



Emergency Assistance Descriptive Analysis

Full Interim Report

December 2024

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Acknowledgments

We would like to thank our partners at the Minnesota Department of Children, Youth, and Families (DCYF) and the Department of Human Services (DHS) for their time, expertise, and data assistance throughout the formulation and development of this report. Kristen Shouman, Pamela McCauley, Kristen Boelcke-Stennes, Lisa Barnidge, and many others have been instrumental in our understanding of the program and the data and have been tremendously helpful in all aspects of the project. We also thank staff from counties, consortia, and Tribal nations (including Anoka, Becker, Beltrami, Blue Earth, Clay, Hennepin, Lake of the Woods, Ramsey, Scott, St. Louis, MNPrairie, Red Lake Nation, and White Earth Nation) that have taken time to share insights with us on their experience with EA, provide feedback on our research questions and findings, and help deepen our understanding of EA across Minnesota. Finally, we thank our teammates at Minnesota Management and Budget, including Ben Nguyen, Yuna Loesch, Anna Solmeyer, Sean Barton, and Laura Kramer, for their helpful guidance and support of this project.

About the team

MMB's Impact Evaluation unit is a team of data and social scientists that rigorously evaluates state investments and policies to find what works and what does not. We prioritize working with agencies and partners to identify and answer pressing questions and creating evidence that is rigorous, relevant, and used by policymakers.

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Executive summary

Emergency Assistance (EA) is a program for families to resolve a one-time financial crisis in housing, covering expenses such as back rent, mortgage payments, and utilities. EA is funded by the State through the Minnesota Family Investment Program (MFIP) Consolidated Fund, but is administered by counties and Tribal nations with wide latitude in administration. Local agencies have discretion to set rules, such as the maximum benefit amount, eligibility criteria, required verifications, and covered expenses. To promote better understanding of current implementation and to inform future policy, this report explores characteristics of applicants, approvals, and denials, as well as local variation in program implementation.

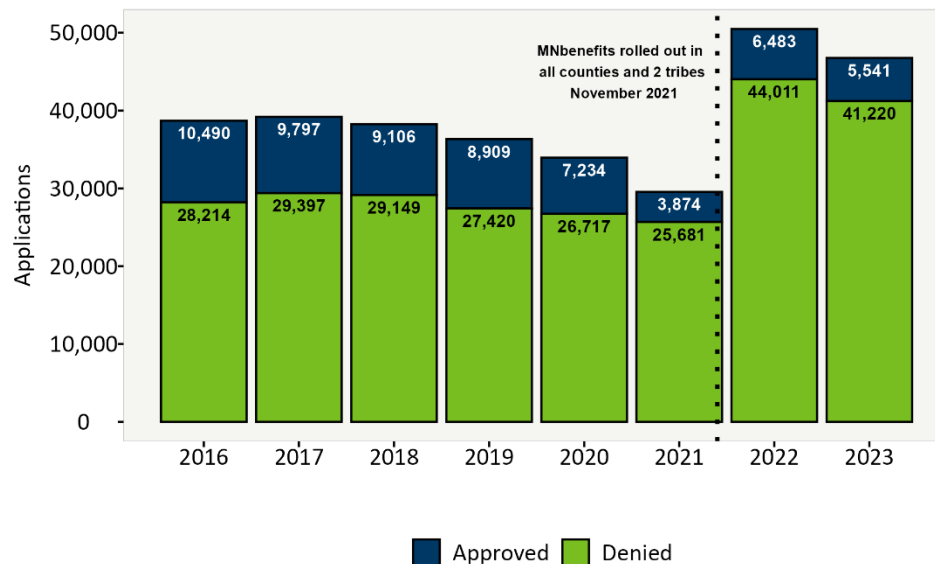
Researchers at Minnesota Management and Budget used administrative data records, and surveyed and coded local agency EA plans to explore key research questions. We find three primary themes. First, applications increased substantially during our study period from 2016 to 2023, as did the denial rate. Second, total EA spending across the state decreased by almost half from 2016 to 2023, but average payments per household stayed relatively flat. Third, there are large differences in EA policy across the state—with potentially large implications for participation.

Finding 1: Increased applications and denial rate

The total number of applications to EA increased substantially starting in late 2021 and early 2022. This period was also marked by a meaningful increase in the denial rates for EA, while overall approvals fell relative to historical averages from 2016 to 2021 (Figure 1). The increase in the volume of applications and in the denial rate coincided with widespread implementation of MNbenefits as the main application platform for EA. While there were many other factors that likely contributed to these changes, the rise in total applications indicates that MNbenefits was successful in making the process of applying for public assistance programs (including EA) easier, but a more accessible application process may not have increased the number of households *receiving* EA. This is important because the EA applicant pool is composed of families that tend to be amongst those with the lowest income in the state. The plurality of applicants (primarily households of two or three people) had no self-reported income, and among applicants reporting they had household income, the median was \$35,481.

Despite the demand for help, local agencies denied about 87-88% of applications for EA from 2021 through 2023. The most common reason for a denial of EA benefits is that the household's circumstances are not considered an emergency. Local partners, however, report staff sometimes use this denial reason in situations when program funding has been exhausted. This high rate of denial can have impacts on housing stability, and may also impact individuals' perception of government and their trust that it will be responsive to claims for help. Households apply with the hope of receiving assistance, but most are inevitably denied, sometimes in accordance with program rules that may be hard to parse.

Figure 1. EA Applications Approved and Denied by Year, 2016 – 2023.

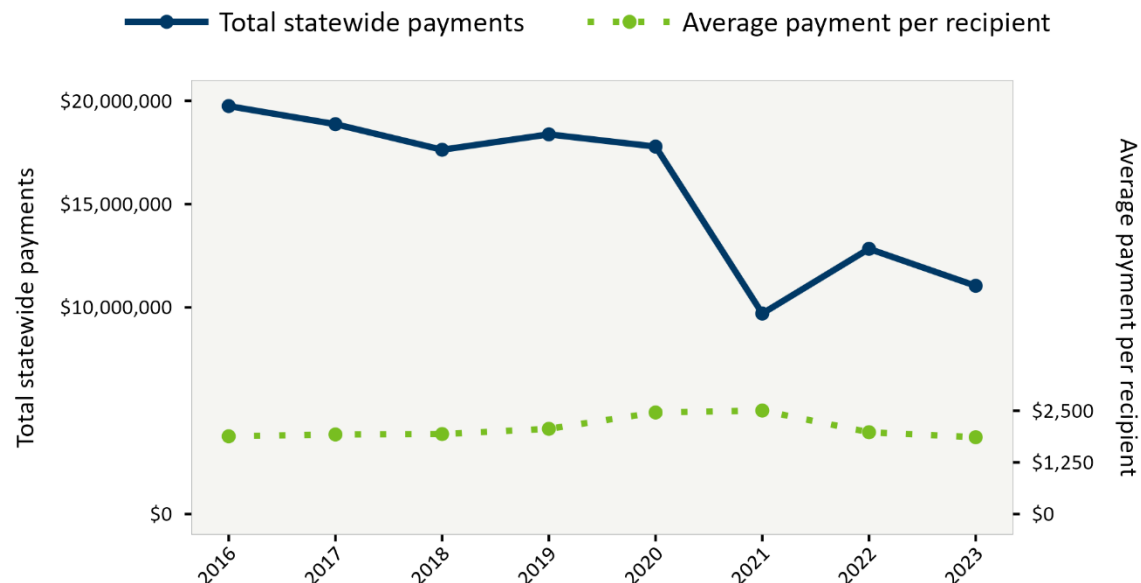


Finding 2: Decreased total payments and flat household average payments

A related theme from our analysis is that total EA spending has decreased across the state (and for most local agencies) since the start of the pandemic, even while the average payment has remained relatively steady. Figure 2 below shows inflation-adjusted payment amounts by year: the solid blue line represents total EA payments across the state, and the dashed green line represents average EA payments per recipient household. Inflation-adjusted total spending in 2023 was \$11 million, which was a bit more than half of the total from 2016 (\$19.7 million); not adjusting for inflation (i.e., nominal dollars), spending fell from \$15 million to \$11 million. The inflation-adjusted average payment per recipient in 2023 was \$1,860, similar to the 2016 amount of \$1,880. Together these trends indicate local agencies have tended to respond to less (inflation-adjusted) funding by serving fewer families, instead of by reducing the size of payments.

Through engagement with local government partners, we learned that temporary pandemic-era funding streams (like the federally-funded RentHelpMN) and tenant protections (like the eviction moratorium) may have induced local agencies to shift dollars away from EA and toward other programs that draw from the same funding source. These temporary programs ended in 2021 and 2022. If local agencies moved resources away from EA in the pandemic context, after the expiration of temporary COVID-era funding and policies it may have become difficult to re-allocate funding back to EA without an increase in the overall pool of available funds. This interpretation is consistent with the pattern of decreased overall EA spending in 2021-23 compared to 2016-19.

Figure 2. Total and average EA payment amounts (inflation-adjusted), 2016-2023.



Finding 3: Differences in local EA programs

The third theme is there are large differences in how local agencies structure their EA programs, and, relatedly, there have been changes in local plans from 2016 to the post-pandemic context. Local discretion results in a patchwork of policies and rules, with agencies using different approaches to maximize their dollars by either serving more households or paying for more expensive emergencies for fewer families. While all local plans in effect at the start of 2024 included rent and utilities as eligible expenses, about 35% allowed EA to cover moving expenses, and 8% of local plans covered childcare costs. Some changes since 2016 served to make EA more accessible to residents. For example, there have been slight increases in maximum benefit amounts (after adjusting for inflation). At the same time, jurisdictions tended to require more verifications to determine eligibility, on average, in 2024 than in 2016. Through our engagement of local partners, many voiced an interest in more policy cohesion across jurisdictions, and for the State to identify and standardize best practices for local EA programs.

This report seeks to facilitate deeper understanding of the use of EA across the state. We call attention to the need for further research into how the EA program affects outcomes for participating households, and to the effects of differences in how local agencies administer the program. To those ends, Minnesota Management and Budget plans to conduct an impact evaluation in consultation with State, Tribal, and local partners. As we explore these questions, we aim to provide insights that can be used to better serve families in crisis across Minnesota.

Background

Introduction

Emergency Assistance (EA) is a program administered by Minnesota counties and tribes to resolve one-time housing and related crises for families with children. In 2003, MN repealed its statewide EA program and gave authority to local agencies (counties, county consortia, and Tribal nations) to develop their own EA programs, policy, and practices. This new county-administered program is funded by the State through the Minnesota Family Investment Program (MFIP) Consolidated Fund, an allocation to counties to augment their primary cash welfare program. Local agencies can choose to use a portion of their allocation for EA among other optional programs, but it is not required, and they have wide discretion over policy and processes for EA eligibility and payments.

Because EA is funded through MFIP, Minnesota's cash welfare program for families with dependent children, only families with dependent children or pregnant persons are eligible. Though it varies by jurisdiction, EA can typically be used to pay for rent to avoid eviction, mortgage arrears, damage deposits, utilities, and other housing-related emergencies. The State also funds two similar programs, Emergency General Assistance (EGA), for households without dependents, and the Family Homelessness Prevention and Assistance Program (FHPAP).

Since EA became a county-run program, over 20 years ago, there has been little research on its use or impact for Minnesota residents. In 2022, the Minnesota Department of Human Services (DHS) published the only publicly available research available to our knowledge, a short brief examining overall trends in the number of families served, primary payment reasons, demographics, and past EA use. While valuable, its scope was limited, examining only broad trends and approved families in a single calendar year.

Another important societal dynamic underscoring the need for evaluation of EA is the COVID-19 pandemic. While the pandemic upended need for and use of most government programs and services, it had an especially direct impact on EA, in specific ways. First, the pandemic catalyzed unprecedented levels of need for emergency services, with families experiencing dire economic circumstances. Second, lawmakers adopted a wide variety of policies to respond to the pandemic. These included new temporary funding streams that states, counties, and localities could tap into to help address need. Also, eviction moratorium policies in effect at the height of the pandemic likely changed dynamics for EA staff and applicants (EA funds are often but not always used for rent payments). Changing contexts of need, policy, and funding during the pandemic likely brought consequences for how residents and local agencies both allocated funding to EA vs other Consolidated Fund programs and used EA to meet residents' needs.

Current Study and Research Questions

EA serves families in deep crisis and is often a critical lifeline for those experiencing imminent housing instability or homelessness. To adequately serve families, we must understand the program's reach, use, limitations, and impact. In this vein, MMB is partnering with the Department of Children, Youth, and

Families (DCYF) to conduct research and evaluation on EA, to supplement past research and provide a deeper look into program trends over the last decade and evaluate its impact on participants. This descriptive report is the first phase of our evaluation plan, where we examine program trends, patterns, and use across a variety of domains. In this report, we explore four primary research questions along these lines.

1. How does EA program policy and administration vary by local agency?
2. How do applicants approved for EA differ from those not approved in demographics, housing characteristics, and use of other public assistance programs?
3. What are the primary reasons applicants for EA are denied funding? Do they vary across counties?
4. How has the creation and use of the MNbenefits application platform influenced trends in EA applications and denials?

While developing this descriptive report, we engaged with DCYF program and research staff as well as staff from counties, county consortia, and Tribal nations, to understand their experiences with EA and ensure our analysis is rooted in proper context. Throughout the report and discussion, we use the insights we gleaned from these engagements to help explain and contextualize our findings.

Data and sample

Data for our analysis comes from three sources: local agency EA plans, the State's MAXIS public assistance database, and the MNbenefits application platform, each of which are explained in greater detail in this section. Our study period is from January 1, 2016 through December 31, 2023. We chose this period to give us a substantial window that includes time periods before, during, and after the COVID-19 pandemic emergency. State and local program staff agree that the pandemic substantially changed EA use across most jurisdictions. Not only did it catalyze an unprecedented level of need, but it also fostered unprecedented temporary funding that could be used to meet the need.

Local EA plans

Our first data source is EA plans from local agencies (counties, county consortia, and Tribal nations). Agencies submit biennial service agreements (BSA) to the State outlining how they will use their allocation from the MFIP Consolidated Fund. As part of this BSA process, agencies submit their EA plans if changed since the last biennium. Local agencies are not required to have an EA program or to update them if they have one, and there is no enforcement to ensure that every update to every plan is submitted. Because of this, the list of plans the State has may not be comprehensive. To mitigate this, the State requested all agencies submit their most recent EA plan for the 2024-2025 BSA process, but there still may be gaps.

To explore differences across local EA programs, we received all EA plans that DCYF has on file from local agencies. We qualitatively coded these plans and across almost forty elements, including the effective date, maximum benefit amount, eligibility criteria, types of coverable expenses, required verifications,

and whether in-person interviews were required, in addition to others. Our team reviewed each plan twice and met regularly to resolve coding discrepancies.

There is no standardized form or template that agencies fill out for their EA plans, and the details in EA plans vary widely across jurisdictions. To make sure our coding was accurate and grounded, we sent a survey to agencies administering EA asking them to correct any errors. We also asked respondents to upload their most recent plan if it was not the one we had, which was re-coded and sent back to them for review. After this multi-step process, we reconciled all plans and survey responses. In all, we coded a total of 151 EA plans implemented by 78 distinct local entities between 2003 and 2024.

MAXIS

Most of our research questions used data from the State’s primary public assistance database, MAXIS. MAXIS provides case and payment tracking across numerous benefit programs, including food and cash assistance and the two emergency programs, EA and Emergency General Assistance (EGA), among others.

We extracted EA applications dated from January 1, 2016 to December 31, 2023 from MAXIS, including all denied applications and the vast majority of approved applications. For approved applications, we included those applications marked as eligible and approved in the result code and program stat codes associated with a valid EA payment dated within 6 months before to 12 months after the application date. Almost 99% of approved/eligible applications matched a payment in this range. Unmatched cases seemed to have no associated payment in MAXIS, which, according to MFIP policy staff, happens from time to time. Some cases may also have been associated with payments that were outside the bounds of study period. For this reason, there is a slight mismatch between total approved cases in the study period and total payments in the study period, and total payments for approved cases do not entirely match official DHS reports.

Most persons associated with a MAXIS case had a descriptor of their relationship with the case (e.g., applicant, spouse, child, etc.), which allowed us to select the appropriate person for applicant characteristics. For the few applications that did not have a clear applicant, we selected the oldest adult associated with the case. Cases that did not have any clear applicant or anyone over 18 were dropped from the sample.

In all, our MAXIS sample contains 316,739 distinct applications that met the above criteria from 2016 to 2023. This includes 61,434 approved cases associated with 100,918 unique payments.

MNbenefits

For our fourth research question, we used data from the MNbenefits application platform—from its start in 2021 through the end of 2023—as well as data from MAXIS, described above. MNbenefits data include all applications for assistance from one of two emergency programs, EA and EGA. The MNbenefits platform does not distinguish between applications for EA (for households with children) and EGA (for single adults). While there are nuances in how applications may be processed by counties and Tribal nations, we restricted the sample to focus on applications considered for EA. Out of 185,067

total MNbenefits applications for emergency programs, our sample includes the 102,368 applications with a household size of at least two (55% of all emergency applications).

We supplemented MNbenefits data with MAXIS data to explore larger trends in EA applications and caseloads over time. MNbenefits data and MAXIS data are from separate systems and architectures. We did not link individual records across the systems and in the MNbenefits section of this report we only use MAXIS data for supplementary analysis to identify how trends may have changed upon the introduction of the MNbenefits platform.

Basic Program Trends

Before we discuss findings from our four research questions, we first set the stage with basic program caseload and payment trends. Figure 3 below shows the total number of approved and denied EA applications (in the blue and green bars respectively) and the corresponding application approval rate (in the orange line) across the state by year from 2016 to 2023. From 2016 to 2018, the number of total applications and approval rate was steady at around 40,000 total applications and 10,000 approved applications. In 2019 and 2020, the total volume decreased slightly before bottoming out in 2021. The total number of applications increased substantially in 2022 and stayed high in 2023, composed primarily of applications that were ultimately denied. Statewide approval rates, that hovered between 21% and 27% from 2016 to 2020, fell sharply in 2021 through 2023 to around 12% to 13%. Approval rates fell in accordance with the increase in total (and particularly denied) applications, except in 2021 when both the total number and approved applications were at a period-wide low.

Figure 3. EA applications approved and denied and approval rate by year, 2016 - 2023

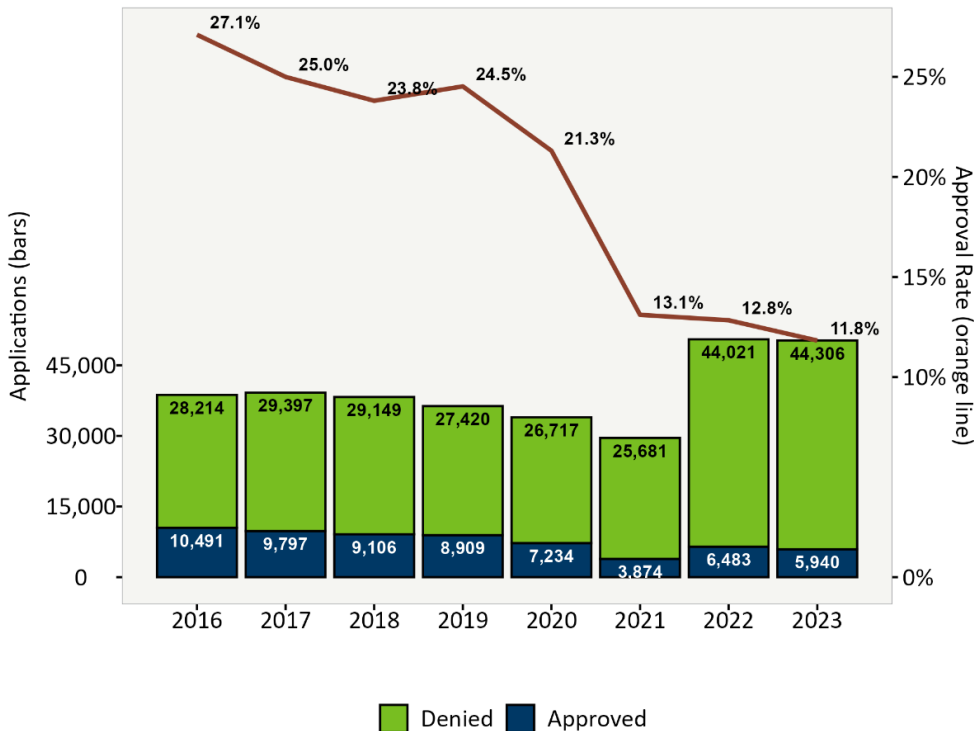
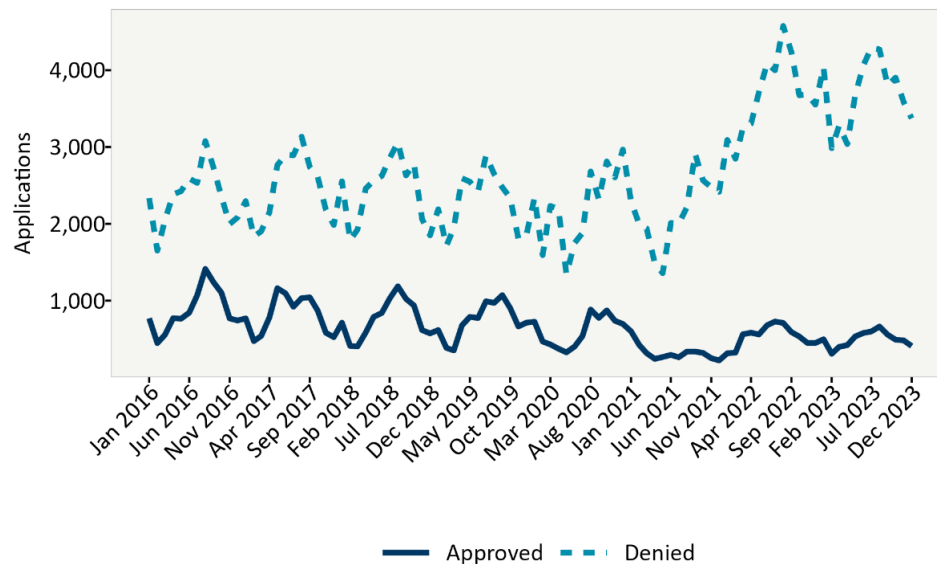


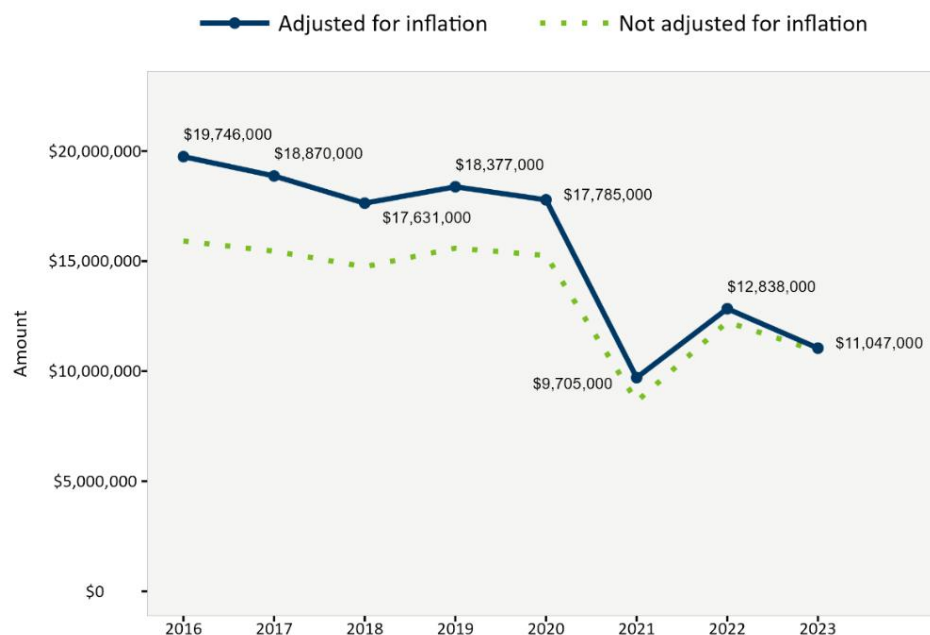
Figure 4 below presents the total number of approved and denied applications at a more granular monthly level from January 2016 to the end of December 2023. This graph showing similar seasonal fluctuations for approved and denied applications until early 2021, with peaks in the summer and fall and troughs in the winter and spring. Starting in early 2021, the number of denied applications increased similar to prior fluctuations, but the number of approved applications stayed steady and even declined slightly. This results in the decreased approval rates starting in 2021 shown in the first figure of this section.

Figure 4. EA applications approved and denied by month, Jan 2016 – Dec 2023



We move from program caseloads to payment trends for the next three graphs. To help make sense of payment trends, we note again here that EA spending is at the discretion of counties and other local agencies and comes from their state allocation of the MFIP Consolidated Fund. Local agencies do not control how much they are given by the State, but they do decide how much of the funding to allocate towards EA vs. other programs.

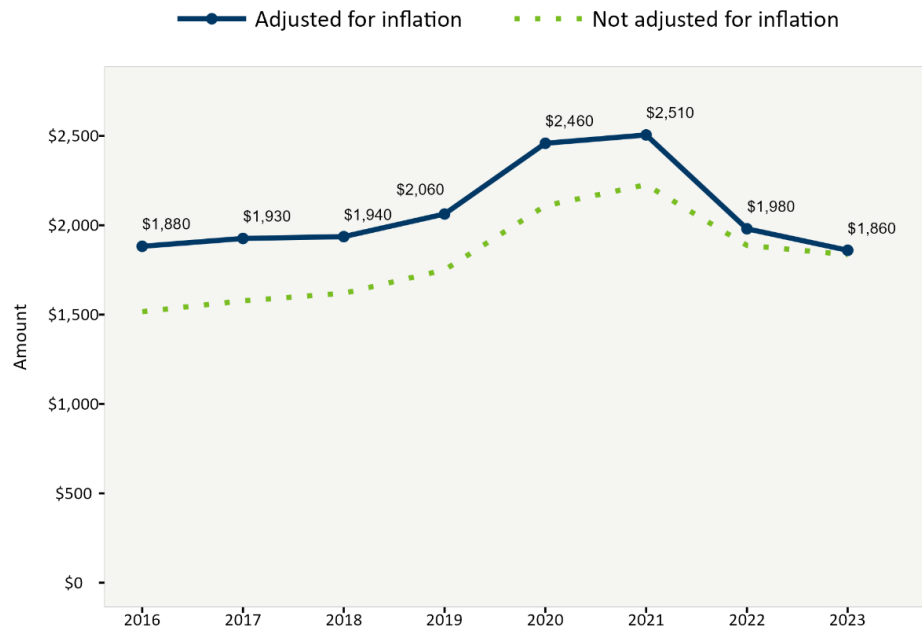
Figure 5. EA total payments to approved cases, 2016 – 2023



Note: Labels indicate inflation-adjusted payments (2024 dollars, adjusted with Personal Consumption Expenditures Price Index).

Figure 5 above presents total payments to approved cases by year showing that while total nominal annual payments were steady around \$15 to 16 million from 2016 through 2020, they declined slightly in real dollars. Total nominal payments fell by half to \$8.6 million in 2021 before rising in 2022 and decreasing slightly in 2023 to about \$11 million. In constant 2024 dollars, the total EA payment amount in 2023 was 44% lower than it was in 2016. If EA payments had kept pace with inflation since 2016, then total EA payments in 2023 would have been \$19.7 million, not \$11 million.

Figure 6. EA average payments to approved cases, 2016 – 2023



Note: Labels indicate inflation-adjusted payments (2024 dollars, adjusted with Personal Consumption Expenditures Price Index).

Figure 6 above shifts the focus from total payments to average case payments by year. Average nominal payments to approved cases increased gradually from \$1,520 in 2016 to \$1,840 in 2023. However, in real dollars, average payments were comparatively stable, with values of \$1,880 in 2016 and \$1,860 in 2023. The purchasing power of EA payments did not change substantially between 2016 and 2023. In both nominal and real dollars, average payments per approved EA application were higher in 2020 and 2021 (during the pandemic emergency).

During the pandemic, there was a drop in the number of families served by EA. While there were relatively high average payments in 2021, the trend for total EA payments fell to its lowest level in 2021 (see the previous figure), and the approval rate trend fell as well (see Figure 2). Pandemic response policies like the eviction moratorium and federally-funded rent help may be related to these changes. In Minnesota, federal and state eviction moratorium policies were in effect between the spring of 2020 and late 2021, with some protections extending until the end of May 2022 (McCarty & Carpenter, 2020; Volunteer Lawyers Network, 2021; HOME Line, 2022). Also, Minnesota renters applied for over \$500 million in rental assistance via RentHelpMN, and this COVID-era program approved payments to over

two thirds of applicants (Minnesota Housing Finance Agency, 2022). With a temporary ban on most evictions, and the availability of a temporary rental assistance program that was much larger than EA, it seems plausible that during this period some local agencies would have chosen to direct scarce funds toward priorities other than EA. However, in 2022 and 2023, approval rates for EA remained below approval rates from the years before the pandemic. Local agencies may have shifted funding toward other priorities during COVID-19, without shifting that funding back after the end of the pandemic emergency.

Next, we consider payment types and reasons. Figure 7 below shows the total count of each payment type from 2016 to 2023 on the x-axis by the average payment amount (in nominal dollars) for that payment type on the y-axis. Permanent housing payments for rent or mortgage were the most frequent at more than 30,000 and had a high average payment of around \$1,300. Payments for utilities were slightly less common and had lower average payments of around \$750. Homeless shelter payments were third most common (around 20,000 from 2016 to 2023) but had the highest average payment amount of almost \$1,500. Payments for damage deposit were less common and had a moderate average payment amount. Other reasons (including child care, employment, home repairs, transportation, and similar) were all less common and had the lowest average payment amounts of around \$500.

Figure 7. Count of EA payment reasons by average payment amount (nominal dollars), 2016 – 2023

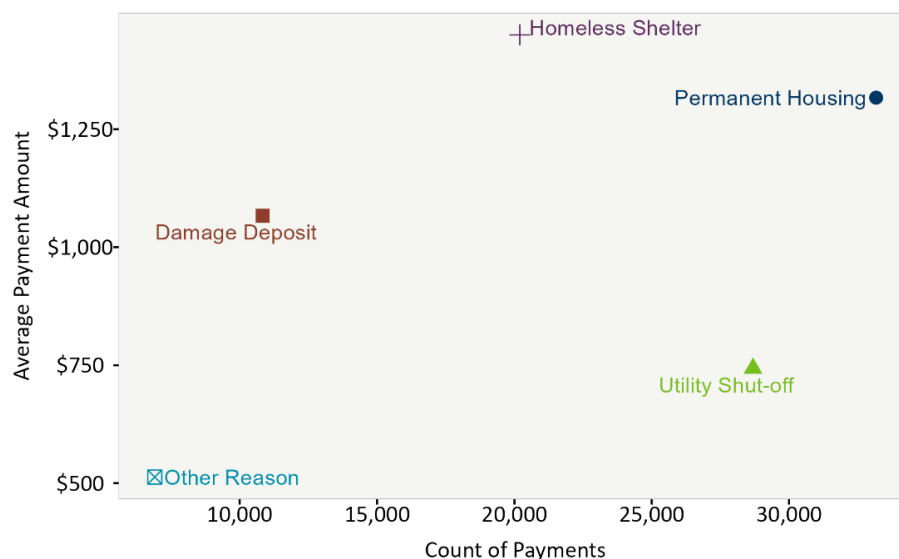
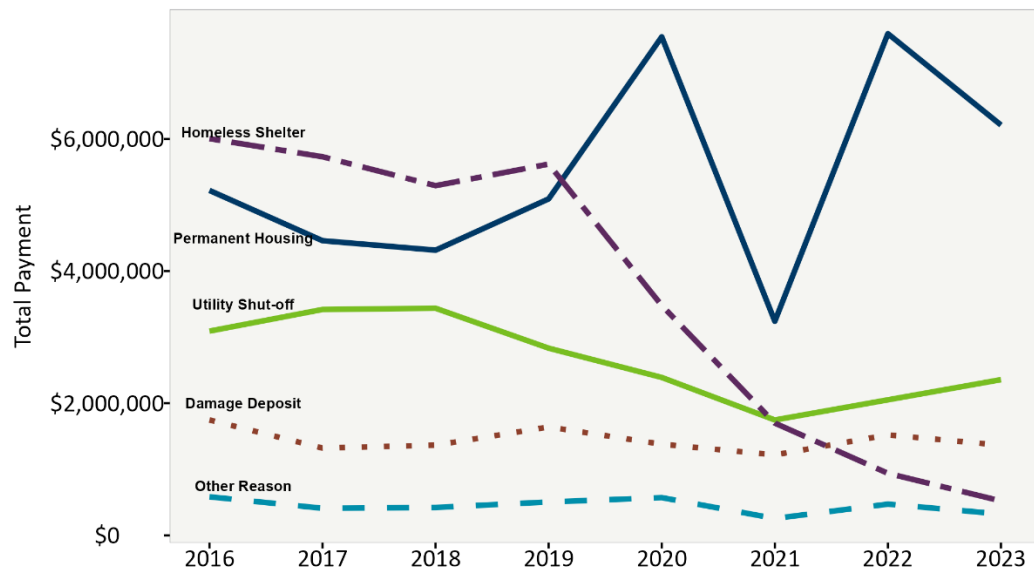


Figure 8 below dives a bit deeper into EA payment reasons by looking at trends over time. Payments for homeless shelter were the biggest spending category from 2016 until 2019, at which point it declines heavily into one of the categories with the least spending. Most homeless shelters in Minnesota are concentrated in the Twin Cities metro area, specifically Hennepin County. Staff from Hennepin shared that they disallowed EA payments for homeless shelter in 2022 and began using a separate funding source. Payments for permanent housing (rent or mortgage) comprised the highest spending from 2020 through 2023, followed by utility payments.

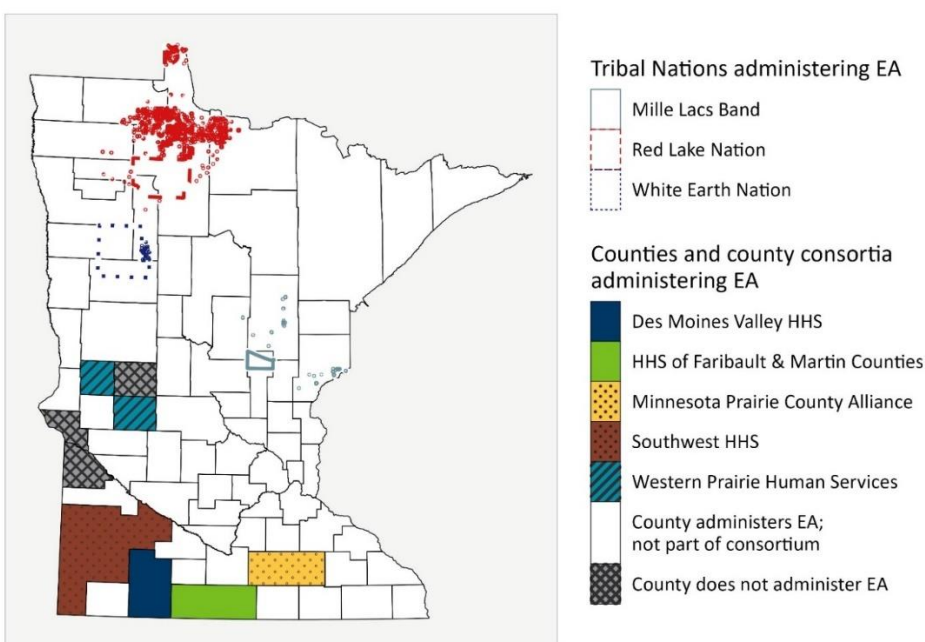
Figure 8: Total EA payments by reason and year, 2016 – 2023



1. County EA programs and policy

There are three types of government entities that administer EA programs. Each entity has the flexibility to design plans for how they will disburse money from the MFIP Consolidated Fund (Emergency Assistance: Serving Families in Crisis, 2021, p. 6). County governments administer the largest number of EA plans. Second, some counties collaborate to deliver Human Services programs. In Minnesota, five county consortia administer EA for member counties (e.g., Grant County Social Services and Pope County Human Services merged to form Western Prairie Human Services on January 1, 2022). Third, three Tribal nations—the Non-Removable Mille Lacs Band of Ojibwe, Red Lake Nation, and White Earth Nation—administer EA for Tribal members. Altogether, EA is available in 84 of Minnesota’s 87 counties.¹ The jurisdictions administering EA are shown below in Figure 9.

Figure 9. EA policies administered by Counties, county consortia, and Tribal nations



Note: Tribal Nation boundaries drawn from the Minnesota Geospatial Commons. Tribal Nation boundaries shown include off-reservation land/trust lands.

Some aspects of EA programs are dictated by state statute regarding the MFIP Consolidated Fund (Minn. Stat. 256J.626). For example, all local agencies require 30-day state residency and set thresholds for maximum household income. However, most rules and policy are set at the local level, and as such, EA programs vary widely across the state. For example, Counties set different rules around the maximum benefit for each case. Each local agency with an EA program creates a plan outlining these policies and procedures, which is then sent to the State, as outlined in the data and sample section above. This section describes how local agencies’ EA programs vary across the state on a variety of elements that likely have real implications for whether residents are or are not able to access funding.

¹ EA is not available in Big Stone County, Douglas County, or Lac qui Parle County.

Table 1. Summary statistics on EA plans in effect on January 1, 2016 versus January 1, 2024

	2016	2024
Average maximum benefit amount ^a , household size two (Inflation adjusted)	\$1,657.30	\$1,725.24
Average maximum benefit amount ^a , household size three (Inflation adjusted)	\$1,887.71	\$1,923.90
Average months between EA receipt	15.611	14.408
<u>Verifications</u>		
Identity	53.7%	61.4%
Residency	35.2%	50.0%
Citizenship	46.3%	48.6%
Cost of emergency	77.8%	81.9%
Income	70.9%	77.8%
Assets	70.4%	75.0%
Household members	37.0%	42.3%
Lease or mortgage	46.3%	50.7%
All factors verified	22.2%	19.7%
<u>Covered expenses</u>		
Foreclosure	83.3%	86.3%
Rent/shelter costs	100.0%	100.0%
Security deposits	88.9%	88.9%
Moving expenses	50.0%	34.7%
Utilities	100.0%	100.0%
Transportation	27.8%	23.3%
Home repairs	27.8%	19.7%
Special furnishings	3.7%	4.2%
Childcare	7.4%	8.3%
Employment-related expenses	18.5%	23.3%
N	55	76
^a Maximum benefit amount where BSA specifies a maximum dollar amount or multiple of the MFIP standard. Excludes cases where jurisdiction covers the cost of the emergency without a specified limit.		

Table 1 above summarizes various elements of local plans during two time periods, among plans in effect as of January 1, 2016, and among plans in effect as of January 1, 2024. Adjusting for inflation, maximum benefit amounts increased. Compared to the plans in effect in 2016, the 2024 plans tended to include more required verifications (though there was a slight decrease in the share of plans stating that all eligibility factors are to be verified, versus specifying which factors require verification). All plans in both 2016 and 2024 included rent/shelter and utilities as covered expenses. In both years, over 80% of

plans included foreclosures as a covered expense. There was a decrease in the share of plans that covered moving expenses (from 50% to 35.6%), and in the share of plans that covered home repairs (from 27.8% to 19.4%).

Table 2. Summary statistics on EA plans in effect as of January 1, 2024, Greater MN versus metro area

	Greater MN	Seven-county metro
Average maximum benefit amount ^a , household size two (Inflation adjusted)	\$1,717.49	\$1,847.25
Average maximum benefit amount ^a , household size three (Inflation adjusted)	\$1,913.05	\$2,094.75
Average months between EA receipt	14.478	13.714
<u>Verifications</u>		
Identity	57.1%	100.0%
Residency	47.6%	71.4%
Citizenship	42.9%	100.0%
Cost of emergency	80.0%	100.0%
Income	75.4%	100.0%
Assets	72.3%	100.0%
Household members	43.8%	28.6%
Lease or mortgage	50.0%	57.1%
All factors verified	21.9%	0.0%
<u>Covered expenses</u>		
Foreclosure	86.4%	85.7%
Rent/shelter costs	100.0%	100.0%
Security deposits	87.7%	100.0%
Moving expenses	32.3%	57.1%
Utilities	100.0%	100.0%
Transportation	24.2%	14.3%
Home repairs	17.2%	42.9%
Special furnishings	3.1%	14.3%
Childcare	9.2%	0.0%
Employment-related expenses	25.8%	0.0%
N	69	7
^a Maximum benefit amount where BSA specifies a maximum dollar amount or multiple of the MFIP standard. Excludes cases where jurisdiction covers the cost of the emergency without a specified limit.		

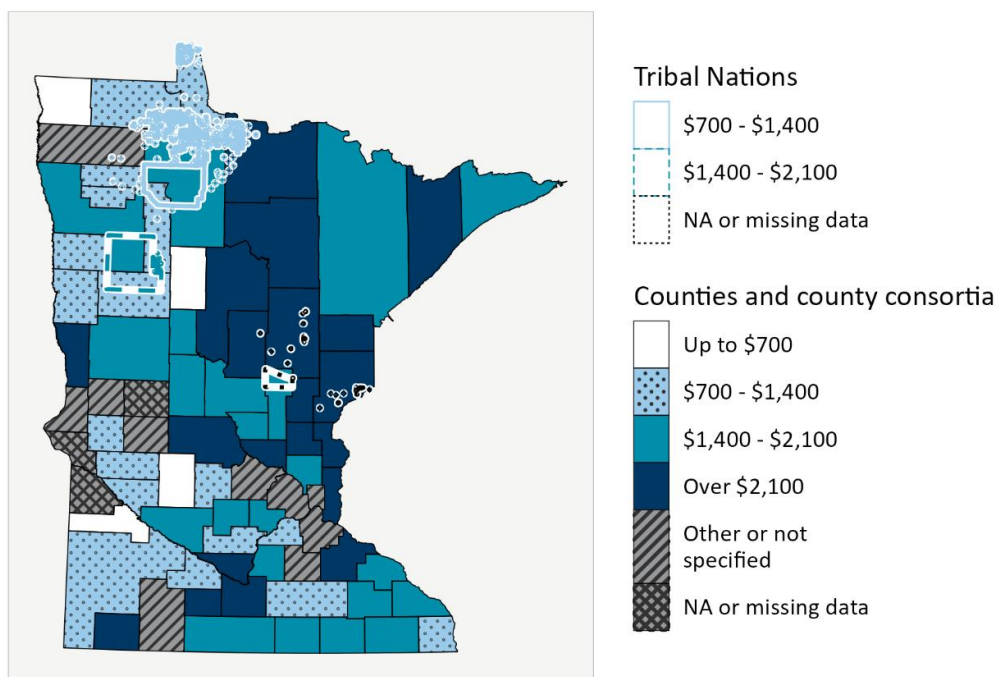
Table 2 above focuses on differences between 2024 plans in the seven-county metro area and Greater

Minnesota, including Tribal nations. A higher share of plans for Greater Minnesota jurisdictions included transportation costs as a covered expense. Metro area plans were more likely to cover moving expenses and home repairs. Metro area plans also tended to require more specific verifications. While 21.9% of Greater Minnesota plans included a statement that all eligibility factors were verified, this statement appeared in none of the metro area plans.

Maximum benefit amount

EA plans vary in the maximum benefit they allow an applicant household to receive. Most often, EA plans specify a maximum benefit amount as a multiple of the MFIP standard for a household of a given size. MFIP standards are higher for households with more children. Other plans specify a fixed dollar amount as the maximum benefit for a household regardless of size. Some plans are more flexible, allowing EA payments up to the cost of the emergency. Figure 10 below shows the maximum benefit amount for EA plans in effect as of January 2024. In general, there tend to be higher maximum benefit amounts in metro and northeastern counties.

Figure 10. Local EA plans by maximum benefit amount (for households with two members)



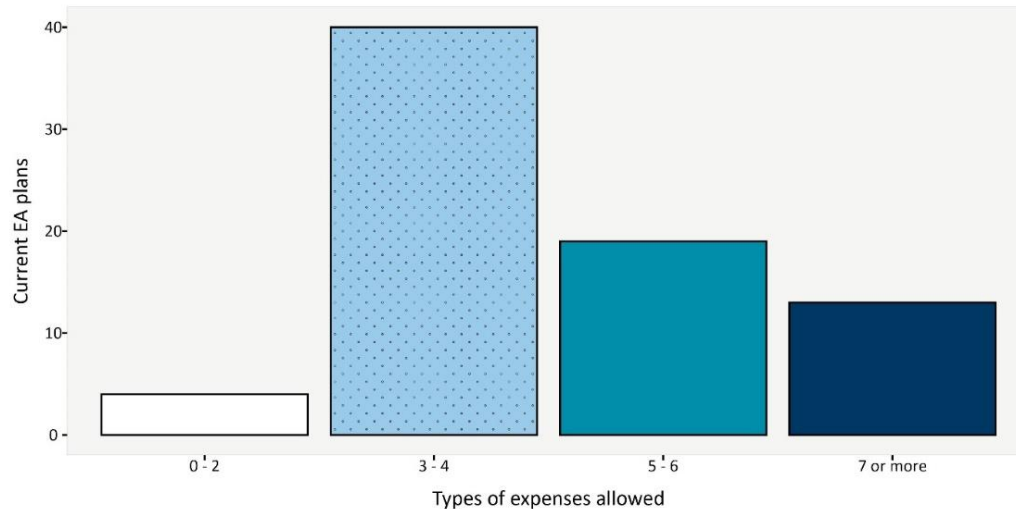
Note: Tribal nation boundaries drawn from the Minnesota Geospatial Commons. Tribal nation boundaries shown include off-reservation land/trust lands.

Covered expenses

EA plans also varied in the number of different types of expenses that could be covered. Virtually all plans covered rent and utilities. It was also common for EA plans to cover foreclosures and security deposits. 35.6% of plans covered moving expenses, and 19.4% covered home repairs. 4.2% of plans covered special furnishings, a category that includes amenities like air conditioning units for individuals

with asthma. The bar graph below, Figure 11, shows that it was most common for EA plans to cover three or four types of expenses.

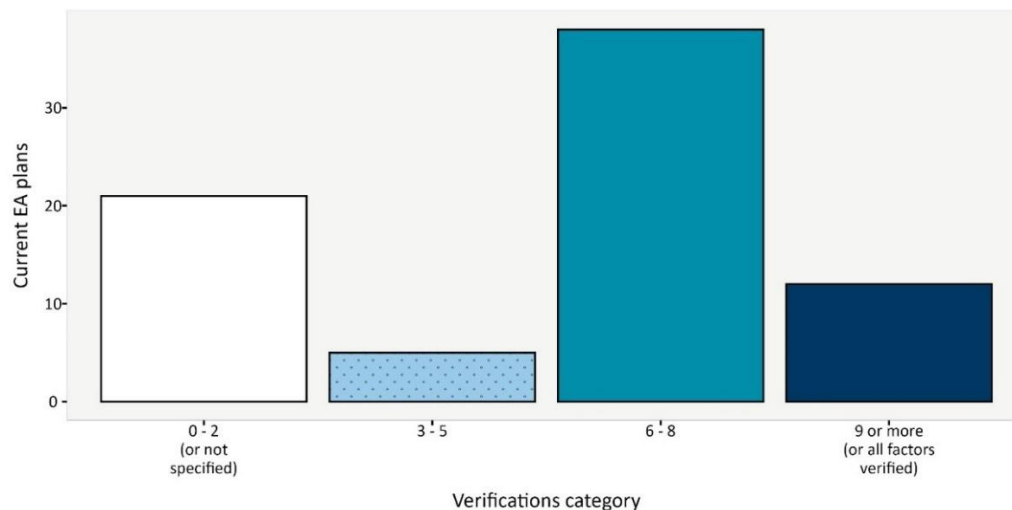
Figure 11. Local EA plans by the number of expense categories that may be covered



Note: This analysis reviewed whether EA plans authorized payments for foreclosures, rent, security deposits, moving expenses, utilities, transportation, home repairs, special furnishings (e.g., for individuals with disabilities), childcare, and employment-related costs. We calculated categories for this plot by adding up the number of these expenses where EA plans authorized payment.

Verifications and other application requirements

Figure 12. Local EA plans by the number of required verifications

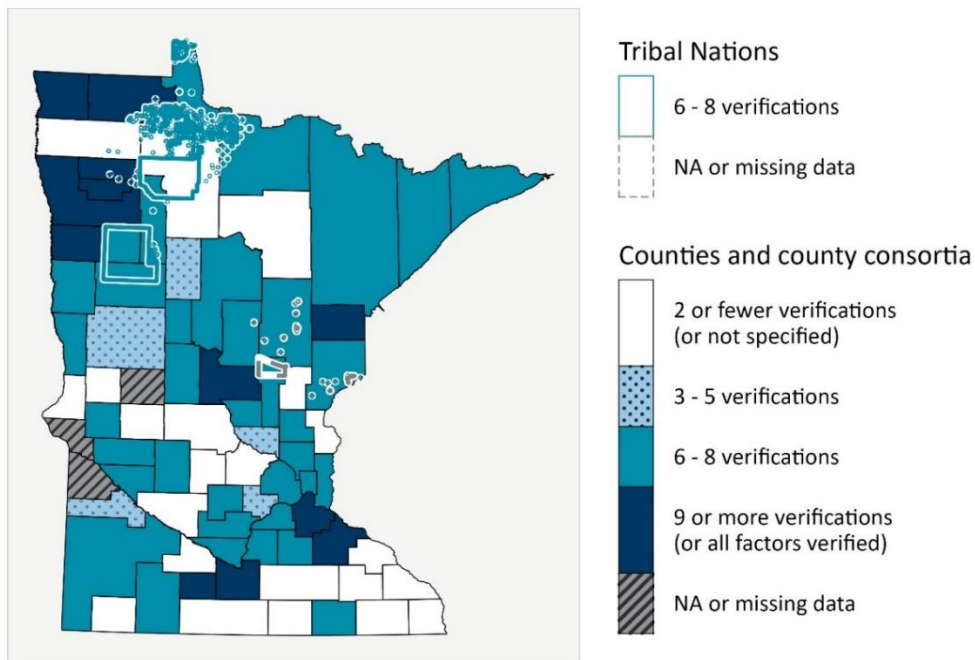


Note: This analysis reviewed whether EA plans required applicants to verify identity, residency, citizenship, the cost of the emergency, income, assets, expenses, relationships to other household members, and the lease or mortgage. We calculated categories for this plot by adding up the number of

these verifications that each EA plan required. We also tracked whether plans stated that all factors were verified (without going into specifics).

There was a bimodal distribution in the number of required verifications. Some plans stated that all eligibility factors required verification without necessarily going into specifics; we categorized these plans along with the top category by number of verifications. There were many local agencies with two or fewer required verifications, or with six or more required verifications. There were not as many local agencies that required three to five verifications. The distribution can be seen in a bar graph (Figure 12 above) above and a map (Figure 13 below).

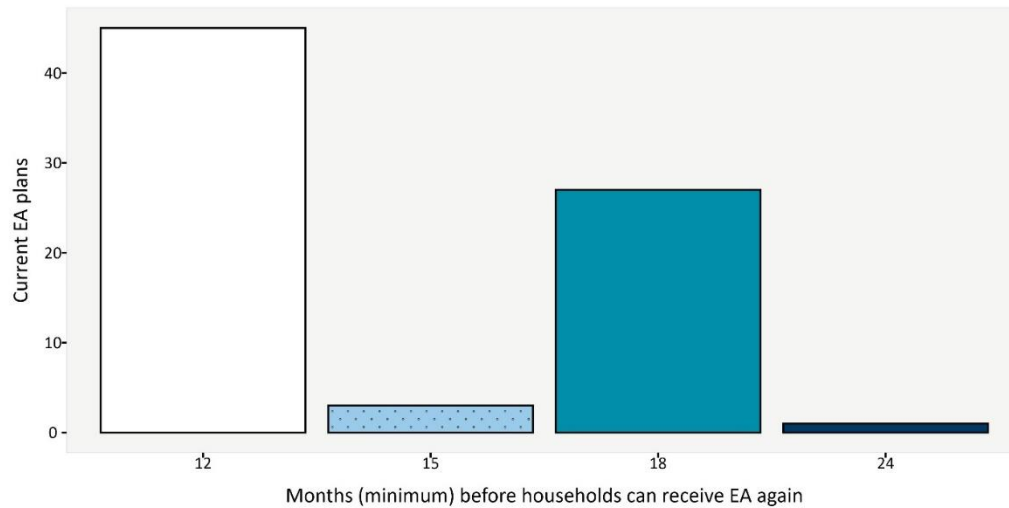
Figure 13. Local EA plans by the number of required verifications



Note: This analysis reviewed whether EA plans required applicants to verify identity, residency, citizenship, the cost of the emergency, income, assets, expenses, relationships to other household members, and the lease or mortgage. We calculated categories for this plot by adding up the number of verifications that each EA plan required. We also tracked whether plans stated that all factors were verified (without going into specifics). Tribal Nation boundaries drawn from the Minnesota Geospatial Commons. Tribal Nation boundaries shown include off-reservation land/trust lands.

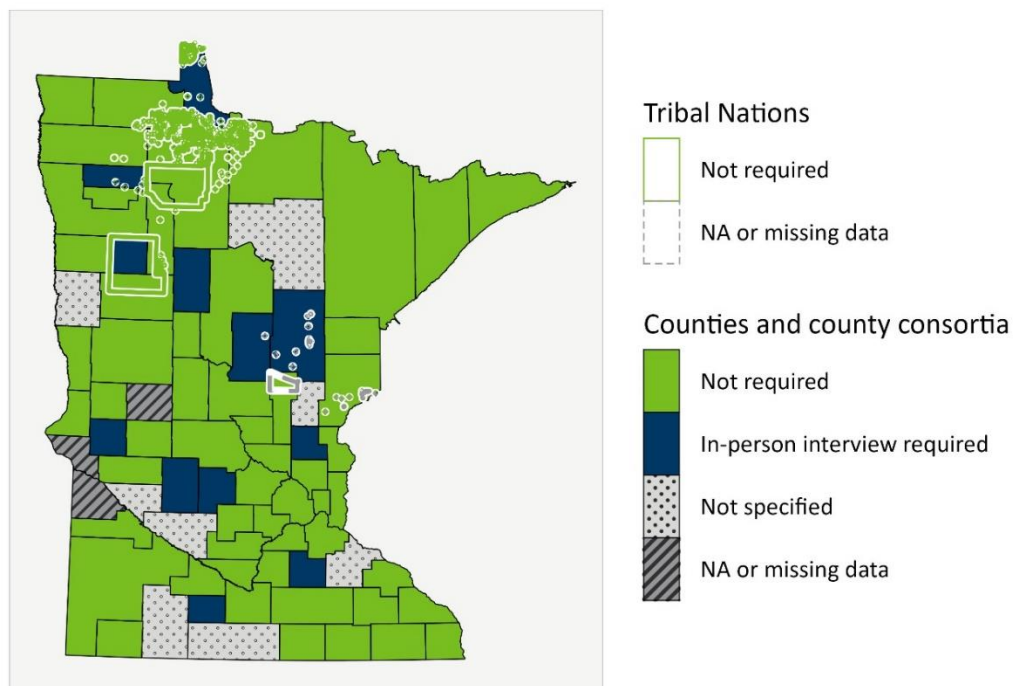
Most local entities required applicant households to wait at least twelve months between instances when they receive EA support. Some entities imposed longer waiting periods, with the 2nd largest number of entities requiring eighteen months between applications. The distribution by months between applications is shown in Figure 14 below.

Figure 14. Local EA plans by months between applications



Some local agencies required an in-person interview, particularly for plans created prior to the COVID-19 period. Other local agencies did not require any interview or allowed phone interviews. The map below, Figure 15, shows the geographic distribution of local EA plans requiring in-person interviews. Twelve of the plans in effect as of January 2024 required an in-person interview, and fifty-six did not.

Figure 15. Local EA plans by in-person interview requirements



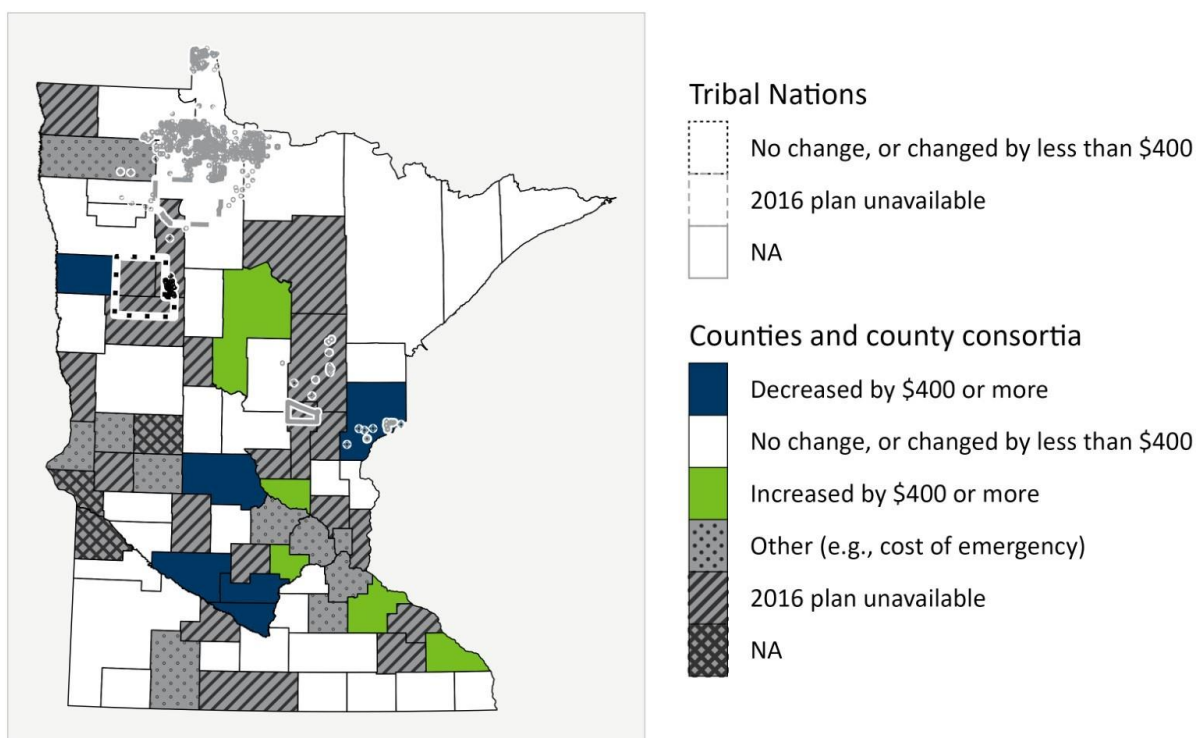
Note: This analysis reviewed whether EA plans required applicants to participate in an in-person

interview. Tribal nation boundaries drawn from the Minnesota Geospatial Commons. Tribal nation boundaries shown include off-reservation land/trust lands.

Change over time

To provide an overview of change over time, we compared the plans that were in effect on January 1, 2016 to the plans that were in effect on January 1, 2024. Figure 16 below shows that some local agencies adjusted maximum benefit amounts. Figure 16 focuses on change over time in the inflation-adjusted maximum benefit amounts for households of size two (e.g., a single parent and one child). We found that maximum benefit amounts decreased by at least \$400 in six local agencies, and increased by at least \$400 in five local agencies. In thirty-five local agencies, the maximum benefit amount in 2024 remained within \$400 of the amount from 2016. For other local agencies, the values were not comparable. Information on other changes in EA plans over the period from 2016 to 2024, such as changes to in-person interview requirements, is provided in Appendix figures 3, 4, and 5.

Figure 16. Local EA plans by change in the maximum benefit amount (for households with two members), January 2016 versus January 2024



Note: Dollar figures reflect price levels as of January 2024, calculated with inflation-adjusted maximum benefit amounts (adjusted with the Personal Consumption Expenditures Price Index). We compared maximum benefit amounts for households of size two, using plans in effect on 1/1/2016 and plans in effect on 1/1/2024. Tribal Nation boundaries drawn from the Minnesota Geospatial Commons. Tribal Nation boundaries shown include off-reservation land/trust lands.

In addition to the maximum benefit specified by policy shown above, we also compared data on total EA expenditures in 2016 to EA payments in 2023. Over this period, local agencies allocated less money to

EA, but average EA payments to recipient households did not change. We show these changes in payments in Appendix figures 6 and 7. In most local agencies, total spending decreased by at least 30% between 2016 and 2023, while average spending per recipient remained about the same. This suggests local agencies chose to concentrate scarce resources among a smaller number of recipients. However, it is unclear whether changes in local EA plans were causally related to changes in patterns of benefits received by households.

2. Applicant characteristics and differences

We now focus our discussion on the characteristics of EA applicants, both the overall population, as well as the differences between approved and denied applicants. This analysis includes looks at applicants (i.e., the person who sent in the application for the household), households (i.e., the household a specific application is for) and applications (i.e., specific instances of a household applying to EA). One applicant or household can submit multiple applications for EA, with each instance approved or denied. Please see the appendix for more detail on how we treat applicants, households, and applications in this analysis.

For each applicant, household, or application characteristic, we present two figures: one for the overall population (i.e., all applicants or applications), and one for the differences in the given attribute between approved and denied applications. Figures showing the characteristics by year are available in the appendix.

It is worth noting explicitly that an application can be denied for many reasons, each of them unique to the county or local agency at hand. In that regard, because “eligibility” is specific to the processing agency and the case itself, the vast majority of denied applications are denied because they were found to be ineligible in some way. However, in our engagement with local agencies, we discovered there are cases where applications are denied due to the lack of funding, and it is possible that these households would have otherwise been eligible. We explore reasons for denial further in the next section.

Sex

We start by looking at applicant sex. Figure 17 below shows that over 80% of all unique EA applicants between 2016 and 2023 were female. Denied applications were slightly more likely to have a male applicant (10% of denied applications compared to around 7.5% of approved; see Figure 18).

Figure 17: EA applicants by sex, 2016 - 2023

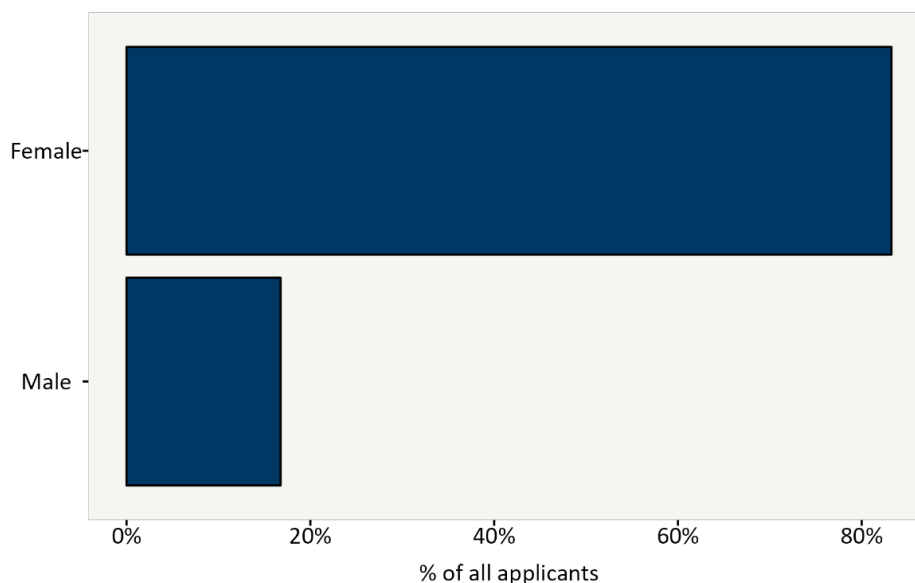
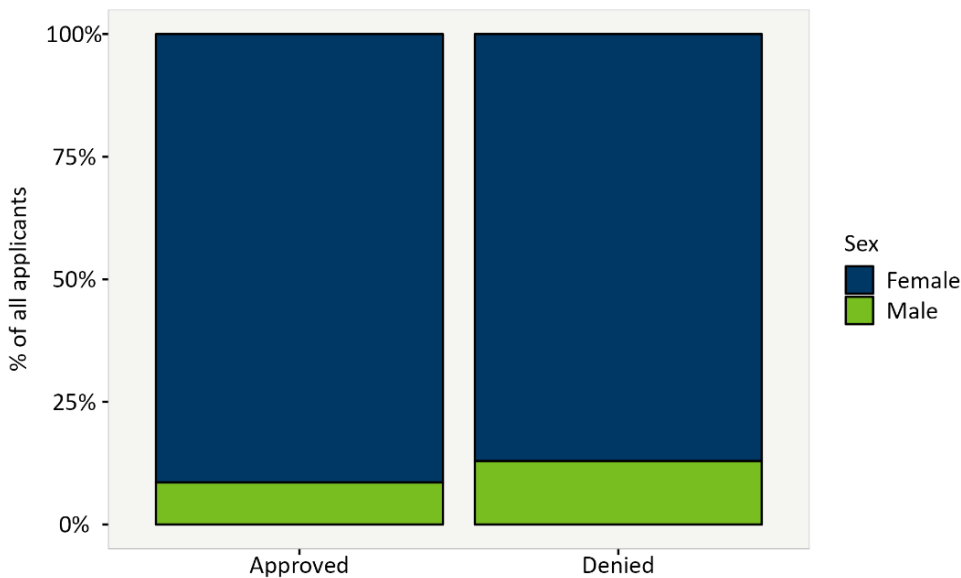


Figure 18: Sex differences between approved and denied applicants, 2016 - 2023



Race

We next move to applicant race/ethnicity. Almost half of all unique EA applicants were white and around one-third were Black (see Figure 19). Slightly over 10% of applicants were Hispanic, while around 5% of applicants were American Indian/Alaskan Native and another 5% were Asian/Pacific Islander. Slightly less than 5% identified with multiple racial categories, and data were missing for around 3%. Overall, the racial composition was roughly proportional to that of MFIP participants, with white applicants making up a slightly higher share (Minnesota Department of Human Services, 2024).

Figure 19: EA applicants by race, 2016 - 2023

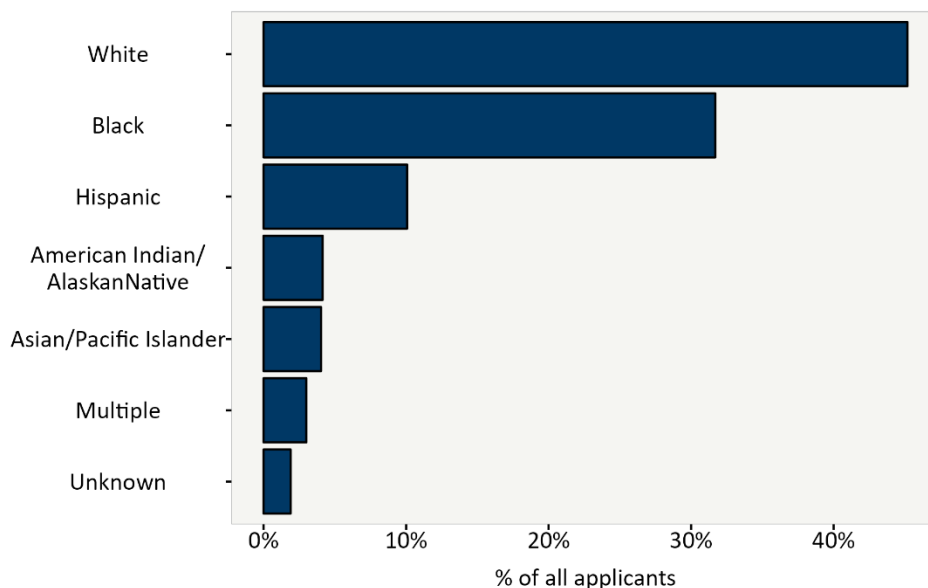


Figure 20: Racial/ethnic differences between approved and denied applicants, 2016 - 2023

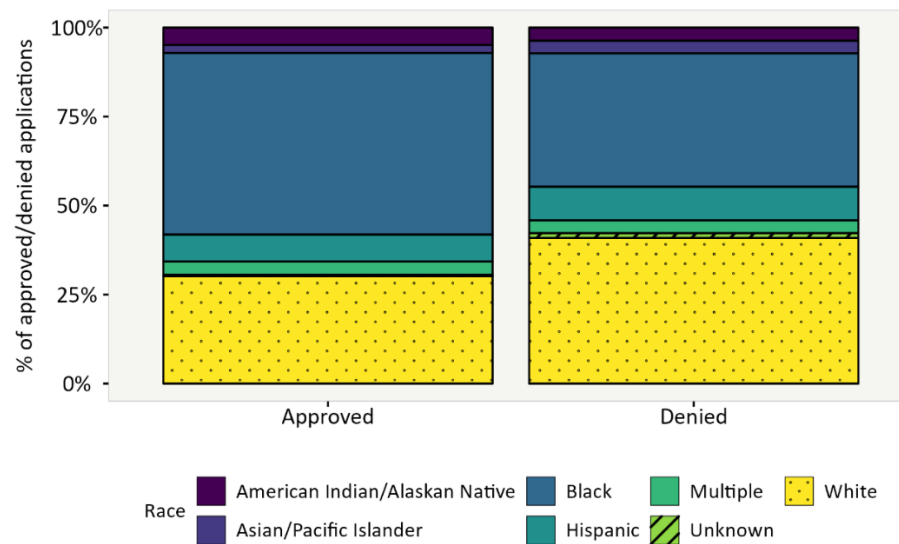
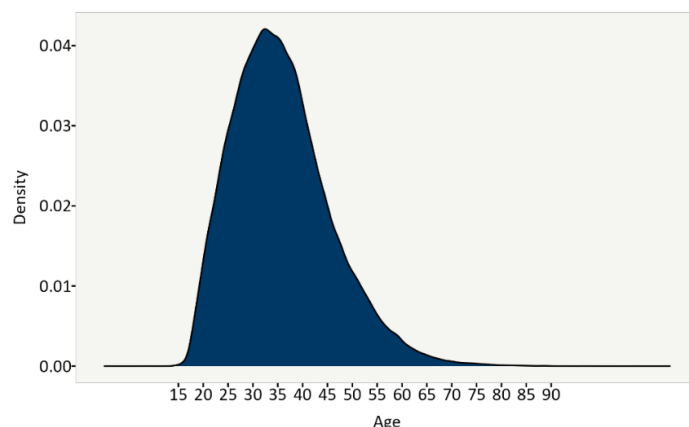


Figure 20 above shows, however, that the racial distribution of applicants on approved and denied applications was slightly different from that of the full applicant pool. Compared to the pool of all applications, those that were approved were more likely to be from a Black applicant than a white applicant. In other words, though both groups were more likely to be denied than approved, Black applicants were more likely to be approved than white applicants were. Other racial groups were represented roughly equally across approved and denied applications, with denied applicants being very slightly more likely to have a Hispanic applicant. It is also important to note that the figure showing all applicants includes unique applicants (de-duplicated if they have multiple applications), while the figure showing differences between approved and denied applicants includes all applications from all applicants.

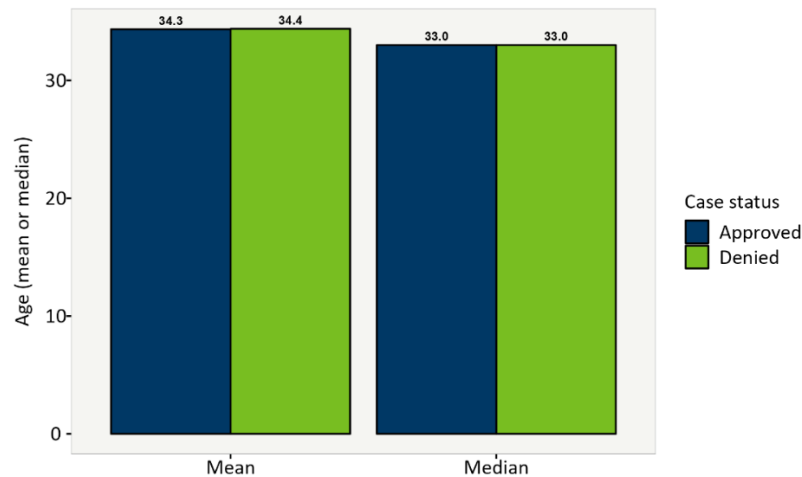
Age

Figure 21: EA applicants by age, 2016 - 2023



We also look at the age distribution across all applicants (in Figure 21) and across approved vs. denied applications (in Figure 22). The typical age for all applicants during the study period was between 30 and 35, and there was no difference in the mean or median age of applicants in approved vs denied applications.

Figure 22: Age differences between approved and denied applications, 2016 - 2023



Household Size

Next, we examine household size across all EA applicant households and differences between approved and denied applications. Generally, EA eligibility requires a household to contain an adult with at least one dependent child. However, in most counties, pregnant people are also eligible for MFIP, and thus for EA, without additional dependent children. Figure 23 shows the distribution of household size across all EA applicant households. A slight majority of applicant households had two or three persons, while approximately 40% had four persons or more and a small share (almost 5%) of households had a single member.

Figure 23: EA applicant households by household size, 2016 – 2023

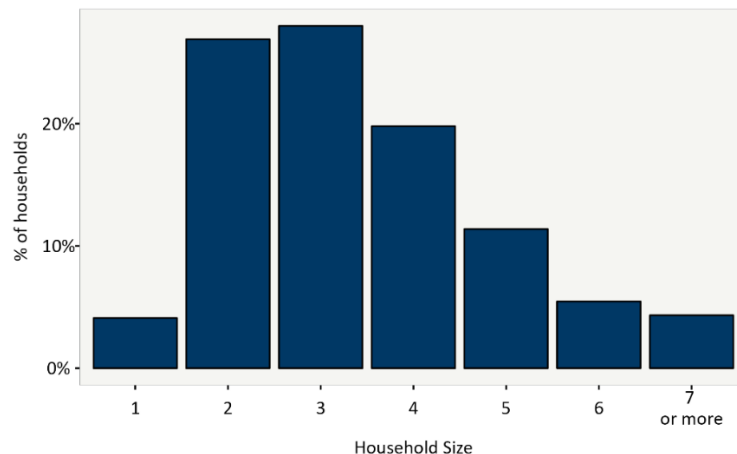
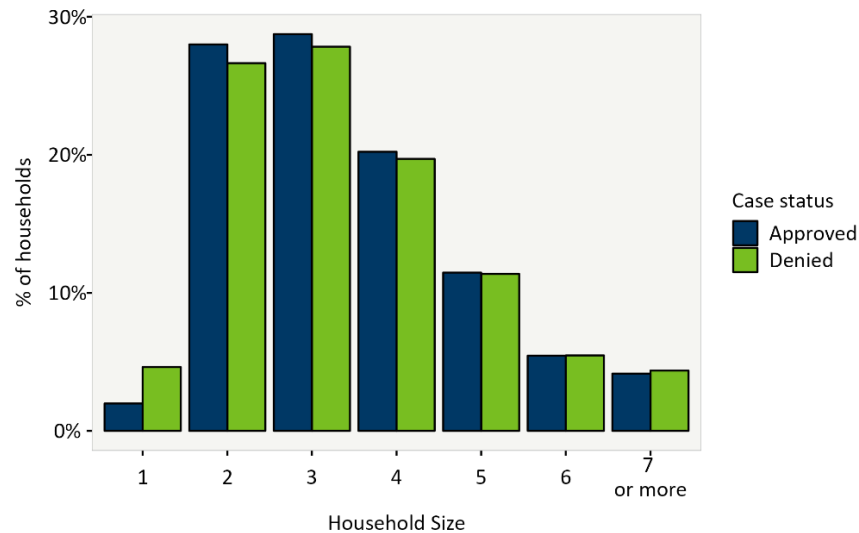


Figure 24 shows differences in distribution of household size between applications that were approved vs denied. In general, the distributions were broadly similar, though, notably, a higher share of denied applications had one person in the household (5%) relative to approved applications (2%).

Figure 24: Differences in household size between approved vs. denied EA applications, 2016 – 2023



Public Assistance Use

We now move to explore EA applicants' use of three other public assistance programs: MFIP, DWP, and SNAP. Figure 25 below shows that almost 80% of EA applicant households received at least one of these three programs in the year prior to their EA application. Figure 26 also shows that approved EA applications were more likely than denied applications to be from households that receive public assistance (almost 90% compared to around 75%).

Figure 25: Share of EA applicant households that received other public assistance benefits in year prior to EA application, 2016 – 2023

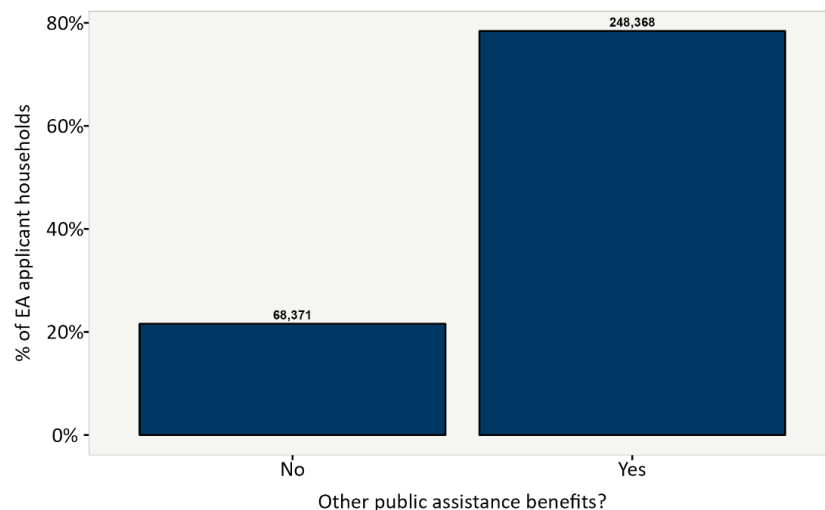
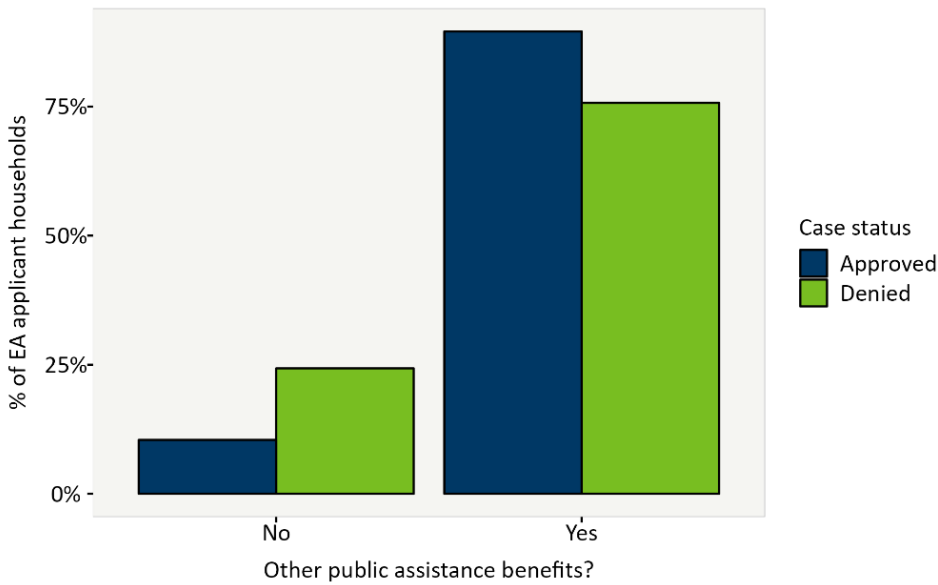
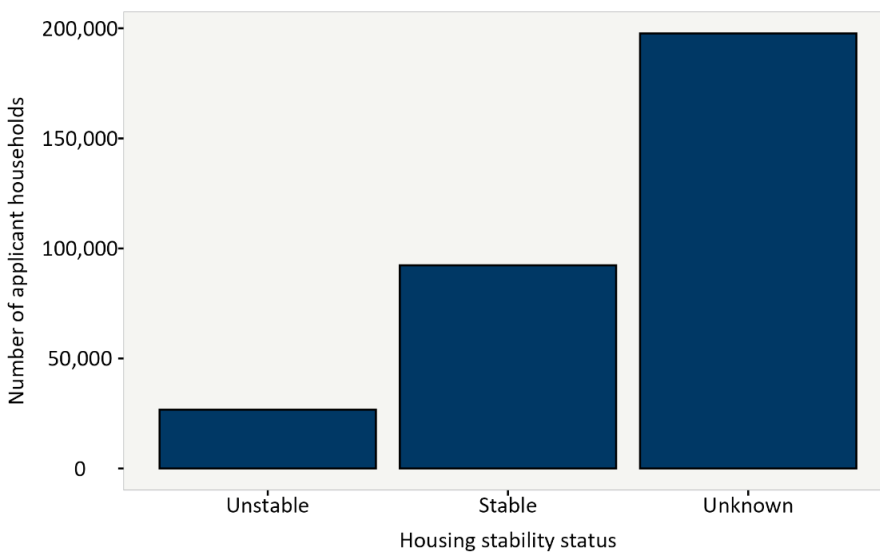


Figure 26: Differences in public assistance use in year prior to EA application between approved vs. denied EA applications, 2016 - 2023



Housing Stability

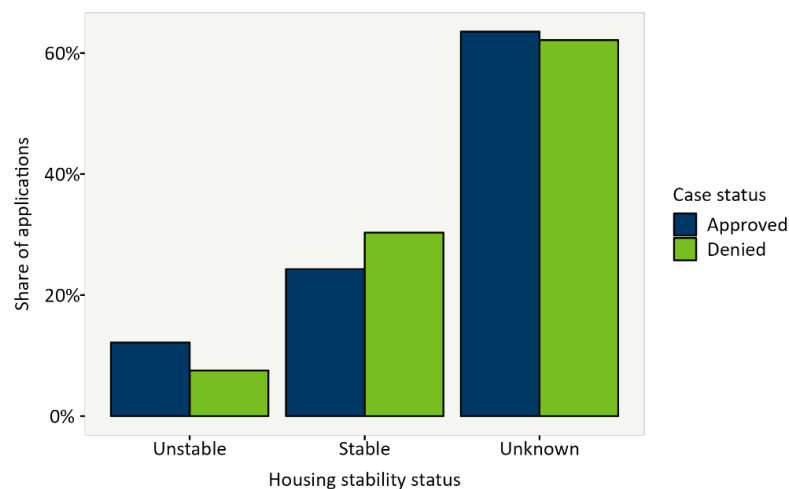
Figure 27: Housing stability status of EA applicant households in 6 months before application, 2016 - 2023



Note: Housing instability defined as having been identified as homeless by a MAXIS case worker or living with family/friends due to economic hardship, in a hotel/motel, in an emergency shelter, or in a place not meant for housing as indicated by the living situation field.

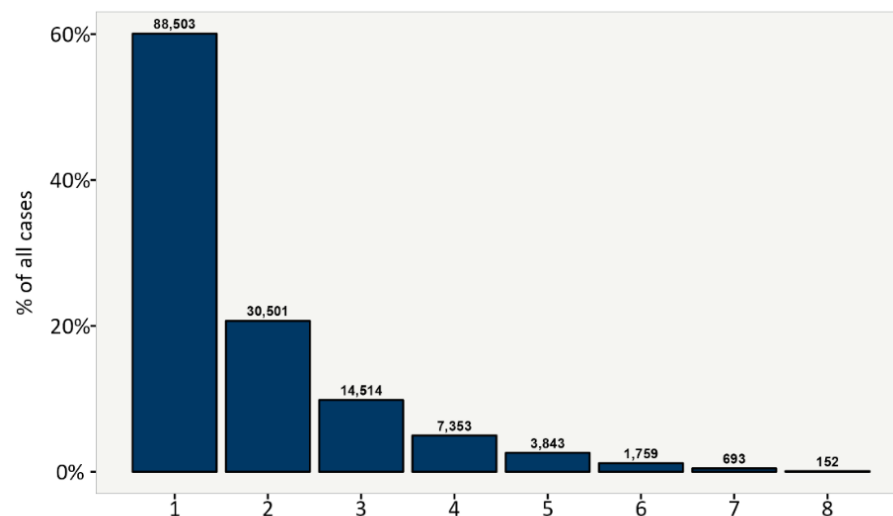
Our last comparison between approved and denied applications relates to housing stability, as measured by the living situation and homelessness indicators in MAXIS. These indicators are not fool-proof and lack coverage for a significant share of households in MAXIS. As evidenced in Figure 27, almost two-thirds of households were not included in the housing indicator data in the six months prior to their EA application. Slightly less than 30% were recorded as housing stable; the remaining 8% were identified as housing unstable in the six months before applying to EA. Figure 28 shows differences in housing stability between approved and denied applications. A similar share of households from both groups were missing the housing indicator data. Approved applications were more likely to be from households identified as housing unstable (around 12%) than denied applications (around 5%).

Figure 28: Differences in housing stability status in 6 months before application between approved vs. denied applications, 2016 - 2023



Number of years applying for EA

Figure 29: EA applicant households by number of years applying EA benefits, 2016-2023



In Figure 29, we show the number of years unique applicants applied to EA during the 8-year period from 2016 to 2023. The majority of applicants (around 60%) only applied for EA in one year of our study period. Around 20% of applicants applied in two years, and slightly less than 10% applied in three years. Less than 10% of all unique applicants applied in four or more years during our period.

3. Denial reasons

We saw in the first section that total yearly application volume, and particularly denied applications, rose steeply in 2022 and 2023, to approximately 50,000 applications. Given the relatively narrow eligibility criteria and nature of the program, there are many potential reasons that someone may not be eligible and therefore be denied funding. The MAXIS data system tracks broad reasons for denial on applications that are not approved, which we used to assess trends during our study period.

Figure 30 shows that annual denial rates for EA applications were steady between 73% and 76% during the first half of our study period from 2016 to 2019. Then they jumped slightly to 79% in 2020 and increased substantially to 87-88% in 2021 through 2023. Almost 9 in 10 EA applications were denied during the last three years of our study period.

Figure 30: Application denial rates by year, 2016 - 2023

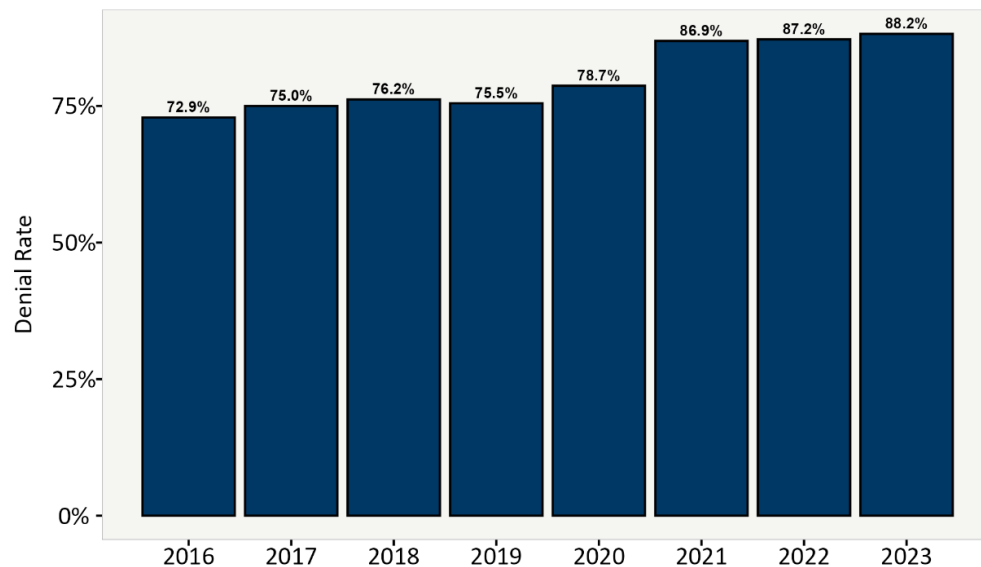


Figure 31 below shows the share of denial reasons across the state for our study period. Applications can be denied for multiple reasons, and we count any application with more than one denial reason in the “multiple” category. All other categories represent applications where the given reason was the sole reason for denial. Three reasons comprised the bulk of EA application denials, along with denials for multiple or unknown reasons. Denials because the situation does not meet the definition of an emergency or because the applicant did not provide all required eligibility verifications were the two most common reasons throughout our period, at 30% and just under 20% of all denials. We did hear from one local partner that their agency uses the “no emergency” denial code when they run out of EA funding, which indicates that this category may contain varied reasons. Next, between 15% and 20% of denials each were for multiple or unknown reasons. One of a host of other, less common reasons

comprised 13% of denials (see Appendix Table 1 for denial reasons coded as “other”). Slightly less than 10% of denials were for applications where the housing or other emergency situation would be too expensive on an ongoing basis (i.e., EA would not be cost-effective).

Figure 31. Reasons for denial of EA applications, 2016 - 2023

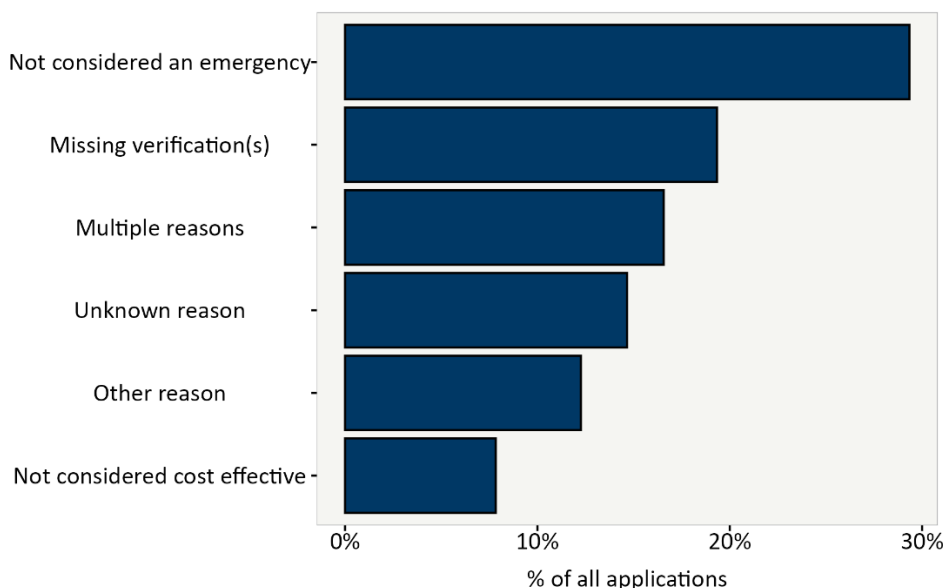


Figure 32. Reasons for denial of EA applications by year, 2016 - 2023

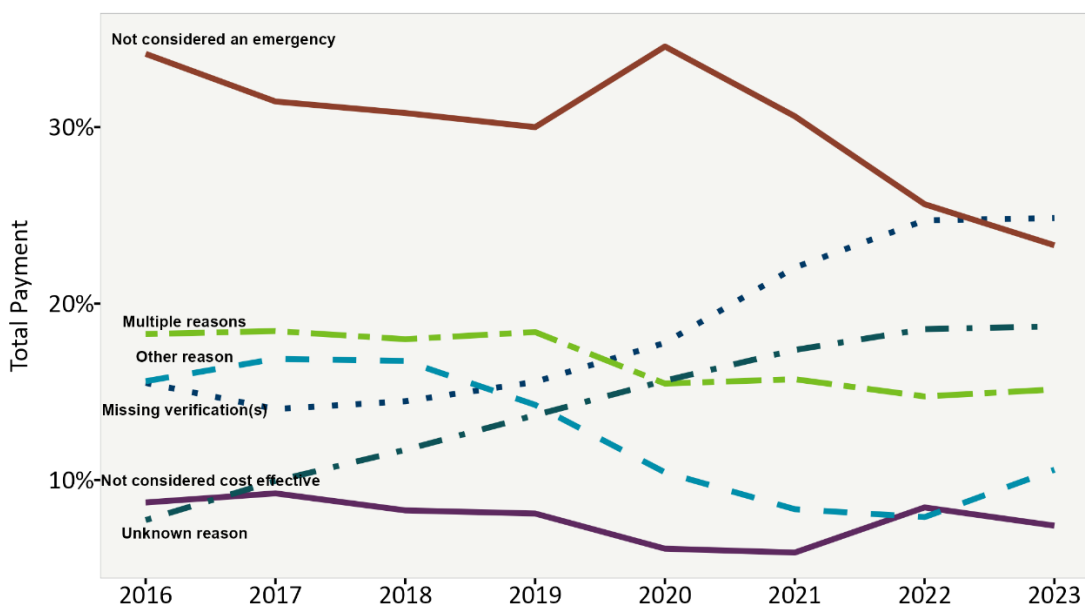
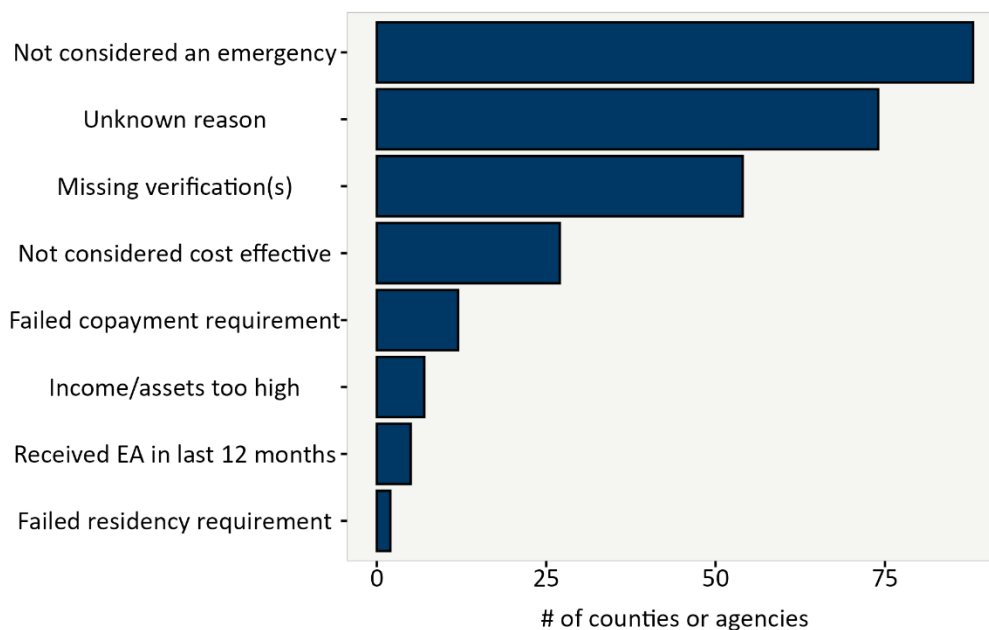


Figure 32 above shows a more comprehensive look at denial reasons by year across our study period. In each of the eight years, denials due to failure to meet emergency criteria were the most common reason, although from 2020 to 2023 they decreased as a share of denials. Two other reason types stand out as having a marked change across time; denials for missing verification(s) and denials for un-

recorded (unknown) reasons made up a gradually increasing share of denials from 2016 to 2023, from 15% to 21% and from 8% to almost 20%, respectively. While not definitive, several state and local partners have communicated that denials without an attached reason were likely denied because the application was incomplete.

Figure 33 below shifts the focus to counties, Tribes, and consortia, showing the categories that were in the top three denial reasons for local agencies. Emergency denials were most commonly in agencies' top three reasons, appearing in 88 (almost all) counties, Tribes, and consortia's top reasons. Unknown reasons, missing verification(s), and lack of cost effectiveness were the next most common in agencies' top three denial reasons. Four other distinct reasons also show up among the agencies' top three, albeit less frequently: the applicant did provide enough of a copayment, the applicant was over the maximum income or asset eligibility threshold, the applicant already received funding in the last 12 months or time period stipulated by the agency), and the applicant had not resided in the state or county for the requisite amount of time.

Figure 33. Local agency top 3 reasons for EA denial, 2016 - 2023



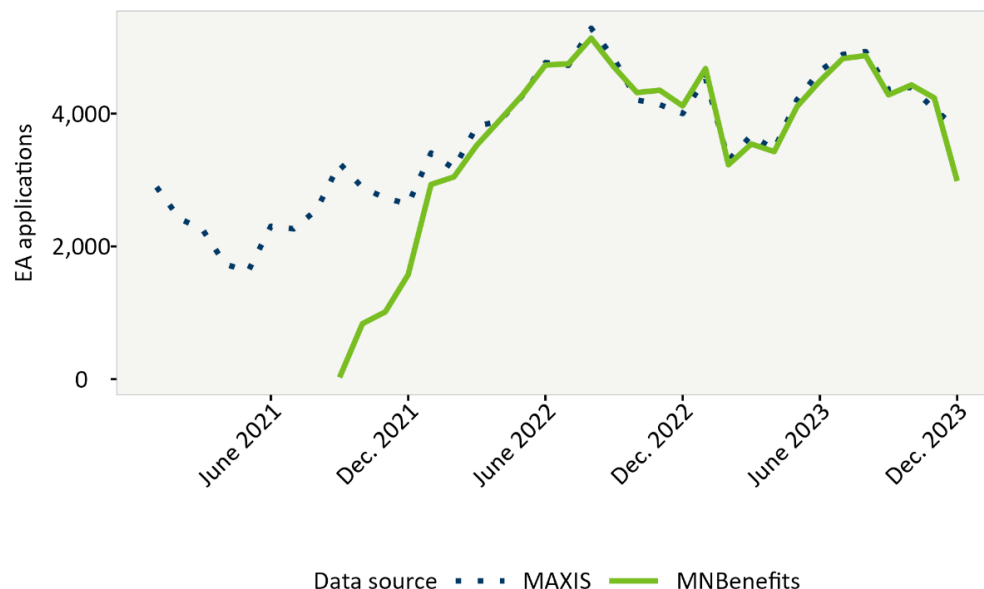
More tables showing the count and share of all denial reasons across the study period by year, as well as each county or local agency's top three denial reasons, are in the Appendix.

4. MNbenefits

In this section, we explore contextual dynamics of EA by focusing specifically on MNbenefits. In 2021, the State of Minnesota launched MNbenefits, a streamlined platform allowing Minnesota residents to apply for multiple public assistance programs, including Emergency Assistance. The State worked with Code for America to build the new system, which would focus on improving residents' experience applying for benefits (Minnesota Department of Human Services, n.d.; Palmer, 2021). Previously, residents applied for benefits either via paper forms or online (using ApplyMN), both of which took over an hour and were onerous for applicants (Minnesota Department of Human Services, 2021).² The MNbenefits application can be completed in less than 15 minutes (Minnesota Department of Human Services, 2021). The platform started with a pilot rollout to 4 counties in September 2020, expanded to 16 counties in April 2021, and later expanded to all 87 counties and three Tribal nations in November 2021. MNbenefits has been heralded as an important advance in improving customer experience and simplifying access to public programs. The new platform appears to have had important downstream effects on EA and other programs, including on the volume of applications and on how local agencies manage their caseloads.

By early 2022, MNbenefits accounted for a large majority of EA applications. Figure 34 shows the count of EA applications over time via MAXIS and MNbenefits records. For several months after the first EA applications were submitted via MNbenefits in late 2021, MAXIS records show substantially higher overall counts of applications. The trends then converged. After this point, it appears that available MNbenefits data likely include most EA applications.

Figure 34. MAXIS and MNbenefits data on EA applications, 2021-23.



² Paper applications are still available in most local agencies, but MNbenefits has completely replaced ApplyMN as the online application platform.

The MNbenefits platform collects demographic and socioeconomic data from applicants, including income, household size, race and ethnicity, and Tribal nation membership. Applicants exhibited diversity across these characteristics, as we explore further below. There were other characteristics that we do not explore in this report, however, where applicants exhibited more demographic homogeneity. In 2023, 83% of applicants were women, and women comprised no less than 60% of applicants in any particular county. Also, large majorities of applicants were English speakers: 97.7% of applicants reported their spoken language as English, compared to 91.2% of adult Minnesotans (U.S. Census Bureau, 2022). This may be because MNbenefits currently only supports applications in English and Spanish.

Seasonal variation

MNbenefits data show that applications tended to fluctuate over the calendar year. Figure 35 below shows EA applications by calendar month. Applications peaked in the late summer or early fall in both 2022 and 2023, before falling around the end of the calendar year. 2021 does not follow the same pattern, but data for that year corresponded to the period shortly after the launch of MNbenefits, when a larger share of EA applications were still presumably submitted via other mechanisms (like ApplyMN).

Figure 35. MNbenefits: EA applications completed by calendar month.



Simultaneous applications for EA and other programs

Many applicants who used the MNbenefits platform to apply for EA simultaneously applied for other forms of public assistance. In 2023, the majority of EA applicants simultaneously applied for cash assistance, SNAP, and/or childcare assistance. However, a plurality of applicants only applied to EA as opposed to multiple programs. The distribution of EA applicants by the number of simultaneous applications for other programs is shown below in Figure 36.

Figure 36. MNbenefits EA applications and the number of simultaneous applications for assistance (2023).

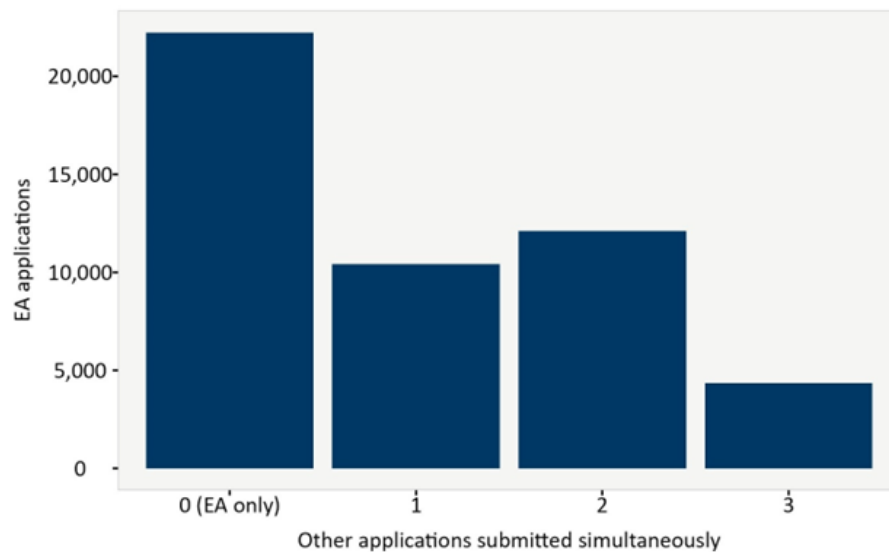
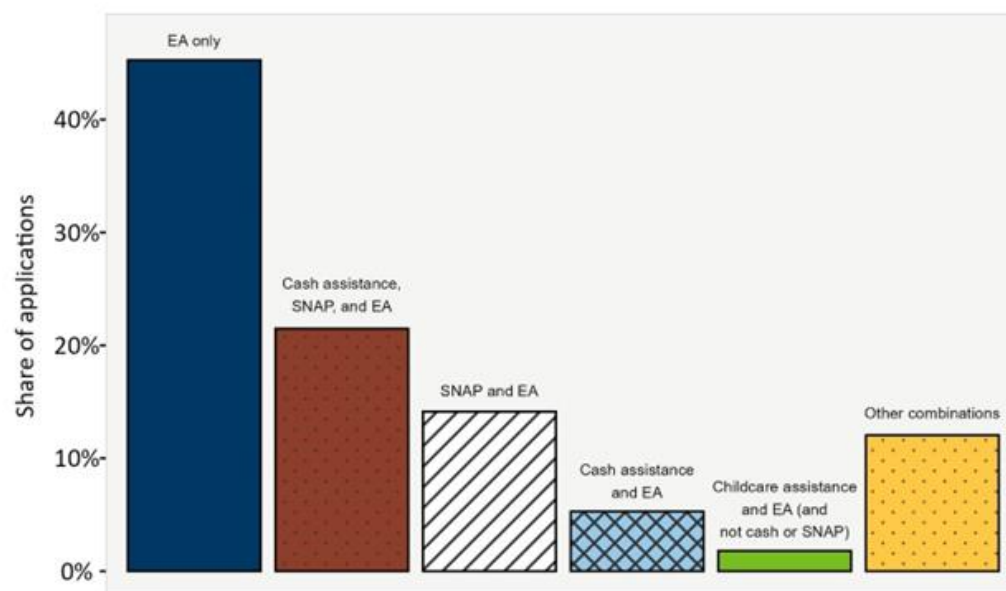


Figure 37 provides more data on the specific programs to which families applied in tandem with EA. In 2023, 45.3% of applicants applied to EA only. 52.9% of families applied for EA in conjunction with cash assistance, SNAP, or both. 13.8% of families applied for EA in conjunction with childcare assistance.

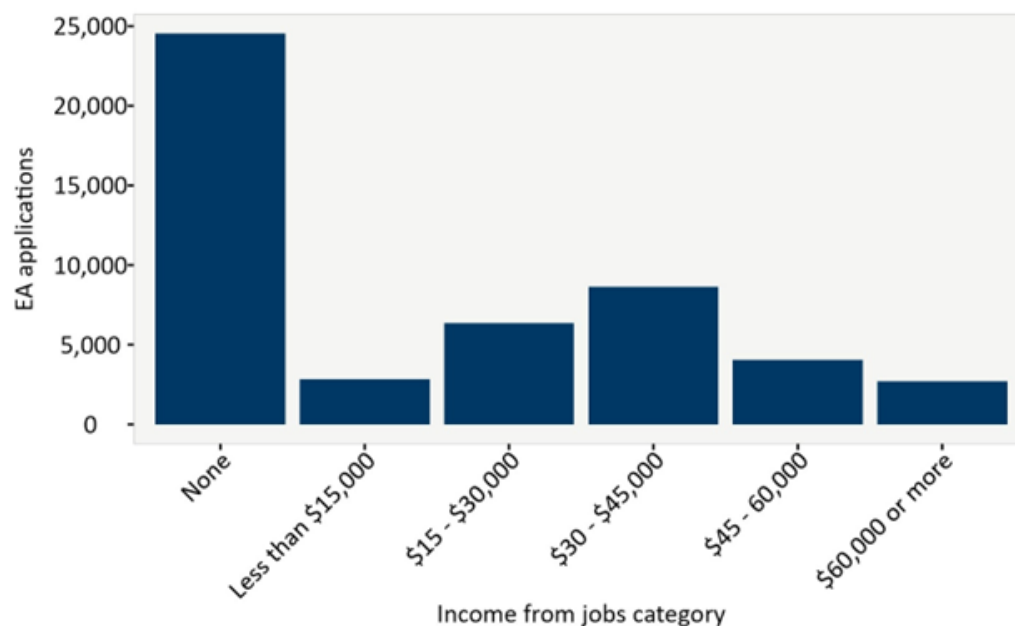
Figure 37. MNbenefits EA applications and simultaneous applications for other forms of assistance (2023).



Income

In 2023, according to self-reported income data in MNbenefits, half of applicants had \$0 in income from jobs. Because of the large number of applicants with no income, median annual income from jobs was \$731 among all applicants in the sample, while median income from jobs was \$35,481 among applicants with positive income. Figure 38 below shows the distribution of self-reported income from jobs among EA applicants. Generally speaking, for funding to be approved, applicants must have some kind of income or resources to be able to pay towards their emergency and demonstrate that they will not be in the same situation again. This figure shows only income from employment reported during this initial phase of the application; applicants could also have income from other sources, such as public benefit programs, that would count toward program eligibility. It is also worth noting again that these income data are self-reported. There is a chance that some of the responses for zero income are missing data.

Figure 38. MNbenefits EA applicants by income from jobs (2023).



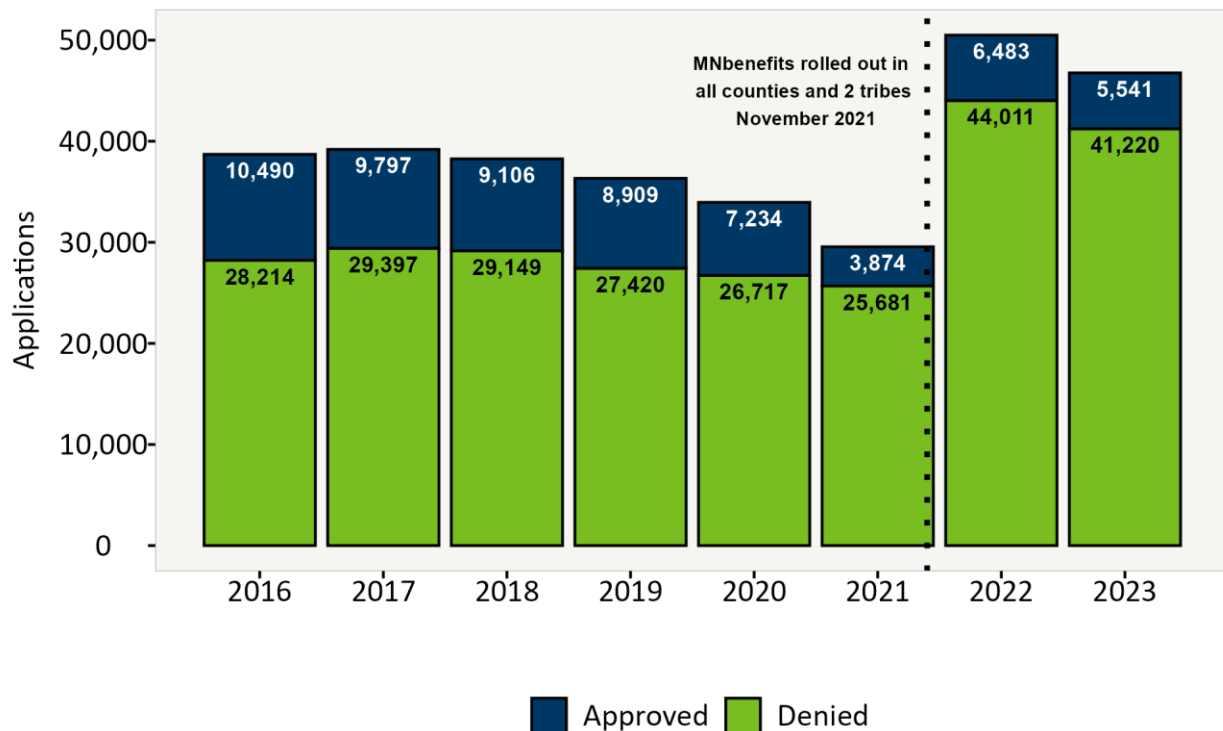
We also found some evidence that MNbenefits applicants for EA had lower income compared to public assistance recipients overall. For four of the largest counties, it was possible to compare income data between MNbenefits applicants and residents with public assistance income. To estimate earned income among public assistance income recipients by County, we used American Community Survey (ACS) data. ACS data privacy restrictions made it impossible to identify the county for responses outside of these four counties: Anoka, Dakota, Hennepin, and Ramsey. For this group of four counties, we compared ACS data on earned income (among public assistance recipients) and MNbenefits data on income from jobs. We report results of this analysis in Appendix figure 13. MNbenefits applicants had, on average, lower mean incomes and were more likely to report having no income than public benefit recipients, overall. One possible explanation is that families may be especially likely to apply for EA after job loss. This would be consistent with the high share of EA applicants who reported no income from jobs.

Broader trends in EA applications and caseloads

In addition to understanding the trends of applications and characteristics of MNbenefits applicants, we also explore whether and how the launch of the platform impacted EA caseloads across the state. Above, we showed that starting in 2022 the majority of EA applications came from MNbenefits (after the platform had been live for several months). In this section we revisit two graphs from the first section on basic program trends

Figure 39 below shows the total number of approved and denied EA applications (via MAXIS) by year from 2016 to 2023. The total volume of applications held steady from 2016 to 2018, declined slightly from 2019 through 2021 and then increased by approximately 50% in 2022 and 2023 compared to 2021. MNbenefits rolled out in November 2021, meaning that a spike in total applications starting in 2022 was likely due, at least in part, to increased ease of access in applying on MNBenefits. This figure also shows that this large jump was primarily driven by denied applications, increasing from around 26,700 in 2020 and 2021 to over 40,000 in 2022 and 2023.

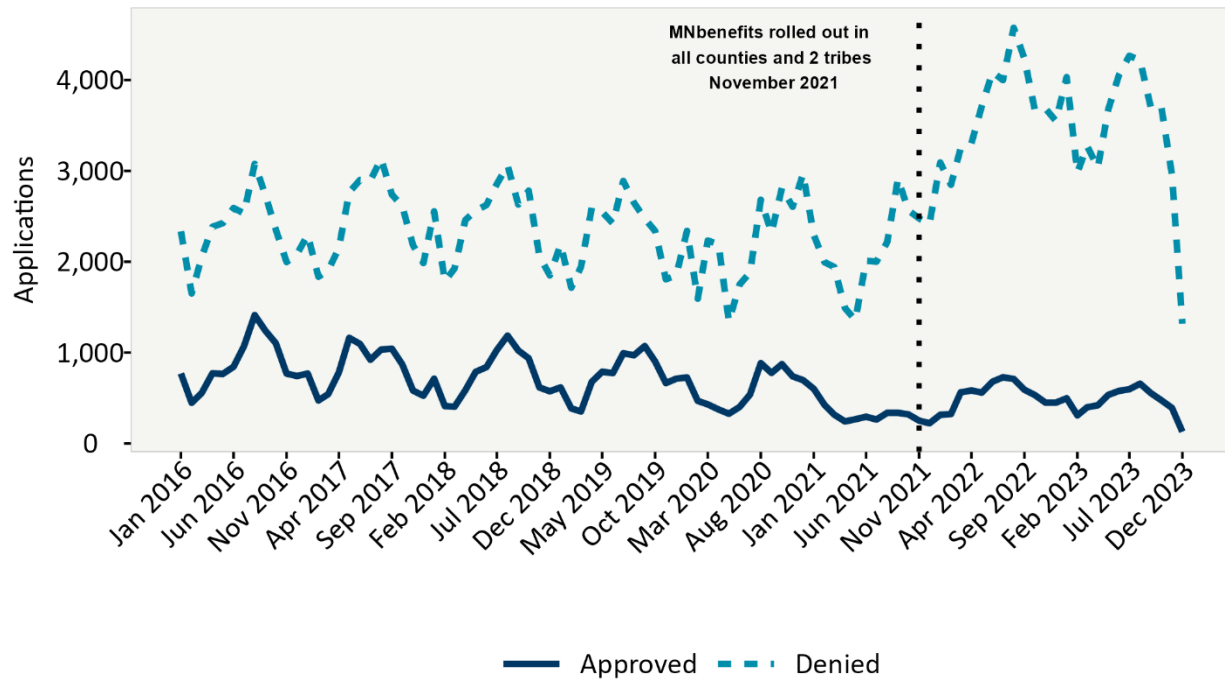
Figure 39. EA Applications Approved and Denied by Year, 2016 – 2023.



This trend is further illuminated in our discussion of program trends earlier, where we found denial rates increased significantly in 2021-2023. While the lower approval rates in 2022 and 2023 do seem to accord with the jump in EA applications following the launch of MNbenefits, the reasons for the low approval rate in 2021 are less clear. There could be a link with temporary programs and policy changes implemented during the COVID-19 Public Health Emergency. Other potential contributing explanations could be duplicate applications or households applying for emergency programs along with other benefits.

Last, we dig deeper into these patterns by looking at the volume of approved and denied applications *by month* from January 2016 to December 2023 in Figure 40 below. This graph shows seasonal fluctuations that are similar for approved and denied applications until early 2021. Starting in early 2021, the number of denied applications increased similar to past years, but the number of approved applications stayed flat. This accords with the decrease in approval rates starting in 2021 (shown in Figure 39).

Figure 40. EA Applications Approved and Denied by Month, Jan 2016 – Dec 2023.



In November 2021, when MNbenefits was rolled out statewide, denied applications immediately jumped to much higher levels than were ever observed in the five years prior, while the number of approved applications held steady at similar levels to past years, with a pattern of seasonal fluctuation.

Key findings and discussion

Basic program trends

In our look at basic program caseload and payment trends, we find the total number of EA applications increased significantly during our study period, but the increase was primarily composed of applications that were ultimately denied, corresponding with a declining approval rate. Annual payment totals, which are largely used for rent or mortgage, decreased, while inflation-adjusted average case payment amounts did not change substantially. These trends could be driven by several factors, most notably the COVID-19 pandemic, which greatly increased economic need and emergency situations, but also brought unprecedented levels of funding for housing and economic assistance. Additionally, funding to counties from the MFIP Consolidated Fund for EA and similar programs stayed relatively flat during the study period, meaning local agencies may have shifted resources in light of other temporary programs.

County EA programs and policy

From our analysis of local agency biennial service agreements, we identified that there has been wide variation in how counties, county consortia, and Tribal nations have administered EA. With relatively few statewide requirements, local agencies have wide discretion to set policies for factors like maximum benefit amounts, mandatory verifications, and covered expenses.

Among plans in effect at the start of 2024, maximum benefit amounts for households of size two ranged from \$500 to \$3,000. There was similarly wide variation for other plan elements. Some local agencies required that nine or more factors for an applicant's eligibility (e.g., citizenship, income, etc.) be verified, while other local agencies did not list any required verifications. While virtually all local agencies allowed the use of EA funds for rent costs, local agencies varied in whether they allowed EA funds to cover home repairs, transportation, or moving expenses. Since local agencies periodically revise their BSAs, plan elements changed over time. For example, between 2016 and 2023 ten local agencies removed in-person interview requirements, and two added such requirements. This analysis provides an opportunity for counties, county consortia, and Tribal nations to learn from each other and revise their own practices. Moreover, as the State and local agencies consider how to adapt policies going forward, it may be possible to make policy changes to encourage practices that increase housing stability.

Applicant characteristics and differences

In our analysis of EA applicant characteristics and differences between approved and denied applicants, we examined demographic, housing, and public assistance use. We reached several key findings. First, the EA applicant pool was similar in terms of gender and race to MFIP participants more broadly. Notably, compared to the group of applicants overall, female applicants and applicants of color comprised higher shares of the group of approved applicants. Second, public assistance use was common for EA applicants; around 80% of applicants used MFIP, DWP, or SNAP in the year prior. Moreover, applicants with public assistance use in the year prior were slightly more likely to be approved than applicants without any public assistance use. This could be an indicator of eligibility or need but could also indicate that these applicants are better positioned to overcome administrative burdens. Third, though housing stability records are unknown for the majority of applicants, 20% with

known records were identified as housing unstable or homeless at some point in the 6 months before applying to EA. Housing unstable applicants were more likely to be approved than housing stable applicants. Finally, most EA applicants (60%) applied to EA only one time between 2016 and 2023, and only 20% applied more than twice.

Denial reasons

Several findings stand out in our analysis of EA denial reasons. As established above, denial rates rose significantly in the last three years of our study period (2021-2023) compared to the first five, from an average of 75% to an average of 87%. First, we find that the most common reason that EA applications are denied is because they don't meet the definition of emergency. This likely means different things in different contexts and local agencies, but the common theme is that many applications are denied because the situation, or someone's documentation of it, does not rise to the level that the agency requires for EA funding. We also learned that staff in some jurisdictions used this reason code when their agency ran out of funding. While still the most frequent reason in every year of our study, its share of all denials decreased in recent years. Denials for lack of verification are the second most common reason and are becoming increasingly frequent. This reason could include both households that would and would not have otherwise been eligible save the fact that they weren't able to provide the required verifications in the required timeframe. Third, across many local agencies, a top reason is EA would not solve the emergency was not cost-effective. This could suggest rising rent and cost of living mean even the maximum benefit in some jurisdictions cannot completely cover the cost of the emergency, though there may be alternate explanations. And finally, an increasing number of applications since the study period began are denied without a recorded reason, which some state and local partners have communicated means that the application was incomplete.

MNbenefits

From our exploration of MNbenefits data on EA applications, two main findings stand out. First, we found a large increase in the total number of applications for EA after the statewide rollout of MNbenefits. At the same time, we saw an increase in number of denied applications, while the level of approved applications remained more stable and even decreased slightly. This evidence, along with supporting anecdotes from staff, suggests that MNbenefits made the application process easier. Many of the new applicants may not have been eligible or may have submitted multiple applications. Moreover, while applications increase, there was not a concurrent increase in funds available.

Second, our results show a substantial number of MNbenefits applicants (44.2%) applied to EA and not to any additional programs. About half of applicants applied to at least one other program, such as cash, food, or childcare assistance. One common anecdote from local partners is that many residents will use MNbenefits and check yes to apply for every program. While this may be happening to some degree, it does not seem as though this dynamic accounts for the lions-share of applications, at least for those including emergency programs.

Discussion

Across our analysis of basic program trends and each of our four research questions, we identified several key themes around the implementation, use, and trajectory of EA across the state. First, the total number of applications to EA has increased substantially since 2016, starting in late 2021 and early 2022, and this increase was composed primarily of applications that were ultimately denied. While many factors—including increasing need during the COVID-19 pandemic—likely contributed to this dynamic, the increase in application volume and denial rates coincided closely with the point when MNbenefits became the main application platform for EA. This indicates that MNbenefits was likely successful in making the process of applying for public assistance programs (including EA) more accessible to residents, at least in terms of how long it takes to apply. However, this has not necessarily meant that more households will be approved for EA, likely for a variety of reasons. By the same token, larger application volumes, regardless of source, also impacted front line workers tasked with assessing eligibility and processing applications. This was likely one factor in reported backlogs, especially among metro counties, delaying benefits for families in need of financial assistance. As one example, one metro reported the median processing time for food applications was more than two times higher one year after the launch of MNbenefits (19 days to 52 days). While our analysis cannot directly address it, this dynamic—applicant need combined high denial rates and relatively long processing times—may have implications for residents' trust in government. EA serves households in difficult situations when seeking help can be challenging. Households apply with the hope of receiving assistance, but most are inevitably denied, sometimes in accordance with rules that may be hard to understand. We recommend future analysis examine how this experience may impact participants' perception of government.

A second key theme is that total spending on EA has decreased across the state and for most counties since the pandemic, but this has not coincided with major changes in average payments per approved household. As noted, counties, tribes, and consortia allocate EA spending along with other programs from the same funding pot. It is possible that temporary protections and alternative funding during the pandemic may have induced local agencies to shift funding away from EA toward other programs. It would likely be difficult to re-allocate those dollars back to EA afterward. At the same time, however, many agencies are requiring more verifications for approval of funding, which has been an increasingly common reason for denials. Also, in this period rent and cost of living were increasing markedly. This indicates to us that in the wake of increased application volumes—due to need, a streamlined application process, or whatever other reasons—local agencies have had to find ways to stretch fewer dollars. One other notable finding that factors into this dynamic is the increase in denials for reasons of cost-effectiveness from 2020-21 to 2022-23. This could indicate that a growing portion of applicants are unable to find housing that is sustainably affordable, and EA is not able to prevent future crisis situations in those cases. This points to the importance of more general supports for families before crisis situations in addition to emergency funding such as EA.

Finally, there are big differences in how local agencies structure their EA programs, in terms of eligibility, services covered, verifications, and benefit amounts, and there has been a fair amount of change in local plans from 2016 to the post-pandemic context. Counties, county consortia, and Tribal nations are navigating increasing need within an ever-evolving landscape of funding with little centralized policy at

the state-level. This has resulted in a patchwork of policy and rules; agencies have used different approaches to maximize their dollars by either serving more households with less expensive emergencies or serving fewer households with more expensive emergencies. In our engagement of local partners, many have voiced interest for more policy cohesion across jurisdictions, and for the State to identify and standardize best practices for EA plans.

Conclusion

These findings are notable and, to us, point to the need for more research on EA, both quantitative and qualitative. This study is designed only to describe the state of the program over the last eight years, not to discern the program's impacts on participants. It is the first phase in our analysis of EA. Rigorous causal research is needed to assess how this program, including how differences in policy across localities, affect important outcomes for participants, like housing and economic stability. Our team plans to conduct this causal impact evaluation as a next step, but additional qualitative research and process evaluation of participant and worker experiences in the program would be similarly helpful.

Ultimately, further research on EA offers opportunities to improve the way that the State can serve residents. By studying the effectiveness of the program and elements that vary across local agencies, a future evaluation may identify best practices that could be expanded to more residents across the state. Not only could this directly impact immediate housing stability and crisis resolution for EA applicants, but also has broader implications for how residents experience government and how the State is able to engage and best serve Minnesotans.

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