

ERASE

CONNECTICUT FAIR HOUSING CENTER

COHORT CASE STUDY

Using Data to Impact Program Spending and Prevent Evictions

“Central to our goal of an expansive ERAP program was high quality public data to identify the racial equity dimension in eviction filings and leverage it to advocate for statewide interventions to preserve housing during the COVID-19 pandemic.”

– Greg Kirschner, executive director of CT Fair Housing Center



Coalition Partners: CT Data Collaborative, Connecticut Bar Foundation, housing counseling agencies, and legal services programs

Background

The State of Connecticut received \$235 million in federal emergency rental assistance (ERA) funds, which it administered through a statewide program, UniteCT. UniteCT faced a number of early [challenges](#), including staffing shortages, uncooperative landlords, and burdensome documentation requirements. In the first year of its implementation, only 27% of funding was spent. The slow roll-out was mitigated, in part, by the state’s willingness to extend its eviction moratorium until June 30, 2021, with some restrictions remaining until February 15, 2022. In January 2022, the state passed right-to-counsel (RTC) legislation to ensure that tenants undergoing the eviction process had legal representation.

In addition to ERA program challenges, the CT Fair Housing Center, a statewide nonprofit working to ensure that all people have equal access to housing opportunities free from discrimination, found that eviction data were needed to ensure that both ERA and the RTC law were implemented equitably and effectively across the state.

Advocacy in Action

Through ERASE, the CT Fair Housing Center convened partners to accelerate UniteCT spending

and improve the program, advocate for the adoption of eviction prevention measures, and track eviction trends post-pandemic. Staff from CT Fair Housing Center attended biweekly meetings with housing advocates and UniteCT to coordinate efforts to streamline the program and build public and political support for it. The Center advocated against lifting the eviction moratorium until UniteCT was up and accepting applications and distributing money. It worked with regional coalitions as well as housing counselors and tenant organizers to identify issues and create solutions to challenges faced by tenants when applying for UniteCT. When tenants faced eviction from landlords who refused to participate in UniteCT, CT Fair Housing Center filed housing discrimination complaints against those landlords and monitored whether tenants were evicted when applications were in process. Ultimately, the state-based fair housing enforcement agency, Connecticut Commission on Human Rights and Opportunities (CHRO), agreed that refusal to accept ERAP funds was a source-of-income violation.

In 2021, the Center filed a complaint with CHRO alleging that a housing provider was refusing to accept UniteCT and that the

refusal violated Connecticut’s protection against source-of-income discrimination. In short, Connecticut law requires landlords to accept payment from a lawful source of income, including public benefits programs like the Housing Choice Voucher program (also known as Section 8). The application of this law to UniteCT payments, however, was novel. In *Gomez v. Gloss*, the court decided that there was reasonable cause to believe that the housing provider had discriminated, and the Center was able to obtain a waiver of over \$4,500 in rent as a settlement. Altogether, the Center has leveraged Connecticut source-of-income protections in over 10 fair housing matters involving ERAP.

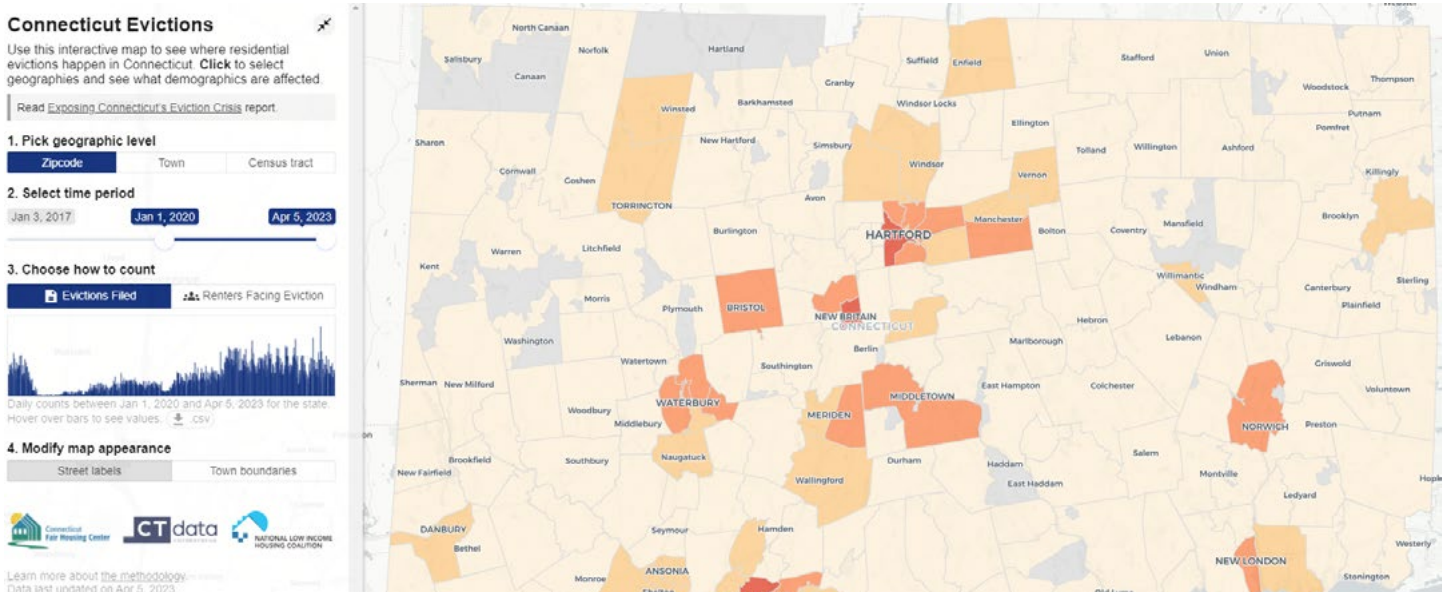
the right-to-counsel program, which initially only opened in select ZIP codes. CT Fair Housing Center, with the help of CT Data Collaborative, monitored and tracked eviction filings by race, national origin, and gender, which supported efforts to track RTC program progress and effectiveness.

To encourage ERA data transparency, CT Fair Housing Center created a database of statistics to track which tenants were able to access UniteCT. It also created a dashboard that included the race, national origin, and gender of people receiving eviction filings and compared these data with data from UniteCT applications and payments published by the State’s Department of Housing to assess the program’s performance. Updates with information about eviction filings and the use of UniteCT were sent to 600 people weekly.

To enable adoption of eviction prevention measures, CT Fair Housing Center participated in the Connecticut Right to Counsel Coalition, which helped implement Connecticut’s right-to-counsel program. The coalition held education sessions with court staff and policy makers about the effects of eviction on tenants and the equity and housing discrimination issues involved in evictions. [Based on methods pioneered by the Urban Institute](#), it created maps that identified eviction hotspots to target

ERA Program Improvements

Due to CT Fair Housing Center’s advocacy efforts, administrators were able to make improvements to the UniteCT program, including making outreach materials available in multiple languages, creating a paper application, streamlining the online portal application process, and implementing categorical eligibility, which allowed for the automatic approval of applications based on applicants’ participation in



Interactive map displaying evictions in Connecticut

other social aid programs. The program also reduced paperwork requirements, making the application process more accessible to people with low or no incomes. Because of improved administrative processes, the program was able to spend down the entirety of its funds by the end of 2022.

Measuring the Impact of RTC on Evictions

The most impactful aspect of the ERASE project was being able to get information on who was being evicted and where in real time. This allowed Stout to conduct a comprehensive analysis of the RTC program. It has allowed the Center to enable a comprehensive analysis of the first year of right-to-counsel program operations by the advisory firm Stout. In the first 10 months of operations, one out of every four CT-RTC qualified tenants with evictions filed against them was assisted by the program. Seventy-three percent of clients had achieved stated case goals, including avoiding involuntary moves, avoiding eviction judgements, and securing 30 days or more to move. Clients served by the program were most likely to be non-white, female, 34-49 years old, and have multiple people in their

household.

Future Focus

The CT Fair Housing Center is currently implementing a movement lawyering project focused on expanding rent banking, the right-to-counsel program, rent caps, fair rent commissions, and housing code enforcement. Two full time staff attorneys are involved in the project: one is focused on empowering tenants by helping them organize around issues pertaining to their buildings, while the other represents unionized tenants in court cases pertaining to housing code violations and evictions. The Center also participates in HUD's Eviction Prevention Program, from which it received the grant to support its movement lawyering project. Grant funds also support the efforts of the Connecticut Bar Foundation to evaluate and expand CT-RTC; of Statewide Legal Services to expand representation outside of the CT-RTC ZIP codes (RTC was limited to certain ZIP codes for the first year of implementation); and of Connecticut Veteran's Legal Center to prevent evictions and to create a new eviction prevention clinic at the University of Connecticut School of Law.

End Rental Arrears to Stop Evictions (ERASE) 2021 – 2022 Cohort

[NLIHC's End Rental Arrears to Stop Evictions \(ERASE\) 2021-2022 Cohort](#) was a group of 38 state and local nonprofit partners that conducted on-the-ground partnership development, capacity building, outreach and education, policy reform, and systems change work to ensure that emergency rental assistance (ERA) funds reached renters and small landlords with the greatest need for assistance - especially Black and Indigenous people and people of color, and other marginalized people and communities - and to build support for long-term housing solutions.