

**HAFP-0140-Kansas
Treasury Feedback Response and
Resubmission of Plan
December 8, 2021**

Thank you for providing feedback and opportunity for response.

Completeness

The participant's response(s) to the following questions was/ were either incomplete or unresponsive:

1. No questions.

Thank you.

Homeowner Needs and Community Engagement Data

1. Please explain how the plan targeting and outreach reflect the data referenced in your plan.

The assistance targeting, and outreach will be directed by the data geographically as well as by socially disadvantage individual (SDI) information. Efforts will be made to work with mortgage servicers and community organizations to target outreach geographically and to SDI families and communities.

Outreach efforts will include:

- Community Action Agencies
- Department for Children and Families
- Habitats for Humanity
- HUD Housing Counseling Agencies
- Kansas African American Affairs Commission
- Kansas Bankers Association
- Kansas Credit Union Association
- Kansas Hispanic and Latino American Affairs Commission
- Qualified Census Tract maps
- Social Service Non-Profit Organizations
- United Ways across Kansas and their partner agencies
- Others

A marketing campaign request for proposal was posted on October 19, 2021 and closed on November 19, 2021. Each proposal received included a scope of work targeting outreach to SDI populations and communities. The selection will be publicized post contracts.

Community Engagement and Public Participation

1. Your plan notes public input and community engagement in the plan development process. Please explain how community engagement informed your plan's programmatic and outreach design.

Community engagement affirmed the program design to cure mortgage delinquency as expeditiously as possible to relieve applicants of the distress that accompanies housing instability. Additionally, it affirmed the program design to have applicants with continuing housing affordability concerns work with a housing counselor. This provides applicants with immediate relief and on-going supportive services to achieve the highest and best possible outcome given their individual circumstances.

We learned how some individuals became aware of the program. This information has and will continue to be used to sharpen the program outreach efforts.

2. Please describe any coordination you intend with Tribes or Tribal entities.

The Kansas HAF Program Director has made initial attempts September 8 and again on November 29, 2021, to coordinate efforts and prevent duplication with the three Kansas Tribal communities. Efforts for this coordination will be continued periodically until linkages are developed.

3. Please provide an update indicating any public comments you have received since you submitted your HAF Plan, from which organization you received any such comment, and whether you have responded to the comments.

No additional public comments have been received since submission of the HAF Plan. KHRC continues to monitor the established communication channels.

Ongoing Assessment of Homeowner Need

1. No questions

Thank you.

Program Design

1. Please explain how the sources of data listed in the section on Homeowner Needs informed the Program Design Elements included in your plan.

The data sources made two things clear. One, there is a significant amount of mortgage delinquency in our market. Two, our program funding cannot satisfy the demand. The more applicants the program can assist without delay, hopefully will afford mortgage servicers capacity to assist others in our state.

2. Will there be a method in your HAF program, early in the process of engaging with a household, to evaluate immediate threats to the housing stability of applicants, which may need to be addressed under an expedited or prioritized timeline (e.g. HOA liens, tax delinquencies, utility shut off)?

Kansas will target funds as required by Treasury guidelines; however, to prevent burden with limited administrative and staffing dollars, Kansas will implement a streamlined process where each application will be weighed consistently to manage multiple channels simultaneously.

3. Please describe how your program will utilize housing counselors or legal services to assist homeowners in evaluating loss mitigation options available for their mortgage. Your description should include:

- a. whether your program will connect homeowners with housing counseling or legal services early in the process.
- b. the role housing counseling or legal services providers will play in supporting homeowners' efforts at engaging in loss mitigation.

Our team believes in a holistic approach to housing stability and that all applicants whether approved for funding or not can gain knowledge from Housing Counseling or Legal Services. Using HAF funds to offer Housing Counseling or Legal Services for all applicants including those who do not qualify for direct assistance is very important to our plan. We are currently exploring the possibility of offering an online housing counseling program available for all applicants to participate in.

Housing counselors and legal services will be secondary support services offered to applicants on a needs base screening. This method is expected to mitigate inundating the entities as well as provide a better quality of service to referred applicants. Upon referral these entities will work with applicants appropriately with the goal of informing and supporting the applicant so they can make the best decision available to them. This will include exploring loss mitigation options offered by their mortgage servicer in pursuit of a sustainable monthly mortgage payment.

4. How will your program leverage resources available through a loss mitigation process to benefit eligible homeowners and how will your program avoid using HAF funds in ways that duplicate relief that available loss mitigation options might provide?

The Kansas program will utilize a software platform allowing the applicant to complete a series of questions to determine if loss mitigation efforts have already been attempted and/or could be attempted to help stretch the HAF dollars and use them wisely. The coordinated effort with mortgage servicers using the CDF (Common Data File) for communication will help to prevent duplication of assistance.

5. Please explain what steps, if any, your program will take to assist the homeowner in determining whether a HAF-resolution will result in a sustainable monthly payment?

The applicant's attestation will be the primary assessment of the applicant's affordability.

6. Are you anticipating increased winter home energy costs and their potential impact on the homeowners that HAF will serve?

Yes, Kansas anticipates increased winter home energy costs and has planned for this in the direct assistance budget.

Eligibility

1. Please provide the rationale for establishing the following additional eligibility requirements specified in your plan, including how you determined these requirements will not create unnecessary barriers to participation by eligible homeowners:

Clarification for this question was requested from Treasury on November 15, 2021. Will Corbett, Senior Policy Advisor, Homeowner Assistance Fund replied on November 17, 2021, to disregard the question. It was erroneously included in the letter.

Outreach

1. Please explain how the program will target outreach and provide access to homeowners with limited English proficiency.

Kansas marketing materials and efforts will include English and Spanish language outreach. Kansas will provide Spanish language outreach specifically to Spanish language radio and Latino organizations.

The chosen HAF software will convert to other languages by the click of a button.

2. Please explain how the program will provide culturally relevant marketing.

Kansas plans to use a diverse and equitable approach in marketing materials. Efforts will be made to work with community organizations such as non-profits and faith-based service organizations for general outreach as well as a marketing agency. The Kansas Marketing RFP includes a comprehensive scope of work for culturally relevant materials and SDI communities.

Outreach efforts will include:

- Community Action Agencies
- Department for Children and Families
- Habitats for Humanity
- HUD Housing Counseling Agencies
- Kansas African American Affairs Commission
- Kansas Bankers Association
- Kansas Credit Union Association
- Kansas Hispanic and Latino American Affairs Commission
- Qualified Census Tract maps
- Social Service Non-Profit Organizations
- United Ways across Kansas and their partner agencies
- Others

Prioritization

1. If your program intends to serve households who are over the 100% AMI threshold, how will your program prioritize Socially Disadvantaged Individuals?

Kansas will target funds as required by Treasury guidelines. Using the program software, applicants will be first categorized by mortgage delinquency or foreclosure status, second by income AMI, and third by SDI. Within each category, applicants identified by mortgage delinquency or foreclosure status, second by income AMI and SDI (combined), third by income AMI and last by SDI will be elevated to the top of each day's submissions to receive priority processing. This will accelerate the review of these select applications.

2. Please describe your marketing and outreach strategy to SDI communities?

Please see above. Kansas plans to use diverse and equitable marketing materials. Efforts will be made to work with community organizations such as non-profits and faith-based service organizations for general outreach as well as a marketing agency. KHRC's marketing firm will develop the comprehensive plan by using the Social Vulnerability Index (SVI) by census tract and region.

Performance Goals

1. Please explain how you intend to communicate your progress towards performance to the public.

Response: Kansas will display a public dashboard on the HAF website to communicate progress towards performance to the public. In addition, periodic newsletters, press releases, and other communications will be released to keep the public informed.

2. Please indicate which three metrics will serve as the best indicators of the success of your program.

1,100 households averted foreclosure by the end of the program.

1,100 households avoided utility disconnect by the end of the program.

453 households averted property tax foreclosure by the end of the program.

3. Please indicate whether you intend to disaggregate metrics by income, race, gender, etc.

Kansas will capture metrics by income, race, ethnicity, and gender and evaluate.

4. Please consider including as an additional metric the number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of HAF funds to resolve the homeowner's defaults or delinquencies.

Kansas will take this under advisement. Thank you.

Readiness

1. Please provide the most recent available information about your program's readiness, including staffing, contractors, etc..

The Kansas HAF team has been utilizing the services of a consulting firm to assist with the program design, development, and implementation. A KHAF Program Director has been hired with over 22 years of experience in the Housing Counseling field. A Request for Proposal (RFP) has been issued for a software vendor and marketing firm to provide the necessary tools to launch a successful program. A final RFP award is forthcoming. The team has developed an organizational chart, hiring plan, and a facility has been secured. After acceptance of the HAF plan and Term Sheets, Kansas will be able to finalize all activities.

2. Is your program prepared to launch upon approval and, if not, by what date will you be ready to launch following approval?

The Kansas program is scheduled to launch in the first quarter of 2022.

3. Please provide updated information about your progress in spending the initial 10% payment from your jurisdiction's full allocation and the status of any pilot assistance already offered or made available to homeowners.

Kansas has utilized a portion of the initial payment to contract with a consulting firm responsible for the design, development, and implementation of the HAF plan for Kansas. Our team is focused on launching a full program in the first quarter of 2022.

Budget

1. Your budget indicates you plan to spend \$2,922,4118 on counseling and legal expenses, which is over 5% of your \$56,738,216 total plan requested amount. Please explain this discrepancy and make any necessary adjustments to fall below the 5% threshold.

The Kansas plan should have indicated the plan to spend \$2,832,410.80 on counseling and legal expenses, which is 5% of the Kansas allocation of \$56,648,216.00. The budget will be corrected to reflect the correct amounts of \$2,124,308.10 (75%) for Counseling and \$708,102.70 (25%) for legal services (totaling \$2,832,410.80). Thank you for catching the error.

2. Your plan provides a total budget amount of \$56,738,216.00, an amount greater than your full allocation amount of \$56,648.216. Please revise your budget to reflect this allocation amount. Our records indicate that you have \$50,983,394.40 remaining from your allocation, after deducting your initial 10% payment.

The Kansas allocation is in fact \$56,648,216.00. The budget will be corrected to reflect the correct amount. Thank you for catching the error.