

Homeowner Assistance Fund: Guidance on Required Interim Report

December 8, 2021 (Last Updated February 17, 2022)¹

For More Information: Please visit www.treasury.gov/HAF

For Media Inquiries: Please contact the U.S. Treasury Press Office at (202) 622-2960

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information

The February 17, 2022 update provides updates to a few definitions (Award Date, Homeowner assistance, and Subrecipient) and changes to Data Element 9.

¹ Guidance for HAF Interim Reporting was initially released on December 8, 2021. The January 31, 2022 update provides updates to the Obligation definition, radio button changes in Data Element 1, updated language in Data Element 7d, radio button changes in Data Element 11, updated response guidance in Data Element 12, and radio button deletions in Data Elements 13 and 14.

Homeowner Assistance Funds Guidance on Required Interim Report

State and Territory Participants that received Homeowner Assistance Fund (HAF) awards are required to submit a one-time Interim Report consisting of the data elements as described below. Please note that for the purposes of the HAF program, Treasury refers to the prime recipient (see 2 CFR § 200.1) receiving the HAF federal assistance award directly from Treasury as the Participant. HAF participants should follow the constructs for pass-through entities in 2 CFR § 200 unless noted otherwise. Also note that Tribal participants are not required to submit an Interim Report.

To monitor preliminary progress of HAF Use of Funds plans and program implementation, Participants will be required to submit an Interim Report that will cover the reporting period from the Award Date through January 31, 2022 (which includes qualified expenses eligible for reimbursement).

Participants must submit the Interim Report via Treasury's portal by Thursday, March 3, 2022. Beyond the interim report, Treasury anticipates Participants will report all other financial, performance, and compliance information in a quarterly filing requirement. Please review the Frequently Asked Questions on the HAF website for more information regarding additional reporting requirements.

I. DEFINITIONS

Award Date means the date the HAF participant signed the HAF Financial Assistance Agreement.

Delinquency(ies) means an obligation on which a Homeowner was past due on any housing related HAF qualified expense.²

Expended means any HAF assistance that has been spent by HAF participants and Subrecipients

HAF participant³ means an Eligible entity that receives funds from the HAF.

Homeowner means an individual who applied and/or receives funds from the HAF participant or Subrecipient to pay for a singular qualified expense (i.e., if a Homeowner receives HAF assistance for more than one qualified expense category, they are counted multiple times, once for each qualified expense category).

In some places the Interim Guidance requires that you provide the number of unique Homeowners. Unique Homeowners are only counted one time even if they applied and or/received funding for more than one qualified expense category.

HAF assistance means any assistance provided by the HAF program, weather through funds received by the HAF program for qualified expenses or through services made available by the HAF program.

² Reference definition published in the HAF Guidance August 2, 2021, and updated on November 12, 2021. Refer to the qualified expenses noted in the HAF Guidance.

³ Reference definition published in HAF Guidance published on August 2, 2021

Monetary HAF Assistance means HAF assistance in the form of money that was provided to Homeowners, financial institutions, utility providers, and taxing authorities under a HAF Program.

Non-monetary HAF Assistance means HAF assistance in any form other than money that was provided to Homeowners under a HAF Program (i.e., housing counseling).

HAF application means an application submitted by the unique Homeowner to the HAF participant or Subrecipient used to determine eligibility to receive HAF funds for qualified expenses.

Obligated means an order placed for property and services, contracts and subawards made, and similar transactions that require payment." (see <u>2 CFR § 200.1</u>). Obligated funds include money that has been Expended. If a HAF participant has extended an offer consistent with the mailbox rule, you must post it as Obligated funds.

 Examples of obligated funds include: HAF funds that have been committed, pledged, or otherwise promised, in writing, to a specific borrower as part of a HAF program; HAF funds that have been set aside to cover obligations arising from loan guarantees; HAF funds that have been committed, pledged, or otherwise promised, in writing, as part of a transaction; and HAF funds that have been committed, pledged, or promised, in writing, for allowable administrative expenses (e.g., an executed contract for services).

Program Design Elements are the following: Mortgage Payment Assistance, Financial Assistance, Mortgage Principal Reduction, Facilitating Interest Rate, Payment Assistance Utilities, Payment Assistance Internet, Payment Assistance Insurance, Payment Assistance Fees, Payment Assistance Loans, Payment Assistance Taxes, Measures Preventing Displacement, Counseling or Education and Legal Services which align to eight of the qualified expenses (excludes administrative expenses).

Socially Disadvantaged Individual⁴ are those whose ability to purchase or own a home has been impaired due to diminished access to credit on reasonable terms as compared to others in comparable economic circumstances, based on disparities in homeownership rates in the HAF participant's jurisdiction as documented by the U.S. Census. The impairment must stem from circumstances beyond their control. Indicators of impairment under this definition may include being a (1) member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society, (2) resident of a majority-minority Census tract; (3) individual with limited English proficiency; (4) resident of a U.S. territory, Indian reservation, or Hawaiian Home Lands, or (5) individual who lives in a persistent-poverty county, meaning any county that has had 20% or more of its population living in poverty over the past 30 years as measured by the three most recent decennial censuses. In addition, an individual may be determined to be a socially disadvantaged individual in accordance with a process developed by a HAF participant for determining whether a homeowner is a socially disadvantaged individual in accordance with applicable law, which may reasonably rely on self-attestations.

Subrecipient as defined in the Uniform Guidance (see 2 CFR § 200.1).

II. REQUIRED DATA ELEMENTS

1. Data Element: The total number of unique Homeowners that received HAF assistance of any kind during the reporting period.

⁴ Reference definition published in HAF Guidance published on August 2, 2021

- Please provide the number of unique Homeowners whose mortgage, insurance, taxes, utilities, or other qualified expense related to housing were fully or partially paid under the subject HAF award, or who received or were referred to housing counseling or legal services, in the reporting period.
- Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- Data Element: The number of unique Homeowners at or below 100% Area Median Income (or US Median Income, whichever is greater) who received HAF assistance of any kind during the reporting period.
 - Please provide the number of unique Homeowners whose mortgage, insurance, taxes, utilities, or other qualified expense related to housing were fully or partially paid under the subject HAF award or who received or were referred to housing counseling or legal services, who are at or below 100% Area Median Income (or US Median Income, whichever is greater).
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- Data Element: The number of unique Homeowners classified as "Socially Disadvantaged Individuals" who received HAF assistance of any kind during the reporting period.
 - Please provide the number of unique Homeowners whose mortgage, insurance, taxes, utilities, or other qualified expense related to housing were fully or partially paid under the subject HAF award, or who received or were referred to housing counseling or legal services, who are classified as Socially Disadvantaged Individuals.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- 4. Data Element: The number of Delinquencies were resolved through non-monetary HAF assistance during the reporting period.
 - Please enter the total count of Delinquencies for Homeowners that were resolved through non-financial assistance (i.e., housing counseling or legal assistance that helped resolve a Delinquency through an existing servicer's program).
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- Data Element: The number of Delinquencies that were resolved with monetary HAF assistance Expended during the reporting period.
 - Please enter the total count of Delinquencies for Homeowners that were resolved with monetary HAF assistance.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period

- 6. Data Element: The number of unique Homeowners receiving HAF assistance that are not Delinquent.
 - Please enter the number of unique Homeowners receiving HAF assistance that are not Delinquent.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period

7a. Automatically populated from your HAF Grantee Plan submission. No action needed.

7b. Data Element: The number of Homeowners with HAF assistance Expended by Program Design Element during the reporting period.

- The number of Homeowners whose mortgage, insurance, taxes, utilities, or other qualified expense related to housing were fully or partially paid under the subject HAF award in the reporting period. This does not include administrative expenses or reimbursement.
- Please note, the HAF participant will be asked to provide the disaggregated number of Homeowners who received HAF assistance by Program Design Element:
 - a) Mortgage Payment Assistance
 - b) Financial Assistance
 - c) Mortgage Principal Reduction
 - d) Facilitating Interest Rate
 - e) Payment Assistance Utilities
 - f) Payment Assistance Internet
 - g) Payment Assistance Insurance
 - h) Payment Assistance Fees
 - i) Payment Assistance Loans
 - j) Payment Assistance Taxes
 - k) Measures Preventing Displacement
 - I) Counseling or Education
 - m) Legal Services

7c. Data Element: The amount of HAF assistance Obligated as of January 31, 2022.

- Please provide the amount of HAF assistance Obligated by the HAF participant as of January 31, 2022, disaggregated by each program design elements. (See 7b for the full list)
- 7d. Data Element: The amount of HAF assistance Expended to Homeowners during the reporting period.
 - Please provide the total dollar amount of HAF assistance paid under the HAF program(s) to or for participating Homeowners including payments for mortgage, taxes, insurance, utilities, and other housing services and qualified expenses during the reporting period (excludes administrative expenses) disaggregated by each program design elements. (See 7b for the full list)
- 8. Data Element: Enter the date the HAF participant started accepting HAF applications for HAF assistance (or will begin).

- Please enter the date (i.e., MM/DD/YYYY) the HAF participant started accepting HAF applications for HAF assistance (or will begin accepting).
- For HAF participants with multiple programs that have varying application periods, participants should share the earliest date the HAF applications are/will be available across any of their HAF funded programs.

9a. Data Element: The number of unique Homeowners that submitted a draft or completed HAF application for HAF assistance during the reporting period.

- Please enter the number of unique Homeowners that submitted a draft or completed HAF application for HAF assistance during the reporting period.
- Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- 9b. Data Element: The number of unique Homeowner that submitted a completed HAF application for HAF assistance during the reporting period.
 - Please enter the number of unique Homeowner that submitted a completed HAF application for HAF assistance during the reporting period.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- 10. Data Element: The number of unique Homeowners that submitted a HAF application for HAF assistance and were approved during the reporting period.
 - Please enter the number of unique Homeowners that submitted a HAF application for HAF assistance and were approved during the reporting period.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- 11. Data Element: The amount of HAF assistance (Obligated and Expended) used for administrative expenses during the reporting period.
 - Please enter the amount of HAF assistance obligated by the HAF participant for administrative expenses as of January 31, 2022. Administrative expenses include planning, community engagement, and needs assessments related to the HAF participant's disbursement of HAF funds for qualified expenses.
 - Please enter the amount of HAF assistance expended by the HAF participant for administrative expenses as of January 31, 2022.
 - Please select "Data Not Yet Available" if the HAF participant has not experienced any activity on this data element during the reporting period.
- 12. Data Element: The amount of HAF assistance Expended for reimbursement expenses during the reporting period.
 - Please enter the amount of HAF assistance Expended by the HAF participant for reimbursement expenses. Reimbursement expenses include funds expended by a state, local government, or entity during the period beginning on January 21, 2020, and ending on the date that the first funds are disbursed

by the HAF participant under the HAF, for a qualified expense (other than any qualified expense paid directly or indirectly by another federal funding source, or any qualified expenses described in clauses (6), (7), (8), or (10) of the qualified expenses section of the HAF guidance).

- Reimbursement expenses are a subset of total HAF assistance Expended, which is to be provided in question #7D. Each reimbursement expense amount by Program Design Element should be less than the corresponding Program Design Element HAF assistance Expended in question #7D.
- Please note, the HAF participant will be asked to disaggregate amount of reimbursement expenses Expended to Homeowners by each Program Design Element.
- Please respond "No" if the HAF participant did not Expend any HAF assistance for reimbursement expenses during the reporting period.
- 13. Automatic calculation of the total amount of HAF assistance Obligated as of January 31, 2022.
 - Total is calculated from the disaggregate table plus the Obligated administrative expense.
- 14. Automatic calculation of the total amount of HAF assistance Expended as of January 31, 2022.
 - Total is calculated from the disaggregate table plus the Expended administrative expense.
- 15. Data Element: Indicate whether the HAF participant has prioritized identifying if loss mitigation is available to the homeowner through their servicer in determining how to distribute HAF assistance to servicers.
 - Please respond "Yes" if you have prioritized identifying whether loss mitigation is available to homeowners through their servicer, otherwise select "No."

HAF participants are required to comply with the reporting requirements established by Treasury pursuant to the "Reporting" section of the HAF Financial Assistance Agreement, which provides in pertinent part, "Recipient agrees to comply with any reporting obligations established by Treasury related to this award. Recipient acknowledges that any such information required to be reported pursuant to this section may be publicly disclosed." Treasury has decided to implement this Interim Report as a substitute to the first Quarterly Report to reduce burden on HAF participants.

Treasury will use the reported information from the HAF participants to determine whether participants are complying with HAF requirements. HAF participants should maintain all documents and financial records sufficient to support the data requests and establish compliance with program requirements.

We appreciate your attention on these issues and please email HAF@treasury.gov or HAF_Tribal@treasury.gov with any questions or concerns.

(Note: The Homeowners Assistance Fund ("HAF") Is authorized by Title III, Subtitle B, Section 3206 of the American Rescue Plan Act, 2021, Pub. L. No. 117-2 (March 11, 2021).)