant recipient staff). The evaluation team then grouped similar themes together into broader categories, called “overarching codes.” Under each overarching code, the evaluation team delved deeper to identify more specific themes. This process involved carefully reading a sample of transcripts and related documents (such as grantee applications and quarterly progress reports). To ensure that the coding process was consistent and accurate, multiple team members reviewed and coded the first six transcripts independently. Whenever differences in interpretation occurred, the evaluation team discussed and resolved these differences to ensure uniformity. For quality control purposes, one team member coded all the transcripts, and another team member conducted quality control checks for 20 percent of the

transcripts. This check helped to create a comprehensive and consistent coding framework that aligns with the established categories and any new categories that emerge from the data. Throughout this process, the evaluation team considered the data source and identified any key similarities or differences in perspectives across the respondents.

Finally, the evaluation team undertook a thematic analysis of the data based on the codes and in alignment with the research questions. The team considered the findings from each of the unique data types, examined how various perspectives contribute to an understanding of the program's efficacy, and looked for overarching themes and key insights across the data types. Chapter 4 presents this information.

Analysis of Secondary Data Captured in the HUD Form 52698—Client Services and Outcomes Report

This section presents the analytical approach that the evaluation team used to construct the exhibits presented in chapter 3. As appendix A explains, HUD Form 52698—Client Services and Outcomes Report provides de-identified individual and household-level data that grantees collected and uploaded at the end of every quarter.⁴² The following details the approach used to clean and analyze these data.

Data Cleaning and Processing

The evaluation team imported the grantee data for each quarter from Excel spreadsheets into Stata.⁴³ The evaluation team then cleaned each quarterly report's data prior to merging all the quarterly data files for each grantee. Although HUD Form 52698 lists 30 variables, the number of variables provided in the Excel spreadsheets varied between grantees and sometimes varied between quarters for the same grantee.⁴⁴ The evaluation team compared the values that grantees reported on HUD Form 52698 and processed the data to ensure consistency across quarters and grantees. This process required the evaluation team to recode variable categories corresponding to HUD Form 52698 and hand-code values if necessary. These data include continuous and categorical variables. The evaluation team tabulated the variables for each grantee to examine the missing data. The assumptions are presented below.

Characteristics

- If information on ethnicity was missing (for example, Advocates for Basic Legal Equality in Ohio did not include the ethnicity variable), the evaluation team assumed that presenting tenants were non-Hispanic. As a result, the percentage of Hispanic households served by Advocates for Basic Legal Equality in Ohio may be underestimated, whereas the percentages for non-Hispanic Blacks and African-Americans, non-Hispanic Whites, and non-Hispanic Asians may be overestimated. The evaluation team will provide a breakdown of presenting tenants by race and ethnicity separately in the final report.

⁴² Appendix E shows HUD Form 52698—Client Services and Outcomes Report.

⁴³ Stata is the statistical software that the evaluation team uses for assessing data quality and for data analysis.

⁴⁴ HUD is aware of variations in how grantees report tenant household information in terms of how they categorize, present, and submit the information. HUD is revising HUD Form 52698 and the reporting requirements for future grants to ensure greater consistency.

- If under the respective questions for race and gender, the response is “Prefer not to respond,” “Unknown,” or no response, then the evaluation team assumed these values to be true missing values and combined them into one category.
- Some grantees, such as Massachusetts Community Legal Aid and Atlanta Volunteer Lawyers Foundation, reported negative or zero family income. When calculating averages, the evaluation team excluded households with negative income because they could not determine whether the negative sign is a typo or should be bottom-coded to 0. The evaluation team calculated average family income for values greater than 0 and average family income for values, including 0. The true average family income lies between these two average income values.
- Some grantees, such as the Legal Aid Center of Southern Nevada and West Tennessee Legal Services, did not report information on eviction status. The evaluation team assumed the eviction status was missing for these households.
- For 19 of the 20 grantees, the reported minimum number of days that grantees provided services to household was 0. The evaluation team assumed that this number was incorrectly entered and updated the minimum number of days as 1.
- On the question asking if a unit is subsidized by a federal housing program, some of the grantees reported HUD Housing Choice Voucher (Section 8) and HUD Project-Based Section 8 as a single category, or simply mentioned Section 8. To maintain consistency, the evaluation team combined these categories into a single category and called it “HUD Housing Choice Voucher (Section 8)/HUD Project-Based Section 8.”
- If no response is given to the question as to whether the evicting party was a public housing authority (PHA; field 5c of the HUD Form 52698), then the evaluation team used the names of the housing authority or agency reported in field 5b of HUD Form 52698 to identify if that evicting party was a PHA. The evaluation team looked up the names reported in the grantee data. For example, if the grantee inserted the name as “Atlanta Housing,” the evaluation coded the response to the field 5c in the HUD Form 52698 as “Yes.”

Descriptive Analysis

After cleaning and processing each grantee’s data, the evaluation team conducted grantee-specific descriptive statistics of household demographics, socioeconomic status, and housing status by eviction status. Chapter 3 discusses the overall descriptive statistics across grantees.

Appendix C: Data Collection Instruments

HUD Staff Interview Protocol for Round 1 of Data Collection

Respondent Background

We would like to start by learning more about you and your role in implementing the Eviction Protection Grant Program.

1. Can you tell us a little bit about yourself and your role at HUD?

Probe:

- How long have you been working in this role?
- Were you involved in the development of HUD's Eviction Protection Grant Program, or did you become involved after the grantees were selected?
 - If yes, what was your role?
- What is your role in the implementation of the Eviction Protection Grant Program?

Grant Development

Now, we would like to ask you about what you considered when developing the Eviction Protection Grant Program, including how you selected activities and desired outcomes.

2. Can you describe the process that HUD used to develop the Eviction Protection Grant Program?

Probe (as needed):

- How did you select activities or services that grantees would be required to implement?
- How did you decide on the eligibility and selection of potential grantees?
- What were the desired outcomes of the grant?
- Who was involved in developing the grant program?
 - Would you recommend involving anyone else if you were to do this again?

3. Why did you select these specific organizations for grants?

- Were there other organization types that were considered but not selected? If so, which organizations and why weren't they selected?

4. What were the challenges HUD faced when developing the grant program?

Probe (as needed):

- Were there any challenges related to ____?
 - funding or resources
 - buy-in from staff and/or leadership
 - buy-in from stakeholders
 - selection of grant activities to be included in the program
 - implementation of the program
- How did you address these challenges?

5. What helped or facilitated the development process for the grant program?

Implementation

Next, we would like to learn more about the implementation of the grant program, including challenges and successes.

6. Can you provide an overview of how the grant program was rolled out by HUD?

Follow-up:

- How did you select grantees?
- Who was involved in the rollout of the program?
- Who was involved in the selection of grantees?

7. What challenges did you face when rolling out the grant program?

Probe (as needed):

- Were there any challenges related to ____?
 - *program management and oversight*
 - *getting agreements signed*
 - *funding*
 - *qualified pool of grant applicants*

8. How did you address these challenges?

9. What facilitated or helped with the rollout of the grant program?

10. Are there individuals who should be involved in the management and monitoring of the grant but are not? If so, who and why aren't they involved?

11. What challenges have you faced with the ongoing management of the grant program?

- How have you addressed/are you planning to address these challenges?
- How do you handle missing administrative data (for example, HUD Form 52698)?
 - Is any of the information consistently missing at the grantee or participant level? If so, what information and why?

12. What challenges have you faced with the ongoing monitoring of the grant program?

- How have you addressed/are you planning to address these challenges?

13. Which activities/services are the most critical for achieving grant objectives? Why?

- What needs do these activities/services meet?

14. Which program activities/services have been the most challenging for HUD to implement?

- How have you addressed/are you planning to address these challenges?

15. What resources are provided to grantees to support implementation of their programs?

Probe (as needed):

- Do you provide resources related to ____?
 - *management of grant funds*
 - *marketing/outreach efforts*
 - *grant activities/services (such as legal services, assisted housing, social services)*

16. What resources would be helpful to HUD to support the ongoing implementation of the grant program?

Lessons Learned

Finally, we want to ask you about lessons learned in the development and rollout of the grant program.

17. What are the key lessons learned about program development and rollout that you think would be helpful to share with others?

18. What, if anything, would you do differently in regard to ____?

- *program development*
- *program rollout*

Grantee and Subrecipient Staff Interview Protocol for Round 1 of Data Collection

Respondent Background

We would like to start by learning more about you and your role in implementing the grant received from HUD through the Eviction Protection Grant Program.

1. Can you tell us a little bit about yourself and your role at <grantee/subrecipient name>?

Probe (as needed):

- How long have you been working in this role?
- Were you involved with planning your HUD grant program?
 - If yes, what was your role?
- What is your role in implementing your HUD grant program

Context of Geographic Target Service Area

Now, we would like to learn more about the contextual factors that influenced the design of your HUD Eviction Protection Grant Program.

2. From your experience, what were the greatest eviction-related concerns and/or needs within your target service area prior to the HUD grant award?

Probe (as needed):

What were the needs and/or concerns related to_____?

- *eviction rates*
 - *Do you have any information or guesses about the approximate number (an estimate is fine) of eviction filings in your service area annually, prior to the HUD grant award? How many of these were contested where both parties show up in court?*
 - *What was the default judgment rate annually prior to the HUD grant award?*
 - *What percentage of these cases were contested prior to the HUD grant award?*
 - *How does your organization estimate the number of tenants “at risk” of eviction in your area?*
 - *How many (an estimate is fine) repeat households seeking assistance with a housing matter did your organization receive prior to the HUD grant award?*
 - *How often were landlords who were serial evictors involved in eviction filings prior to the HUD grant award? Do you keep a list of landlords who are serial eviction filers? If so, how many landlords do you have on the list? Can you share the list with us?*
- *access to legal services for individuals/families facing eviction*
- *eviction moratoriums*
- *access to non-legal services (for example, support services) for individuals/families facing eviction*
- *access to rental assistance (for example, tenants having trouble paying rent quickly enough when states/locals had trouble administering the ERA program)*
- *tenants knowing their rights*

- *Were there specific government agencies and/or non-governmental organizations helping tenants to understand their rights prior to the HUD grant award?*
- *local rental markets or landlord practices (for example, soaring rents, flipping units, illegal evictions, and so on)*

3. What are some of the unique legal, demographic, or geographic characteristics of your target service area (that is, the community you serve)?

Probe:

- Are the local laws more favorable to landlords or tenants?
- What are the demographics of your target service area?
- To what extent do you target urban versus rural areas?
- To what extent do these legal, demographic, or geographic characteristics contribute to the level of evictions/eviction filings?
- How have those characteristics impacted how you designed your grant activities?
- Prior to this grant, what eviction-prevention services were available in your target area?
- How did the grant change the services you were providing to your households?

4. Prior to this grant, can you describe if there were any opportunities to pair legal assistance with other services (for example, rental assistance) provided by local housing authorities or other funding sources?

Grant Planning

Next, we would like to ask you about what you considered when planning the grant, including management and how you selected activities. Planning includes your initial planning period and any capacity issues identified following the grant award.

5. Can you describe the process that <grantee/subrecipient name> used to develop its HUD-funded Eviction Protection Grant Program?

Probe (as needed):

- How did you select activities or services to offer for your grant program?
- Who was involved in planning the program activities?
- Who was not involved in the planning that should have been?

6. What were the challenges <grantee/subrecipient name> faced when initially planning HUD-funded grant activities?

Probe (as needed):

- Were there any challenges related to ____?
 - *funding or resources*
 - *buy-in from staff and/or partners*
 - *implementation of the program*

7a. What factors have affected your capacity to manage this grant since the award?

Probe (as needed):

- Were there any challenges related to ____?
 - *timing of the planning process*
 - *resources for planning*
 - *outreach and participant engagement*

- staff availability and turnover (for example, number of staff hired and average tenure of staff)
- lag between receipt of grant funds and provision of services

7b. With regards to financial management, what were the successes and challenges that you as a <grantee/subrecipient> experienced while administering the grant?

Probe (as needed):

- How is your organization spending the money?
- What are some of the factors that affect the capacity of grantee organizations to manage the grant?

Execution

Next, we would like to learn more about the planned activities and the intended outcomes of your grant program, why these may have changed, and the challenges and successes to implementing your program that you are experiencing.

8. Can you provide an overview of how funding is allocated for your grant activities/services?

Probe (as needed):

- What proportion of the grant was allocated to the various activities (estimates are fine)?
- Did the funding meet the budget requirements for each activity?

9. What strategies do you use to identify and market your program to new clients?

- What types of clients are the targets for these outreach efforts?

10. How do you sign up new clients into your program?

Probe (as needed):

- How accessible is your program to clients who seek out or need your services?
- Is the enrollment process under the HUD-funded grant program different from grant programs funded by other government agencies (for example, the Legal Services Corporation and state governments)? If so, please elaborate.

11. Does your program target specific groups (such as people of color, LGBTQ+, people with limited English proficiency, persons with disabilities) for assistance? If so, which group(s), and why?

12. How do you decide who gets which services?

13. At this stage of your grant implementation, which activities/services are the most critical for achieving your grant objectives? Why?

- What needs do these activities/services meet?

14. How do your HUD-funded grant activities/services interact or complement other services provided by your organization?

- How do HUD-funded grant activities/services interact or complement services provided by your partners or services available in your area?
- How are HUD-funded grant activities/services different or similar to activities/services funded by other government agencies (such as the Legal Services Corporation and state governments)?

- Now that the Emergency Rental Assistance (ERA) program has ended, what additional rental assistance support (if any) does your organization provide?

15. Does your organization have any experience with landlord/tenant mediation services? If so, please describe your experience.

- How helpful or not helpful are mediation services for tenants? Please explain.
- Do you facilitate landlord/tenant mediation that involves the judge serving as the mediator? If so, please describe how it works.

16. Which program activities/services have been the most challenging to implement as part of your HUD grant?

Probe (as needed):

- What types of challenges have you encountered with ____?
 - program management and oversight
 - client marketing
 - client intake
 - provision of legal services
 - provision or referral to non-legal services (like social services)
 - education/outreach services
 - any other challenges
 - collaborating with courts, judges, or others
- How have you addressed/are you planning to address these challenges?

17. What about the Eviction Protection Grant Program requirements have caused additional challenges or presented a barrier to your organization or its client base?

18. Have any of the major planned program activities changed? If so, why, and how have they changed?

19. What planned activities have you been unable to conduct to date, if any? Why?

Probe: When would they start, or do you plan to scrap that activity?

20. Please describe your program's process for collecting and tracking program performance data.

Probe (as needed):

- What systems/tools do you use to support these efforts?
- How do you track data on repeat clients?
- How are the data reporting requirements under the HUD-funded grant different from those funded by other government agencies (such as the Legal Services Corporation and state governments)?
- What challenges have you faced in collecting/reporting program data?
- How have you addressed these challenges?

Partnerships

In the next set of questions, we would like to ask you about the partners involved in your HUD-funded grant program and their roles.

21. What partnerships are being used to offer grant services? What activities/services do they support/provide?

Probe (as needed):

- How are partners supporting your grant program?
- Can you describe the process of how you refer clients to _____?
 - housing providers
 - legal service providers
 - other social service providers
- Were these partnerships in place prior to the grant? If not, what helped to bring <grantee/subrecipient name> together with these new partners?

22. Have you been able to engage landlords in the implementation of your program?

- If so, how have you engaged them?
- If not, why?

23. How have partnerships impacted your ability to implement your grant activities/services?

- What are some activities/services being offered that would not be possible without the support of partners?
- Do these partners provide tenants with services not offered through your organization?

24. What are any challenges you experienced with partners when implementing your grant program?

Probe (as needed): *What challenges have you experienced with regards to_____?*

- engagement of partners on grant activities
- subcontracting processes and procedures
- billing/reimbursement processes for contracts

25. Do you have a process of identifying “serial evictors”? If so, how do you identify them?

Probe (as needed): We define an evicting party as a serial evictor if the same evicting party has filed against the same client more than two times or against multiple clients (more than three).

26. What activities do you undertake to defend your clients against “serial evictor” landlords or public housing authorities?

27. What else would you like to share about your experience in rolling out the HUD grant that you have not had a chance to talk about or that I did not ask about?

Tenant Household Focus Group Protocol

1. First, we would like to know a little bit more about your backgrounds and how you learned about services available at <GRANTEE OR SUBRECIPIENT NAME>. Can you each share a little bit about who you are? Also, please share how you learned about <GRANTEE OR SUBRECIPIENT NAME>?
2. In your experience, what circumstances led to your being at risk of eviction?
Probe for: What do you think are some of the **major** issues that led to your being at risk of, or subject to, eviction?
3. Now, I would like to know a little bit more about your experience with <GRANTEE OR SUBRECIPIENT NAME>, beginning with how <GRANTEE OR SUBRECIPIENT NAME> informs the community about available services. From your point of view, does <GRANTEE OR SUBRECIPIENT NAME> do a good job of providing information to tenants? Why or why not?

Probe for:

- A. The effectiveness of **different** types of outreach/engagement from the organization (for example, radio ads, 'know your rights' campaigns, door knocking).
- B. Any barriers or challenges to getting services from the grantee.
- C. Whether they had been working with or considering any other organizations when they needed legal services; whether they pursued rental or financial assistance from any other organizations in addition to seeking legal assistance; and, if so, why they selected this one?

(Possible places they may have found out about the grantee is the court, the service community, word of mouth, or independent searching.)

4. Now, we would like to hear more about whether the services provided by <GRANTEE OR SUBRECIPIENT NAME> met your needs.

4a. Which services did you find most helpful, and why?

Probe for:

- A. For example: services you may have received could be legal advice, legal representation, help negotiating with landlord, help securing rental assistance, help with getting an extension to continue to stay in your home, and so on.
- B. Did you receive more than one service? Were any combinations of services particularly helpful? How were they helpful?
- C. What are the benefits of light-touch (such as court navigation, limited advice) versus more extensive services (such as full court representation)?
- D. What outcomes were you hoping for when you sought legal advice?
- E. Did you receive rental or financial assistance, in addition to legal assistance? How did these types of assistance complement legal assistance?

4b. Which services did you find least helpful, and why?

4c) Did the services meet all your needs?

Probe for:

- A. How did the services meet your needs?
- B. Was there anything you needed/hoped for from <GRANTEE OR SUBRECIPIENT NAME> that they were unable to provide?

Follow-up: As part of your eviction case, did you go to court and have a hearing in front of the judge?

Probe for:

- 1. Did an attorney attend the hearing with you?
- 2. Did you talk with the attorney before the hearing?
- 3. Did you go to mediation or a settlement conference?
 - a. If so, did an attorney go with you?
 - b. Did the attorney talk to the landlord or the landlord's attorney on your behalf?

Follow-up: Were you satisfied with how your case turned out/got resolved?

- 5. Did <GRANTEE OR SUBRECIPIENT NAME> help you connect with other programs or organizations? If so, which ones? How helpful were these connections, and why?

Probe for: Which other services specifically: including housing providers, legal service providers, rental assistance programs, financial assistance, or any other services.

- 6. What about your experience with <GRANTEE OR SUBRECIPIENT NAME> was **positive**, and why?

Probe for: What were the successes you experienced?

- 7. What about your experience with <GRANTEE OR SUBRECIPIENT NAME> **could have been improved**, and why?

Probe for: What were the challenges you experienced?

- 8. Based on your experience, what suggestions or recommendations do you have for <GRANTEE OR SUBRECIPIENT NAME> about how they might better serve clients facing eviction?

- 9. How many times has the landlord attempted to evict you?

- 10. How many evictions have been filed against you by the same landlord?

- 11. What else would you like to share about your experience with <GRANTEE OR SUBRECIPIENT NAME> that you have not had a chance to talk about or that I did not ask about?

Appendix D: Supplemental Tables

Exhibit D-1. Complementary Eviction and Other Supportive Services by Grant Recipients

Grantee Name	Housing Services	Social Services	Medical Services	Financial and Employment Services	Family Services
Jacksonville Area Legal Aid (Jacksonville, FL)	✓	-	-	-	-
Idaho Legal Aid Services (Boise, ID)	✓	-	-	-	-
Legal Services of Eastern Missouri (St Louis, MO)	-	✓	-	-	-
Legal Aid Center of Southern Nevada	✓	✓	-	-	-
Advocates for Basic Legal Equality	✓	✓	-	-	-
Connecticut Fair Housing Center (Hartford, CT)	✓	✓	-	-	-
Community Legal Aid, Inc. (Worcester, MA)	✓	✓	-	-	-
Atlanta Volunteer Lawyers Foundation (Atlanta, GA)	✓	✓	-	-	-
Legal Aid Society of Northeastern NY (Albany, NE NY)	✓	✓	-	-	-
Legal Assistance of Western New York (Geneva, NW NY)	✓	-	✓	✓	✓
Legal Aid Society of San Bernardino (San Bernardino, CA)	✓	✓	-	-	-
Legal Services of Greater Miami (Miami, FL)	✓	✓	-	-	-
Acadiana Legal Service Corporation (Lafayette, LA)	-	✓	-	-	-
Pine Tree Legal Assistance (Portland, ME)	✓	✓	-	-	-
Legal Services of New Jersey (Edison, NJ)	✓	✓	-	-	-
Legal Services of the Hudson Valley (White Plains, NY- Hudson Valley)	✓	✓	-	-	-
Northern Manhattan Improvement Corporation (NY, NY)	✓	✓	-	-	-
Legal Aid Services of Oklahoma (Oklahoma City, OK)	✓	✓	-	-	-
One80 Place (Charleston, SC)	✓	✓	-	-	-
West Tennessee Legal Services (Jackson, TN)	✓	-	-	✓	-
City of San Antonio (San Antonio, TX)	✓	-	-	✓	-

✓ represents that grant recipient provides the service.

- represents that grant recipient does not provide the service.

Notes: The grant recipients may provide some supportive services through referrals to partners or other sources of funding. However, grant recipients may not have noted this provision in their action plans or quarterly performance reports.

Sources: Grantee action plans; quarterly progress reports as of June 30, 2023

Exhibit D-2. Household Characteristics

Household Demographics	Overall	Households at Risk of Eviction	Households Subject to Eviction
Gender Identity: Male (%)	28.7	30.2	27.8
Gender Identity: Female (%)	71.1	69.6	72.0
Gender Identity: Transgender (%)	0.0	0.0	0.1
Gender Identity: Nonbinary/Nonconforming (%)	0.2	0.2	0.1
Gender Identity: Missing (%)	5.7	3.8	7.0
Race/Ethnicity: Hispanic (%)	12.4	12.8	12.3
Race/Ethnicity: Non-Hispanic White (%)	32.9	32.1	33.0
Race/Ethnicity: Non-Hispanic Black and African-American (%)	47.6	48.1	47.4
Race/Ethnicity: Non-Hispanic Asian (%)	2.7	2.9	2.6
Race/Ethnicity: Other (%)	4.5	4.1	4.7
Race/Ethnicity: Missing (%)	10.9	9.5	12.1
Presenting Tenants with a Disability (%)	28.5	30.8	26.8
Presenting Tenants with a Disability: Missing (%)	8.0	15.1	3.0
Presenting Tenants with Limited English Proficiency (%)	17.8	30.7	9.0
Presenting Tenants with Limited English Proficiency: Missing (%)	2.4	2.1	1.9
Households with No Children (%)	47.3	51.0	44.1
Households with 1 Child (%)	16.8	16.7	17.0
Households with 2+ Children (%)	35.9	32.3	38.9
Household Composition: Missing (%)	0.1	0.0	0.1
Family Income: Extremely Low-Income (%)	65.1	64.4	65.5
Family Income: Very Low-Income (%)	21.4	20.8	21.7
Family Income: Low Income (%)	13.5	14.8	12.7
Family Income: Missing (%)	13.0	19.7	7.7
Average Annual Family Income (\$)	22,794	22,686	22,908
Average Annual Family Income (including those who reported no income) (\$)	17,938	17,030	18,909

Notes: As of June 30, 2023, 14,260 households were served. Forty-one (41.1) percent of the households were at risk of eviction, 56.6 percent were households subject to eviction, and 2.3 percent did not have information on their eviction status. The evaluation team excluded missing values from the calculation of percentages for gender, race and ethnicity, disability status, limited English proficiency status, household composition, and family income. The evaluation team made assumptions to clean and process the data. If ethnicity information was missing, the evaluation team assumed that the presenting tenants were non-Hispanic. If grantees had the option to choose responses such as “Prefer not to respond” or “Unknown” for gender, race, and ethnicity, the evaluation team treated them as missing values. If households reported negative family income in HUD Form 52698, the evaluation team excluded them from the analysis of average family income presented in this report. Source: HUD Form 52698 data submitted by 20 grantees as of June 30, 2023, which includes data from the first quarter of 2022 through the second quarter of 2023, with data reported for 14,260 tenant households

Exhibit D-3. Housing Situation of Tenant Households

Housing Location and Situation of Households	Overall	Households at Risk of Eviction	Households Subject to Eviction
Households in a Rural Location (%)	7.1	8.4	6.0
Households in an Urban Location (%)	92.9	91.6	94.0
Households Location: Missing (%)	2.2	1.2	2.2
Households in Federally Assisted Housing:* HUD Public Housing (%)	3.3	3.3	3.3
Households in Federally Assisted Housing: HUD Housing Choice Voucher/Project-Based Section 8 (%)	10.7	13.1	9.6
Households in Federally Assisted Housing: Low-Income Housing Tax Credit (%)	1.4	1.7	1.1
Households in Federally Assisted Housing: U.S. Department of Agriculture's Rural Housing Service (%)	0.4	0.7	0.2
Households in Federally Assisted Housing: Other (%)	2.0	1.6	2.1
Households in Federally Assisted Housing: No Subsidy (%)	82.2	79.6	83.7
Households in Federally Assisted Housing: Missing (%)	15.8	25.6	8.2
Households Sought Emergency Rental Assistance: Yes, approved or receiving assistance (%)	9.4	5.8	9.9
Households Sought Emergency Rental Assistance: Yes, applied for assistance (%)	17.3	12.2	20.7
Households Sought Emergency Rental Assistance: Yes, but denied assistance (%)	11.7	10.6	12.6
Households Sought Emergency Rental Assistance: No Emergency Rental Assistance (%)	60.8	70.4	56.1
Households Sought Emergency Rental Assistance: Other (%)	0.8	1.1	0.6
Households Sought Emergency Rental Assistance: Missing (%)	21.1	30	14.5
Evicting Party: Public Housing Agency (%)	4.9	6.1	4.3
Evicting Party: Private Landlord (%)	95.1	93.9	95.7
Evicting Party: Missing (%)	16.6	26.9	8.9

*Information on households living in federally assisted housing was captured at the point of intake for legal services. In some cases, the grantees did not specify if the client received HUD Housing Choice Voucher (Section 8) or HUD Project-Based Section 8. The evaluation team combined these options and reports them as a new category as HUD Housing Choice Voucher (Section 8)/HUD Project-Based Section 8.

Notes: The evaluation team excluded missing values from the calculation of percentages for household location, households in federally assisted housing, households that sought emergency rental assistance, and evicting party. The overall group includes households with no information on eviction status (2.3 percent of total households). If the grantees reported households to have emergency rental assistance at the point of intake for legal services but did not select any of the options reported in HUD Form 52698, the evaluation team classified these households as 'Other.' To identify urban or rural regions, the evaluation team geocoded the participants based on the geographical information provided (which included their ZIP Code, city, county, and state). The evaluation team overlaid this geocoded information with urban area shapefiles to determine if participants were in an urban or rural area. Slightly more than two-thirds (67.90 percent) of households served by grantees funded in 2021 and 48.89 percent of households served by grantees funded in May 2022 did not provide street address information, thereby hampering the precision of geocoding. Thus, the geographical mapping approximates their precise location. The variable constructed is a binary variable that takes the value 1 for urban and 0 for rural. The urban-rural definition used to identify areas is described in more details at: <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>.

Sources: HUD Form 52698 data submitted by 20 grantees as of June 30, 2023, which includes data from the first quarter of 2022 through the second quarter of 2023, with data reported for 14,260 tenant households; U.S. Census Bureau

Exhibit D-4. Types of Legal Services Each Grant Organization Planned to Provide Under the Eviction Protection Grant Program

Grantee Name (City, State)	Negotiated settlement without litigation	Negotiated settlement with litigation	Administrative agency decision	Court decision	Extensive service not resulting in settlement	Limited Counsel and Advice	Limited Action/Brief Service	Information or education in a group	One-on-one information at a court-	One-on-one information via direct	Referral to a legal provider not affiliated	Referral to a non-legal service provider	Receiving Mediation Representation	Receiving Mediated Settlement Agreement	Other Alternative Dispute Resolution	Other Advocacy/Activity to	Other Pretrial Activity	Other Trial Activity	Other Post-Trial Activity	
Jacksonville Area Legal Aid (Jacksonville, Florida)	✓	✓	-	✓	-	✓	✓	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
Idaho Legal Aid Services (Boise, Idaho)	✓	✓	✓	-	-	✓	✓	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
Legal Services of Eastern Missouri (St Louis, Missouri)	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	✓	-	-	-	-	-	✓	✓	✓
Legal Aid Center of Southern Nevada (Las Vegas, Nevada)	✓	✓	-	✓	-	✓	✓	✓	-	✓	-	-	✓	✓	-	-	✓	✓	✓	✓
Advocates for Basic Legal Equality (Toledo, Ohio)	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	-	✓	✓	✓	-	✓	✓	✓	✓	-
Connecticut Fair Housing Center (Hartford, Connecticut)	✓	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	-
Community Legal Aid, Inc. (Worcester, Massachusetts)	✓	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓

Atlanta Volunteer Lawyers Foundation (Atlanta, Georgia)	✓	✓	-	✓	-	✓	✓	✓	✓	-	✓	✓	-	-	✓	✓	-	-	-
Grantee Name (City, State)	Negotiated settlement without litigation	Negotiated settlement with litigation	Administrative agency decision	Court decision	Extensive service not resulting in settlement or	Limited Counsel and Advice	Limited Action/Brief Service	Information or education in a group setting (such	One-on-one information at a court-based help	One-on-one information via direct outreach or at a	Referral to a legal provider not affiliated	Referral to a non-legal service provider	Receiving Mediation Representation	Receiving Mediated Settlement Agreement	Other Alternative Dispute Resolution	Other Advocacy/Activity to Avoid Litigation	Other Pretrial Activity	Other Trial Activity	Other Post-Trial Activity
Legal Aid Society of Northeastern NY (Albany, New York)	✓	✓	-	✓	✓	✓	✓	✓	-	-	✓	✓	-	-	✓	✓	✓	✓	✓
Legal Assistance of Western New York (Geneva, New York)	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	-	-	✓	✓	✓	✓	✓
Legal Aid Society of San Bernardino (San Bernardino, California)	✓	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	✓	-	-	✓	✓	✓	✓
Legal Services of Greater Miami (Miami, Florida)	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
Acadiana Legal Service Corporation (Lafayette, Louisiana)	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	✓	-	-	✓	✓	✓	-	-
Pine Tree Legal Assistance (Portland, Maine)	✓	✓	-	-	-	✓	✓	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	✓
Legal Services of New Jersey	-	-	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	-	✓	✓	✓	✓	✓

Grantee Name (City, State)	Negotiated settlement without litigation	Negotiated settlement with litigation	Administrative agency decision	Court decision	Extensive service not resulting in settlement or	Limited Counsel and Advice	Limited Action/Brief Service	Information or education in a group setting (such	One-on-one information at a court-based help	One-on-one information via direct outreach or at a	Referral to a legal provider not affiliated	Referral to a non-legal service provider	Receiving Mediation Representation	Receiving Mediated Settlement Agreement	Other Alternative Dispute Resolution	Other Advocacy/Activity to Avoid Litigation	Other Pretrial Activity	Other Trial Activity	Other Post-Trial Activity	
(Edison, New Jersey)																				
Legal Services of the Hudson Valley (White Plains, New York)	✓	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	-	✓	✓	✓	✓	✓	-
Northern Manhattan Improvement Corporation (NYC, New York)	✓	✓	✓	✓	-	✓	✓	✓	-	-	✓	✓	-	-	✓	✓	✓	✓	✓	✓
Legal Aid Services of Oklahoma (Oklahoma City, Oklahoma)	✓	✓	-	✓	-	✓	✓	✓	-	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓
One80 Place (Charleston, South Carolina)	✓	✓	-	✓	-	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
West Tennessee Legal Services (Jackson, Tennessee)	-	-	-	-	-	✓	✓	✓	-	-	✓	✓	✓	✓	-	-	-	-	-	-
City of San Antonio (San Antonio, Texas)	✓	✓	-	✓	✓	✓	✓	-	✓	✓	-	✓	-	-	✓	✓	✓	✓	✓	✓

✓ represents that the grant recipient planned to provide the service. - represents that the grant recipient did not specifically plan to provide the service. Notes: This table does not include information on actual activities that have been implemented. Consequently, it may not reflect every activity that grant recipients engaged in during their program implementation. The services were drawn from the primary services criteria described in HUD Form 52698, with

the added inclusion of mediation services as a category. The evaluation team then classified these legal services into five broad types: extensive legal representation, brief legal representation, mediation and diversion, information and education, and other forms of legal services.

- Extensive representation service category includes negotiated settlement without litigation, negotiated settlement with litigation, administrative agency decision, court decision, and extensive service not resulting in settlement or court or administrative action.
- Brief representation service category includes limited counsel and advice, and limited action and brief service.
- Informational service category includes information or education in a group setting (such as a presentation or workshop), one-on-one information at a court-based help desk, one-on-one information via direct outreach or at a help center or hotline other than a court-based help desk, referral to a legal provider not affiliated with the program or referral to a non-legal service provider.
- Mediation and diversion service category includes receiving mediation representation or receiving mediated settlement agreement.
- Other legal services category includes other alternative dispute resolution activity, other advocacy and activity to avoid litigation, other pretrial activity, other trial activity, and other post-trial activity.

Source: Grantee applications and action plans

Appendix E: HUD Form 52698—Client Services and Outcomes Report

U.S. Department of Housing and Urban Development
Office of Policy Development and Research

OMB Control Number 2528-0331
Expires 03/31/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Eviction Protection Grant Program Client Services and Outcomes Report

A. Client Served

1. Client

1a. Client Unique ID _____

1b. Limited English Proficiency? Yes No

1c. Gender Identity (select all that apply)

Female Male Transgender Non-binary/non-conforming Prefer not to respond

1d. Race (select all that apply)

White Black or African American American Indian or Alaska Native Asian Native Hawaiian or Other Pacific Islander Some Other Race Prefer not to respond

1e. Hispanic or Latino? Yes No Prefer not to respond

1f. Disability Yes No

2. Household Members

2a. Total number of children living in the household (under age 18) _____

2b. Total number of adults living in the household (age 18 and older) _____

3. Family Income

3a. Total family income \$ _____

3b. Family income group Extremely Low Income Very Low Income Low Income

4. Eviction Risk (select one category that best reflects circumstances at initial engagement)

At risk of eviction Subject to eviction

5. Rental Housing Unit (at issue in the pending or potential eviction matter)

5a. Rental Housing Unit Physical Address

Number and Street _____ Apt _____

City _____ State _____ ZIP+4 Code _____

County _____

5b. Evicting Party _____

5c. Is the Evicting Party a public housing agency (PHA)? Yes No

5d. Is the client's rent for the unit listed in 5a subsidized by a federal housing program?

HUD Public Housing HUD Housing Choice Voucher (Section 8) HUD Project-Based Section 8

Low Income Housing Tax Credit (LIHTC) USDA Rural Housing Other _____

No

5e. Has the client sought emergency rental assistance, such as Emergency Rental Assistance (ERA) program assistance?

Yes, applied for assistance Yes, approved for or received assistance Yes, but denied assistance

No

5f. Is the client's mailing address at the time of initial engagement the same as the unit address at issue in the pending or potential eviction matter?

Yes No

Form HUD 52698

B. Services Provided

6. Service Provider _____

7. Primary Service (select one category that best reflects the level of service provided)

- One-on-one information at a court-based help desk
- One-on-one information via direct outreach or at a help center or hotline other than a court help desk
- Information or education in a group setting (i.e. presentation, workshop)
- Referral to a legal provider not affiliated with the program
- Referral to a non-legal service provider
- Limited counsel and advice
- Limited action/brief service
- Negotiated settlement without litigation
- Negotiated settlement with litigation
- Administrative agency decision
- Court decision
- Extensive service not resulting in settlement or court or administrative action
- Other pretrial activity
- Other trial activity
- Other post-trial activity
- Other alternative dispute resolution activity
- Other advocacy or activity to avoid litigation

8. Mediation Service (select all that apply)

- Mediation representation
- Mediated settlement agreement

9. Additional or Other Services Provided (briefly describe additional or other services provided)

C. Outcomes

10. Outcomes (select all that apply)

- Prevented eviction filing
- Negotiated agreement or settlement
- Tenancy preserved, client remained in home
- Obtained additional days to move out (number of additional days _____)
- Back rent reduced or waived
- Secured or maintained rental assistance
- Secured or maintained non-housing service or benefit
- Displacement without eviction judgement
- Eviction default judgement
- Eviction judgement (not default)
- Eviction delayed or stayed
- Eviction record sealed or expunged
- Avoided or reduced holdover damages, landlord attorney fees, or other costs

- Other
- Unknown

11. Additional or Other Outcomes (briefly describe additional or other outcomes)

12. Case Duration Number of days engaged _____

**Instructions for HUD Form 52698, Eviction Protection Grant Program
Client Services and Outcomes Report**

- 1a. Unique client identification number assigned by the grantee.
1b. Client who, as a result of his, her, or their national origin, does not speak English as a primary language and who has a limited ability to speak, read, write, or understand.
1c. Select the category or categories that the client says best indicates the client's gender identity. Select all that apply.
1d. Select the category or categories that the client says best indicates the client's race. Select all that apply.
1e. Select one category that the client says best indicates the client's ethnicity.
1f. Indicate whether or not the client has a disability.
- 2a. Indicate the total number of persons under age 18 living in the household.
2b. Indicate the total number of persons age 18 and older living in the household.
- 3a. Indicate the family's total annual income.
3b. Select one category that represents the family's income relative to the local area median income based on the number of persons in the household. See [HUD's income limits](#) website.
4. Select one category that best reflects the client's circumstances at the time of initial engagement.
At risk of eviction means the tenant: (1) has been given one or more formal or informal warnings by an Evicting Party, (2) has been notified by formal or informal means that the Evicting Party has commenced or intends to commence formal or informal eviction actions through the courts, self-help, or other means, or (3) is being harassed, threatened, discriminated against, neglected or treated differently than other tenants or other protected classes under the Fair Housing Act by the Evicting Party or the Evicting Party's agents in a manner that appears calculated to result in the tenant's vacating of the property.
Subject to eviction means: (1) the tenant has been notified that they will be removed from the property by a sheriff, marshal or other law enforcement or private agent enforcing a civil eviction order or engaging in self-help on behalf of the Evicting Party, (2) the tenant has been notified that they will be removed from the property by the Evicting Party or its agent, or (3) the Evicting Party has begun the eviction process pursuant to local law.
- 5a. Indicate the physical address of the client's rental housing unit at issue in the pending or potential eviction matter. Indicate the city, state, full 9-digit ZIP Code, and county at a minimum. Other physical address details (building number, street, and unit number) are optional for reporting purposes.
5b. Indicate the Evicting Party name in the pending or potential eviction matter with respect to the unit listed in 5a.
Evicting Party is a landlord, owner of a residential property, or other person or entity, including corporations, companies, associations, firms, partnerships, societies, joint ventures, joint stock companies, franchises and individuals, that has or purports to have a legal right to pursue eviction or possessory action.
5c. Indicate whether the Evicting Party listed in 5b is a public housing authority or agency (PHA).
5d. Indicate whether the client's rent for the unit listed in 5a is subsidized by a federal housing program at the time of initial engagement. This information may be self-reported by the client if documentation or third-party confirmation of a federal housing subsidy is not available. Do not include short-term federal emergency rental assistance, such as Emergency Rental Assistance (ERA) program assistance in item 5d.
5e. Indicate whether the client has sought emergency rental assistance through the Emergency Rental Assistance (ERA) program or other emergency rent relief program. Select one category that best reflects the client's circumstances at the time of initial engagement. This information may be self-reported by the client if documentation or third-party confirmation is not available.
5f. Indicate whether, at the time of initial engagement, the client receives mail at the physical rental housing unit at issue in the pending or potential eviction matter.
6. Indicate name of grantee, subrecipient, or contractor providing service.
7. Select one category that best reflects the level of service provided at the time the matter is closed. Note that grantees are not required to use HUD Form 52698 for collecting or reporting information about large-scale outreach or public education events (such as

large live streaming or webinar events) where individual viewer or participant demographics, income, or rental circumstances are unknown. A description of those services, audience targeting strategies, and the estimated or actual number of viewers or participants should be reported in the grantee's quarterly narrative reports.

Limited counsel and advice means ascertained or reviewed facts, exercised judgment in applying relevant law, and counseled client concerning his, her, or their legal problem.

Limited action/brief service means communications to a third party, preparation of a simple legal document, or assisting a *pro se* client with preparation of court or other legal documents.

Negotiated settlement without litigation means resolved client's problem through negotiation and settlement without any court or administrative actions pending.

Negotiated settlement with litigation means resolved client's problem through negotiation and settlement while a court or formal administrative action was pending, including when the court or administrative agency issues an order memorializing the settlement.

Administrative agency decision means represented client in an administrative agency action that resulted in a case-dispositive decision by the administrative agency or body after a hearing or other formal administrative process.

Court decision means represented client in a court proceeding that resulted in a case dispositive decision made by the court.

Extensive service not resulting in settlement or court or administrative action means assistance involving high level of factual complexity, highly sophisticated legal analysis, drafting of non-routine original pleadings or legal documents, or significant legal research.

8. Select the category or categories that reflect mediation services provided during the client engagement, if any.

Mediation representation means represented client in a mediation process involving a trained, impartial third-party mediator, whether the decision to mediate was voluntary or ordered by a court.

Mediated settlement agreement means resolved client's problem through negotiation and settlement and memorialized by a settlement agreement mediated by a trained, impartial third-party mediator, whether or not a court or administrative agency issues an order memorializing the settlement.

9. Briefly describe additional services provided. If applicable, briefly explain "Other" activity or advocacy.

10. Select the category or categories that represent client outcomes at the time the matter is closed. Select all that apply.

11. Briefly describe additional outcomes. If applicable, briefly explain "Other" outcomes.

12. Indicate the number of days the service provider listed in item 6 was engaged with the client in this matter, from the time of initial engagement to the time the matter is closed.

Source: HUD Form 52698. Retrieved from <https://omb.report/icr/202201-2528-001/doc/118168000>.

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