United States Department of the Treasury

Homeowner Assistance Fund Plan
Submitted by State of Montana

HAF Grantee Plan Name
HAFP-0057
# United States Department of the Treasury

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

<table>
<thead>
<tr>
<th>Allocation Amount</th>
<th>$5 Million or Greater</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submission Date</td>
<td>12/14/2021 7:58 PM</td>
</tr>
<tr>
<td>Total Plan Requested Amount</td>
<td>$50,000,000.00</td>
</tr>
<tr>
<td>Record Type</td>
<td>State</td>
</tr>
<tr>
<td>Application Record</td>
<td>SLT-0055</td>
</tr>
<tr>
<td>HAF Grantee Plan Status (external)</td>
<td>Approved</td>
</tr>
</tbody>
</table>
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.

Data provided by Treasury. Federal Reserve Bank of Atlanta's Mortgage Analytics and Performance Dashboard (proprietary). State-By State Ranking Reports released from Black Knight Financial Technology Solutions, LLC (proprietary). Data from survey of non-depository mortgage companies operating in the state of Montana conducted by state of Montana Banking and Finance Division (provided quarterly). U.S. Census American Community Survey 2019 1 year.

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.

U.S. Census American Community Survey 2019 year 1 for race and ethnicity of owner occupied units. CDC Social Vulnerability Index ranking of counties and census tracks on 15 social factors including unemployment, minority status, disability and others that factor into a community’s ability to prevent human suffering or financial loss in the event of a disaster. U.S. Census Small Area Income & Poverty Estimates Program to identify persistent-poverty counties under HAF guidance revised definition of Socially Disadvantaged Individuals.

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.
We have not yet obtained data, but are actively coordinating with the Montana Association of Counties to gather delinquent property tax information for owner occupied residential homes from county treasurers. We are requesting the number of homeowners delinquent, average amount and average number of months delinquent. We have partnered with large utility providers like Northwestern Energy on deployment of our Emergency Rental Assistance program, including information sharing for households at risk of utility shut-off. We anticipate similar collaboration with utility providers for our HAF program.

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.

MT Department of Labor & Industries job tracking and Hindsight reports highlighting Montana's workforce activity from April 2020 to June 2021. Overall, Montana's recovery from peak COVID-19 pandemic impacts has been positive, with Montana having more job openings since February 2020 than any other state and ranking #9 among states for best performance in terms of job growth through the COVID-19 recession.

Within the Montana Board of Housing’s own portfolio, 290 loans were 60 or more days delinquent as of June 30, 2021, a nearly 70% increase from 171 loans in June of 2020. Also as of June 30, 2021, we had 211 loans in COVID-19 formal forbearance. This represents 4.18% of the total mortgage servicing portfolio. Loans in COVID19 formal forbearance include 136 FHA, 20 USDA-RD, 19 VA loans, and other mortgage revenue bond (MRB) loans. Average loan balance is $135K. The total estimated amount needed to bring the portfolio current, including estimated payments for partial claims, is $2.514M. We are undertaking a pilot program for a HAF reinstatement loan for Montana Board of Housing borrowers in COVID-19 forbearance with the initial $5 million in HAF funds. Pilot program implementation is underway as we assess these borrowers for other loss mitigation options under their respective loan insurers.

December 14, 2021 update: Please refer to Treasury Feedback Response PDF uploaded in the Terms Sheets section for further information on how data gathered informed our planning process.

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.

<table>
<thead>
<tr>
<th>Provider Name</th>
<th>Provider Address</th>
<th>Provider Primarily Serves LMI Households</th>
<th>Provider Addresses Impact of Housing Discrimination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeword</td>
<td>1535 Liberty Lane Suite #116A, Missoula, Montana 59808</td>
<td>✅</td>
<td>✅</td>
</tr>
<tr>
<td></td>
<td><a href="https://homeword.org">https://homeword.org</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Montana Legal Services Association</td>
<td>616 Helena Avenue Suite 100, Helena, Montana 59601</td>
<td>✅</td>
<td>✅</td>
</tr>
<tr>
<td></td>
<td><a href="https://www.mtlsa.org">https://www.mtlsa.org</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NeighborWorks Montana</td>
<td>17 5th Street South, Great Falls, Montana 59401</td>
<td>✅</td>
<td>✅</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.nwmt.org">http://www.nwmt.org</a></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Organization Name</th>
<th>Organization Address</th>
<th>Organization Primarily Serves LMI Households</th>
<th>Provider Addresses Impact of Housing Discrimination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montana Budget and Policy Center</td>
<td>input, input, Montana 59000</td>
<td>✅</td>
<td>✅</td>
</tr>
<tr>
<td></td>
<td><a href="https://montanabudget.org">https://montanabudget.org</a></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.


Update December 14, 2021: We have not received any further public comments on the HAF plan.

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?

Monthly or quarterly data from mortgage servicers on loan delinquency, particularly borrowers who do not have access to other government insurer loss mitigation options. Delinquent property tax information from owner occupied homes. Data on manufactured housing loans.
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.

<table>
<thead>
<tr>
<th>Title</th>
<th>Upload Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montana_HAF_plan_REVISED_FINAL_121421</td>
<td>12/14/2021 7:56 PM</td>
</tr>
<tr>
<td>Treasury_Feedback_Response_FINAL_12142021</td>
<td>12/14/2021 7:56 PM</td>
</tr>
<tr>
<td>Term Sheets for HAF Program Design Elements FINAL</td>
<td>9/28/2021 2:52 PM</td>
</tr>
</tbody>
</table>

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?

Yes

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)

<table>
<thead>
<tr>
<th>Program Design Element</th>
<th>Deviation from sample terms</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial assistance to allow a homeowner to reinstate a mortgage</td>
<td>Interest free loan with payments due in full when first mortgage ends (repayment, refinance, transfer, sale). Repayment is subject to review and pay require payment in full or establish a payment plan. Deviation from Sample Terms is that loans will not be forgivable.</td>
<td>Other loss mitigation resources are in the form of repayable, deferred loans. Offering forgivable loans under this HAF program would create inequity between applicants for the HAF program and those borrowers who qualify for other loss mitigation options provided by mortgage insurers. We intend to align with Treasury guidance encouraging participants to avoid using HAF funds in a manner that replaces other loss-mitigation resources. In addition, unlike the Hardest Hit Fund Program addressing a climate of depreciating home values, our current market is experiencing significant appreciations in home values and sale prices.</td>
</tr>
</tbody>
</table>

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?

No

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.

**Contracts for Deed or Land Contract will be on case by case basis depending on who holds title.**

Update December 14, 2021: Our review will determine who is the deed holder and whether there is a right-to-encumber option on the deed. For land contracts, we will determine whether there is a home (mobile home) on the property where the borrower could be displaced if payment is not made.

**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.

Applicants will be provided the Socially Disadvantaged Individual definition per HAF guidance and requested to indicate whether they believe their household qualifies under one or more categories. The state of Montana does not include any majority-minority Census tracks, but does include eight separate Tribal governments and seven Indian reservations. We assessed U.S. Census Small Area Income & Poverty Estimates (SAIPE) Program data to determine persistent-poverty counties. Twelve (12) of 56 counties in Montana meet the county poverty upper bound (within 90% margin of error) criteria.

### 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:

**Other**

Please list any other languages.

The state of Montana does not have a significant population of English Second Language speakers but will work with partner organizations to provide translation services to applicants on a as-needed basis.
Update December 14, 2021: Through our coordination with the NeighborWorks Montana Homeownership Counseling Network, we understand that in fiscal year 2020, 2.1% of their clients were Limited English Proficiency. In fiscal year 2021, this decreased to 1.5% of clients. Per census data, less than 0.2 of 1% of Montana residents do not speak English. In addition, 0.4 of 1% are considered to “not be proficient” at speaking English. NeighborWorks Montana has not received a single request for translation services in the last few years; however, they do have a process for connecting clients with translation services upon request, including a referral form.

This is similar to our experience with administration of the Montana Emergency Rental Assistance program, which to-date has received one request for translation services. We will accommodate all requests and are aware of a variety of resources to connect HAF applicants with interpretation services, such as:

- Montana Department of Transportation list of local interpreters.
- Montana State University Extension program - Modern Language & Literatures Tutors and Translators website.
- Montana Language Services helps people connect and access interpretation services online.

These are all resources available to NeighborWorks Montana housing counselors and can be leveraged by state of Montana to support borrowers applying for the HAF program.

**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;
- [x] resident of a U.S. territory, Indian reservation, or Hawaiian Home Land;
- [x] homeowners that reside in persistent poverty counties;
- [ ] individual with limited English proficiency.

Please list any other languages.

The state of Montana does not have a significant population of English Second Language speakers but will work with partner organizations to provide translation services to applicants on a as-needed basis.

Update December 14, 2021: Through our coordination with the NeighborWorks Montana Homeownership Counseling Network, we understand that in fiscal year 2020, 2.1% of their...
clients were Limited English Proficiency. In fiscal year 2021, this decreased to 1.5% of clients. Per census data, less than 0.2 of 1% of Montana residents do not speak English. In addition, 0.4 of 1% are considered to “not be proficient” at speaking English. NeighborWorks Montana has not received a single request for translation services in the last few years; however, they do have a process for connecting clients with translation services upon request, including a referral form.

This is similar to our experience with administration of the Montana Emergency Rental Assistance program, which to-date has received one request for translation services. We will accommodate all requests and are aware of a variety of resources to connect HAF applicants with interpretation services, such as:

- Montana Department of Transportation list of local interpreters.
- Montana State University Extension program - Modern Language & Literatures Tutors and Translators website.
- Montana Language Services helps people connect and access interpretation services online.

These are all resources available to NeighborWorks Montana housing counselors and can be leveraged by state of Montana to support borrowers applying for the HAF program.

**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.

<table>
<thead>
<tr>
<th>Provider Name</th>
<th>Provider Primarily Serves LMI Households</th>
<th>Provider Addresses Impact of Housing Discrimination</th>
</tr>
</thead>
<tbody>
<tr>
<td>NeighborWorks Montana</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>17 5th Street South, Great Falls, Montana 59401</td>
<td></td>
<td></td>
</tr>
<tr>
<td><a href="http://www.nwmt.org">http://www.nwmt.org</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Montana Legal Services Association</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>616 Helena Avenue South Suite 100, Helena, Montana 59601</td>
<td></td>
<td></td>
</tr>
<tr>
<td><a href="https://mtlsa.org">https://mtlsa.org</a></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**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?
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.

Other

Please list any other languages.

Translation services provided on as-needed basis.

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.

<table>
<thead>
<tr>
<th>Program Design Element</th>
<th>Metric of Success</th>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payment Assistance for Delinquent Property Taxes</td>
<td>Number of home losses avoided due to HAF funds</td>
<td>Prevent 1000 home losses within five years from property tax lien foreclosure</td>
</tr>
<tr>
<td>Payment Assistance for Homeowner’s Insurance</td>
<td>Number of home losses avoided due to HAF funds</td>
<td>Prevent 250 home losses within five years from homeowner insurance lien foreclosure</td>
</tr>
<tr>
<td>Mortgage Reinstatement</td>
<td>Number of home losses avoided due to HAF funds.</td>
<td>Prevent 1000 home losses within five years</td>
</tr>
<tr>
<td>Payment Assistance for HOA fees or liens</td>
<td>Number of home losses avoided due to HAF funds</td>
<td>Prevent 250 home losses from HOA fees or liens</td>
</tr>
<tr>
<td>Payment Assistance for Homeowners Utilities</td>
<td>Number of home utility shut offs avoided due to HAF funds</td>
<td>Prevent 2,500 homeowners from loss of utilities</td>
</tr>
<tr>
<td>Payment Assistance for Homeowner’s Internet Service</td>
<td>Continuation of critically needed Internet service due to HAF funds</td>
<td>Support 2,500 homeowners with three months Internet assistance</td>
</tr>
</tbody>
</table>
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?

Yes

If yes, has the documentation for that pre-existing program been adapted to HAF requirements (please answer yes if the pre-existing program already complied with HAF program requirements)?

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?

No

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?

$261,167.80

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

Pilot program for reinstatement loan program for Montana Board of Housing borrowers in COVID-19 formal forbearance was approved by Advisory Commission at July 21 meeting and is under development. Scope of work for online application system with software vendor executed September 24, 2021 for $261,167.80.
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:

<table>
<thead>
<tr>
<th>Measure</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mortgage Payment Assistance</td>
<td>$0.00</td>
</tr>
<tr>
<td>Mortgage Principal Reduction</td>
<td>$0.00</td>
</tr>
<tr>
<td>Payment Assistance for Homeowner’s Internet Service</td>
<td>$387,500.00</td>
</tr>
<tr>
<td>Payment Assistance for HOA fees or liens</td>
<td>$1,375,000.00</td>
</tr>
<tr>
<td>Payment Assistance for Delinquent Property Taxes</td>
<td>$5,500,000.00</td>
</tr>
<tr>
<td>Mortgage Reinstatement</td>
<td>$27,500,000.00</td>
</tr>
<tr>
<td>Facilitate Mortgage Interest Rate Reduction</td>
<td>$0.00</td>
</tr>
<tr>
<td>Payment Assistance for Homeowner’s Insurance</td>
<td>$1,375,000.00</td>
</tr>
<tr>
<td>Payment Assistance for Down Payment Assist. Loans</td>
<td>$0.00</td>
</tr>
<tr>
<td>Payment Assistance for Homeowners Utilities</td>
<td>$3,875,000.00</td>
</tr>
</tbody>
</table>

Other measures to prevent homeowner displacement

<table>
<thead>
<tr>
<th>Measure</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montana may add other measures to prevent homeowner displacement under HAF guidance in the future.</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

Displacement Prevention Sub-Total                             $40,012,500.00

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.
Specify the Participant’s allocations for the following | Amount
--- | ---
Counseling or Educational Services | $1,250,000.00
Legal Services | $1,250,000.00

| Services Sub-Total | $2,500,000.00 |

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).

<table>
<thead>
<tr>
<th>Type of Expense</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montana does not anticipate requesting reimbursement for previous expenses.</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

| Reimbursement Sub-Total | $0.00 |

Allocation of Administrative Expenses
<table>
<thead>
<tr>
<th>Type of Expense</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Services: Estimate 10 new FTE as application reviewers, accounting / compliance specialists and HAF Program Supervisor. Continuing program support from permanent management staff in homeownership, mortgage servicing, accounting / finance and IT positions.</td>
<td>$3,700,000.00</td>
</tr>
<tr>
<td>State of Montana Indirect Admin Rate (14.78% of Personal Services).</td>
<td>$546,860.00</td>
</tr>
<tr>
<td>Document prep fees (recording and title).</td>
<td>$200,000.00</td>
</tr>
<tr>
<td>Servicing over life of loan for est. 1,000 loans at 3.75% servicing fee, est. 7 year life of average loan.</td>
<td>$656,250.00</td>
</tr>
<tr>
<td>Communications, marketing and outreach.</td>
<td>$500,000.00</td>
</tr>
<tr>
<td>Software design, implementation and maintenance.</td>
<td>$300,000.00</td>
</tr>
<tr>
<td>Office package (state of Montana standard office package per 1,600 per FTE).</td>
<td>$16,000.00</td>
</tr>
<tr>
<td>Software and document retention fees.</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Supplies and materials.</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Computer page (state of Montana standard computer package 1,200 per FTE).</td>
<td>$12,000.00</td>
</tr>
<tr>
<td>Personal Services: Pilot Program</td>
<td>$855,822.00</td>
</tr>
<tr>
<td>State of Montana Indirect Admin Rate (14.78% of Personal Services): Pilot Program</td>
<td>$127,731.00</td>
</tr>
<tr>
<td>Document prep fees (recording and title): Pilot Program</td>
<td>$22,500.00</td>
</tr>
<tr>
<td>Software design, implementation and maintenance: Pilot Program</td>
<td>$75,000.00</td>
</tr>
<tr>
<td>Communications, marketing and outreach: Pilot Program</td>
<td>$41,357.00</td>
</tr>
<tr>
<td>Office packet: Pilot Program</td>
<td>$4,800.00</td>
</tr>
<tr>
<td>Computer package: Pilot Program</td>
<td>$3,600.00</td>
</tr>
<tr>
<td>Postage: Pilot Program</td>
<td>$3,000.00</td>
</tr>
<tr>
<td>Supplies and Materials: Pilot Program</td>
<td>$6,090.00</td>
</tr>
<tr>
<td>Other expenses - legal, mortgage servicing consulting etc.</td>
<td>$272,600.00</td>
</tr>
<tr>
<td>Postage: Statewide Program</td>
<td>$26,390.00</td>
</tr>
<tr>
<td>Software and document retention fees per year (initial HAF budget of $5,000 was annual cost - updating for life of program).</td>
<td>$10,000.00</td>
</tr>
<tr>
<td>Document prep fees (recording and title): Statewide program. Increased from initial HAF budget based on current recording and title costs.</td>
<td>$100,000.00</td>
</tr>
</tbody>
</table>

Administrative Expenses Sub-Total                                           $7,487,500.00
| Total Plan Requested Amount | $50,000,000.00 |

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: Cheryl Cohen
Agency/Office: Montana Department of Commerce, Housing Division
Email: cheryl.cohen@mt.gov
Phone Number: 4068412844

Reporting Contact

Name: Vicki Bauer
Agency/Office: Montana Department of Commerce, Housing Division
Email: vibauer@mt.gov
Phone Number: 4068412849

Additional Contact

Name: Ginger Pfankuch
Agency/Office: Montana Department of Commerce, Housing Division
Email: gipfankuch@mt.gov
Phone Number: 4068412855

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.

<table>
<thead>
<tr>
<th>Title</th>
<th>Upload Date</th>
</tr>
</thead>
</table>
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:

State of Montana

Name and Title of Certifying Official

Name: Cheryl Cohen
Title: Department of Commerce Housing Division Administrator
Telephone: 4068412844
Email: cheryl.cohen@mt.gov