

United States Department of the Treasury

Homeowner Assistance Fund Plan Submitted by Virginia Housing Development Authority

HAF Grantee Plan Name
HAFP-0092

United States Department of the Treasury

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

Allocation Amount	\$5 Million or Greater
Submission Date	12/13/2021 11:57 AM
Total Plan Requested Amount	\$258,444,431.00
Record Type	State
Application Record	SLT-0003
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.

Census ACS Demographic Data, ZIP Code, 2015-2019
HUD CHAS Data, Locality/County, 2013-2017; AMI housing data
CoreLogic, Loan Level Market Analytics Servicing Data for Virginia, ZIP Code, July 2021
CoreLogic, Custom LLMA Analytics Report for Virginia, ZIP Code, July 2021
Core Logic, Open Liens Data for Virginia, Address Level, July 2021
Core Logic, Demographic Info from Location Inc for Virginia, ZIP Code, July 2021
CDC SVI, Social Vulnerability, Count/Census Tract, 2018
Census Bureau Community Resilience Estimates, County, 2018, 2019
Bureau of Labor Statistics Unemployment Numbers, Locality, April 2021
Virginia Employment Commission Unemployment Numbers, Locality, April 2021
CFPB Mortgage Delinquency Data, County, metro and non-metro areas, September 2020
Virginia Realtors Home Values, County, May 2021
VA DOT Manufactured Homes, Locality, July 2021
US Department of Treasury, Loan Data
Virginia State Data and Virginia Housing Mortgage Loan Portfolio Data, ZIP Code, July 2021

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.

- **Dragas Center for Economic Analysis and Policy, Strome College of Business, Old Dominion University: 2020 State of the Commonwealth, December 2020. Annual report documents quantitative data on experience and impacts of economy in Virginia, analyzing disparate impacts on minority populations.**
- **Neal, M., Young, C. (2020), Delinquent Homeowners in Neighborhoods of Color are less Likely to be Protected by Forbearance, Urban Institute. Researchers analyzed credit bureau data and ACS data to determine delinquency rates and forbearance uptake among racial groups.**
- **National Fair Housing Alliance, 2021 Fair Housing Trends Report. This report provides an**

annual snapshot of fair housing enforcement activities across the nation.

• Young, C. (2018), 50 Years after the Fair Housing Act – Inequality Still Lingers, Trulia Research Special Reports. Analysis produced in partnership between National Fair Housing Alliance and Trulia, with input from Kirwan Institute for the Study of Race and Ethnicity (Ohio State University). The report analyzes housing disparities including unequal housing opportunities across racial and ethnic groups but was not specific to Virginia.

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?

No

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.

N/A. Virginia did not participate in the Hardest Hit Fund program.

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
Accomack-Northampton Planning District Commission 23372 Front Street ,Accomac, Virginia 23301 https://www.a-npdc.org/accomack-northampton-pla...	<input type="checkbox"/>	<input type="checkbox"/>
Appalachian Community Action & Development Agency, Inc.(AppCAA) 175 Military Lane ,Gate City, Virginia 24251 https://appcaa.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Blue Ridge Housing Network 134-A Peyton Street Front,Royal, Virginia 22630 http://blueridgehousingnetwork.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Catholic Charities of Eastern Virginia, Inc. 5361 Virginia Beach Blvd. , Virginia Beach, Virginia 23462 https://cceva.org/services/financial-housing-co...	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Norfolk Redevelopment & Housing Authority - HomeNet Homeownership Center 555 E Main St ,Norfolk, Virginia 23510 http://www.nrha.us/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Central Virginia Housing Coalition 2300 CHARLES STREET ,FREDERICKSBURG, Virginia 22401 https://centralvahousing.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
centro de apoyo Familiar 6231 Leesburg Pike Suite 410,Falls Church, Virginia 22044 https://mycaf.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Child & Family Services of Eastern Virginia d/b/a The Up Center 150 W. Boush Street Ste. 500,Norfolk, Virginia 23510 https://www.theupcenter.org/	<input type="checkbox"/>	<input type="checkbox"/>
Danville Redevelopment and Housing Authority 35 Jones Crossing ,Danville, Virginia 24541 https://www.drhava.com/	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Hampton Redevelopment Housing Authority 1 Franklin Street Suite 603,Hampton, Virginia 23669 http://www.hamptonrha.com/	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Commonwealth Catholic Charities 1601 Rolling Hills Drive ,Richmond, Virginia 23229 https://www.cccofva.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Community Housing Partners 48 Depot Street NE ,Christiansburg, Virginia 24073 https://www.communityhousingpartners.org/	✓	✓
Northern Virginia Family Services 10455 White Granite Dr #100,Oakton, Virginia 22124 https://www.nvfs.org/	✓	<input type="checkbox"/>
Cornerstones 11150 Sunset Hills Road Suite 210,Reston, Virginia 20190 https://www.cornerstonesva.org/	✓	<input type="checkbox"/>
Piedmont Housing Alliance 682 Berkmar Cir ,Charlottesville, Virginia 22901 https://piedmonthousingalliance.org/	✓	✓
First Home Alliance 3138 Golansky Blvd Suite 202,Woodbridge, Virginia 22192 https://firsthomealliance.org/	✓	<input type="checkbox"/>
James City County 101 Mounts Bay Road ,Williamsburg, Virginia 23185 https://www.jamescitycountyva.gov/	<input type="checkbox"/>	<input type="checkbox"/>
Latino Economic Development Corporation of Washington, DC 2300 9th Street South Suite 300 B,Arlington, Virginia 22204 https://www.ledcmetro.org/	<input type="checkbox"/>	<input type="checkbox"/>
Hampton Roads Community Action Program, Inc. 2410 Wickham Avenue ,Newport News, Virginia 23607 https://hrcapinc.org/	✓	✓
Helping Overcome Poverty's Existence 680 West Main Street ,Wytheville, Virginia 24382 https://www.wythehope.org/	✓	✓
Housing Opportunities Made Equal of Virginia, Inc. (HOME) 626 East Broad Street Suite 400,Richmond, Virginia 23219 https://homeofva.org/	✓	✓
Korean Community Service Center of Greater Washington 7700 Little River Turnpike #406,Annandale, Virginia 22003 http://www.kcscgw.org/	<input type="checkbox"/>	<input type="checkbox"/>
New River Community Action, Inc. 1093 E Main St ,Radford, Virginia 24141 https://newrivercommunityaction.org/	✓	✓
STOP Inc 5700 Thurston Ave STE 101, Virginia Beach, Virginia 23455 https://www.stopinc.org/	✓	✓

Lynchburg Community Action 1010 Main St ,Lynchburg, Virginia 24504 https://lyn-cag.org/	✓	✓
People Incorporated of Virginia 1173 W Main St ,Abingdon, Virginia 24210 https://www.peopleinc.net/	✓	✓
Quin Rivers, Inc. dba Thrive Virginia 7911 Courthouse Cir, ,New Kent, Virginia 23124 https://thriveva.org/	✓	<input type="checkbox"/>
Skyline Community Action Partnership 532 S Main St ,Madison, Virginia 22727 http://skylinecap.org/	✓	✓
Southeast Rural Community Assistance Project, Inc 347 Campbell Ave SW ,Roanoke, Virginia 24016 http://www.southeastrcap.org/	✓	✓
Southside Outreach Group 1425 Seymour Dr ,South Boston, Virginia 24592 https://www.ssorg.org/	✓	<input type="checkbox"/>
Southside Community Development & Housing Corporation 1624 Hull St ,Richmond, Virginia 23224 https://www.scdhc.com/	✓	✓
Urban League of Hampton Roads, Inc. 7300 Newport Avenue ,Norfolk, Virginia 23505 https://ulhr.org/	✓	✓
Suffolk Redevelopment and Housing Authority 530 E Pinner St ,Suffolk, Virginia 23434 https://www.suffolkrha.org/	✓	✓
Telamon Corporation 808 Moorefield Park Drive #106, State Office - Virginia, Richmond, Virginia 23236 https://www.telamon.org/	✓	✓
Total Action Against Poverty D/B/A Total Action For Progress 302 2nd St SW, Roanoke, Virginia 24001 https://tapintohope.org/	✓	<input type="checkbox"/>
Virginia Cooperative Extension - Prince William County 8033 Ashton Avenue Suite 105, Manassas, Virginia 20109 https://prince-william.ext.vt.edu/	<input type="checkbox"/>	<input type="checkbox"/>
Volunteers of America Chesapeake, Incorporated 7901 Annapolis Road ,Lanham, Maryland 20706 https://www.voachesapeake.org/	✓	<input type="checkbox"/>

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

Yes

Community Information

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

Organization Name Organization Address Organization Website	Organization Primarily Serves LMI Households	Provider Addresses Impact of Housing Discrimination
Latino Economic Development Corporation of Washington, DC 2300 9th Street South Suite 300 B, Arlington, Virginia 22204 https://www.ledcmetro.org/	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Virginia Realtors 10231 Telegraph Road, Glen Allen, Virginia 23059 https://virginiarealtors.org/	<input type="checkbox"/>	<input type="checkbox"/>

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

Yes

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

Yes

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

This HAF Plan was informed by a virtual public hearing (phone and video access) held August 5 regarding housing needs and the Virginia Mortgage Relief Program. Draft Plan was published on July 21, 2021, public comments accepted through August 6, 2021- by mail, e-mail, and web submission. Draft plan published in English and Spanish to three websites, and numerous community-based organizations were informed of this publication so that they could inform communities they serve. An ASL interpreter was provided at the public hearing. Public notice was published in 5 newspapers of general circulation along with electronic listing posted to the Virginia Town Hall and Virginia Commonwealth Calendar. It was physically posted to the area designated for public notices at Virginia Housing's headquarters lobby, CEO's office, and The City of Richmond Circuit Court. It was emailed to 240+ industry professionals, local officials, and nonprofits focusing on homeownership issues and the Draft Plan was emailed to all 200 of

the HUD Housing Counselors in the Commonwealth. Sessions were held with Virginia Housing's Homeowner Advisory Group, The Virginia Bankers Association, and Agriculture and farmers' stakeholders, including: Virginia Farm Bureau, the Black Family Land Trust, Office of Farmland Preservation, Virginia Department of Agriculture and Consumer Services, and the Virginia Secretary of Agriculture and Forestry's staff. The Virginia Department of Housing and Community Development posted information on the public hearing on their Virginia Rent Relief Program webpage. Information about the plan was posted to Virginia 2-1-1.

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?

None known at this time

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
Virginia Term Sheets_Final	8/17/2021 4:25 PM
Virginia Consolidated Term Sheet.revised 12.11.21	12/13/2021 10:50 AM
Virginia Response to Treasury Feedback Revised 12.11.21	12/13/2021 11:54 AM
Virginia Response to Treasury Feedback	11/18/2021 10:13 AM

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
Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan	Requires bankruptcy court approval to participate	The requirement is not a bar to participation, but however is required in order for a servicer or other payee to accept payment on the eligible applicant’s behalf if the property owner is in bankruptcy.

<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>Applicants that have been in a forbearance plan and gone through the loss mitigation process (such as a HUD partial claim) are not eligible for VMRP. However, if there is a subsequent eligible financial hardship, they may be eligible if all other criteria are met.</p>	<p>Virginia Housing believes that a program requirement forcing applicants to first seek Loss Mitigation options through their servicers would be burdensome on both the homeowners and loan servicers and therefore has excluded this as a requirement from the program design. While Virginia Housing is not requiring VMRP applicants seeking mortgage payment assistance to first seek loss mitigation relief from their loan servicer, the requirement that applicants that have been in a forbearance plan and gone through the loss mitigation process are not eligible is intended to be consistent with Treasury guidance recommending participants to avoid using HAF funds in a manner that replaces other loss-mitigation resources. These individuals may be eligible for future VMRP programs approved by Treasury in amendment(s) to this HAF Plan.</p>
<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>Socially disadvantaged individual (SDI) may be any household member and such household can have income up to the 150% AMI limit, as defined in the Treasury guidance.</p>	<p>Unclear from Treasury guidance whether the SDI must be the homeowner. However, a more broad application of SDI to any household member appears to be consistent with the guidance's intent.</p>
<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>Expenses due prior to 1/21/20 are not eligible. If such expenses are owed, applicant must have other sources of funds or agreement with servicer to address.</p>	<p>This is a decision Virginia Housing is making as a prioritization of funds, given limited program resources. It also reflects that, based upon Virginia Housing's experience administering the landlord component of the Virginia Rent Relief Program which covers only past due amounts after April 1, 2020, these expenses are unlikely to be COVID related.</p>

<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>Use of fact specific proxy (FSP) only on an exception basis.</p>	<p>In addition to a self-attestation of income, Virginia Housing intends to income qualify applicants using income documentation. FSP (together with a self-certification) will be used on an exception basis only where documenting income proves to be impossible or impractical based on extenuating circumstances (such as the examples listed in Treasury guidance). This is not expected to be an unnecessary impediment given that individuals that have obtained homeownership have a history of providing this documentation in connection with loan qualification. Also this requirement will be a guard against fraudulent self-attestations for the integrity of the program.</p>
<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>New Treasury Guidance dated August 2, 2021, changed eligible expenses related to hardship such that “Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF if they experienced a financial hardship after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date)”. The program has not adopted the “including a hardship that began before January 21, 2020, but continued after that date” and requires that hardship begin after January 21, 2020.</p>	<p>This is a decision Virginia Housing is making as a prioritization of funds, given limited program resources. It also reflects that, based upon Virginia Housing’s experience administering the landlord component of the Virginia Rent Relief Program which covers only past due amounts after April 1, 2020, these expenses are unlikely to be COVID related.</p>
<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>In instances where there is no outstanding mortgage on a dwelling, but other housing expenses are being paid with HAF funds (such as real estate taxes and insurance), Virginia Housing will apply an eligibility criterion that the current assessed value of the land and dwelling (as determined by the local taxing authority) does not exceed the applicable current conforming loan limit (CLL).</p>	<p>This is consistent with the CLL requirement where there is a mortgage outstanding, and it guards against the political and reputational risk to the program if expenses were paid on high value properties rather than properties accessible for ownership by first-time homeowners and other low- and moderate-income Virginians (Virginia Housing’s mission).</p>

<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>In addition to paying a qualifying loan and insurance on an unattached mobile home, Virginia Housing proposes to pay personal property tax (on the housing unit) and delinquent lot rental fees on behalf of eligible applicants owning unattached mobile homes.</p>	<p>Personal property tax and lot fees on an unattached mobile home are not specifically enumerated in the Treasury guidance; however, it does seem consistent with the intent of the program and is analogous to real estate tax on an attached mobile home. Unpaid personal property tax could lead to a lien on the unattached mobile home. Unpaid lot fees could cause the owner of the unit to be forced to leave the mobile home park. Also, the cost of the land is included in the payment on an attached mobile home loan, so lot rent on an unattached unit seems analogous. Note that applications for only lot rental fees would be referred to the Virginia Rent Relief Program for payment; however, if other expenses are being paid, the lot rent will be paid from VMRP to avoid homeowner having to make multiple applications for relief to separate programs.</p>
<p>Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan</p>	<p>Mortgage principal reduction, mortgage interest rate reductions, utilities, internet service, home repairs, assistance to enable households to receive clear title to their properties, counseling or educational efforts or legal services for applicants are not eligible uses of Virginia HAF funds.</p>	<p>This is a decision Virginia Housing is making as a prioritization of funds, given limited program resources. State, local, and private utility relief programs in Virginia provide a source of funds for these payments. Regarding home repairs, home equity lines of credit (HELOCs) and other second loans are eligible for VMRP reinstatement and in some cases continuing monthly payments. Regarding clearing title, U.S. Department of Agriculture is providing \$67 million in competitive loans through the new Heirs' Property Relending Program, which aims to help agricultural producers and landowners resolve heirs' land ownership and succession issues. Also, Virginia Housing has created a website www.StayHomeVirginia.com with information for homeowners on federal programs, housing counselors, foreclosure prevention and legal aid contacts and Virginia Housing intends to also add these links to its VMRP web site. Further, apart from VMRP and not to be reimbursed by HAF funds, Virginia Housing is committed to providing Housing Counseling resources to support the Virginia HUD-approved Housing Counseling Network. Through a program utilizing Virginia Housing's net assets, it has provided HUD-approved Housing Counseling Programs approximately \$2.5 million annually. In FY22 we have increased our commitment to \$3.5 million. The increase in funds is to specifically support to housing counseling and education services, to households facing housing instability such as eviction, default, foreclosure, or loss of income that caused or could cause eviction, default, foreclosure or homelessness. Virginia Housing intends to hold information sessions with the housing counselors once the final VMRP program is announced.</p>

Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan	2-4 unit properties are not eligible.	This is a decision Virginia Housing is making as a prioritization of funds, given limited program resources. Also, rent relief programs are likely to provide adequate support for the owner of these quasi-investment properties in many cases.
Mortgage Reinstatement, Mortgage Payment, Taxes, Insurance, HOA/Condo Fees, Payment Assistance on Down Payment Loan	A program assistance cap of \$30,000 or 20 months of assistance, whichever is less, is in place. If requested assistance exceeds this amount, applicant must have other sources of funds or agreement with servicer to address.	This is a decision Virginia Housing is making as a prioritization of funds, given limited program resources. It reflects a reasonable estimate of maximum mortgage assistance needed by affected low- and moderate-income Virginians during the covered period after reviewing Virginia Housing’s loan portfolio delinquency information and the other data sources listed in this document. The amount and duration are consistent with other peer Housing Finance Agencies.

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.

Not applicable, as no exclusions are being 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.

VMRP eligibility requirements will permit Treasury's priority for socially disadvantaged individuals to be satisfied by any household member, rather than by only the applicant themselves. In the absence of clear Treasury Guidance to the contrary, this broader and more inclusive application of the socially disadvantaged individual definition appears to be consistent with the overall goals of the HAF program and is in keeping with Virginia Housing's mission. The VMRP pre-screening process provides the Treasury definition of Socially Disadvantaged Individual to the applicant and asks whether or not the applicant or anyone in his or her household meets the definition. Applicants who select yes, will be classified as socially disadvantaged.

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

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.

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
HUD Housing Counseling Agencies Multiple Agencies , Richmond, Virginia 23224 https://www.vhda.com/Homebuyers/Pages/Housing-C...	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Virginia Legal Aid Multiple Agencies , Richmond, Virginia 23229 https://www.valegalaid.org/	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Virginia Poverty Law Center 919 East Main Street Suite 610, Richmond, Virginia 23219 https://vplc.org/what-we-do/	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Targeting specific groups of homeowners

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

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

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

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

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

Spanish

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 Payment Assistance	Total number of homeowners assisted Number of homeowners assisted at or below 100% AMI Number of socially disadvantaged homeowners assisted Total dollar amount of mortgage payment assistance provided Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners. Number of days spent to provide assistance	Assist 3,000 homeowners Assist at least 1,500 homeowners at 100% AMI or below Assist at least 1,500 socially disadvantaged homeowners Commit \$65M dollars of mortgage payment assistance \$32.5M dollars to 100% AMI or below \$32.5M dollars to socially disadvantaged Average of 60 days or less to provide assistance

<p>Mortgage Reinstatement</p>	<p>Number of mortgages reinstated Number of homeowners at or below 100% AMI assisted Number of socially disadvantaged homeowners assisted Dollar value paid for mortgage reinstatement Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners Number of days spent to provide assistance</p>	<p>Assist 6,400 homeowners Assist at least 3,200 homeowners at 100% AMI or below Assist at least 3,200 socially disadvantaged homeowners Commit \$115M dollars of mortgage payment assistance \$57.5M dollars to 100% AMI or below \$57.5M dollars to socially disadvantaged Average of 60 days or less to provide assistance</p>
<p>Payment Assistance for Homeowner's Insurance</p>	<p>Total number of homeowners assisted Number of homeowners assisted at or below 100% AMI Number of socially disadvantaged homeowners assisted Total dollar amount of insurance payment assistance provided Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners Number of days spent to provide assistance</p>	<p>Assist 1200 homeowners Assist at least 600 homeowners at 100% AMI or below Assist at least 600 socially disadvantaged homeowners Commit \$8M dollars of homeowner's or other property insurance payment assistance \$4M dollars to 100% AMI or below \$4M dollars to socially disadvantaged Average of 60 days or less to provide assistance</p>

<p>Payment Assistance for HOA fees or liens</p>	<p>Total number of homeowners assisted Number of homeowners assisted at or below 100% AMI Number of socially disadvantaged homeowners assisted Total dollar amount of home ownership cost assistance provided Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners Number of days spent to provide assistance</p>	<p>Assist 1200 homeowners Assist at least 600 homeowners at or below 100% AMI Assist at least 600 socially disadvantaged homeowners Commit \$8M dollars of homeowner, condominium association payment assistance \$4M dollars to 100% AMI or below \$4M dollars to socially disadvantaged Average of 60 days or less to provide assistance</p>
<p>Payment Assistance for Down Payment Assist. Loans</p>	<p>Total number of homeowners assisted Number of homeowners assisted at or below 100% AMI Number of socially disadvantaged homeowners assisted Total dollar amount of assistance provided Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners Number of days spent to provide assistance</p>	<p>Assist 1200 homeowners Assist at least 600 homeowners at or below 100% AMI Assist at least 600 socially disadvantaged homeowners Commit \$8M dollars of mortgage payment assistance for second mortgage down payment assistance loans \$4M dollars to 100% AMI or below \$4M dollars to socially disadvantaged Average of 60 days or less to provide assistance</p>

<p>Payment Assistance for Delinquent Property Taxes</p>	<p>Total number of homeowners assisted Number of homeowners assisted at or below 100% AMI Number of socially disadvantaged homeowners assisted Total dollar amount of property tax assistance provided Dollar value provided to homeowners at or below 100% AMI Dollar value provided to socially disadvantaged homeowners Number of days spent to provide assistance</p>	<p>Assist 2000 homeowners Assist at least 1000 homeowners at or below 100% AMI Assist at least 1000 socially disadvantaged homeowners Commit \$11M dollars of property tax payment assistance \$5.5M dollars to LMI \$5.5M dollars to socially disadvantaged Average of 60 days or less to provide assistance</p>
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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?

No

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

No

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?

\$249,757.25

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

Yes

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

\$1,389,954.68

How many households have applied for HAF assistance?

432

How many households has the Participant provided with housing counseling or legal services using HAF funds?

0

How many households has the Participant provided with assistance using HAF funds?

18

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

The initial 10% allocation of HAF funding is being used to perform the VMRP Pilot. Virginia Housing may defer reimbursement of administrative costs of the needs assessment, VMRP design, public hearing, technology system solution (licenses for which our VMRP consultant is providing as part of our contract), all other fees to our VMRP consultant, and all other administrative costs until receipt of the balance of HAF Funds from Treasury and make such reimbursement from those additional funds, in order to maximize Pilot Program Funds.

11/18/2021 See uploaded document in Term sheet Agreement

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	\$65,900,329.90
Mortgage Principal Reduction	\$0.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$8,786,710.65
Payment Assistance for Delinquent Property Taxes	\$11,573,421.31
Mortgage Reinstatement	\$115,833,883.19
Facilitate Mortgage Interest Rate Reduction	\$0.00
Payment Assistance for Homeowner's Insurance	\$8,786,710.65
Payment Assistance for Down Payment Assist. Loans	\$8,786,710.65
Payment Assistance for Homeowners Utilities	\$0.00

Other measures to prevent homeowner displacement

Measure	Amount
NA	\$0.00

Displacement Prevention Sub-Total	\$219,667,766.35
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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	\$0.00

Services Sub-Total	\$0.00
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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
NA	\$0.00

Reimbursement Sub-Total	\$0.00
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Allocation of Administrative Expenses

Type of Expense	Amount
Planning	\$2,000,000.00
Community Engagement	\$2,810,000.24
Needs Assessment	\$1,000,000.00
Contracted Services	\$25,000,000.00
Systems, Comms, Data Software Access, Support and Management	\$1,669,070.88
Project Delivery & Compliance Services/Supplies	\$3,545,000.00
Agency Labor	\$2,752,593.53

Administrative Expenses Sub-Total	\$38,776,664.65
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Total Plan Requested Amount	\$258,444,431.00
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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: **Llewellyn Anderson**

Agency/Office: **Virginia Housing Development Authority**

Email: llewellyn.anderson@virginiahousing.com

Phone Number: **8043435812**

Reporting Contact

Name: **Malika Mickey**

Agency/Office: **Virginia Housing Development Authority**

Email: malika.mickey@virginiahousing.com

Phone Number: **8043435877**

Additional Contact

Name: **Malika Mickey**

Agency/Office: **Virginia Housing Development Authority**

Email: malika.mickey@virginiahousing.com

Phone Number: **8043435877**

Proprietary or Otherwise Non-Public Information

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

No

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

Title VI Assurances

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

Title	Upload Date
Civil Rights Document 8-17-21	8/17/2021 5:36 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:

Virginia Housing Development Authority

Name and Title of Certifying Official

Name: **Llewellyn Anderson**

Title: **Managing Director of Federal Programs**

Telephone: **8043435812**

Email: llewellyn.anderson@virginiahousing.com