

United States Department of the Treasury

Homeowner Assistance Fund Plan Submitted by New York State

HAF Grantee Plan Name
HAFP-0066

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	11/12/2021 4:00 PM
Total Plan Requested Amount	\$539,458,517.00
Record Type	State
Application Record	SLT-0042
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.

- **U.S. Census American Community Survey 5-year estimates (2015-2019):** The Census Bureau provides summary tables by various geographic levels (including county, zip code, census tract) on a variety of economic and demographic characteristics. Their Public Use Microdata Summary provides these characteristics at the household level. These data sources were used to identify areas with high shares of homeowners – both mortgage-holders and non-mortgage-holders – who are income eligible and/or socially disadvantaged. We also used PUMS data to model the impact of COVID on household incomes.
- **Black Knight MAPD data:** The Federal Reserve Bank of Atlanta provided Mortgage Analytics and Performance Dashboard (MAPD) data from Black Knight in aggregated form. The data included information on mortgage performance, including county and zip code-level delinquency and forbearance rates, for each month from April 2020 and January 2021. The data were used to identify areas with high levels of mortgage distress, as well as trends over time.
- **Data collected from county tax assessors:** NYSHCR engaged the New York State County Treasurers and Finance Officers Association to survey their members about tax collections in 2019 and 2020. These data are not collected or compiled centrally, and data available varies greatly by county. We received data and feedback from 6 counties and New York City.
- **NYSHCR and NYC HDC Administrative data:** NYSHCR used administrative data on our own portfolio of limited-equity cooperatives, as well as administrative data from New York City's Housing Development Corporation limited-equity coops, to identify developments where residents were delinquent on maintenance payments.
- **Home Mortgage Disclosure Act data:** The Consumer Finance Protection Bureau provides data on home mortgage originations aggregated to the Census Tract level. The data include information on the household's income and race/ethnicity, as well as information about the loan (loan type, servicer information, loan amount, etc.)

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.

In our Needs Assessment, HCR used forbearance and delinquency data as well as State Department of Labor data on unemployment rates and COVID impacted industry statistics to compare against census tracts level data showing high rates of homeownership among Socially Disadvantaged New Yorkers, and high rates of homeowners earning less than 100% of the Area Median Income. This overlap is guiding our outreach and marketing planning to ensure we are targeting households who are lower income, who meet the definition of socially disadvantaged, and who are likely in some type of economic and/or housing distress.

We also relied on an HCR analysis using Home Mortgage Disclosure Act (HMDA) across the nearly 5000 census tracts in New York State to analyze mortgage rejection rates for mortgage applicants of color as compared to white applicants from the same census tract. We found high levels of mortgage applications submitted by households of color in just over 1400 census tracts, and in more than half of those geographies, rejection rates for applicants of color were at least 1.5 times higher as compared to white applicants (in some cases the disparity was significantly higher.)

In planning for HAF we analyzed how these areas have also been impacted by homeowner distress using data sources outlined above.

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.

HCR surveyed the New York State County Treasurers and Finance Officers Association, a state-wide trade association that represents Counties responsible for tax, sewage and water collections. They were able to provide county tax delinquency data from roughly 20 counties comparing arrearages during COVID versus delinquencies during 2019. The findings led us to extrapolate an increase in delinquency from 1% during non COVID years to closer to 2% during the pandemic.

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.

HCR looked at application trends, average award amounts, processing times, and other key data points from the MAP program, a \$80 million program that ran in NY State during the last foreclosure crisis, and which was administered by the same CDFI partner that we have engaged under HAF. Some key decision points that came from that data:

- Structuring the funds as recorded lien created immense bottlenecks and did not hold much advantage from an enforcement perspective (as compared to what we are proposing for HAF which is an unsecured UCC lien).**
- Better controls on taking in applications were needed to avoid raising expectations. In the MAP program a high number of applications made it through the prequalification and submission stage and later had to be rejected due to a lack of remaining funds. Significant feedback during our public comment period spoke to this issue and urged us to avoid this under HAF.**
- Looking at turn times for processing applications across different homeowner types under MAP led us to the decision to create a separate case management team for mortgaged applicants who will be negotiating with the servicers. This type of engagement requires subject matter**

expertise, and by creating separate teams we will allow the non-mortgaged Case Management team to process less complicated applications more quickly.

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.

Provider Name Provider Address Provider Website	Provider Primarily Serves LMI Households	Provider Addresses Impact of Housing Discrimination
Affordable Housing Partnership of the Capital Region 255 Orange St. ,albany,New York 12210 http://www.ahphome.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Allegany County Community Opportunities & Rural Development Corp. (ACCORD) 84 Schuyler Street P.O. Box 573,Belmont,New York 14183 https://www.accordcorp.org/	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
American Debt Resources 384 Larkfield Rd. Suite 1,East Northport,New York 11731 http://www.americandebtresources.com	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Arbor Housing and Development 26 Bridge St., ,Corning,New York 14830 http://www.arbordevelopment.org	✓	✓
Belmont Housing Resources of WNY 2393 Main St. ,Buffalo,New York 14214 http://www.Belmonthousingwny.org	✓	✓
Bridge Street Development Corporation 460 Nostrand Avenue ,Brooklyn,New York 11216 http://www.bsdcorp.org	✓	✓
Bronx Legal Services 349 E 149th Street 10th Floor,Bronx,New York 10455 https://www.legalservicesnyc.org/	✓	✓
Brooklyn Bar Association Volunteer Lawyers Project 44 Court St., , NY 11216 Suite 1206,,Brooklyn,New York 11216 http://www.Brooklynvlp.org	✓	✓
Brooklyn Legal Servicers 105 Court Street, 4th Floor,,Brooklyn,,New York 11201 https://www.legalservicesnyc.org/our-program/br...	✓	✓
Buffalo Urban League 15 Genesee St. ,Buffalo,New York 14203 http://www.buffalourbanleague.org	✓	✓
Capital District Women's Bar Association Legal Project, Inc. (The Legal Project) 24 Aviation Road Suite 101,Albany,New York 12205 http://www.legalproject.org	✓	<input type="checkbox"/>
Economic Opportunity Council of Suffolk, Inc. 31 W. Main St Suite. 300,Patchogue,New York 11772 http://www.eoc-suffolk.com	✓	✓
Empire Justice Center 1 West Main Street Suite 200,Rochester,New York 14614 http://www.empirejustice.org	✓	✓
Frank H. Hiscock Legal Aid Society 351 S. Warren St ,Syracuse,New York 13202 http://www.hlalaw.org	✓	<input type="checkbox"/>
Friends of the North Country, Inc. 1387 Hardscrabble Road, ,Cadyville,North Carolina 12918 https://www.friendsofthenorthcountry.org	✓	✓
Hispanic Brotherhood, Inc. 59 Clinton Avenue ,Rockville Center,New York 11570 https://www.hispanicbrotherhood.org/	✓	✓

Hudson River Housing 313 Mill Street ,Poughkeepsie,New York 12601 http://www.hudsonriverhousing.org	✓	✓
JASA Legal Services for Elder Justice 97-77 Queens Blvd Suite 600,Queens,New York 11374 http://www.jasa.org	✓	✓
Legal Aid of Rockland County 2 Congers Road, Suite 1, New City, NY 10956 Suite 1,New City,New York 10956 http://www.legalaidrockland.org	✓	✓
Legal Assistance of Western New York, Inc. 361 South Main Street ,Geneva,New York 14456 http://www.lawny.org	✓	✓
Legal Services NYC 40 Worth Street Suite 606,New York,New York 10013 http://www.lsnyc.org	✓	✓
LONG ISLAND HOUSING PARTNERSHIP 180 OSER AVE ,HAUPPAUGE,New York 11784 http://www.lihp.org	✓	✓
NEIGHBORHOOD HOUSING SERVICES OF STATEN ISLAND 192 CORSON AVENUE 10301 ,Staten Island,New York 10310 http://www.NHSOFSI.ORG	✓	✓
Neighborhood Housing Services of Jamaica, Inc. 89-70 162 Street, Jamaica ,Jamaica,New York 11432 http://www.nhsj.org	✓	✓
Neighbors Helping Neighbors, Inc. 621 DeGraw Street ,Brooklyn,New York 11217 http://www.nhnhome.org	✓	✓
New York Legal Assistance Group 100 Pearl Street ,New York,New York 10004 http://www.nylag.org	✓	✓
Orange County Rural Development Advisory Corp 2 South Montgomery St ,Walden,New York 12586 http://www.ocrdac.org	✓	✓
Queens Legal Services 8900 Sutphin Blvd 5th Floor,Jamaica,New York 11435 http://www.legalservicesnyc.org/our-program/queens	✓	✓
The Bronx Neighborhood Housing Services CDC Inc., 1451 East Gun Hill Road ,Bronx,New York 10469 http://www.BronxNHS.org	✓	✓

The Housing Council at PathStone 75 College Avenue ,Rochester,New York 14607 http://www.Thehousingcouncil.org	✓	✓
Troy Rehabilitation and Improvement Program, Inc. 415 River Street ,Troy,New York 12108 http://www.trionline.org	✓	✓
Westchester Residential Opportunities, Inc. 470 Mamaroneck avenue Suite 401,White Plains,New York 10605 http://www.wroinc.org	✓	✓
Western New York Law Center 37 Franklin Street Suite 210,Buffalo,New York 14202 http://www.wnylc.org	✓	✓

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.

Organization Name Organization Address Organization Website	Organization Primarily Serves LMI Households	Provider Addresses Impact of Housing Discrimination
400 foundation 132 Odell Clark Place, New York, New York 10030 http://www.400foundation.org	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nassau county office of minority affairs One West Street, Westbury, New York 11501 http://www.nassaucountyny.org	<input type="checkbox"/>	<input checked="" type="checkbox"/>
St. John Baptist Church 184 Goodell Street, Buffalo, New York 14204 http://www.stjohnbaptistbuffalo.org	<input type="checkbox"/>	<input checked="" type="checkbox"/>
First Baptist Cathedral of Westbury 212 Garden Street, Westbury, New York 11590 http://m.facebook.com/FBCofWestbury	<input type="checkbox"/>	<input checked="" type="checkbox"/>
NYS Rural Housing Coalition 79 North Pearl Street#3, Albany, New York 12207 http://www.ruralhousing.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Neighborhood Housing Preervation Coalition 126 State StreetSuite 302, Albany, New York 12207 http://www.npcnys.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Greater Faith Ministries 260 Quincy Street, Brooklyn, New York 11201 http://m.facebook.com/GreaterFaithMinistries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
La Fuerza Unida, Inc 40 Glen StreetSuite 1, Glen Cove, New York 11542 http://www.lfuinc.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
United Church of Jesus Christ 3936 Bronxwood Ave., Bronx, New York 10452 http://www.unitedchurchbx.org	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Refuge Apostolic Church 106 Broadway,, Freeport, New York 11520 http://www.refugefreeportny.org	<input checked="" type="checkbox"/>	<input checked="" 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.

The HCR draft NYS HAF plan was published on June 11th on As previously mentioned, in creating out original Needs Assessment we surveyed the New York Association of the HCR website in full, as well as a summary of the plan which was posted in four languages (English, Spanish, French Creole and Chinese). A public hearing was held on June 23rd during which the public was provided an opportunity to comment on the plan. The public comment period remained open until July 2nd. In addition, we have created a public email account where potential applicants and stakeholder may still submit comments or request more information about the HAF program.

We published advertisements in three statewide newspapers to announce a virtual public hearing and sent notice of the public hearing to an HCR stakeholder list comprised of more than 250 housing non-profits who serve both rural and urban communities in every county of New York State. In addition, we held several stakeholder briefings for faith-based leaders, manufactured housing advocates, and a network of more than 85 housing counseling and legal services providers who work directly with low- income homeowners at risk of foreclosure. HCR has created a dedicated HAF email address which remains open where members of the public can send us information or request to be contacted when the application period is open.

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?

-A database with information about the number of loan modifications offered and accepted, particularly with regard to borrowers who have a federally backed mortgage by FHA, Fannie Mae, Freddie, Mac, VA, and USDA.

-The number of new foreclosure filings broken out by state and by loan type during the 4th Quarter of 2021 and for all four quarters of 2022.

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
NYS HAF Termsheets 9.13.21	9/13/2021 6:52 PM
NYS HAF Response to Treasury 11.5.21	11/5/2021 5:55 PM
NYS HAF Reponse to Treasury 11.11.21	11/11/2021 1:42 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?

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)

Program Design Element	Deviation from sample terms	Justification

<p>Principal Reduction and Mortgage Reinstatement</p>	<p>NYS HAF is requesting two deviations: - We would like to treat these as one intervention - We will limit applications to those who are delinquent, those who have exhausted forbearance and those who are within 60 days of forbearance expiration</p>	<p>NYS HAF, consistent with direction from Treasury, intends to assist applicants with exhausting all available loss mitigation options before making a final award. To assist applicants in this process we will onboard a special Case Management team of attorneys with deep subject matter expertise in loss mitigation who will work with applicants through this process. As this team identifies cases where barriers to obtaining a modification can be advanced by providing HAF funds, we will need flexibility to offer the servicer a partial payoff of arrears (reinstatement), a principal reduction or potentially both. There is no clear way to predict the intervention needed until the negotiation with the Servicer is well underway and the applicants current income is known. We will need the ability to move between these options and if we are required to come to Treasury for permission to move funds in the event that our predictions require a greater than 10% adjustment, this will likely create a tremendous slow down in our ability to bring applications to completion. In addition, we proposing to limit this intervention to applicants who are delinquent, whose forbearance has expired or who are within 60 days of forbearance from the date of application. We are applying this threshold because we anticipate receiving far more applications than the NYS HAF program will be able to address, and we want to prioritize applicants who are at the greatest risk of displacement.</p>
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<p>Mortgage Assistance Payments</p>	<p>-We are calling this Forward Assistance Payment to capture non mortgaged borrowers - We are proposing limiting it to applicants who are unemployed or who have exhausted unemployment benefits at the time of application (or if an adult contributing member of the household meets this criteria) - We are seeking an exception to allow "current" homeowners who meet the unemployment requirement to apply for forward payments</p>	<p>NYS HAF believes all types of homeowners (as opposed to solely mortgaged borrowers) that are currently unemployed are equally vulnerable to displacement. It could be argued that non mortgaged borrowers are at even greater risk of displacement because eviction and foreclosure is a much faster process under NY State law in courts that oversee claims against cooperators behind on maintenance fees, manufactured homeowners delinquent on chattel or personal loans, and property tax foreclosures, as compared to mortgage foreclosures which are very long because NY is a judicial foreclosure state.</p> <p>We are limiting this intervention to unemployed applicants because we believe that the NYS HAF program is going to be well oversubscribed based on our data driven needs assessment. For this reason, at least during our initial application phase, we feel we must limit applications to those who are most vulnerable.</p> <p>During our public hearing and open comment period, we received a lot of feedback from stakeholders and elected officials about homeowners who struggled to stay current on their housing payments during the pandemic but are now in very difficult financial circumstances. For this reason, we are asking for an exception to allow current homeowners who are also unemployed at the time of application to be considered eligible for forward payments.</p>
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<p>Income Qualification and Socially Disadvantaged Targeting</p>	<p>-We are proposing to open the NYS HAF only to applicants who earn equal to or less than 100% of the AMI, at least for the initial application period.</p> <p>-We are proposing to set aside a minimum of 40% of all funds for applicants who meet the definition of Socially Disadvantaged and we have added Vulnerable Populations to this proposed set-aside.</p>	<p>Our needs assessment suggests that the need for homeowner intervention will be far greater than what the NYS HAF program will be able to address. There are 1.7 million homeowners in NY who earn less than 100% of AMI, and based on housing distress indicators, including unemployment, delinquency, forbearance rates, property tax delinquency etc, we believe well over 100,000 homeowners may need assistance. Based on our funding allocation, we estimate that we will be able far less homeowners even if the average award is less than the \$50,000 cap.</p> <p>For this reason, we are planning to open the application window for a 30- day period initially and limit applications to households at or below 100% AMI. If at the end of 30 days, the program is not oversubscribed, we will extend for an additional period until fully subscribed. This will allow us to manage application flow and public expectations about the availability of funding. However, in light of that timeframe, we also want to ensure that applicants who may have a more difficult time applying are not excluded from the program. We propose a 40% set-aside which will be reserved for Socially Disadvantaged and Vulnerable Populations. That set-aside application window will open and close on its own timeline (30 days or until fully subscribed.) And as previously stated, if applications that meet these criteria exceed the 40% set-aside, we will continue to accept those applications until the overall program is fully subscribed.</p>
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<p>NYS HAF Payments Directly to Homeowners</p>	<p>We propose allowing HAF awards to be remitted directly to homeowners. If a homeowner requests the NYS HAF make payment directly to a 3rd party creditor (bank, coop, tax collecting authority etc) NYS HAF will accommodate that request provided the payment can be executed within a reasonable timeframe. The only exception to this will be in circumstances where a mortgaged borrower cannot be brought current unless a payment is applied directly to the unpaid principal balance and remitted directly to the servicer.</p>	<p>HCR did an analysis of the 3rd parties with whom we will need to coordinate payments on behalf of homeowners. The findings are extremely daunting. Depending on where you are in the state and due to the defused nature of the property tax collection, we may need to find right-party contacts at 63 county finance offices, and potentially hundreds of municipal governments and school board authorities. In the cooperative space, we have identified 500 coops that may likely have members who need HAF assistance. Almost half of these are “self-managed” meaning there is no management company to contact and individual board of director contacts may have to be tracked down to remit payment. In the Manufactured Home space, retail installment contracts are very common and often controlled by individual Park owners who do not reside in the same town as the manufactured home park and are frequently based out of state. In light of this, HCR has serious concerns that payments to 3rd parties may significantly slow our ability to provide relief to homeowners in a timely fashion. Moreover, HCR believes that the applicants applying for HAF funds will be highly committed to taking pro-active steps to preserve their homes and should be empowered to take control over this process. HCR’s long history working exclusively with low-and moderate-income families have demonstrated that good financial practices are a necessity, and consequently this population is inclined to make good financial decisions. We are confident that giving homeowners agency over their long-term housing stability is sound government policy.</p>
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<p>Property Charge Default v Arrears Satisfaction</p>	<ul style="list-style-type: none"> - While this is not technically a deviation from the Treasury Sample Term Sheets, we are calling this intervention Arrears Satisfaction (as opposed to Property Charge Default Resolution). - We are also including manufactured homeowners in this category, recognizing that those who reside in manufactured home parks (as opposed to on fee simple land) will not have a mortgage but a chattel loan or retail installment contract and will not seek support through the mortgage intervention. - We are proposing that under Arrears Satisfaction, we not be required to make specific HAF allocations to support one type of homeowner versus another, but rather all homeowners who are delinquent on non-mortgage arrears can apply for the total funding allocated to this intervention. 	<p>The primary reason for not allocating funds within the Arrears Satisfaction category is that once we establish that all funds will be reserved for applicants earning 100% of AMI or less, and create a 40% set-aside for Socially Disadvantaged and Vulnerable Populations, all applicants are likely to be equally in need and equally at risk. Having to cut off applications from a particular type of homeowner until getting Treasury approval to reallocate funds could severely slow down our ability to process applications quickly. We will, of course, track all applications across homeowner type and report to both Treasury and out to the public on how many applications are received and ultimately fund under each category of homeowner.</p>
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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.

NYS HAF will use State Department of Labor to verify household income. This source is the most accurate and up to date and was used for similar purposes in the first NYS rent relief program. Applicants who cannot be verified using this proxy will still be eligible to apply but will need to provide income documentation as outlined in our term sheets.

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?

No

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.

none excluded

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.

The NYS HAF program is proposing to set aside 40% of all program funds for applications that meet the definition of Socially Disadvantaged defined as racial and ethnic minorities who have been historically subject to housing discrimination, and we are proposing to expand that definition for the purposes of the 40% set aside to include "Vulnerable Populations" which we define as senior citizens, those with limited access to the internet, those with limited English proficiency and applicants who are living with a disability.

In our application portal, we will ask applicants to self-identify according to these categories and provide an attestation that this information (as well as all other non-documented information provided) is truthful. If the 40% set-aside becomes "over-subscribed" we will continue to accept applications from Socially Disadvantaged and Vulnerable Populations until the total program funding is fully committed.

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; Korean; Russian; Arabic; Haitian Creole; Other

Please list any other languages.

Bengali, Polish and Italian

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.

Bengali, Polish and Italian

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.

Provider Name Provider Address Provider Website	Provider Primarily Serves LMI Households	Provider Addresses Impact of Housing Discrimination
Brooklyn Legal Services 105 Court Street 4th Floor, Brooklyn, New York 11201 https://www.legalservicesnyc.org/our-program/br...	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Bridge Street Development Corp 460 Nostrand Ave , Brooklyn, New York 11211 http://www.bsdcorp.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CAMBA 1720 Church Street 2nd Floor, Brooklyn, New York 11226 http://www.camba.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Allegany County Community Opportunities and Rural Development Corp 84 Schuyler Street PO Box 573, Belmont, New York 14813 https://www.accordcorp.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Arbor Housing and Development 26 Bridge Street , Corning, New York 14830 http://www.arbordevelopment.org	✓	✓
Better Community Neighborhoods 670 Franklin Street , Schenectady, New York 12305 http://www.bcnihousing.org	✓	✓
Brooklyn Legal Services Corp A 260 Broadway Suite 2, Brooklyn, New York 11211 http://www.bka.org	✓	✓
Belmont Housing Resources 2393 Main Street , Buffalo, New York 14214 http://Belmonthousingwny.org	✓	✓
Bronx Legal Services 349 E 149th Street 10th Floor, Bronx, New York 10456 https://www.legalservicesnyc.org	✓	✓
Buffalo Urban League 15 Genesee Street , Buffalo, New York 14203 http://www.buffalourbanleague.org	✓	✓
American Debt Resources 384 Larkfield Road , East Northport, New York 11731 http://www.americandebtresources.com	✓	✓
Albany County Rural Housing Alliance 24 Martin Road , Albany, New York 12210 http://www.acrha.org	✓	✓
Affordable Housing Partnership of the Capital Region 255 Orange Street , Albany, New York 12210 http://www.ahphome.org	✓	✓
Brooklyn Bar Association 44 Court Street Suite 1206, Brooklyn, New York 11201 http://www.Brooklynvlp.org	✓	✓
Neighbors Helping Neighbors, Inc. 621 DeGraw Street , Brooklyn, New York 11217 http://www.nhnhome.org	✓	✓
New York Legal Assistance Group 100 Pearl Street , New York, New York 10004 http://www.nylag.org	✓	✓
NHS of Queens CDC, Inc. 60-20 Woodside Avenue, LL , Woodside, New York 11377 http://www.nhsoqueens.org	✓	✓

The Legal Aide Society 199 Water Street, 3FL, New York, NY 10038 3rd Floor, New York, New York 10038 https://legalaidnyc.org/	✓	✓
Queens Volunteer Lawyers Project 90-35 148th Street , Jamaica, New York 11435 http://QCBA.org/probono	✓	✓
The Bronx Neighborhood Housing Services CDC Inc., 1451 East Gun Hill Road , Bronx, New York 10469 http://Bronx NHS .org	✓	✓
RUPCO 289 Fair Street Kingston , Kingston, New York 12401 http://www.rupco.org	✓	✓
Rockland Housing Action Coalition 475 Route 304 Suite 1, New Clty, New York 10956 http://www.rhachomes.org	✓	✓
Westchester Residential Opportunities, Inc. 470 Mamaroneck avenue Suite 410, White Plains, New York 10605 http://www.wroinc.org	✓	✓
SafeGuard CCS 67 Ft Salonga Rd Northport NY 11768 , Northport, New York 11768 http://www.safeguardcredit.org	✓	✓
Western Catskills Community Revitalization Council, Inc 125 Main St , Stamford, New York 12167 http://westerncatskills.org	✓	✓
Staten Island Legal Services 36 Richmond Terr Ste 205 Suite 205, Staten Island, New York 10301 http://Legalservicesnyc.org	✓	✓
West Side Neighborhood Housing Services, Inc. 355 Connecticut Street , Buffalo, New York 14213 http://www.nwcpbuffalo.org	✓	✓
Pratt Area Community Council, Inc. dba IMPACCT Brooklyn 1000 Dean Street Suite 420, Brooklyn, New York 11238 http://www.impacctbrooklyn.org	✓	✓
United Tenants of Albany 255 Orange Street, Albany, NY 12210 , Albany, New York 12210 http://www.utalbany.org	✓	✓
Western NY Law Center 37 Franklin Street Suite 210, Buffalo, New York 14202 http://www.wnylc.com	✓	✓

NHS Brooklyn, CDC Inc 2806 Church Avenue, Brooklyn, NY 11226 , Brooklyn, New York 11226 http://www.NHSBROOKLYN.ORG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Queens Volunteer Lawyers Project 90-35 148th Street , Jamaica, New York 11435 http://QCBA.org/probono	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Putnam County Housing Corporation 11 Seminary Hill Road , Carmel, New York 10512 http://www.Putnamhousing.com	<input checked="" type="checkbox"/>	<input type="checkbox"/>
NEIGHBORHOOD HOUSING SERVICES OF STATEN ISLAND 192 CORSON AVENUE , Staten Island, New York 10301 http://www.NHSOFSI.ORG	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
The Housing Council at PathStone 75 College Avenue , Rochester, New York 14607 http://Thehousingcouncil.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Touro College Jacob D. Fuchsberg Law Center 225 Eastview Drive, Central Islip, NY 11722 , Central Islip, New York 11722 http://www.tourolaw.edu	<input type="checkbox"/>	<input type="checkbox"/>
Queens Legal Services 8900 Sutphin Blvd 5th Floor, Jamaica, New York 11435 https://www.legalservicesnyc.org/our-program/qu...	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Northfield LDC of Staten Island 160 Heberton Avenue, Staten Island, NY 10302 , Staten Island, New York 10302 http://www.Northfieldldc.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Utica Neighborhood Housing Service Inc - DBA UNHS Neighborhoods HomeOwnershipCenter 1611 Genesee Street , Utica, New York 13501 http://Utica Neighborhood Housing Service Inc -...	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Troy Rehabilitation and Improvement Program, Inc. 415 River Street, Troy New York 12180 , Troy q, New York 12180 http://www.trionline.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CSS of Rochester 1050 University Ave Suite A, Rochester, New York 14607 http://www.ccssofrochester.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Catholic Charities of Chemung/Schuyler 215 East Church Street , Elmira, New York 14901 http://www.cs-cc.org	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Long Island Housing Services, Inc. 640 Johnson Avenue Suite 8, Bohemia, New York 11716 http://www.LIFairHousing.org	✓	✓
Housing Assistance Counsel of Essex 103 Hand Avenue PO BOX 157, Elizabethtown, New York 12932 http://www.hapec.org	✓	✓
Frank H. Hiscock Legal Aid Society 351 S. Warren St , Syracuse, New York 13202 http://www.hlalaw.org	✓	<input type="checkbox"/>
Metro Interfaith Housing Management Corp 21 New Street , Binghamton, New York 13903 http://www.Metrointerfaith.org	✓	✓
Labor and Industry for Education, Inc. 112 Spruce Street Cedarhurst, NY 11516 , Cedarhurst, New York 11516 http://www.lifetech.org	✓	✓
Legal Assistance of Western New York, Inc. 361 South Main Street , Geneva, New York 14456 http://lawny.org	✓	✓
Legal Services NYC 40 Worth Street, Suite 606, NY, NY 10013 Suite 606, New York, New York 10013 http://www.lsnyc.org	✓	✓
Legal Services of the Hudson Valley 90 Maple Ave, White Plains, NY 10601 , White Plains, New York 10601 http://www.Lshv.org	✓	✓
Mutual Housing Association of New York 470 Vanderbilt Avenue , Brooklyn, New York 11211 http://www.mutualhousingny.org	✓	✓
Cypress Hill LDC 3214 Fulton Street , Brooklyn, New York 11208 http://www.cypresshills.org	✓	✓
Neighborhood Housing Services of Jamaica, Inc. 89-70 162 Street , Jamaica, New York 11432 http://www.nhsj.org	✓	✓
Economic Opportunity Council of Suffolk 31 W. Main St Suite 300, Patchogue, New York 11772 http://www.eoc-suffolk.com	✓	✓
Legal Aid Bureau of Buffalo, Inc. 290 Main Street, Suite 400, Buffalo, NY 1402 Suite 400, Buffalo, New York 14022 http://legalaidbuffalo.org	✓	✓

Fulton Community Development Agency 125 West Broadway , Fulton, New York 13069 http://www.fultoncda.com	✓	✓
Consumer Credit Counseling of Buffalo 40 gardenville Pkwy Suite 300, West Seneca, New York 14224 http://www.consumercreditbuffalo.org	✓	✓
Home HeadQuarters 538 Erie Blvd. , Syracuse, New York 13204 http://www.homehq.org	✓	✓
Neighborhood Housing Services Of New York City 307 West 36th Street 12th Floor, New York, New York 10018 http://www.nhsnyc.org	✓	✓
La Fuerza Unida 40 Glen St. Suite Suite 1, Glen Cove, New York 11542 http://www.lfuinc.org	✓	✓
Galvan Housing Resources, Inc. 252 Columbia St. , Hudson, New York 12534 http://www.galvanfoundation.org/historic-preser...	✓	✓
Human Development Services of Westchester, Inc. 930 Mamaroneck Ave , Mamaroneck, New York 10543 http://www.hdsw.org	✓	✓
Community Development Corporation of Long Island 2100 Middle Country Road , Centereach, New York 11720 http://www.cdcli.org	✓	✓
Housing and Family Services of Greater New York, Inc. 415 Albemarle Rd Brooklyn, NY 11218 , Brooklyn, New York 11218 http://brooklynhousing.org	✓	✓
Nassau/Suffolk Law Services One Helen Keller Way, Hempstead, NY 11550 , Hempstead, New York 11550 http://www.nslawservices.org	✓	✓
Mobilization for Justice, Inc. 100 William Street 6th Floor, New York, New York 10038 http://mobilizationforjustice.org	✓	✓
Empire Justice Center 1 West Main Street Suite 200, Rochester, New York 14614 http://www.empirejustice.org	✓	✓
Community Housing Innovations 75 S Broadway Suite 340, White Plains, New York 10601 http://www.communityhousing.org	✓	✓

Friends of the North Country, Inc. 1387 Hardscrabble Road , Cadyville, New York 12918 https://www.friendsofthenorthcountry.org	✓	✓
Grow Brooklyn 1474 Myrtle Avenue , Brooklyn, New York 11237 http://www.growbrooklyn.org	✓	<input type="checkbox"/>
Housing Help Inc 91 Broadway Suite 10, Greenlawn, New York 11740 https://www.housinghelpinc.org	✓	<input type="checkbox"/>
Legal Aid Society of Northeastern New York, Inc. 95 Central Avenue, Albany, NY 12206 , Albany, New York 12206 http://www.lasnny.org	✓	✓
Legal Aid Society of Rockland County, Inc. 2 Congers Road, Suite Suite 1, New City, New York 10956 http://www.legalaidrockland.org	✓	✓
City Bar Justice Center 42 West 44th Street , New York, New York 10036 http://citybarjusticecenter.org	✓	✓
Hispanic Brotherhood, Inc. 59 Clinton Avenue , Rockville Center, New York 11570 https://www.hispanicbrotherhood.org/	✓	✓
Central Islip Civic Council, Inc. 68 Wheeler Road , Central Islip, New York 11722 http://centralislipciviccouncil.org	✓	<input type="checkbox"/>
JASA Legal Services for Elder Justice 97-77 Queens Blvd. Suite 600 Queens NY 11374 Suite 600, Queens, New York 11374 http://www.jasa.org	✓	✓
Capital District Women's Bar Association Legal Project, Inc. (The Legal Project) 24 Aviation Road, STE 101, Albany, NY 12205 Suite 101, Albany, New York 12205 http://www.legalproject.org	✓	<input type="checkbox"/>
Neighborhood Housing Services of Brooklyn (Bed-Stuy) CDC, Inc. DBA Brooklyn Neighborhood Services 506 MacDonough Street, Brooklyn, NY, 11233 , Brooklyn, New York 11233 http://www.bnscdc.org	✓	✓
LONG ISLAND HOUSING PARTNERSHIP 180 OSER AVE , Hauppauge, New York 11784 http://www.lihp.org	✓	✓

Nassau Bar Foundation Inc (Nassau County Bar Association 501c3) 15th and west Streets, Mineola , Mineola, New York 11501 http://www.nassaubar.org	✓	<input type="checkbox"/>
Chautauqu Opportunities 10825 Bennett Rd , Dunkirk, New York 14048 http://www.chautauquaopportunities.com	✓	✓
Hudson River Housing 313 Mill Street, Poughkeepsie, NY 12601 , Poughkeepsie, New York 12601 http://www.hudsonriverhousing.org	✓	✓
Keuka Housing Council, Inc. 160 Main St , Penn Yan, New York 14527 http://www.keukahousingcouncil.org	✓	✓
Legal Aid Society of Mid-New York Inc. 120 Bleecker Street Utica NY 13501 , Utica, New York 13501 http://www.lasmny.org	✓	✓

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; Korean; Russian; Haitian Creole; Other

Please list any other languages.

Bengali, Polish and Italian

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.

Program Design Element	Metric of Success	Goal
Mortgage Reinstatement	Roughly 7000 mortgaged borrowers will be brought current on their mortgages	Provide full mortgage reinstatement for roughly 7000 borrowers for whom loss mitigation is not a viable option within 36 months
Mortgage Principal Reduction	Roughly 6000 mortgaged homeowners will avoid default or foreclosure	Enable roughly 6000 mortgaged borrowers to achieve an affordable loan modification within 36 months
Payment Assistance for HOA fees or liens	Prevent roughly 1400 evictions of cooperators who are behind on their monthly fee	Pay off arrears for roughly 1400 cooperators within 12 months
Other measures to prevent homeowner displacement	Achieve 6 months of housing stability for roughly 240 non mortgaged homeowners at imminent risk of eviction or in-rem foreclosure	Assist roughly 240 non mortgaged homeowners who are unable to pay monthly housing costs (taxes, chattel, coop fees) and who are unemployed or severely underemployed within 12 months
Payment Assistance for Delinquent Property Taxes	Prevent roughly 3000 in-rem tax foreclosures	Pay off arrears for roughly 3000 non mortgaged homeowners who are behind on property taxes (including sewer and water) within 24 months
Other measures to prevent homeowner displacement	Prevent roughly 900 evictions for manufactured homeowners	Pay off arrears for roughly 900 manufactured homeowners who are behind on their chattel or retail installment loans within 12 months
Mortgage Payment Assistance	Achieve 6 months of housing stability for roughly 1000 mortgaged homeowners at imminent risk of default or foreclosure	Assist roughly 1000 mortgaged homeowners who are delinquent or coming out of forbearance and who are unemployed or severely underemployed within 12 months
Other measures to prevent homeowner displacement	Roughly 5000 mortgaged borrowers will receive a Reasonable Home Retention Offer and be brought current on their mortgages	Assist roughly 5000 mortgaged homeowners with obtaining a reasonable loss mitigation offer from their mortgage servicer without the need for NYS HAF financial assistance

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?

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?

\$0.00

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

To date we have not expended any of the funds recieved in the first 10% allocation from Treasury. We have committed funds out of the Administration Budget to our CDFI Administration Partner and to vendors who working to set up the online application and Case Managment systems.

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	\$12,653,971.00
Mortgage Principal Reduction	\$189,275,408.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$17,377,159.00
Payment Assistance for Delinquent Property Taxes	\$35,592,007.00
Mortgage Reinstatement	\$185,135,823.00
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	\$0.00

Other measures to prevent homeowner displacement

Measure	Amount
Payment Assistance for Non Mortgaged Borrowers	\$878,694.00
Arrears Satisfaction for Manufactured Home Borrowers	\$10,143,752.00
Displacement Prevention Sub-Total	\$451,056,814.00

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	\$0.00
Legal Services	\$7,500,000.00

Services Sub-Total	\$7,500,000.00
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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).

Type of Expense	Amount
none	\$0.00

Reimbursement Sub-Total	\$0.00
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Allocation of Administrative Expenses

Type of Expense	Amount
<p>Staff and Case Management \$35,657,419 Technology and Tech Support \$4,704,798 Professional Services (Financial, Legal, Other) \$3,020,976 Communications (External Affairs, Marketing, Outreach Partners) \$1,832,395 Overhead (Equipment, rental and Office support) \$4,259,081 HCR Staff and Technical Support \$500,000 Reserve for Year 4 and 5 \$30,927,035</p> <p>New York State has engaged a non-profit CDFI, Sustainable Neighborhoods LLC (SN LLC), to serve as program administrator for the NYS HAF program. SN LLC has been a leader across the state for the last 12 years specifically managing large program dedicated to foreclosure prevention and homeownership preservation. Under direction from NY State Homes & Community Renewal (HCR), SN LLC will be responsible implementing and managing all aspects of the NYS HAF program including the call center, the development and maintenance of the program technology, case management and oversight of vendors, quality control and assurance, financial management and disbursement of grant funds to homeowners, and overall program compliance with local, state and federal law. HCR has engaged SN LLC for a three-year contract with the intention to complete our assistance to at-risk homeowners in that timeframe. Under our current contract we are capping the administrative expenses to no more than 10% . In addition, HCR will use less than 1% of administrative funds for supporting internal staff and technical assistance . The remaining 4% of eligible administrative funds will be held in reserve by HCR to address any additional expenses needed to complete the program in three years, or in the event that the program needs to extend into years four and five to complete our homeowner assistance goals. If the 4% reserve not needed for administration of the program, HCR will reallocate those funds to direct homeowners assistance at the earliest possible date.</p>	<p style="text-align: right;">\$80,901,703.00</p>

Administrative Expenses Sub-Total	\$80,901,703.00
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Total Plan Requested Amount	\$539,458,517.00
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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: **Terri Crowley**

Agency/Office: **Office of the State Comptroller**

Email: tcrowley@osc.ny.gov

Phone Number: **5184024102**

Reporting Contact

Name: **Dina Levy**

Agency/Office: **New York State Homes and Community Renewal**

Email: dina.levy@nyshcr.org

Phone Number: **9732027441**

Additional Contact

Name: **Rachel Wieder**

Agency/Office: **New York State Homes and Community Renewal**

Email: rachel.wieder@nyshcr.org

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.

No information provided in our plan is considered proprietary

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
Title VI Assurances NY	8/20/2021 4:04 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:

New York State

Name and Title of Certifying Official

Name: **Terri Crowley**

Title: **Executive Deputy Comptroller For Operations**

Telephone: **5184024102**

Email: tcrowley@osc.ny.gov