United States Department of the Treasury

Homeowner Assistance Fund Plan Submitted by SC State Housing Finance and Development Authority

HAF Grantee Plan Name HAFP-0111

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 1/20/2022 3:57 PM

Total Plan Requested Amount \$144,650,807.00

Record Type State

Application Record <u>SLT-0032</u>

HAF Grantee Plan Status (external)

Approved

Homeowner Needs and Community Engagement

What Quantitative Data Has Informed the Participant's Planning?

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

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

Yes

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

- Data provided by Treasury Treasury provided data, contributed by a number of federal agencies, including information on mortgage delinquencies and forbearances, breakdowns by demographic factors, and concentration among mortgage servicers.
- CoreLogic Real Estate Analytics Suite SC Housing has entered into a data sharing agreement with CoreLogic to obtain regularly updated data by county on the serious (90+ day) delinquency rate, foreclosure rate, and annual change in the serious delinquency rate.
- Federal Reserve Bank of Atlanta SC Housing used the Atlanta Fed's public Mortgage Analytics and Performance Dashboard as its source for the forbearance rate and non-forbearance delinquency rate for each county.

UPDATED 12-8-2021: American Community Survey data was used to help prioritize which languages to provide outreach and services in. Comprehensive Housing Affordability Strategy (CHAS) data, when cross-referenced with data about mortgage delinquencies, emphasized that majority-minority census tracts and residents of persistent poverty counties were most at risk of displacement. The risks increased faced by members of socially disadvantaged groups were further confirmed by all of the consulted research.

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.

- Suh, E. (2020), "Black Homeownership in the U.S.," Policy Genius. This article documents the disparate rates of homeownership between Black and white homeowners and includes data for South Carolina.
- Mitchell, A. (2018), "Minorities in Greenville-Anderson area more likely to be denied home loans, data show," Greenville News. This article includes data on the discrepancies for loan denial rates between white and Black applicants in various South Carolina jurisdictions.
- Manhertz, T. (2020), "Home Value Disparities Between Races Are shrinking, but Remain Very

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Wide," Zillow. This article captures the home valuation disparities between races and includes data specific to South Carolina.

- Patton, S. (2017), "The State of Racial Disparities in Charleston County, South Carolina 2000-2015," College of Charleston Race and Social Justice Initiative. This report has detailed housing data for the Charleston County region from 2000-2015 with a specific focus on racial discrimination and inequities.
- Dumont, A. and Roberts, A. (2019), "Perspectives from Main Street: Bank Branch Access in Rural Communities," Board of Governors of the Federal Reserve System. This report identifies Allendale County, SC as "deeply affected" by bank closures, meaning that the county had 10 or fewer branches in 2012 and lost at least 5% of those branches by 2017.
- Huang, J, et al. (2021), "Urban-rural differences in COVID-19 exposures and outcomes in the South: A preliminary analysis of South Carolina," University of South Carolina. This paper explores and attempts to explain the discrepancies in COVID-19 infections and outcomes in South Carolina's rural and urban counties.

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.

- Data collected from county tax assessors Data was requested from every county treasurer or delinquent tax collector for the sum of delinquent 2020 property taxes owed by traditional homeowners and mobile homeowners. Because of the way South Carolina's property taxes are assessed, it was possible for most counties to provide the total for owner-occupied properties only. The total included fees. 41 out of 46 counties provided this data.
- Data collected from utility providers The 2020 arrearage and disconnection data published quarterly by utility providers to the South Carolina Public Service Commission was used for investor-owned utilities. Special requests were made to obtain the same totals from Santee Cooper, The Electric Cooperatives of South Carolina, and the Municipal Association of South Carolina (MASC). All major electricity providers responded with information, but water and sewer providers other than the 197 (out of 270) that participated in MASC were not contacted (MASC did not provide a list of participating municipalities).

UPDATED 12-8-2021: Culturally relevant outreach requires the engagement of key stakeholders (formal and informal) that have earned trust with the identified communities. Our outreach approach is inclusive of all cultural groups and communities, including rural communities. The approach recognizes the broad network of organizations, including grassroots, special interest, and faith-based organizations, that have an established presence, legitimacy, and access to communities that may not necessarily trust or understand government programs. The basis of our outreach approach is the new practice model of "cultural humility," which leaves the door open for continuous learning about a cultural group or community and provides room for their voice, perspective, and unique needs to drive engagement.

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.

- Hardest Hit Fund Performance data: SC Housing operated an HHF program and used data from this program to inform its program design.
- SC Works and the South Carolina Department of Employment and Workforce: SC Housing consulted these sources for data on unemployment during COVID-19.
- <u>Tracktherecovery.org</u>: SC Housing consulted this source for data on the health of specific sectors of the state's economy.
- Data on operational size from Housing Counseling Agencies: SC Housing requested the most recent HUD 9902 form from all operational housing counseling agencies in South Carolina that provide some form of counseling to delinquent homeowners according to the information published on the HUD website. 7 out of 13 agencies contacted provided this information.
- HUD CHAS Data 2013-2017: SC Housing used this source for data by county on the share of homeowners below 100% AMI and the share who are BIPOC.
- Urban Institute: SC Housing used this source for data on the share of the population by county in debt collection
- The Center for Heirs Property Protection: provided data on the scale of the problem of heirs' property and the costs involved in scaling up their work resolving it

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.

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Provider Name Provider Address Provider Website	Provider Primarily Serves LMI Households	Provider Addresses Impact of Housing Discrimination
Origin SC 8084 Rivers Avenue Suite 100,North Charleston,South Carolina 29406 http://originsc.org	x	~

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
Center for Heirs' Property Preservation 1535 Sam Rittenburg BlvdSuite D, Charleston, South Carolina 29407 http://heirsproperty.org	✓	
South Carolina Habitat for Humanity PO Box 1990, Mount Pleasant, South Carolina 29465 http://southcarolinahabitat.org	✓	

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?

No

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.

SC Housing solicited comments June 8-20 from homeowners and the general public, accepting comments by phone, mail, email, and an online survey. Overall, over 80 unique responses were received. Many of these were emails and phone calls from homeowners attesting to the positive impact SCMRP could have on their lives. Two stakeholders, Habitat for Humanity SC and a private citizen with mortgage industry experience, responded to the request for comment with detailed letters providing their suggestions for the program. Both emphasized the need for collaboration with external partners and pointed to best practices from other states that SC Housing could follow. The results of the survey confirmed that mortgage and utility delinquencies were the most common issues, but all of the expenses that were asked about (also including insurances, property taxes, condominium/homeowner's association fees) were a concern for at least some of the respondents.

UPDATED 12-8-2021: SC Housing has not received any public comments from companies or organizations since we submitted our plan. We have received three emails and eighteen voicemails from citizens interested in applying for our program, but because our program is not yet open for applications, we have not yet responded to these communications.

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?

- Mortgage performance data disaggregated by both demographics and geography
- More current mortgage performance data than available from subscription services
- Identifiable information on delinquent mortgagors for targeted outreach
- Rolling data on utility and property tax delinquencies by geography
- Neighborhood Watch data disaggregated by geography and demographics

UPDATED 12-8-2021: Our vendor for ERAP is coordinating with the Catawba Nation, our only federally recognized Tribe, to manage duplication of benefits. A data sharing agreement was recently approved by the Tribe and that work is underway. This is still in its infancy, but provides a foundation. In addition, the SC Commission on Minority Affairs has done extensive work with tribal organizations and has an existing network that the program can engage with. They have a Native Affairs Division and established communications channels to support this work. In addition, the program has already begun preliminary work in building a database that includes information about the state's recognized tribes and special interest groups. However, meaningful engagement will require interactions with tribal communities at the grass-roots level to learn more about cultural norms, traditions, customs and organizational structure. This will enable the program to identify appropriate pathways for outreach and coordination, and to validate proposed activities with tribal leadership.

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
yayment 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

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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
Additional Program Design Information Updated 1.20.22	1/20/2022 12:00 PM
Term Sheet	8/20/2021 10:13 AM
Additional Program Design Information	12/8/2021 2:26 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
none	none	none

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.

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SC Housing intends to implement a fact-specific proxy for income determination in what the agency has determined are low-income ZIP codes (LIZCs). In these areas, applicants will be able to self-attest in writing as to household income preemptively, i.e., as a first option rather than subsequent to attempts to verify income through other means. This approach should increase program throughput in the areas of South Carolina that are most economically insecure. Overall, of 424 ZIP codes statewide, there are 166 LIZCs. These ZIP codes were selected based on median household income (MHI) as reported by the 2015-2019 American Community Survey. Specifically, a ZIP code was designated as a LIZC if its MHI was no more than 80 percent of the comparable state MHI (\$53,199). These counties are largely rural in nature, though some are also in distressed urban communities. Given that all applicants with incomes at or below \$79,900 are eligible, it is extremely unlikely that an applicant housed in a LIZC would be ineligible for the program.

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

✓ First Mortgages

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

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.

Allocating funds to citizens with reverse mortgages that carry no immediate repayment requirement does not mitigate financial hardships associated with the pandemic which is the purpose of the Treasury program. SC Housing has decided to structure the program such that the primary focus is mortgage reinstatement. Although these borrowers often have limited or fixed income and may otherwise be eligible for assistance in the program, there are no monthly payment requirements therefore no urgent need as it relates to this type of mortgage loan.

UPDATED 12-8-2021: Reverse mortgage holders, because such an agreement does not require

monthly payments, are not at risk of displacement because they hold a reverse mortgage. However, they may be at risk of displacement from other factors (delinquent property taxes, utilities, etc.), and our program will allow them to apply for this assistance.

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

The Participant must describe how it will target HAF resources in accordance with the HAF guidance. Targeting strategies are affirmative efforts to inform, encourage the participation of, and facilitate access to resources for targeted households, including by offering multiple intake formats, engaging with nonprofit organizations (e.g., housing counselors or legal services organizations) to provide additional pathways into the program, and providing community outreach, partnerships with housing counseling agencies or legal aid organizations, or other educational services that are aligned with the HAF participant's program design, in a manner that is culturally and linguistically relevant to the targeted communities.

Defining Socially Disadvantaged Individual

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

Applicants will be asked to attest to various key characteristics, including race, ethnicity, gender, and income, and those that meet the criteria laid out by 13 CFR § 124.103 will be considered socially disadvantaged. Additionally, an opportunity will be provided for applicants to attest whether they are socially disadvantaged if their status could not be verified by other questions.

UPDATED 12-8-2021: Questions on the application will allow us to determine whether an individual meets the definition provided in the application. During the application review process, all SDIs will be given priority in processing among applications from households over the 100% AMI threshold. Efforts will be made to work with mortgage servicers to identify markets (counties) with heavier populations of SDIs. Stronger marketing efforts will be made to penetrate these identified areas to attract more SDIs to apply for the program.

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; Other

Please list any other languages.

American Sign Language

UPDATED 12-8-2021: The program will involve targeted groups in the development of marketing materials to ensure that the messaging, imagery, and delivery method is strength-based, culturally appropriate, and promotes engagement. Our new Community Relations Manager will be responsible for researching, developing and executing on strategies that are both broad in their scope (to reach as many people as possible) but also tailored to specific audiences across the state (based on English proficiency, country of origin, access to high-speed internet, etc.). The program will convene focus groups and/or facilitate roundtable discussions with key stakeholders to help inform the development of marketing strategies and outreach approaches. Specifically, the program will gather feedback from key stakeholders serving socially disadvantaged communities and tailor marketing strategies based upon their feedback—pre and post launch. This may include beta testing, focus group discussions with representative groups, or the collection of data analytics (e.g., click through rates, impressions, website visits, etc.) to evaluate the public's engagement with the content and capture information about demographic trends among persons who have expressed an interest in the program. Lastly, the program will ensure that the language and modality by which information is delivered to various audiences respect and honor cultural differences and norms. The program will accomplish this by ensuring that marketing strategies are adaptable to the needs of diverse communities and through the use of community outreach toolkits that allow for tailored marketing campaigns.

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.

American Sign Language

UPDATED 12-8-2021: The program will involve targeted groups in the development of marketing materials to ensure that the messaging, imagery, and delivery method is strength-based, culturally appropriate, and promotes engagement. Our new Community Relations Manager will be responsible for researching, developing and executing on strategies that are both broad in their scope (to reach as many people as possible) but also tailored to specific audiences across the state (based on English proficiency, country of origin, access to high-speed internet, etc.). The program will convene focus groups and/or facilitate roundtable discussions with key stakeholders to help inform the development of marketing strategies and outreach approaches. Specifically, the program will gather feedback from key stakeholders serving socially disadvantaged communities and tailor marketing strategies based upon their feedback—pre and post launch. This may include beta testing, focus group discussions with representative groups, or the collection of data analytics (e.g., click through rates, impressions, website visits, etc.) to evaluate the public's engagement with the content and capture information about demographic trends among persons who have expressed an interest in the program. Lastly, the program will ensure that the language and modality by which information is delivered to various audiences respect and honor cultural differences and norms. The program will accomplish this by ensuring that marketing strategies are adaptable to the needs of diverse communities and through the use of community outreach toolkits that allow for tailored marketing campaigns.

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
Origin SC 8084 Rivers Avenue Suite 100, North Charleston, South Carolina 29406 http://originsc.org	*	~
CCCs of the Savannah Area 69 Robert Smalls Parkway Suite 3E, Beaufort, South Carolina 29906 http://www.cccsavannah.org	×	~
Beaufort County Black Chamber of Commerce 711 Bladen Street, Beaufort, South Carolina 29902 http://www.bcbcc.org	X	<
Greenville County Human Relations Commission 301 University Ridge Suite 1600, Greenville, South Carolina 29601 http://www.greenvillecounty.org/humanrelations	¥	~
Southeastern Housing and Community Development 986 Doyle Street , Orangeburg, South Carolina 29115 http://www.southeasternhousing.org	×	~
Charleston Trident Urban League 1064 Gardner Road Suite 307, Charleston, South Carolina 29407 http://www.ctul.org	X	~
Increasing H.O.P.E. Financial Training Center 1551 Remount Road Suite B, North Charleston, South Carolina 29406 http://www.increasinghope.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.

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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; Other

Please list any other languages.

American Sign Language

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

Yes

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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
Other measures to prevent homeowner displacement	o Total funds distributed o Quantity of funds approved and paid to eligible applicants based on Area/National Median Income guidelines o Quantity of funds approved and paid to eligible Socially Disadvantaged applicants	Overall Success Metrics

• Number of recipients of mortgage payment assistance Number of sent for approval applications processed by quality control over the number of applications sent for approval Application review process approved Mortgage throughput Payment Payment process Assistance throughput • Number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of

HAF funds to

homeowner's

resolve the

defaults or delinquencies

- Help 10,000 homeowners stay current on their mortgage during the first 24 months of the program
- Review through a quality control process 40% of applications sent for approval
- Approve or deny applications a median of 21 days from the date the application was received; Service Level Agreements (SLAs) are monitored. Staffing can be adjusted as application volume shifts. If application is returned for more information, SLA timeframe is frozen, until additional information is captured. At that time, the SLA time clock will continue.
- Payees receive payment a median of 7 days after an application is approved
- The agency has recently engaged Tableau as a software service provider and will be implementing an externally-facing interactive dashboard that will provide the public with information as to how many households have been served and the types of assistance provided. The dashboard will be shared from the agency's website. The agency also sends out communications through Constant Contact and distributes a quarterly newsletter. The agency also provides updates to the public at outreach events, as well as through interviews with media agents. The agency also prepares annual performance reports to its board and the state legislature. Lastly, the most powerful reports that can be made are through the voice of actual customers who have an opportunity to share how the program has benefitted them from our Faces of Home series. Data will also include metrics by income, race, gender, etc.

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Number of assisted homeowners in forbearance socially disadvantaged groups • Number of homes that exit forbearance • Number of homeowners helped who were not under Mortgage forbearance Reinstatement • Number of applications approved processed by quality control over the number of applications sent for approval

 Application review process

• Payment process

throughput

throughput

- Over 50% of assisted homeowners will be members of socially disadvantaged groups
- Help 10,000 homeowners exit forbearance in the first 12 months of the program
- Help 15,000 homeowners exit forbearance in the first 24 months of the program
- Prevent foreclosure on 2,500 homes that were not under forbearance
- Review through a quality control process 40% of applications sent for approval
- Approve or deny applications a median of 21 days from the date the application was received; Service Level Agreements (SLAs) are monitored. Staffing can be adjusted as application volume shifts. If application is returned for more information, SLA timeframe is frozen, until additional information is captured. At that time, the SLA time clock will continue.
- Payees receive payment a median of 7 days after an application is approved
- The agency has recently engaged Tableau as a software service provider and will be implementing an externally-facing interactive dashboard that will provide the public with information as to how many households have been served and the types of assistance provided. The dashboard will be shared from the agency's website. The agency also sends out communications through Constant Contact and distributes a quarterly newsletter. The agency also provides updates to the public at outreach events, as well as through interviews with media agents. The agency also prepares annual performance reports to its board and the state legislature. Lastly, the most powerful reports that can be made are through the voice of actual customers who have an opportunity to share how the program has benefitted them from our Faces of Home series. Data will also include metrics by income, race, gender, etc.

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Payment Assistance for Down Payment Assist. Loans

- Number of down payment assistance loans brought current
- Number of applications processed by quality control over the number of applications sent for approval
- Application review process throughput
- Payment process throughput

- Bring 150 down payment assistance loans current
- Review through a quality control process 40% of applications sent for approval
- Approve or deny applications a median of 21 days from the date the application was received; Service Level Agreements (SLAs) are monitored. Staffing can be adjusted as application volume shifts. If application is returned for more information, SLA timeframe is frozen, until additional information is captured. At that time, the SLA time clock will continue.
- Payees receive payment a median of 7 days after an application is approved
- The agency has recently engaged Tableau as a software service provider and will be implementing an externally-facing interactive dashboard that will provide the public with information as to how many households have been served and the types of assistance provided. The dashboard will be shared from the agency's website. The agency also sends out communications through Constant Contact and distributes a quarterly newsletter. The agency also provides updates to the public at outreach events, as well as through interviews with media agents. The agency also prepares annual performance reports to its board and the state legislature. Lastly, the most powerful reports that can be made are through the voice of actual customers who have an opportunity to share how the program has benefitted them from our Faces of Home series. Data will also include metrics by income, race, gender, etc.

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Number of assisted homeowners in socially disadvantaged groups • Number of households with utility bills brought **Payment** current Assistance for Number of Homeowners applications Utilities processed by quality control over the number of applications sent for approval • Application review process throughput Payment process

throughput

- Over 50% of assisted homeowners will be members of socially disadvantaged groups
- Assist 3000 homeowners prevent utility disconnections in the first 24 months of the program
- \bullet Review through a quality control process 40% of applications sent for approval
- Approve or deny applications a median of 21 days from the date the application was received; Service Level Agreements (SLAs) are monitored. Staffing can be adjusted as application volume shifts. If application is returned for more information, SLA timeframe is frozen, until additional information is captured. At that time, the SLA time clock will continue.
- Payees receive payment a median of 7 days after an application is approved
- The agency has recently engaged Tableau as a software service provider and will be implementing an externally-facing interactive dashboard that will provide the public with information as to how many households have been served and the types of assistance provided. The dashboard will be shared from the agency's website. The agency also sends out communications through Constant Contact and distributes a quarterly newsletter. The agency also provides updates to the public at outreach events, as well as through interviews with media agents. The agency also prepares annual performance reports to its board and the state legislature. Lastly, the most powerful reports that can be made are through the voice of actual customers who have an opportunity to share how the program has benefitted them from our Faces of Home series. Data will also include metrics by income, race, gender, etc.

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Payment Assistance for Delinquent Property Taxes

- Number of tax-related delinquencies paid off
- Number of applications processed by quality control over the number of applications sent for approval
- Application review process throughput
- Payment process throughput

- Prevent the displacement of 500 homeowners by paying off their delinquent property taxes
- Review through a quality control process 40% of applications sent for approval
- Approve or deny applications a median of 21 days from the date the application was received; Service Level Agreements (SLAs) are monitored. Staffing can be adjusted as application volume shifts. If application is returned for more information, SLA timeframe is frozen, until additional information is captured. At that time, the SLA time clock will continue.
- Payees receive payment a median of 7 days after an application is approved
- The agency has recently engaged Tableau as a software service provider and will be implementing an externally-facing interactive dashboard that will provide the public with information as to how many households have been served and the types of assistance provided. The dashboard will be shared from the agency's website. The agency also sends out communications through Constant Contact and distributes a quarterly newsletter. The agency also provides updates to the public at outreach events, as well as through interviews with media agents. The agency also prepares annual performance reports to its board and the state legislature. Lastly, the most powerful reports that can be made are through the voice of actual customers who have an opportunity to share how the program has benefitted them from our Faces of Home series. Data will also include metrics by income, race, gender, etc.

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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?

Yes

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?

No

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

Yes

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

No

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

Yes

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

No

Use of Initial Payment

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

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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.

Pilot program development in final stages to include finalizing SOW with grants administrator. Anticipated go-live date of 08.27.2021. Targeting government insured loans of one servicer with a mortgage reinstatement program roll-out to eligible applicants.

UPDATED 12-8-2021:

SC Housing has hired an Emergency Housing Director and Assistant Director. One full-time staff person has been assigned to manage the daily operation of the pilot program. We are continuing our contract with the third-party vendor who administered the Emergency Rental Assistance Program for our agency to do so again for HAF. The program will staff up completely once our plan has been approved. We are prepared to launch out HAF program within 30 days of approval. Our pilot program, available to customers in our mortgage-servicing portfolio, has received 582 applications. 83 homeowners have been brought current for a total of \$719,528.68 expended.

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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	\$15,200,891.00
Mortgage Principal Reduction	\$0.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$0.00
Payment Assistance for Delinquent Property Taxes	\$1,000,000.00
Mortgage Reinstatement	\$91,419,330.00
Facilitate Mortgage Interest Rate Reduction	\$0.00
Payment Assistance for Homeowner's Insurance	\$0.00
Payment Assistance for Down Payment Assist. Loans	\$2,314,413.00
Payment Assistance for Homeowners Utilities	\$5,786,032.00

Other measures to prevent homeowner displacement

Measure	Amount
none	\$0.00

Displacement Prevention Sub-Total	\$115,720,666.00
-	

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.

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Specify the Participant's allocations for the following	Amount
Counseling or Educational Services	\$1,084,881.00
Legal Services	\$6,147,639.00

Services Sub-Total	\$7,232,520.00
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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
Payroll and Related Expenses	\$2,603,715.00
Information Technology	\$1,735,810.00
Master Program Manager/Grant Administration Services to include program design and standup, software implementation – deploying software to the cloud that will be used to accept applications, review for award decisions, notifications and processing of payment files to the South Carolina Enterprise Information System, operation of the call center (inbound and outbound), communications support and messaging, application review and award determination, program management support, monitoring and compliance, and data collection and reporting, including weekly status reports and required federal reporting	\$16,056,240.00
Other - Supplies , Advertising/Outreach, Training, Travel	\$1,301,856.00

Administrative Expenses Sub-Total	\$21,697,621.00
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Total Plan Requested Amount	\$144,650,807.00
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Amount Requested Confirmation:

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: Bonita Shropshire

Agency/Office: South Carolina State Housing Finance and Development Authority, Executive

Director

Email: bonita.shropshire@schousing.com

Phone Number: 8038969005

Reporting Contact

Name: Roberta Whitner

Agency/Office: South Carolina State Housing Finance and Development Authority, Assistant

Emergency Housing Director

Email: roberta.whitner@schousing.com

Phone Number: 8032067749

Additional Contact

Name: Larry Huff

Agency/Office: South Carolina State Housing Finance and Development Authority, Director of

Emergency Housing

Email: larry.huff@schousing.com

Phone Number: 8038969279

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.

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Title VI Assurances

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

Title	Upload Date
Signed Title VI Form	8/20/2021 11:20 AM

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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:

SC State Housing Finance and Development Authority

Name and Title of Certifying Official

Name: Bonita Shropshire

Title: Executive Director

Telephone: 8038969005

Email: bonita.shropshire@schousing.com

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