

# **United States Department of the Treasury**

## **Homeowner Assistance Fund Plan**

**Submitted by Agency of Commerce and Community Development**

HAF Grantee Plan Name

**HAFP-0040**

# United States Department of the Treasury

## Homeowner Assistance Fund Plan For Participants with Allocations \$5 million or Greater

Allocation Amount	\$5 Million or Greater
Submission Date	12/3/2021 8:55 AM
Total Plan Requested Amount	\$49,997,817.00
Record Type	State
Application Record	<a href="#">SLT-0007</a>
HAF Grantee Plan Status (external)	Funded

# Homeowner Needs and Community Engagement

---

## **What Quantitative Data Has Informed the Participant's Planning?**

Treasury will assess the extent to which a Participant has, in the course of its HAF planning process, relied on quantitative data, including from community-based organizations or organizations that serve potentially eligible homeowners.

In its HAF planning process, has the Participant obtained quantitative data from mortgage servicers, private data providers, government entities, community-based organizations, or other sources to inform its planning about how to target and best serve eligible homeowners with mortgage delinquencies, defaults, foreclosures?

**Yes**

If yes, please list and, briefly describe each source of quantitative data.

**The Participant, State of Vermont, Agency of Commerce and Community Development, Department of Housing and Community Development is granting the HAF funds to the Vermont Housing Finance Agency (VHFA), body politic and corporate and public instrumentality of the State tasked with serving Vermont Homeowners, to implement Vermont's HAF program. VHFA has used the most accurate sources available to plan and target HAF resources to eligible homeowners facing mortgage delinquency, default and foreclosure including the following:**

**Data provided by mortgage servicers – Numbers and amount owed for Vermont mortgages by investor and delinquency and foreclosure status were provided by US Bank, the largest mortgage servicer. In addition, VHFA used quarterly data through the National Delinquency Survey to identify and project trends by investor (including for FHA and VA mortgages).**

**Mortgage performance data from Federal Reserve Bank of Atlanta – Forbearance outstanding and non-forborne mortgages 30+ days past due by location and mortgagor type helped inform our planning for program targeting and outreach.**

In its HAF planning process, has the Participant obtained and reviewed quantitative data or studies regarding which demographic segments in its jurisdiction have historically experienced discrimination in the housing or housing finance market?

**Yes**

If yes, please list and, briefly describe each source of quantitative data.

**VHFA has a long history of recognizing the critical importance of data-driven decisions when it comes to using housing programs to reach undeserved communities. For this reason, the Agency's housing research department runs the Vermont Housing Data website ( [www.housingdata.org](http://www.housingdata.org)) and conducts in depth housing needs assessments at the state, county and local levels. We have conducted or reviewed the following studies to build our understanding of the impact of discrimination in Vermont's housing market.**

- **Housing barriers for immigrants and refugees to Vermont**
- **2020 Vermont Housing Needs Assessment**

- o Race and Ethnicity (Fact Sheet, Report Chapter)
- o Households with special needs and unique challenges (Fact Sheet Report Chapter)
- Vermont Community Profiles
- o Race of householder
- o Tenure by race
- o Mortgage applications by race
- o Migrant workers
- o Homelessness

In its HAF planning process, has the Participant obtained quantitative data from utility providers or entities charged with assessing and collecting property taxes or relied on quantitative data or studies to inform its planning about how to target and best serve eligible homeowners at risk of displacement due to utility arrearage or tax foreclosure?

**Yes**

If yes, please list and, briefly describe each source of quantitative data.

**VHFA has used the most accurate sources available to plan and target HAF resources in need of help with back property taxes or utility bills, as listed below:**

**Experience from 2020-2021 Vermont Emergency Utility Assistance Program – In 2020 and 2021, the Vermont Department of Public Service operated the Vermont COVID-19 Arrearage Assistance Program which demonstrated the prevalence, level and types of needs for utility assistance among Vermont homeowners harmed by the pandemic.**

**Electric company reports – Two electric companies, Green Mountain Power and Vermont Electric Cooperative, which cover most of Vermont reported delinquency rates and arrear amounts that helped inform both the 2020-2021 program and plans for HAF utility assistance for subsequent years.**

**Survey of town tax officials – Results of a statewide survey VHFA conducted in July 2021 of municipal governments provided key information for HAF program planning about the prevalence and level of need among Vermont homeowners for help with back property taxes.**

**Experience from 2020 Vermont Emergency Mortgage Assistance Program – In July through November 2020 and again in May through June 2021, VHFA administered a CARES Act funded Emergency Mortgage Assistance Program which provided property tax and mortgage assistance. This experience demonstrated the prevalence, level and types of needs among Vermont homeowners with mortgages for property tax assistance.**

In the following text box, please list any source not listed above of quantitative information, including sources of data on the performance of any of the Participant's previously implemented programs, that the Participant used to inform its HAF planning process, briefly describe how the data informed the Participant's planning.

**Other sources consulted include the following:**

**Experience from 2020 Vermont Emergency Mortgage Assistance Program – In July through November 2020 and again in May through June 2021, VHFA administered a CARES Act funded Emergency Mortgage Assistance Program which demonstrated the prevalence, level and types of needs among Vermont homeowners with mortgages harmed by the pandemic.**

**U.S. Census Bureau, American Community Survey – Estimates pertaining to tenure, mortgage status, race, household income were used to estimate the scope of potential needs for programmatic areas with gaps in evidence from other sources.**

**Manufactured Housing Loan Borrowers report from Consumer Financial Protection Bureau – This detailed report provided state level information about the prevalence of chattel loans. This helped us improve our estimates about the potential demand for help with this loan type.**

Did the Participant communicate with mortgage servicers regarding the development of its program design?

**Yes**

Did the Participant communicate with other HAF participants regarding the development of its program design?

**Yes**

### **How Has Community Engagement and Public Participation Informed the Participant's Planning?**

Treasury will assess the extent to which a Participant's assessment of homeowner needs has been informed by and reflects input from organizations and individuals representing eligible homeowners, including any opportunities for public participation in the development of the Participant's plan. Treasury will pay particular attention to the extent of the Participant's engagement with populations that are the subject of statutory targeting requirements.

Has the Participant requested and received input on its HAF planning process from providers of housing counseling services or providers of legal assistance to homeowners facing foreclosure or displacement?

**Yes**

### **Provider information**

If yes, please list such providers, including the providers' address and website. Please indicate by checking the appropriate box below if the provider's primary purpose is to serve low- and moderate-income households or to address the impacts of housing discrimination on one or more demographic groups in the Participant's jurisdiction.

<b>Provider Name Provider Address Provider Website</b>	<b>Provider Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Vermont Legal Aid</b> 264 North Winooski Avenue, ,Burlington,Vermont 05401 <a href="https://www.vtlegalaid.org">https://www.vtlegalaid.org</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Champlain Housing Trust</b> 88 King Street ,Burlington,Vermont 05401 <a href="http://www.getahome.org">http://www.getahome.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Neighborworks of Western Vermont</b> 110 Marble Street ,West Rutland,Vermont 05777 <a href="http://www.nwwvt.org">http://www.nwwvt.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Downstreet Housing &amp; Community Development</b> 22 Keith Ave Ste. 100 ,Barre,Vermont 05641 <a href="http://downstreet.org">http://downstreet.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Windham &amp; Windsor Housing Trust</b> 68 Birge Street ,Brattleboro,Vermont 05301 <a href="https://www.homemattershere.org">https://www.homemattershere.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Opportunities Credit Union</b> 25 Winooski Falls Way Suite 203,Winooski,Vermont 05404 <a href="https://www.oppsvt.org">https://www.oppsvt.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Rural Edge</b> 48 Elm Street PO Box 259,Lyndonville,Vermont 05851 <a href="https://ruraledge.org">https://ruraledge.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Has the Participant requested and received input regarding its HAF planning process from community-based organizations or organizations that serve potentially eligible homeowners?

**Yes**

### **Community Information**

If yes, please list such organizations, including the providers' address and website if available. Please indicate by checking the appropriate box below if the provider's primary purpose is to serve low- and moderate-income households or to address the impacts of housing discrimination on one or more demographic groups in the Participant's jurisdiction.

<b>Organization Name</b> <b>Organization Address</b> <b>Organization Website</b>	<b>Organization Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Champlain Valley Office of Economic Opportunity</b> 255 So. Champlain St. PO Box 1603, Burlington, Vermont 05401 <a href="https://www.cvoeco.org/index.html">https://www.cvoeco.org/index.html</a>	✓	✓
<b>Association of Africans Living in Vermont (AALV)</b> 20 Allen St 3rd Floor, Burlington, Vermont 05401 <a href="http://aalv-vt.org">http://aalv-vt.org</a>	<input type="checkbox"/>	✓
<b>Rutland area NAACP</b> Rutland Area NAACP PO Box 311, Wallingford, Vermont 05773 <a href="http://naacprutland.org">http://naacprutland.org</a>	<input type="checkbox"/>	✓
<b>The Housing Foundation, Inc.</b> P.O. Box 157, Montpelier, Vermont 05601 <a href="https://www.hfivt.org">https://www.hfivt.org</a>	✓	<input type="checkbox"/>
<b>People's United Bank</b> 77 Pine street, Burlington, Vermont 05401 <a href="http://peoples.com">http://peoples.com</a>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Burlington Community &amp; Economic Development Office</b> City Hall 149 Church Street, Burlington, Vermont 05401 <a href="https://www.burlingtonvt.gov/cedo">https://www.burlingtonvt.gov/cedo</a>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Central VT Habitat for Humanity</b> PO Box 837, Montpelier, Vermont 05602 <a href="https://www.centralvermonthabitat.org">https://www.centralvermonthabitat.org</a>	✓	<input type="checkbox"/>
<b>Vermont Center for Independent Living</b> 11 East Main Street, Montpelier, Vermont 05602 <a href="https://vcil.org">https://vcil.org</a>	✓	<input type="checkbox"/>
<b>Vermont Housing &amp; Conservation Board</b> 58 East Main Street, Montpelier, Vermont 05602 <a href="https://www.vhcb.org">https://www.vhcb.org</a>	✓	<input type="checkbox"/>
<b>U.S. Committee for Refugees and Immigrants (USCRI-VT)</b> 462 Hegeman Ave. #101, Colchester, Vermont 05446 <a href="https://refugees.org/uscri-vermont/">https://refugees.org/uscri-vermont/</a>	✓	<input type="checkbox"/>
<b>BROC Community Action</b> 45 Union St., Rutland, Vermont 05701 <a href="https://www.broc.org/">https://www.broc.org/</a>	✓	<input type="checkbox"/>

Has the Participant consulted with localities or tribal governments (cities, counties, or rural communities) in its jurisdiction regarding the needs of eligible homeowners in its jurisdiction?

**Yes**

Has the Participant provided an opportunity for public input regarding its HAF Plan through public hearings or published materials?

**Yes**

If yes, please indicate whether a proposed or draft plan was published, please describe where details about the comment solicitation were posted, for how long, in what languages, and whether any efforts were made to make the posting accessible to persons with disabilities or individuals without reliable internet access.

**This HAF Plan was informed by four virtual public meetings (with phone access) held June 1, June 3, June 22 and August 19. VHFA published a Vermont HAF News web page on May 21, 2021 containing the latest information about the program, public meetings and instructions for submitting comments and questions. On June 30, VHFA released a draft program description and shared program income limits. On August 13, VHFA published a narrative draft HAF plan. To ensure access to people with low English proficiency, all web-based outreach was accompanied by an opportunity to request translation. According to the Census Bureau's 2019 American Community Survey, there are an estimated 2,380 limited English-speaking households in Vermont (0.9%).**

**To adequately address the needs of underserved communities in Vermont's HAF plan, VHFA sought feedback from a wide network of community-based and statewide organizations. All four public meetings were publicized on the VHFA News blog and social media pages which reach 1,000s of subscribers and followers. In addition, VHFA directly invited over 60 key stakeholders directly from across the state, encouraging them to participate in the meetings and/or provide written comment. These include: every HUD-approved homeownership center; the state's network of housing nonprofits, including all five Neighborworks of America partner organizations; state and federal housing agencies; each legal aid group; every town's manager and clerk; banks and credit unions; utility companies; the local United Ways; homebuilding associations; agencies serving seniors and people with disabilities, including our state Center for Independent Living; and organizations representing minority Vermonters, including refugee resettlement groups and local NAACP chapters.**

**Please see HAF-Grantee-Plan-Template-Response PDF attached for further detail due to character constraints.**

## **How Will the Participant Continue to Assess the Needs of Eligible Homeowners?**

Treasury anticipates that an ongoing process of assessing the needs of eligible homeowners will help address the needs of potentially eligible homeowners as economic conditions change over time.

Does the Participant plan to update its assessment of community needs within the next year to determine whether its HAF program design should be updated to address changing needs of potentially eligible homeowners?

**Yes**

What additional data would be helpful to the Participant as it seeks to assess homeowner needs over time?

**Quarterly data about rate of serious loan delinquency/foreclosure for Vermont homeowners at or below 100% AMI in the following break-outs:**



- county
- servicer
- investor type (including FHA, VA, RD, private)

**Quarterly data about rate of loan delinquency by loan type among Vermont homeowners**

- Reverse mortgages
- Chattel loans
- Other

**Quarterly rate of utility delinquencies among Vermont homeowners at or below 100% AMI**

**Quarterly rate of association fee delinquencies among Vermont homeowners at or below 100% AMI**

**Quarterly rate of property tax delinquency among Vermont homeowners who do not escrow these with their mortgage and have incomes at or below 100% AMI**

**Every 12 months, we will analyze and report on Vermont's HAF program activity relative to initial projections and performance goals. Specifically, we will compare the HAF assistance provided to Vermont homeowners with our initial demand projections to identify areas in which homeowner needs may have shifted. By confirming HAF usage trends with broader quantitative data sets available through mortgage servicers, the National Delinquency Survey, the Federal Reserve Bank of Atlanta, Vermont's largest utility providers, and the Census Bureau, we will propose any changes warranted to our HAF plan. For example, if the demand for utility assistance through Vermont's HAF program during the first year falls short of initial projections, we will explore why this is occurring and if we confirm that needs have declined, we may submit a HAF plan change request to offer an additional type of assistance not in our original plan, such as help with home repairs.**

# Program Design

---

## **What are the Program Design Elements Through Which the Participant Will Deliver HAF Assistance to Eligible Homeowners?**

A program design element is a specific activity or program, which is consistent with a qualified expense category, under which a Participant will disburse HAF funds in accordance with the HAF Plan. Please note that multiple program design elements may fit under a single qualified expense category; for example, a mortgage assistance program that has different terms for federally backed mortgages and manufactured-home mortgages may constitute two separate program design elements, for which case the Participant provides a separate term sheet or other description for each program design element.

HAF participants must have at least one program design element intended to reduce mortgage delinquency among targeted populations. Treasury encourages HAF participants to consider program design elements that address homeownership preservation for targeted populations in areas where there is a sustained trend of increasing property taxes or utility costs, including for households that do not have mortgages.

Please identify each qualified expense category in which the Participant will offer a program design element by checking the boxes below.

- mortgage payment assistance
- mortgage principal reduction, including with respect to a second mortgage provided by a nonprofit or government entity
- payment assistance for homeowner's utilities, including electric, gas, home energy, and water
- payment assistance for homeowner's insurance, flood insurance, and mortgage insurance
- payment assistance for delinquent property taxes to prevent homeowner tax foreclosures
- payment assistance for down payment assistance loans provided by nonprofit or government entities
- financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default
- facilitating mortgage interest rate reductions
- payment assistance for homeowner's internet service, including broadband internet access service, as defined in 47 CFR 8.1(b)
- payment assistance for homeowner's association fees or liens, condominium association fees, or common charges
- measures to prevent homeowner displacement, such as home repairs to maintain the habitability of a home or assistance to enable households to receive clear title to their properties

For each program design element that the Participant will offer, the Participant is required to upload a term sheet or other description, that, at a minimum, provides the following information regarding that program design element. Term sheets for all of Participant’s HAF programs may be uploaded together as one document.

Title	Upload Date
VHFA HAF Plan Narrative	12/2/2021 5:01 PM
HAF-Grantee-Plan-Template-Responses	12/2/2021 5:02 PM
HAF-Plan-Treasury-Feedback-Response	12/2/2021 5:02 PM
HAF Program Term Sheets	12/2/2021 5:01 PM

A HAF participant may elect to revise its HAF Plan over time to add or subtract program design elements. Does the Participant anticipate adding additional program design elements to this HAF Plan within one year of this submission?

**No**

Treasury has provided sample term sheets to assist HAF participants in developing their HAF plans. Participants may use these sample term sheets, in whole or in part, as part of their submission. To the extent the Participant intends to structure the program differently with respect to significant program terms described in the Sample Term Sheets, Treasury will, in the course of its review of the HAF Plan, request a justification for how the alternate approach will further the objectives of the HAF, including targeting and prioritization requirements. In the chart below, the HAF Participant may provide a justification for significant deviations from the terms described in the sample term sheets upon initial submittal. (optional for initial submission)

<b>Program Design Element</b>	<b>Deviation from sample terms</b>	<b>Justification</b>
Mortgage Assistance Program	This is based on the Mortgage Reinstatement Program Template with some deviations. We have not specifically stated that funds are only to supplement other loss mitigation options. We have not required that applicants state they have the ability to resume payments after reinstatement. We have not required that reverse mortgage borrowers enter a payment plan.	These deviations reflect VHFA’s experience with its recent CARES Act-funded Mortgage Assistance Program. Servicers with mortgages that are in forbearance or have been subject to loss mitigation consider the loans to be current and do not indicate that any amount is due, so no payment is made. Requiring the commencement of loss mitigation in every case would create delay and confusion for the applicants. Mitigation processes may result in partial claim liens/soft seconds that reduce equity for populations that are already disparately impacted when it comes to homeownership and wealth building. Requiring applicants to certify that they will have the ability to resume payments could result in applicants being unwilling to apply for fear that if they do not remain current that the assistance might be “clawed back”.
Property Charge Assistance Program	We have not included insurance premiums outside of amounts included in mortgage escrows as part of the Mortgage Assistance Program.	Given the expected needs and the funding available we focused on those charges that could result in a lien on the property such as property taxes, homeowner association fees and other charges, and necessary utilities.
Maximum Benefit	Our maximum benefit is a cap to cover all 3 programs.	Provides flexibility in dealing with individual circumstances, especially where an applicant may have allowed themselves to get behind on one set of costs in order to stay current on another. Programs are ranked in priority so if an applicant’s total need exceeds the cap, we first look to the mortgage, then property taxes, then other common charges, then utilities.

### Documentation of Homeowner Income

Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF only if they have incomes equal to or less than 150% of the area median income or 100% of the median income for the United States, whichever is greater. In addition, not less than 60% of amounts made available to each HAF participant must be used for qualified expenses that assist homeowners having incomes equal to or less than 100% of the area median income or equal to or less than 100% of the median income for the United States, whichever is greater. The HAF guidance describes permissible ways for HAF participants to determine homeowner income.

Under the HAF guidance, one permissible approach for determining income is for (1) the household to provide a written attestation as to household income and (2) the HAF participant to use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household’s geographic area. Will the Participant allow income to be determined in this way?

**Yes**

If yes, please describe the fact-specific proxy or proxies to be used for the income determination.

**VHFA may rely on fact-based proxies such as whether the homeowner can provide proof of current receipt of benefits under a federal means-tested program which requires income to be at or below that required income for an eligible homeowner under HAF (such as Supplemental Nutritional Assistance Program/SNAP (3SquaresVT) or Medicaid) or the location of the residence in a census tract with one of the following designations:**

- a. FHFA Duty to Serve designations of Areas of Concentrated Poverty**
- b. HUD designations of Racial and/or Ethnic Areas of Concentrated Poverty**
- c. FFIEC designations of distressed, underserved, poverty, remote rural and/or unemployment**
- d. HUD designations of Qualified Census Tracts for use in the Low-Income Housing Tax Credit program**
- e. Other fact-based proxy eligibilities may be developed as data becomes available.**

Under the HAF guidance, HAF participants may provide waivers or exceptions to this documentation requirement as reasonably necessary to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic, or a lack of technological access by homeowners; in these cases, the HAF participant is still responsible for making the required determination regarding household income and documenting that determination. Will the Participant allow applicants to request such waivers or exceptions?

Yes

### **Eligible Mortgage Types**

Please indicate which of the following mortgage types are eligible to be assisted under one or more of the Participant's program design elements.

- First Mortgages
- Reverse Mortgages (Home Equity Conversion Mortgages, Single-Purposes Reverse Mortgages, or Proprietary Reverse Mortgages)
- Contracts for Deed or Land Contract (if it is a credit transaction secured by a consensual security interest in a dwelling)
- Second Mortgages
- Loans Secured by Manufactured Housing (secured by real estate or dwelling)

If the Participant excludes any of the forgoing mortgage types from one or more program design elements, explain the exclusion.

N/A

### **How Will the Participant Target HAF Resources Consistent with Statutory Requirements?**

The Participant must describe how it will target HAF resources in accordance with the HAF guidance. Targeting strategies are affirmative efforts to inform, encourage the participation of, and facilitate access to resources for targeted households, including by offering multiple intake formats, engaging with nonprofit

organizations (e.g., housing counselors or legal services organizations) to provide additional pathways into the program, and providing community outreach, partnerships with housing counseling agencies or legal aid organizations, or other educational services that are aligned with the HAF participant's program design, in a manner that is culturally and linguistically relevant to the targeted communities.

## Defining Socially Disadvantaged Individual

Please describe the process the Participant will use to determine whether a homeowner is a "socially disadvantaged individual" as defined in the HAF guidance.

**Participants will be asked whether they or a member of their household is Black, Indigenous, Asian American/Pacific Islander, Non-white Hispanic, South Asian or if they or a member of their household has limited English proficiency. Vermont has no majority-minority census tracts or persistent poverty counties. Vermont is not and does not encompass a US territory, Indian reservation or Hawaiian Home Land.**

## Public Communications

Will the Participant engage in a public communications campaign to raise awareness among targeted populations about the availability of HAF resources, in media such as television, newspapers, online media, or social media?

**Yes**

If yes, please indicate whether the public communications campaign will include communications that primarily target the following populations:

- Homeowners earning less than 100% of area median income
- member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- resident of a majority-minority Census tract; (3)
- resident of a U.S. territory, Indian reservation, or Hawaiian Home Land
- homeowners in persistent poverty counties;
- individual with limited English proficiency

Please indicate in which languages, in addition to English, public communications to targeted populations will be undertaken:

**Spanish; Chinese; Vietnamese; Arabic; Other**

Please list any other languages.

**Somali, Swahili, French, Burmese, Nepali, Bosnian**

## Outreach

Will the Participant engage in outreach through partnerships with organizations that focus primarily on serving homeowners earning incomes below 100% of area median income or socially disadvantaged individuals and that have the capacity to engage targeted communities in a culturally and linguistically relevant manner to encourage the submission of applications for HAF resources from targeted populations?

**Yes**

If yes, please indicate whether the community outreach efforts will include partnerships with organizations that primarily target the following populations:

- member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- resident of a majority-minority Census tract; (3) individual with limited English proficiency;
- resident of a U.S. territory, Indian reservation, or Hawaiian Home Land;
- homeowners that reside in persistent poverty counties;
- individual with limited English proficiency.

Please list any other languages.

**Somali, Swahili, French, Burmese, Nepali, Bosnian**

### **Housing Counseling and Legal Services**

Will the Participant facilitate access for eligible households to housing counseling or legal services?

**Yes**

If yes, please identify below the providers of housing counseling or legal services that have indicated to the Participant that they are willing and able to support homeowners receiving assistance under the Participant's HAF programs.

<b>Provider Name Provider Address Provider Website</b>	<b>Provider Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Vermont Legal Aid</b> 264 North Winooski Avenue , Burlington, Vermont 05401 <a href="https://www.vtlegalaid.org">https://www.vtlegalaid.org</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Champlain Housing Trust</b> 88 King Street , Burlington, Vermont 05401 <a href="https://www.getahome.org">https://www.getahome.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Rural Edge</b> 48 Elm Street PO Box 259, Lyndonville, Vermont 05851 <a href="https://ruraledge.org">https://ruraledge.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Neighborworks of Western Vermont</b> 110 Marble Street , West Rutland, Vermont 05777 <a href="https://www.nwwvt.org">https://www.nwwvt.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Downstreet Housing &amp; Community Development</b> 22 Keith Ave, Ste. 100 , Barre, Vermont 05641 <a href="https://downstreet.org">https://downstreet.org</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Windham &amp; Windsor Housing Trust</b> 68 Birge Street , Brattleboro, Vermont 05301 <a href="https://www.homemattershere.org/">https://www.homemattershere.org/</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Opportunities Credit Union</b> 25 Winooski Falls Way Suite 203, Winooski, Vermont 05404 <a href="https://www.oppsvt.org/">https://www.oppsvt.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

### **Targeting specific groups of homeowners**

Will the Participant conduct outreach specifically tailored to target potentially eligible households that:

- have mortgages or mortgage assistance contracts held or backed by the Participant?
- have mortgages backed by any of the following agencies: Federal Housing Administration; Department of Veterans Affairs; U.S. Department of Agriculture?
- have privately held mortgages?

### **What Efforts will be Made to Address Barriers to HAF Program Participation for Potentially Eligible Homeowners, Including Those with Limited English Proficiency or Who are Disabled?**

Targeted outreach may be needed to reach homeowners who are likely to experience barriers to access, including persons with limited English proficiency and those with disabilities.



Indicate all of the languages, in addition to English, in which the Participant's HAF application and other program documents will be made available.

**Spanish; Chinese; Vietnamese; Arabic; Other**

Please list any other languages.

**Somali, Swahili, French, Burmese, Nepali, Bosnian**

Will the Participant's HAF applications and other program documents be provided in forms that are accessible to persons with disabilities?

**Yes**

## Performance Goals

Treasury will consider the goals and benchmarks the Participant proposes to use to measure the effectiveness of its programs, including whether those goals address the homeowner needs identified by the Participant, the extent to which the goals are disaggregated by key homeowner characteristics as appropriate for the jurisdiction, and whether they include a goal focused on reducing mortgage delinquency.

Please describe Participant's goals and benchmarks for each of its programs with the following program design elements.

<b>Program Design Element</b>	<b>Metric of Success</b>	<b>Goal</b>
Mortgage Reinstatement	Number of mortgage loans reinstated	Annual change in mortgage loans reinstated is equal to or exceeds the annual change in the total number of Vermont mortgages with delinquencies.
Payment Assistance for HOA fees or liens	Number of households whose homeowner association fees or liens, condominium association fees or common charges are brought current.	Annual change in households with fees brought current is within 5 points of the annual change in the total number of Vermont mortgages with delinquencies.
Payment Assistance for Homeowners Utilities	Number of households whose utility bills are brought current	Annual change in number of households whose utility bills are brought current is within 10 points of the annual change in Vermont Census Bureau pulse survey respondents who said they had trouble paying energy bills.
Payment Assistance for Delinquent Property Taxes	Number of households whose delinquent property taxes are brought current.	Annual change in households with taxes brought current is within 5 points of the annual change in the total number of Vermont mortgages with delinquencies.

# Readiness

---

## **Staffing, Systems and Contractors**

Treasury seeks information regarding the Participant's organizational capacity to implement its HAF Plan.

Does the Participant anticipate needing to hire additional staff to implement this HAF Plan?

**Yes**

Does the Participant anticipate significant information technology system upgrades to implement this HAF Plan?

**Yes**

Does the Participant have policies or procedures that govern the implementation of each HAF program design element described in this HAF Plan?

**No**

If no, is a policy and procedure in development for each HAF program design element described in this HAF Plan?

**Yes**

Will the Participant use HAF funds to assist eligible households through a program that was operational before the Participant first received HAF funds?

**No**

Will the Participant use any third-party contractor or partner to conduct program administration (such as reviewing applications, determining eligibility, processing payments, conducting reporting, and reviewing compliance) for some or all of the Participant's HAF programs?

**Yes**

If yes, has the Participant entered into all necessary arrangements with all of the third-party contractors or partners that will conduct program administration?

**Yes**

## **Use of Initial Payment**

If the Participant has already received any HAF funds from Treasury, provide the following information about the use of such funds as of June 30, 2021.

What amount of the HAF funds that the Participant has received been disbursed to eligible homeowners?

**\$0.00**

Has the Participant begun accepting applications from homeowners for any HAF-funded programs?

**No**

How much of the HAF funds that the Participant has received been obligated?

**\$1,057,315.00**

Provide a brief description of how the Participant has used the HAF funds it has received.

**So far, the 10% payment of HAF funds has been used for payments to our vendor for development of the application portal and for development of systems and processes to manage the program and for staff planning and program development. As of this time, \$1,057,315 has been spent for these purposes. Because VHFA had just completed a round of CARES Act funded mortgage assistance which closed in June 2021, no pilot program was offered using Homeowner Assistance Fund money to allow for the Agency to focus on developing the Homeowner Assistance Program. Additionally, the state used CARES Act funds to provide well over \$15 million in utility arrearage funding to households and businesses through a program that was open through October 2021.**

# Budget

## **Budgeting of HAF Funds by Program Design Element**

Specify the amounts of HAF funds that the Participant proposes to allocate to each of the following program design elements, if offered:

Measure	Amount
Mortgage Payment Assistance	\$0.00
Mortgage Principal Reduction	\$0.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$4,539,078.00
Payment Assistance for Delinquent Property Taxes	\$7,168,590.00
Mortgage Reinstatement	\$18,827,692.00
Facilitate Mortgage Interest Rate Reduction	\$0.00
Payment Assistance for Homeowner's Insurance	\$0.00
Payment Assistance for Down Payment Assist. Loans	\$0.00
Payment Assistance for Homeowners Utilities	\$10,581,457.00

### **Other measures to prevent homeowner displacement**

Measure	Amount
N/A	\$0.00

Displacement Prevention Sub-Total	<b>\$41,116,817.00</b>
-----------------------------------	------------------------

### **Counseling or Legal Services**

The Participant may allocate up to 5% of its HAF funds for counseling or educational efforts by housing counseling agencies approved by the Department of Housing and Urban Development or a tribal government, or legal services, target to households eligible to be served with funding from the HAF related to foreclosure prevention or displacement.

<b>Specify the Participant's allocations for the following</b>	<b>Amount</b>
Counseling or Educational Services	\$560,000.00
Legal Services	\$821,000.00

<b>Services Sub-Total</b>	<b>\$1,381,000.00</b>
---------------------------	-----------------------

### **Reimbursement of Funds Expended After January 21, 2020**

As described in the HAF guidance, HAF funds may be used for reimbursement of certain expenses between January 21, 2020 and the date when the first HAF funds are disbursed by the HAF participant under the HAF for a qualified expense (with certain limitations, as set forth in the HAF guidance).

<b>Type of Expense</b>	<b>Amount</b>
N/A	\$0.00

<b>Reimbursement Sub-Total</b>	<b>\$0.00</b>
--------------------------------	---------------

### **Allocation of Administrative Expenses**

<b>Type of Expense</b>	<b>Amount</b>
FAMS License and Fees	\$1,001,000.00
Cloud hosting and storage	\$330,000.00
System Support	\$1,245,000.00
Call center and operations	\$2,109,201.00
Program management	\$2,814,799.00

<b>Administrative Expenses Sub-Total</b>	<b>\$7,500,000.00</b>
--	-----------------------

<b>Total Plan Requested Amount</b>	<b>\$49,997,817.00</b>
------------------------------------	------------------------

Amount Requested Confirmation:

**Yes**

# Contacts

---

Please identify up to three contacts for the Participant- a primary contact, a designated point of contact for reporting, and an additional contact.

## Primary Contact

Name: **Maura Collins, Executive Director**

Agency/Office: **Vermont Housing Finance Agency**

Email: [mcollins@vhfa.org](mailto:mcollins@vhfa.org)

Phone Number: **8026523434**

## Reporting Contact

Name: **Naomi Cunningham, Grants Management Specialist**

Agency/Office: **Vermont Department of Housing and Community Development**

Email: [naomi.cunningham@vermont.gov](mailto:naomi.cunningham@vermont.gov)

Phone Number: **8022492689**

## Additional Contact

Name: **Maxwell Krieger, General Counsel**

Agency/Office: **Vermont Department of Housing and Community Development**

Email: [maxwell.krieger@vermont.gov](mailto:maxwell.krieger@vermont.gov)

Phone Number: **8025223132**

## Proprietary or Otherwise Non-Public Information

Does your plan submission include any information or materials that are proprietary or otherwise non-public?

**No**

If "Yes," please indicate which information or materials are proprietary or otherwise non-public.

## Title VI Assurances

---

You must provide on behalf of the HAF Participant assurances that the HAF Participant will comply with Title VI of Civil Rights Act of 1964. Please download the assurances, then review, sign, and upload the signed copy to this page before submitting the HAF Plan.

Title	Upload Date
Signed HAF-Title_VI_Assurance	12/2/2021 5:10 PM



# Official Certification

---

I (the undersigned) certify that the information provided in the HAF submission is accurate and complete after reasonable inquiry of people, systems, and other information available to the HAF Participant. The HAF participant and I acknowledge that any materially false, fictitious, or fraudulent statement or representation (or concealment or omission of material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 U.S.C. § 1001 and also may subject me and HAF Participant to civil penalties and/or administrative remedies for false claims or otherwise, (including 31 U.S.C. §3729 et seq.). I am an authorized representative of HAF Participant with authority to make the above certifications and representations on behalf of the HAF Participant.

Name of HAF Participant:

**Agency of Commerce and Community Development**

Name and Title of Certifying Official

Name: **Lindsay Kurrle**

Title: **Secretary, Vermont Agency of Commerce and Community Development**

Telephone: **8028283080**

Email: [lindsay.kurrle@vermont.gov](mailto:lindsay.kurrle@vermont.gov)