

HAFP-0147-Oklahoma

Resubmission of Plan

### **Completeness**

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

- **Your plan lists Deborah Jenkins as the Authorized Official. Our records indicate you have not submitted a signed financial assistance agreement. To ensure prompt payment upon approval, the Authorized Official needs to be the same as the signatory on the application for HAF payments. If you have any questions, please email to [HAF@treasury.gov](mailto:HAF@treasury.gov).**

Deborah Jenkins is our Authorized Official who signed and submitted the financial assistance agreement 12/01/2021.

### **Homeowner Needs and Community Engagement Data**

- **Please explain how the program expects to serve targeted populations without more specific underlying data.**

Oklahoma HAF has reached out for discussions with additional sources for more specific underlying data regarding the rate of mortgage delinquency as well as the impact of COVID 19 on socially disadvantaged populations, including Freddie Mac, the Consumer Financial Protection Bureau, Metropolitan Fair Housing Council of Oklahoma, the Latino Community Development Agency, Urban League of Greater Oklahoma City, Neighborhood Housing Services of Oklahoma City, NOVAD Consulting Reverse Mortgage Servicers, Oklahoma United Way Partner Agencies, City of Oklahoma City Neighborhood Coalition, African Methodist Episcopal Church 12<sup>th</sup> Episcopal District, Oklahoma National Baptist Convention, Oklahoma Catholic Charities and nationwide mortgage loan servicers. Shared data has informed Oklahoma HAF Program administrators on targeted populations for service. The data received and reviewed includes Consumer Financial Protection Bureau data on Oklahoma mortgages 30-89 days delinquent, information explaining that multiple mortgage loan servicers may have underreported mortgage delinquencies by not characterizing households in forbearance due to COVID 19 as delinquent, data from a nation-wide mortgage loan servicer showing the number of Oklahoma households delinquent since January 21, 2020 and the dollar amount of delinquency for all Oklahoma delinquent borrowers and the most recent Freddie Mac Foreclosure Prevention, Refinance and FPM report – August 2021, published 11/10/2021 that provides a state breakdown of loans in forbearance.

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

The plan targeting and outreach reflects the data referenced in our plan and the additional data collected through outreach since the original plan submission. The data referenced in our initial plan and received from multiple stakeholders since the original submission confirms that our plan to target households at or equal to 100% AMI, prioritizing socially disadvantaged households and households facing imminent displacement, serving Oklahoma Home Equity Conversion Mortgage Borrowers and creating a fast-track limited income documentation for households with household income below 100% of the county AMI is

consistent with reaching Oklahomans who are most vulnerable and experiencing the greatest evidence of housing insecurity.

### **Community Engagement and Public Participation**

- **Your plan indicates only two housing counseling providers, and two community organizations were involved in your public input process. Please explain how the program is confident in its ability to reach targeted populations without engaging additional organizations in planning and implementation.**

With the hiring of a dedicated HAF Director and HAF staff, OHFA has, since the initial public input session, reached out to multiple community-based organizations and other organizations committed to the service of low-to-moderate income families for input on the most plausible ways to administer a homeowner assistance fund program and how OHFA can successfully reach targeted populations. Those organizations include Metropolitan Fair Housing Council of Oklahoma, the Latino Community Development Agency, Urban League of Greater Oklahoma City, Neighborhood Housing Services of Oklahoma City, NOVAD Consulting Reverse Mortgage Servicers, Oklahoma United Way Partner Agencies, City of Oklahoma City Neighborhood Coalition, African Methodist Episcopal Church 12<sup>th</sup> Episcopal District, Oklahoma National Baptist Convention, Oklahoma Catholic Charities and nationwide mortgage loan servicers.

Additionally, knowledge and assessment of statewide needs is one of the core functions of the Oklahoma Housing Finance Agency as we have addressed housing needs of all 77 Oklahoma Counties since 1976

- **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.**

Public input and community engagement in our plan development process informed the Oklahoma HAF programmatic and outreach design in multiple ways, including:

- Focusing our HAF Funds on the reinstatement of mortgages and payment of additional future mortgage payments to help Oklahomans develop resources for reserves to aid in a more stable and secure housing future,
- Allowing for the payment of delinquencies that include housing related expenses that could result in the greatest potential for housing insecurity and displacement, such as homeowner's insurance, property taxes, and HOA Dues vs. providing utility assistance for which there are multiple state resources to address. The OHFA HAF emphasis is to keep homeowners in their homes.
- Creating a Program Website and marketing materials available in languages other than English, including Spanish and Vietnamese.
- Hiring bilingual HAF staff with many years of combined mortgage, real estate industry and social service/advocacy and counseling backgrounds. OHFA HAF staff includes employees who can read, speak and write Spanish and Vietnamese.
- Creating an online application process supplemented by direct service to address communities with greater digital divide and lack of internet services or savvy

- Creating shared referral relationships with local, grass roots, community-based organizations
- OHFA HAF has or is seeking to create MOUs with the following local organizations:
  - Urban League of Greater Oklahoma City
  - Latino Community Development Organization
  - Metropolitan Fair Housing Council
  - Neighborhood Housing Services of Oklahoma City
  - Oklahoma Community Cares Partners
  - Legal Aid of Western Oklahoma
  - Oklahoma Association of Community Action Agencies
  - NE Oklahoma City Neighborhood Coalition
  - Metropolitan Better Living Center
  - Catholic Charities of the Archdiocese of Oklahoma City
  - Collins Community AME Church
  - Flipper Chapel AME Church
  - Allen Chapel AME Church
  - St John Missionary Baptist Church
  - Fairview Missionary Baptist Church
  - Prospect Missionary Baptist Church
  - Chickasaw Nation Division of Housing
  - Community Action Resource and Development, Inc.
  - Community Development Support Association
  - Housing Authority of the Choctaw Nation of Oklahoma
  - Little Dixie Community Action Agency
  - Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties, Inc.
  - Greenpath Financial Wellness
  - Housing Partners of Tulsa, Inc.
  - Quickcert, Inc.
  - Tulsa Habitat for Humanity
- **Please describe any coordination you intend with Tribes or Tribal entities.**

Oklahoma HAF will implement the following program designs to cooperate and coordinate with Tribal Nations:

- Allowing applicants to indicate in the application that they are members of a Tribal Nation and to identify that Tribal Nation
- Providing applicants awareness of Tribal Nations awarded HAF Funds
- Requesting authorization from eligible approved applicants to share information with their identified Tribal Nation of their HAF grant award, including amount and delinquency paid
- Tribal Nation member applicants, as will all applicants, will be asked to self-certify that they have not received duplicative HAF assistance.

- **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.**

Oklahoma HAF has received comment from multiple community-based organizations, grass roots organizations and non-profit organizations targeting service to low-to-moderate income families. We have responded to that input and continue to have ongoing engagement with organizations to inform our program's design. Some specific organizations and feedback that OHFA has received and incorporated into our program for administering HAF are listed below:

African Methodist Episcopal Church 12<sup>th</sup> Episcopal District – Many seniors and low-to-moderate income individuals who need assistance will need direct service to complete an application. Please consider using faith-based places of worship as hub locations to offer application clinics by way of training the membership to assist their neighbors with knowing the program eligibility requirements, gathering required documents and in some cases, assisting the applicant to complete an online application

Urban League Organizations – Please consider offering the ability to complete an application on the telephone with the guided help of a program staff person who enters the necessary data

Latino Community Development Agency – Consider hiring bilingual staff and/or including marketing and program information in multiple languages

Neighborhood Housing Services of Oklahoma City – Provide all applicants with the contact information of a HUD Approved Housing Counselor within their local area if possible

Metropolitan Fair Housing Council – Use local, grass roots organizations' newsletters to promote the program and provide awareness

### **Ongoing Assessment of Homeowner Need**

- **Please explain how the program will address changes in homeowner needs in coming years.**

To address changes in homeowner needs in the coming years Oklahoma HAF will:

- Provide each applicant with the contact information for the Oklahoma 211 Resource Center which has dedicated, trained individuals to receive calls and direct Oklahomans to a local resource for addressing diverse concerns.
- Provide each applicant with the web link for locating a HUD approved Housing Counselor in their area
- Oklahoma HAF will survey HAF awarded participants for a status update at 6- and 12-month post award intervals
- OHFA will continuously monitor the landscape in Oklahoma for changes in homeowner needs due to Covid-19 and will quickly request permission from Treasury to amend our plan to address those needs or to request re-allocation of initial program budgets to priorities based on needs and applicant demand.

- **Please explain how the sources of data listed in the section on Homeowner Needs Informed the Program Design Elements included in your plan**
- The sources of data listed in the section on Homeowner Needs in our initial plan include data provided by the US Treasury, contributed by multiple federal agencies, data from OHFA's master mortgage servicer, US Bank, data from public input sessions and data from multiple mortgage loan servicers. The data received and reviewed from all sources helped to frame our program design elements including the maximum amount of HAF assistance that would successfully reinstate a large majority of Oklahoma delinquent borrowers, the number of months of forward mortgage payments that will provide adequate cushion or reserves to help households achieve total recovery and the overall categories of assistance most required by Oklahoma households. Review of input from community-based organizations able to respond to our initial plan, as a result of making it available on our website for public comment, has led us to revise plan goals and budget to more accurately demonstrate the need in Oklahoma. Changes to the original submitted plan include an increase in the budget to reflect the total allocation, a decrease in the number of households to be assisted with down payment assistance loans from non-profit or government agencies, an increase in the number of households to receive mortgage reinstatement and forward monthly mortgage payment assistance, and the inclusion of more specific housing counseling assistance, legal services referral and direct contact and cooperation with mortgage loan servicers to assess and apply permanent loss mitigation options when appropriate.
- **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)?**

Oklahoma HAF's initial application eligibility determination will assess if applicants are in imminent danger of being displaced. Households who are in imminent danger of being displaced will be prioritized, through an internal escalation process, for full eligibility assessment and award of HAF funds when appropriate.

- **Please confirm your exclusion of reverse mortgages and contracts for deed or land contracts and explain what steps you have taken to assess the needs of homeowners in these categories. Please summarize any community feedback or data on which you have based this decision. If borrowers with these arrangements will be eligible under specific programs (i.e., delinquent taxes), you may count these as included.**

Based on feedback received during input outreach, Reverse Mortgage Borrowers will not be excluded, rather they are included in the Oklahoma HAF program addressing delinquent homeowner's insurance, property taxes and HOA/Condo Association dues and liens.

Contracts for deed or land contract holders will be excluded from the Oklahoma HAF Program as these situations create a heightened fraud risk and do not include ownership status for the participant in which case COVID 19 rental assistance and relief programs within the state are a more appropriate resource.

- **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:**
- **Whether your program will connect homeowners with housing counseling or legal services early in the process.**
- Oklahoma HAF will provide all applicants with contact information for Oklahoma HUD Certified Housing Counseling Agencies.
- Oklahoma HAF will ask each HAF eligible applicant to indicate if they believe they need individual one on one counseling with a HUD Certified Housing Counselor to retain successful homeownership and will provide payment for a 2-hour counselling session to the HUD Certified Agency of the applicant's choice from a list of HUD Certified agencies in Oklahoma who have agreed to provide counseling service to the HAF program on a fee for service basis.
- Oklahoma HAF will provide referral only assistance to applicants needing legal services to local legal organizations that provide legal services for low-to-moderate income households on a pro bono basis or a sliding fee scale.

**The role housing counseling or legal services providers will play in supporting homeowners' efforts and engaging in loss mitigation.**

Housing Counselors and Legal Services Representatives will participate with Oklahoma HAF through a cooperative referral process whereby they refer households believed to be eligible for the Homeowner Assistance Fund Program.

Housing Counselors selected to provide one on one, 2-hour household counseling services to select HAF Applicants will share information with HAF on the individual household status regarding loss mitigation options.

- **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 the available loss mitigation options might provide?**

Oklahoma HAF Program will receive Third Party Authorization from each HAF eligible applicant that allows OHFA to discuss the applicant's file with the mortgage servicer. OHFA will contact the mortgage loan servicer to explore loss mitigation options and benefits available to applicants to ensure that the best possible combination of available services is employed to help Oklahoma Borrowers achieve recovery, stability and sustainability.

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

Oklahoma HAF will empower Applicants by asking as part of the application process to attest if they can afford their monthly mortgage payment with current household income post HAF assistance. Applicants who respond no to this question will be invited to receive a referral to a local HUD Certified Housing Counselor for help in determining the best course of action moving forward and prior to receiving HAF Assistance.

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

Oklahoma HAF anticipates that delinquent Borrowers will likely need some assistance to restore personal reserves, so that future costs like rising utility costs, for example, can be addressed without impacting monthly mortgage obligation. Therefore, we are including in our program design the making of up to 3 months additional forward mortgage payments for households who receive mortgage reinstatement.

### **Eligibility**

- **Oklahoma HAF has further clarified our fact-based proxy and how it informs our program design. We've included that explanation and chart with this resubmission.**

### **Program Income Eligibility**

Oklahoma Housing Finance Agency will determine income eligibility for the program based on applicants with household incomes at or below the greater of 100% of the US Area Median Income (AMI) or by county by household size.

For individuals who identify as socially disadvantaged, OHFA will determine income eligibility for the program based on applicants with household incomes at or below the greater of 100% of the US Area Median Income (AMI) or 150% Area Median by county by household size.

### **Fact-Specific proxy Eligibility for Income Verification**

Oklahoma Housing Finance Agency is using a fact-specific proxy to reduce documentation requirements to remove barriers and expedite payments on behalf of Oklahoma homeowners. Applicant households with self-reported incomes of greater than or equal to 100% Area Median Income (AMI) for their county for a four-person household size will not be able to use the fact-specific proxy and will have to submit additional income documentation.

### **Outreach**

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

Oklahoma HAF has hired and trained a multilingual staff, including employees who can read, write, and speak English, Spanish and Vietnamese. We offer all marketing materials and the online application process in these three languages. We also employ the services of a Language Line for all other languages where we do not have staff with the fluent ability in an applicant's particular language and train staff to

utilize an interpreter service for individuals who use American Sign Language as their primary mode of communication. Beyond this, Oklahoma HAF has relationships with multiple community-based organizations, including the Latino Community Development Agency, and Oklahoma Catholic Charities, whose target client base includes individuals with limited English proficiency.

- **Please explain how the program will provide culturally relevant marketing**

Oklahoma HAF will provide culturally relevant marketing by employing the following strategies:

- Offering marketing/awareness materials in Oklahoma's three most prominent languages (English, Spanish, and Vietnamese)
- Identifying and cooperating with community-based and grass roots organizations within diverse communities who can continue to provide input for marketing/awareness and outreach approaches and design
- Creating marketing/awareness/outreach strategies that include diverse multi-media approaches, including writing, digital communications, social media, and broadcast media. .

#### **Prioritization**

- **If your program intends to serve households who are over the 100% AMI threshold, how will your program prioritize Socially Disadvantaged Individuals? Please describe your marketing and outreach strategy to SDI communities.**

The only households with greater than 100% AMI served by Oklahoma HAF will be Socially Disadvantaged Households and the income limit for those households will not exceed 150% AMI.

Oklahoma HAF will ask applicants to self-identify as Socially Disadvantaged according to the SDI Indicators included in the US Treasury definition with the addition of LGBTQ+ households.

Oklahoma HAF will outreach to Socially Disadvantaged individuals and communities by identifying and cooperating with grass roots and community-based organizations within those communities to create program awareness, train willing volunteers within these organizations to provide information on eligibility criteria, as well as help individuals to complete the online application process when necessary.

#### **Performance Goals**

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

Oklahoma HAF will expand its current website to include a dashboard that tracks the number of applications received, number of Oklahoma Neighbors helped with HAF assistance and referrals to other services.



Oklahoma HAF will continue to allow interested parties to sign up on the OHFA HAF website for HAF email updates. Periodic email updates on pertinent program information will be regularly sent to those who have signed up.

Oklahoma HAF will submit timely responses to any required or requested reporting to US Treasury.

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

Oklahoma HAF will disaggregate metrics by income, race, and gender.

- **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.**

Oklahoma HAF will track all assistance provided to applicants and individuals inquiring about HAF eligibility.

Oklahoma HAF will survey all awarded applicants at 6- and 12-month post award intervals to inform HAF of their status

Oklahoma HAF will request that all mortgage loan servicers, housing counselors and other referral agencies or cooperating organizations inform Program staff of awarded applicants' status, and impact of HAF

## **Readiness**

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

Oklahoma HAF has hired initial core multi-lingual staff necessary to launch our HAF program to serve all 77 counties in Oklahoma.

Oklahoma HAF has contracted with Neighborly Software and is finalizing the online application, online processes for application, prioritization, file review, communication, and tracking. It is anticipated that the software will be ready for launch no later than December 13<sup>th</sup>.

Oklahoma HAF has contacted multiple potential community partners and is meeting with those entities to create program awareness and cooperation

Oklahoma HAF has established HAF banking and implemented fiscal and operational policies and procedures to administer the HAF Program

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

Oklahoma HAF is ready to launch our program serving all 77 Oklahoma counties the later of December 13th, 2021, or within one week of US Treasury approval of the Oklahoma HAF plan.

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

Oklahoma HAF did not operate a pilot program

### **Budget**

- **Your total allocation amount is \$87,056,967.00. The total budget in your draft HAF plan is for \$87,000,000.00. Please confirm your budget is correct, and that at this time, you wish to receive less than your remaining allocation. If necessary, please revise your budget.**

Oklahoma HAF has revised our budget to match the total allocation amount of \$87,056,967. In addition, now that we are further into the application process and have additional information, we have reallocated the original budget between the various term sheet activities and adjusted the targeted number of clients we will serve in each set of term sheet activities.