

## HAF Early Closeout Checklist

The Homeowner Assistance Fund (HAF) award period of performance ends on September 30, 2026, but HAF recipients may opt to engage in “early closeout” by submitting their Final Reports prior to that date.

Use this list to conduct a self-assessment to determine whether you are ready to submit your HAF Final Reports (“Final Reports”) to Treasury for closeout your HAF Award. This checklist is designed to help support successful closeout but does not necessarily reflect all the closeout preparation activities in which a HAF recipient may engage. **Recipients that answer “no” to any of the applicable questions should consider whether they are ready for early closeout of their HAF award.**

Remember, once you have submitted the Final Reports to Treasury, ***you may not obligate or expend any remaining or returned award funds for any purpose.*** After your HAF award has been closed out, you will still remain subject to records retention and audit requirements (see [HAF Closeout Resource](#) for more details).

- **Does your budget in Treasury’s Portal accurately reflect your actual HAF award budget?**
  - *Note: Recipients may make adjustments to their budgets through Treasury’s Portal, but these changes should be submitted to Treasury for approval prior to accessing their Final Reports.*
  
- **Have you and/or your subrecipient(s) expended all of your HAF award funds?** You may no longer spend HAF award funds once you have submitted your Final Reports to Treasury. It is critical to ensure that you have completely processed all payments for HAF assistance, services, and administrative expenses related to implementing your HAF program before you submit your Final Reports.
  - Have you and/or your subrecipient(s) processed all final payments for mortgage assistance, utility bills, housing counseling, etc.?
    - *Note: Be sure that you do not have any prospective HAF expenses queued for payment related to mortgage assistance, utility assistance, housing counseling, operational activities, etc. after submission of your Final Reports to Treasury. A HAF recipient cannot provide a mortgage servicer, utility company, or homeowner with HAF funds for prospective assistance if that assistance will cover a period of time after the submission date of the Final Reports.*
  - Have you and/or your subrecipients completed all *administrative activities* and/or liquidated all HAF award obligations for *administrative expenses* (staff salaries, subawards, contracts, etc.)? Administrative activities may include those to support closeout such as:
    - Verification that all HAF data submitted in the HAF Final Reports comply with the requirements set forth in the [Homeowner Assistance Fund Guidance](#), the

HAF Financial Assistance Agreement, and the [HAF Reporting Guidance](#) including that:

- Cumulative program and financial data are complete and accurate, as required by the Quarterly and Annual Reporting requirements.
  - Information about equipment, supplies, and tangible real property, as applicable, is prepared in compliance with HAF reporting requirements, see the [HAF Closeout Resource](#).
  - Review and reconciliation of general ledger, accounting, reporting, and bank reconciliation. Review of program policies, procedures, and controls to ensure eligible use of HAF award funds.
    - *Note: This may involve follow-up with beneficiaries (e.g., homeowners, servicers, utility companies, etc.) to reconcile documentation, as needed. These activities can no longer be funded by the HAF award once you submit the Final Reports.*
  - Preparation for **post-closeout** activities:
    - Established staff contact(s) for Treasury to contact during Treasury's review of the Final Reports.
    - Established staff contacts in Treasury's Portal for any continuing accounting responsibilities (such as, tracking returned funds, verifying the Pre-Debt Notice sent by Treasury at the end of Treasury's review of your Final Reports for HAF award closeout).
  - Processes and a resource plan to support ongoing **data security measures** and protection of personally identifiable information.
  - Processes and a resource plan to support the 5-year documentation retention requirements, in compliance with the HAF Financial Assistance Agreement. See also the HAF Closeout Resource ([page 8](#))
- If you are not on track to expend your total HAF award, have you contacted Treasury to discuss your readiness for early closeout?
- **Are all activities related to your HAF award complete?** Before you submit your Final Reports to Treasury, you should ensure that there are no ongoing activities that were funded by your HAF award funds. This includes making sure that all activities performed by subrecipients are complete.
- Are all mortgage assistance, utility assistance, or home repair payments for prospective services to homeowners complete? Are all home repair activities complete?
    - *Note: HAF award funds can only be used to cover eligible HAF expenses that occur before the date the HAF recipient submits its Final Reports to Treasury. For example, propane tanks and fuel purchased to cover utility costs or materials to support home repair projects must be delivered to and, as applicable, installed for the homeowners prior to submission of the Final Reports. Additionally, if a HAF recipient has paid out funds to cover prospective mortgage payments or utility services, those funds can only cover mortgage or utility services for the months prior to the date of the submission of the Final Reports.*

- Are all the housing counseling and legal services being funded by the HAF recipient's award funds complete?
  - *Note: Even if the payment has been made to an organization for providing housing counseling or legal services, you should not submit the Final Reports until all activities paid for by the HAF award funds are complete.*
  
- **Have you considered if your program could receive any returned and/or recovered HAF award funds that could significantly affect the total HAF award expenditures or obligations?**
  - Has your program estimated the likelihood of you and/or your subrecipient(s) continuing to receive returned funds, and if so, would it be possible to redeploy those funds to other homeowners by keeping your HAF program open?
    - *Note: Sometimes mortgage servicers, utility companies, and other beneficiaries return HAF award funds. You may wish to delay submitting your Final Reports if you and/or your subrecipients are still regularly receiving returned funds, particularly if your program has mechanisms to redeploy those funds to help homeowners. Any funds returned after the Final Reports have been submitted to Treasury cannot be redeployed or repurposed and must be returned to Treasury.*
  
  - Has your program considered if you and/or your subrecipient(s) expect to recover HAF funds such as program income or improper payments?
    - *Note: Only recipients with open HAF awards (i.e., not closed out) can redeploy recovered funds. If you and/or your subrecipients are involved in efforts to recover funds, you may want to consider delaying submitting your Final Reports to Treasury until those efforts have settled, particularly if your program has mechanisms to redeploy those funds to help homeowners. There is one exception for program income. Recipients that initiate early closeout must return recovered program income to Treasury between the period that they submit their Final Reports and September 30, 2026. Recipients are not required to return program income to Treasury that they received after September 30, 2026 (see [page 12](#) in HAF Closeout Resource).*
  
  - Have you created an administrative plan for the post-closeout processing of returned funds, for instance:
    - Establishing a process for routing returned payments.
    - Establishing responsible staff to process returned payments.
  
- **Have you resolved any outstanding compliance items that might affect the reporting in your Final Reports?**
  - *Note: If you are in the process of addressing compliance items, you may wish to reconsider engaging in early closeout until after those issues are resolved. Once you submit your Final Reports to Treasury, you will have limited ability to re-obligate or recharacterize funds. Reconsidering the timing of engaging in early closeout may allow you more flexibility to respond to compliance items.*

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## Additional Best Practices

The following questions are additional closeout questions that might help you (1) maintain resources for homeowners at risk of housing displacement, (2) maintain some of the housing stability infrastructure developed through the implementation of HAF award funds, and (3) identify and share “lessons learned” from HAF programmatic efforts.

- **Have you established any mechanisms to provide ongoing resources to homeowners?**
  - To the degree it is appropriate within your community, can you provide educational materials to support homeowner housing stability?
  - Have you considered developing [referral systems](#), such as contact information for housing counseling, housing stability services, legal aid, etc.?
  
- **Have you developed mechanisms to maintain housing service networks and community relations and continue to support homeowner assistance and foreclosure prevention?**
  
- **Have you analyzed, documented, and disseminated lessons learned from implementation of your HAF award?**
  - Have you documented key processes and strategies, as well as recommendations for future emergency housing programs?
  - Have you identified a strategy for maintaining the institutional knowledge developed through the HAF programs so that future program administrators may benefit from lessons learned?
  - Have you considered developing research partnerships to learn from implementation efforts of your HAF award?
  - Have you contacted Treasury to share lessons learned to inform Treasury maintained materials about lessons learned?
    - **Note: Treasury has developed an [Economic Recovery Learning Agenda](#) which lists key questions to better understand the impact of your HAF award. If you would like to share learnings from your research efforts, you can contact [HAF@treasury.gov](mailto:HAF@treasury.gov) and/or Treasury’s Office of Strategy Planning and Performance Improvement: [OSPPI@treasury.gov](mailto:OSPPI@treasury.gov).**