

## MISSISSIPPI HOME CORPORATION

HOMEOWNER ASSISTANCE FUND PLAN

## **Introduction**

Mississippi Home Corporation ("MHC") recognizes the importance of the opportunity to help Mississippi homeowners avoid foreclosure through utilization of resources from the Homeowner Assistance Fund ("HAF"). MHC is qualified to develop and administer programs to utilize HAF funding as it is already committed to addressing Mississippi's housing needs and has fostered private and public partnerships throughout the state to address these housing needs.

Section 3206 of the American Rescue Plan Act of 2021 established HAF "to mitigate financial hardships associated with the coronavirus pandemic by providing funds to eligible entities for the purpose of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing."

MHC will establish the Mississippi Homeowner Assistance Fund Program (the "Program"). This Program will strive to provide Mississippi homeowners who have encountered a financial hardship due to COVID-19 mortgage relief with a chance of sustaining homeownership and creating housing stability by preventing foreclosure and displacement. MHC will accomplish these goals by providing financial assistance to eligible homeowners. MHC's Program outreach efforts will target socially disadvantaged homeowners and homeowners at or below 100% of the area median income.

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

In its HAF planning process, has MHC 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, and foreclosures?

 $\boxtimes$  Yes - see below.

 $\Box No$ 

Understanding the hardships Mississippi homeowners faced and continue to face during the coronavirus pandemic is crucial to identifying the key needs that will guide the plan and Program. MHC is focused on ensuring that the Program meets the performance outcomes outlined by the U.S. Treasury's HAF guidance, including preventing mortgage delinquencies, defaults, foreclosures, and displacements of homeowners experiencing financial hardship. In order to do this, MHC examined data sets and indicators, from a variety of verifiable sources as described below, to determine the potential size and scope of the populations that meet the threshold financial qualifications for the Program. Analysis of these data sets, in conjunction with information collected through past and ongoing community engagement and programs, including MHC's Hardest Hit Fund program, informed the parameters of the Program.

#### Corelogic Report -- Mississippi Mortgage Loan Delinquencies

Measuring early-stage delinquency rates is important for analyzing the health of the mortgage market. To monitor mortgage performance more comprehensively, CoreLogic examines all stages of delinquency as well as transition rates that indicate the percent of mortgages moving from one stage of delinquency to the next.

The report is published monthly with coverage at the national, state and Core Based Statistical Area (CBSA)/Metro level and includes transition rates between states of delinquency and separate breakouts for 120+ day delinquency.

Select States	Overall Delinquency Rate November 2021	Annual Change in Overall Delinquency Rate November 2021 (Percent Points)
Louisiana	7.3%	-2.4
Mississippi	6.2%	-2.7
New York	5.3%	-3.2
Oklahoma	4.7%	-2.2
Alabama Source: CoreLogic Novemb	4.7% er 2021	-2.1

Additionally, data from the Bureau of Unemployment Statistics, the Federal Reserve Bank Mortgage Dashboard, and the National Mortgage Database and local real estate data demonstrate the dire financial need of Mississippi homeowners and the much-needed relief that HAF funding will provide. The economic disruption created by the pandemic continues to drive the current housing instability and risk of displacement of Mississippi homeowners. The unemployment rate sharply increased in April and May of 2020 to 15.7% and 11% respectively. The Black or African- American population group in Mississippi was impacted more than the white population group.

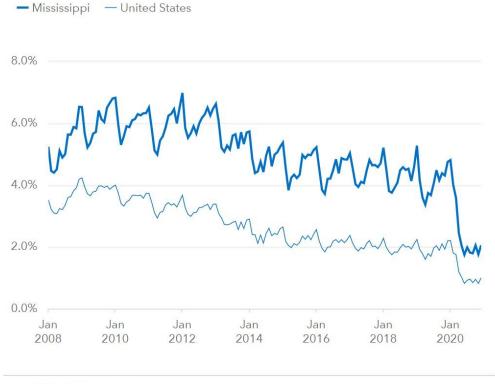
Year		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	)	5.6	5.8	6.0	15.7	11.0	9.6	8.5	7.8	7.2	6.9	6.7	6.6
2021	l	6.4	6.3	6.2	6.2	6.1	6.2						

Table \_ Source : https://data.bls.gov/pdq/SurveyOutputServlet

Those who remain unemployed are falling further behind while those who became re-13695521.2 employed may not have the resources to catch up on their arrears or are falling further behind due to re- employment at a lower income.

Data from the Bureau of Unemployment Statistics illustrates that the percentage of Mississippi mortgages 30-89 days delinquent and 90 or more days delinquent is consistently higher than the national average.

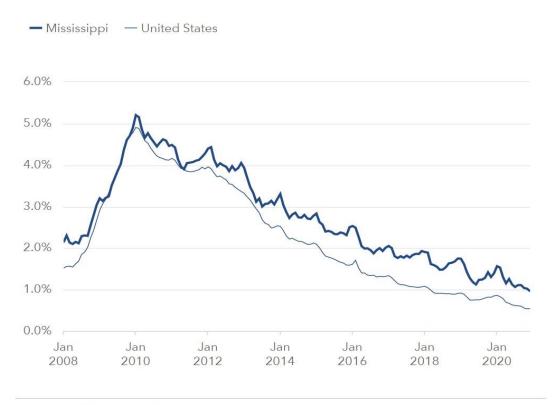
Percentage of mortgages 30-89 days delinquent: **Mississippi** versus **national average**, January 2008-December 2020



Source: National Mortgage Database Date published: June 2021

Figure \_ Source: National Mortgage Database

## Percentage of mortgages 90 or more days delinquent: **Mississippi** versus **national average**, January 2008-December 2020



Source: National Mortgage Database Date published: June 2021

### Figure \_ Source: National Mortgage Database

## **Total Potential Homeowner Need**

Based on the 2019 American Community Survey (ACS), Mississippi has 1,322,808 housing units statewide. Owner-occupied homes were estimated at 752,841. A total of 371,622 housing units are owner-occupied with a mortgage.

Mortgage Status	Housing Units	Share of Homeowner Units
Housing Units without a mortgage	381,219	50.6%
Housing Units with a mortgage	371,622	49.4%
Owner-occupied units	752,841	100%

Table \_ Source: 2019 American Community Survey

The rate of mortgage forbearance and delinquencies has fluctuated since the pandemic began. Based on data from the Federal Reserve Bank Mortgage Dashboard provided by the U.S. Treasury, there is a statewide forbearance rate of 5.3% and statewide delinquency rate of 3.4% for a total of 8.7% of loans impacted by COVID-19.

Forbearance Rate									
	Statewide	Rural	Urban	Low-Income	Non-Low- Income	High Minority	Low Minority		
MISSISSIPPI	5.3%	5.4%	5.3%	6.2%	5.1%	6.1%	5.0%		
NATIONAL	3.9%		1	S 5 5 5 5 5		2			

Delinquency Rate									
	Statewide	Rural	Urban	Low-Income	Non-Low- Income	High Minority	Low Minority		
MISSISSIPPI	3.4%	3.7%	3.2%	4.5%	3.0%	4.5%	2.9%		
NATIONAL	1.9%								

#### Data Definitions.

Number of Mortgages - The number of mortgages arises from an approximate two-thirds sample of the U.S. mortgage market; the figures presented here are not scaled up to the market. Forbearance Rate - Percentage of active loans that servicer

indicates are in forbearance Delinquency Rate - Percentage of active loans that servicer

indicates are 30 days past due, but not in forbearance.

#### Data sources.

The datasets used to generate the accompanying dataset are the following:

- Black Knight Data & Analytics LLC provided by the RADAR

Group at the Federal Reserve Bank of Philadelphia - Federal Housing Finance Agency Low Income Areas file

 U.S. Department of Housing and Urban Development ZIP-Tract crosswalk (2021Q1)

The data is a modified version of the publicly-available Mortgage Analytics and Performance Dashboard (MAPD), a joint effort by

### Homeowner Needs for 100% AMI or below

Owner-occupied households at or below area median income ("AMI") will be a priority in terms of income targeting. The U.S. median family income is \$79,900 for 2021 and households with income at or below this amount will meet the income guidelines for this Program.

The income guidelines are separated by county and the median income can vary greatly across the state. For example, 100% AMI in Hinds County is \$73,900 for a -four-person household, in contrast to the \$53,100 100% AMI for Washington County. This program will utilize a web-based portal system to calculate an applicant's AMI based on their home address and the applicable income limits for the Program.

Based on census data, there are an estimated 191,724 owner-occupied homeowner units that have a mortgage within this income range. With a needs analysis of owner-occupied mortgages impacted by COVID-19 to be approximately 8.7%, an estimated 16,680 households may be eligible for the target income of at or below 100% AMI.

Annual Income	Housing Units	Percentage
Below \$10,000	12,824	3.5%
\$10,000 to \$24,999	32,211	8.7%

\$25,000 to \$34,999	28,646	7.7%
\$35,000 to \$49,999	45,009	12.1%
\$50,000 to \$74,999	73,034	19.7%
\$75,000 to \$99,999	63,780	17.2%
\$100,000 to \$149,999	70,790	19.0%
\$150,000 or more	45,328	12.2%

Table \_ Source: 2019 American Community Survey

In its HAF planning process, has MHC obtained quantitative data from utility providers or entities charged with accessing and collection property taxes or relied on quantitative data or studies to inform its planning about how to target and best serve eligible homeowners at risk or displacement due to utility arrearage or tax foreclosure?

 $\boxtimes$  yes - see below.  $\square$  No

MHC will exclude utility assistance from the Program. There are many local programs that assist with utilities assistance in Mississippi, particularly for low-income and elderly residents. MHC will provide a utility resource sheet on the web portal for homeowners who need utility assistance.

The Program will provide payments for eligible homeowners for delinquent real estate property taxes. Any delinquency must have occurred after January 21, 2020, and as a result of the Covid-19 pandemic hardship. MHC relied upon the below data to support this decision.

According to CoreLogic, Mississippi has the highest average property tax delinquency rate in 2021:

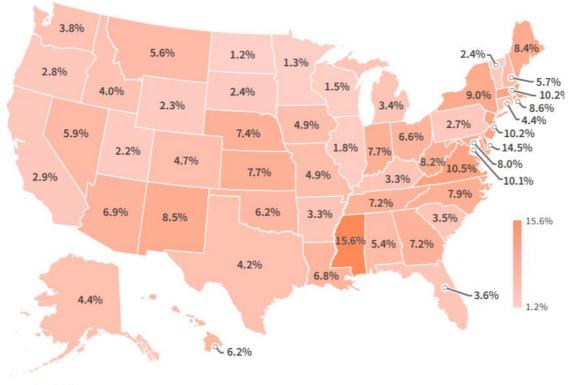
## Top 5 States for Highest Average Tax Delinquency Rate

By State for Year 2021

1	Mississippi	15.6%
2	Delaware	14.5%
3	Virginia	10.5%
4	New Jersey / Massachusetts	10.2%
5	Washington, D.C.	10.1%

Figure 2: 2021 Average Tax Delinquency Rate





Source: CoreLogic

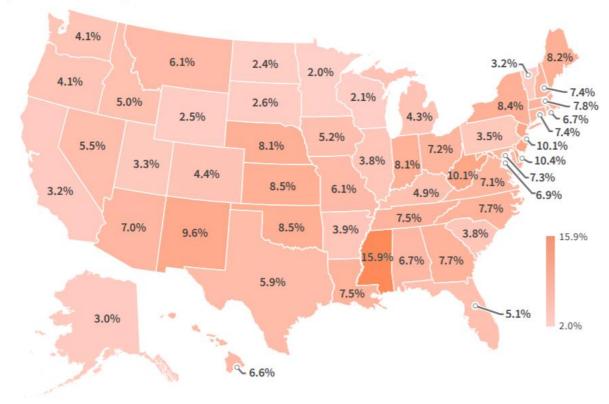
## Top 5 States for Highest Average Tax Delinquency Rate

(2011-2021)

1	Mississippi	15.9%
2	Delaware	14.5%
3	West Virginia and New Jersey	10.1%
4	New Mexico	9.6%
5	Oklahoma	8.5%

## Figure 3: Average Tax Delinquency Rate

(Period 2011-2021)



Source: CoreLogic

### Serious Delinquency

Serious delinquency is defined as 90 days or more past due including loans in foreclosure.

## Serious Delinquency Rate – Top 10 States

STATE	NOVEM	BER 2021 RATE
Louisiana		4.3%
New York		3.5%
Mississippi		3.4%
New Jersey		2.8%
Hawaii		2.8%
Maryland		2.8%
District of Colu	mbia	2.8%
Oklahoma		2.8%
Florida		2.5%
Connecticut		2.5%

Complete 2011-2021		State an	d Natior	nal								
State	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	AVG
MS	14.1%	13.8%	16.3%	17.8%	17.2%	15.8%	17.3%	16.5%	17.8%	12.5%	15.6%	15.9%
National	7.1%	6.5%	6.5%	6.5%	6.4%	6.1%	5.6%	5.4%	5.6%	6.3%	5.9%	6.2%

Each homeowner, mortgage and taxing authority are unique. Outliers, such as an unusually high delinquency rates may impact analysis accuracy. Special circumstances with each loan may exist. Real estate property tax payments are a critical component of funding local and state budgetary and infrastructure needs. Increases and decreases in tax payment delinquency rates are often early indicators of further economic change.

In its HAF planning process, has MHC 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?

 $\boxtimes$  Yes - see below.

 $\Box$  No

#### Analysis of Impediments to Fair Housing Choice

#### **OVERVIEW OF FINDINGS**

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the State of Mississippi has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1 provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice

2. Medium: Factors that have a less direct impact on fair housing choice, or that State of Mississippi has limited authority to mandate change.

3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that State of Mississippi has limited capacity to address.

Table I.1           Contributing Factors							
Contributing Factors	Priority	Justification					
Discriminatory patterns in lending	High	Minority households tend to have higher rates of mortgage denials than white households, as seen in 2008-2016 HMDA data.					
Failure to make reasonable accommodation	High	HUD Fair Housing Complaint data suggests that failure to make reasonable accommodation was the most cited issue for complaints statewide.					
Lack of access to housing for homeless and released from incarceration	Medium	Public input and the homeless and vulnerable population analysis revealed that homeless, persons recently released from incarceration, and transition-age foster youth have limited access to housing option throughout the State.					
Lack of access to independence for persons with disabilities	High	Public input, the Disability and Access workgroup, and the Disability and Access Analysis revealed that households with disabilities have limited access to options that increase their independence.					
Lack of opportunities for persons to obtain housing in higher opportunity areas	High	Access to higher opportunity areas is limited for many households due to income, transportation, and a variety of factors.					
Moderate to high levels of segregation	High	The dissimilarity index shows a moderate to high level of segregation for minority households.					
Moderate to high concentrations of poverty	High	Concentrations of poverty, as demonstrated by R/ECAPs in the area, continue to be a contributing factor in accessing fair housing.					
Lack of resources	High	Lack of resources continues to be a high rated contributing factor, as noted by Stakeholder Consultation meetings and public input.					
Insufficient affordable housing in a range of unit sizes	High	The prevalence of cost burden, especially for lower income households, demonstrates the continued need for affordable housing options in a range of unit sizes.					

Insufficient accessible affordable housing	High	The Disability and Access workgroup and Disability and Access analysis, coupled with a high disability rate particularly for the elderly population, demonstrated a lack of accessible affordable housing to meet current and future demand.
Lack of fair housing structure	High	Fair housing survey results and public input indicated a lack of fair housing structure.
Insufficient fair housing education	High	Fair housing survey results and public input indicated a continued need for fair housing education.
Insufficient understanding of credit	High	Fair housing survey results and public input indicated an insufficient understanding of credit.

#### ADDITIONAL FINDINGS

In addition to the table above, there are several other significant findings. Black and Hispanic households have a moderate level of segregation. Other racial groups also have a moderate to high level of segregation, but these households represent a small proportion of the population. The number of R/ECAPs in the State have increased since 2000. Black households have markedly lower access to low poverty areas, school proficiency, and labor market engagement.

#### IMPEDIMENTS TO FAIR HOUSING CHOICE

#### Private Sector Impediments

#### Impediment 1: More frequent denial of home purchase loans to black, Hispanic, and female applicants:

The perception that black, Hispanic, and female applicants found it more difficult to secure a home loan was cited by several survey respondents. This impression was shared by participants in fair housing forum discussion, and the perception was borne out in an analysis of home loan denials in non-entitlement areas of the state. Just over 30 percent of loan applications were denied to all applicants, but when those applicants were black the denial rate climbed to 45.2 percent. Hispanic applicants were denied 34.6 percent of the time, compared to a 28.4 percent denial rate for non-Hispanic applicants. Likewise, 36.1 percent of home loan applications from female applicants were denied, while 26.6 of applications from male applicants were denied.

#### Impediment 2: Predatory style lending falls more heavily on black borrowers:

This impediment was identified in review of home loan data collected under the Home Mortgage Disclosure Act and in results of the 2014 Fair Housing Survey. Predatory style lending refers to loans with high annual percentage rates (HALs).2 While 24.7 percent of those who took out a home loan were issued a loan that was predatory in nature, the percentages of HALs to black and Hispanic borrowers were 38.7 and 27.3 percent, respectively.

#### Impediment 3: Discriminatory terms and conditions and refusal to rent:

This impediment was identified through review of the results of the fair housing survey, the fair housing forum discussion in Hattiesburg, and fair housing studies profiled in the literature review. Perception of discriminatory refusal to rent was relatively common among survey respondents, who cited race as the basis for this perceived discrimination. In addition, discrimination was identified as more common in the rental industry during the fair housing forum in Hattiesburg, and national fair housing studies focus on the persistence of discrimination in the rental housing industry.

#### Impediment 4: Failure to make reasonable accommodation or modification:

Discrimination based on disability was one of the most common complaints that HUD received from Mississippi from 2004 through the beginning of 2014, and the refusal on the part of housing providers to make a reasonable accommodation for residents with disabilities was a relatively common accusation. Fair housing forum discussions turned at points to the difficulties that persons with disabilities face in convincing landlords to allow reasonable modifications or in finding accessible apartments, as well as to the difficulties that those in construction and property management face in interpreting accessibility requirements. These concerns were also reflected in commentary submitted with the fair housing survey. Finally, two of the six DOJ complaints filed against Mississippi housing providers in the last five years alleged discrimination based on disability.

#### Public Sector Impediments

#### Impediment 1: Insufficient understanding of fair housing laws:

This impediment was identified through a review of the fair housing survey and the minutes taken at the four fair housing forums. Survey respondents and forum participants alike continually cited a need for more education of fair housing law and policies, as well as the types of actions that could constitute unlawful violations of the Fair Housing Act. In addition, results from the fair housing survey indicate some confusion among respondents on several matters relating to fair housing policy, including the extent of protections offered under the Fair Housing Act. Finally, nearly a quarter of fair housing survey respondents who reported their level of awareness of fair housing laws professed to know "very little" about such laws.

#### Impediment 2: Insufficient fair housing testing and enforcement in non-entitlement areas of Mississippi:

This impediment was identified in the results of the 2014 Fair Housing Survey. Of those who answered the survey question concerning awareness of fair housing testing, only about a fifth were aware of any such testing. Furthermore, a majority of respondents who registered their opinion on current levels of fair housing testing thought that they were insufficient.

#### Impediment 3: Fair Housing Infrastructure largely lacking:

This impediment was identified through review of the fair housing structure as well as the minutes from the Hattiesburg Fair Housing Forum. There is no state level agency that is charged with enforcing fair housing law in the state, just as there is no fair housing statute at the state level. The lack of such an agency, and the difficulties this presents for affirmatively furthering fair housing, were a dominant theme in the Hattiesburg Fair Housing Forum.

#### Impediment 4: Lack of understanding of the fair housing duties:

Just as housing consumers are often unaware and uninformed of their rights under the Fair Housing Act, housing providers can be unaware of their responsibilities under the Act. This lack of awareness often manifests itself as an unwillingness to make reasonable accommodations for residents with disabilities, though it can appear in other actions and omissions on the part of housing providers. The presence of this impediment was identified through review of the minutes of the fair housing forum and the results of the fair housing survey.

## *Impediment 5*: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the State.

Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected non-entitlement areas of the State. Further analysis demonstrates that there is some correlation between locations of such housing and concentrations of poverty.

#### **Household Demographics**

There was a total of 1,115,768 households in 2010, up from 1,046,434 in 2000. One person households changed by 14.0 percent between 2000 and 2010, while two person households changed by 9.0 percent. Three and four person households changed by 0.3 percent and -2.9 percent respectively, representing 17.4 percent and 13.5 percent of the population in 2010.

	Households by Household Size State of Mississippi 2000 & 2010 Census SF1 Data											
Sina 2000 Census 2010 Census % Change												
Size Households % of Total Households % of Total 00–10												
One Person	257,708	24.6%	293,807	26.3%	14.0%							
Two Persons	327,377	31.3%	356,795	32.0%	9.0%							
Three Persons	194,171	18.6%	194,682	17.4%	0.3%							
Four Persons	155,180	14.8%	150,650	13.5%	-2.9%							
Five Persons	70,292	6.7%	72,933	6.5%	3.8%							
Six Persons	25,324	2.4%	27,883	2.5%	10.1%							
Seven Persons or More	16,382	1.6%	19,018	1.7%	16.1%							
Total	Total 1,046,434 100.0% 1,115,768 100.0% 6.6%											

Households earning more than 100,000 dollars per year represented 14.2 percent of households in 2016, compared to 12.0 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 18.8 percent of households in 2016, compared to 20.1 percent in 2000.

	Households by Income State of Mississippi 2010 Five-Year ACS & 2016 Five-Year ACS Data										
2010 Five-Year ACS 2016 Five-Year ACS											
Income	Households	% of Total	Households	% of Total							
Less than \$15,000	217,112	20.1%	206,202	18.8%							
\$15,000 to \$19,999	81,825	7.6%	80,213	7.3%							
\$20,000 to \$24,999	75,908	7.0%	70,762	6.4%							
\$25,000 to \$34,999	130,682	12.1%	129,660	11.8%							
\$35,000 to \$49,999	156,638	14.5%	156,651	14.3%							
\$50,000 to \$74,999	183,156	16.9%	186,172	16.9%							
\$75,000 to \$99,999	106,319	9.8%	113,364	10.3%							
\$100,000 or More	129,412	12.0%	155,779	14.2%							
Total	1,081,052	100.0%	1,098,803	100.0%							

Housing units built between 2000 and 2009, account for 18.1 percent in 2010 and 15.2 percent of households. Housing units built prior to 1939 represented 4.3 percent of households in 2016 and 5.0 percent of households in 2010.

	Households by Year Home Built State of Mississippi 2010 Five-Year ACS & 2016 Five-Year ACS Data											
Year Built 2010 Five-Year ACS 2016 Five-Year ACS												
Tear Duilt -	Households	% of Total	Households	% of Total								
1939 or Earlier	53,873	5.0%	47,160	4.3%								
1940 to 1949	42,060	3.9%	36,753	3.3%								
1950 to 1959	86,283	8.0%	79,757	7.3%								
1960 to 1969	140,607	13.0%	128,004	11.6%								
1970 to 1979	210,295	19.5%	206,606	18.8%								
1980 to 1989	176,700	16.3%	166,795	15.2%								
1990 to 1999	206,507	19.1%	200,842	18.3%								
2000 to 2009	164,727	15.2%	198,749	18.1%								
2010 or Later			34,137	3.1%								
Total	1,081,052	100.0%	1,098,803	100.0%								

An estimated 76.9 percent of white households occupy single-family homes, while 63.6 percent of black households occupy single-family homes. Some 5.4 percent of white households occupy apartments, while 13.7 percent of black households occupy apartments. An estimated 68.2 percent of Asian, and 77.2 percent of American Indian households occupy single-family homes.

	Distribution of Units in Structure by Race State of Mississippi 2016 Five-Year ACS Data											
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/ Pacific Islanders	Other	Two or More Races					
Single-Family	76.9%	63.6%	77.2%	68.2%	82.7%	52.2%	67.7%					
Duplex	1.3%	3.9%	1.9%	2.1%	2.0%	3.3%	3.4%					
Tri- or Four-Plex	1.7%	4.9%	0.3%	2.9%	3.0%	3.0%	4.2%					
Apartment	5.4%	13.7%	7.8%	23.2%	6.4%	14.1%	14.0%					
Mobile Home	14.5%	13.8%	12.6%	3.5%	5.9%	27.2%	10.0%					
Boat, RV, Van, Etc.	0.2%	0.0%	0.2%	0.0%	0.0%	0.2%	0.7%					
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%					

#### Segregation and Integration

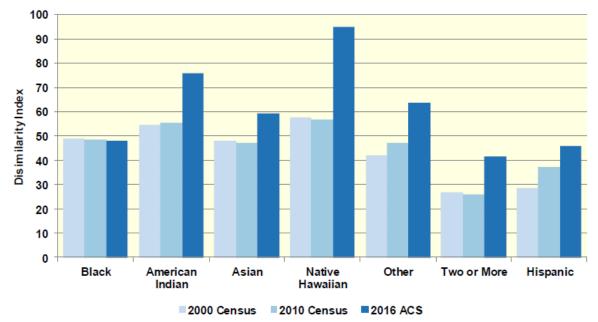
The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

#### Segregation Levels

Any racial or ethnic group with a dissimilarity index rating between 40 and 54 has a moderate level of segregation. Any racial or ethnic group with a dissimilarity index rating 55 or above has a high level of segregation. Black households, which account for 37.5 percent of the statewide population in 2016, have a moderate level of segregation. The rate of segregation for black households has remained virtually the same since 2000. Hispanic households, which accounted for 2.9 percent of the population in 2016, also have a moderate level of segregation. The rate of segregation for Hispanic households has increased since 2000. Two or more races' households also have a moderate level of segregation. Asian households, which accounted for 1.0 percent of the population in 2016, have a high level of segregation. American Indian, Native Hawaiian/Pacific Islander, and "other" race households all had a high level of segregation. However, these households represent less than one percent of the statewide population.

## **Dissimilarity Index**

State of Mississippi



#### **Disparities in Access to Opportunity**

Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

> Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census Tract level.

> School Proficiency - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.

> Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)

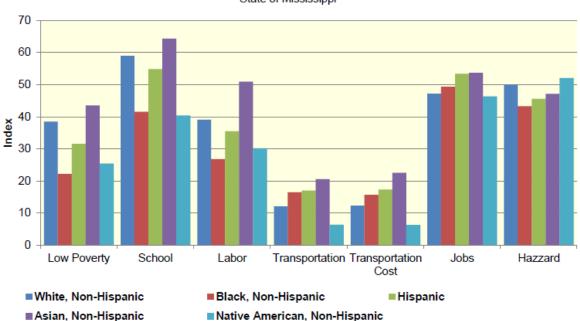
> Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood

 $\succ$  Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region

➤ Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters

> Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

The disparities in access to opportunity are shown in the differences between the various racial and ethnic groups in the diagram. For example, if white households have a distinctly higher index rating than black households then black households have a disproportionate access. Black households have markedly lower access to low poverty areas, school proficiency, and labor market engagement.



Access to Opportunity State of Mississippi

#### **Cost Burden**

Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In State of Mississippi, 15.5 percent of households had a cost burden and 13.2 percent had a severe cost burden. Some 21.1 percent of renters were cost burdened, and 22.4 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 8.0 percent and a severe cost burden rate of 5.3 percent. Owner occupied households with a mortgage had a cost burden rate of 17.4

			<b>Burden and S</b> Sta 2010 Five-Year A	ate of Missis	sippi						
	Less Tha	n 30%	31%-5	0%	Above	50%	Not Com	outed			
Data Source	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	Total		
Owner With a Mortgage											
2010 Five-Year ACS	287,753	66.6%	82,267	19.0%	59,326	13.7%	2,761	0.6%	432,107		
2016 Five-Year ACS	266,734	69.5%	66,844	17.4%	47,049	12.3%	2,906	0.8%	383,533		
			Owner	Without a M	lortgage						
2010 Five-Year ACS	278,127	83.4%	30,329	9.1%	20,249	6.1%	4,873	1.5%	333,578		
2016 Five-Year ACS	307,576	84.8%	29,157	8.0%	19,100	5.3%	7,033	1.9%	362,866		
				Renter							
2016 Five-Year ACS	122,606	38.9%	66,967	21.2%	70,452	22.3%	55,342	17.5%	315,367		
2016 Five-Year ACS	143,315	40.7%	74,402	21.1%	78,793	22.4%	55,894	15.9%	352,404		
				Total							
2000 Census	688,486	63.7%	179,563	16.6%	150,027	13.9%	62,976	5.8%	1,081,052		
2016 Five-Year ACS	717,625	65.3%	170,403	15.5%	144,942	13.2%	65,833	6.0%	1,098,803		

percent, and severe cost burden at 12.3 percent.

#### ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 19886. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Homeowner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans.

2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and

3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2016, the most recent year for which these data are available.

### **Denial Rates**

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution.
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant.
- "Application denied by financial institution," which defines a situation wherein the loan application failed.

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- "Application withdrawn by applicant," which means that the applicant closed the application process.
- "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

Just over 165,616 home purchase loan applications were originated over the 2008-2017 period, and 34,319 were denied.

	Loan Applications by Action Taken State of Mississippi 2008–2017 HMDA Data												
Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total		
Loan Originated	17,296	15,197	13,422	12,734	13,911	15,441	15,817	17,902	20,830	23,066	165,616		
Application Approved but not Accepted	1,274	761.0	608.0	634.0	543.0	677.0	634.0	627.0	739.0	900.0	7,397		
Application Denied	4,717	3,652	3,371	3,013	3,019	3,407	3,094	3,134	3,501	3,411	34,319		
Application Withdrawn by Applicant	2,291	1,993	2,042	1,572	1,815	2,017	2,050	2,350	2,649	2,813	21,592		
File Closed for Incompleteness	613.0	479.0	337.0	259.0	244.0	369.0	296.0	307.0	395.0	474.0	3,773		
Loan Purchased by the Institution	11,221	12,340	10,805	9,792	10,083	10,697	9,204	9,503	9,794	8,843	102,282		
Preapproval Request Denied	1.0	3.0	1.0	0.0	2.0	7.0	9.0	1.0	5.0	7.0	36.0		
Preapproval Approved but not Accepted	0.0	0.0	0.0	0.0	2.0	3.0	3.0	4.0	0.0	1.0	13.0		
Total	37,413	34,425	30,586	28,004	29,619	32,618	31,107	33,828	37,913	39,515	335,028		

	Loan Applications by Reason for Denial State of Mississippi 2008–2017 HMDA Data											
Denial Reason         2008         2009         2010         2011         2012         2013         2014         2015         2016         2017         Total												
Debt-to-Income Ratio	732.0	591.0	455.0	426.0	474.0	519.0	502.0	493.0	628.0	628.0	5,448	
Employment History 48.0 62.0 62.0 62.0 60.0 57.0 47.0 49.0 94.0 67.0 608.0												
Credit History	1,299	1,223	1,021	1,046	1,072	942.0	712.0	711.0	605.0	617.0	9,248	
Collateral	282.0	232.0	249.0	228.0	231.0	264.0	252.0	249.0	280.0	362.0	2,629	
Insufficient Cash	73.0	66.0	59.0	56.0	52.0	76.0	85.0	116.0	145.0	112.0	840.0	
Unverifiable Information	107.0	69.0	57.0	85.0	76.0	78.0	70.0	70.0	84.0	68.0	764.0	
Credit Application Incomplete	414.0	228.0	153.0	118.0	113.0	153.0	140.0	158.0	148.0	206.0	1,831	
Mortgage Insurance Denied	20.0	12.0	6.0	4.0	1.0	7.0	3.0	3.0	1.0	5.0	62.0	
Other	222.0	212.0	185.0	118.0	115.0	169.0	146.0	122.0	170.0	168.0	1,627	
Missing	1,520	957.0	1,124	870.0	825.0	1,142	1,137	1,163	1,346	1,178	11,262	
Total	4,717	3,652	3,371	3,013	3,019	3,407	3,094	3,134	3,501	3,411	34,319	

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.60. While white applicants had a denial rate of 13.3 percent over the period from 2008 through 2017, black applicants had a denial rate of 27.9 percent. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 16.2 percent versus 21.4 percent.

	Denial Rates by Race/Ethnicity of Applicant State of Mississippi 2004–2017 HMDA Data												
Race/Ethnicity 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Avera													
American Indian	42.9%	46.2%	44.0%	28.3%	33.3%	30.9%	25.0%	37.0%	22.8%	12.1%	29.5%		
Asian	25.0%	20.8%	23.4%	16.7%	21.3%	20.9%	18.8%	14.8%	14.6%	16.0%	18.9%		
Black	36.3%	32.3%	28.7%	30.2%	30.1%	30.6%	26.2%	25.2%	23.3%	20.2%	27.9%		
Pacific Islander	34.8%	32.5%	11.1%	20.0%	28.0%	28.1%	14.8%	20.0%	22.4%	16.7%	23.4%		
White	15.8%	14.7%	15.7%	15.0%	14.3%	14.3%	13.0%	11.3%	11.1%	9.7%	13.3%		
Not Available	34.7%	36.3%	49.6%	44.4%	37.8%	33.6%	33.4%	30.8%	26.0%	27.9%	34.4%		
Not Applicable	68.9%	0.0%	20.0%	20.0%	25.0%	20.0%	33.3%	0.0%	40.0%	0.0%	43.0%		
Average	21.4%	19.4%	20.1%	19.1%	17.8%	18.1%	16.4%	14.9%	14.4%	12.9%	17.2%		
Non-Hispanic	27.6%	27.7%	25.1%	21.7%	25.3%	27.9%	20.9%	20.2%	18.7%	12.9%	21.4%		
Hispanic	20.3%	18.4%	18.4%	17.7%	17.0%	17.2%	15.5%	14.1%	13.7%	12.0%	16.2%		

#### Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Homeowner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

#### 1. If they are HOEPA loans.

2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and

3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instrument by at least three percentage points. As shown in Table IV.61, some 165,616 loans between 2008 and 2017 were HALs, accounting for 3.8 percent.

While white households experienced HAL rates at 4.0 percent between 2008 and 2017, black households had a rate of HALs at 6.0 percent.

	Rate of HALs Originated by Race/Ethnicity of Borrower State of Mississippi 2008–2017 HMDA Data												
Race 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Averag													
American Indian	11.1%	4.8%	0.0%	0.0%	0.0%	2.1%	0.0%	2.9%	0.0%	0.0%	2.2%		
Asian	14.8%	10.9%	0.0%	4.0%	5.3%	0.4%	1.3%	0.8%	1.3%	0.0%	4.1%		
Black	21.5%	11.0%	2.7%	3.4%	5.6%	3.1%	2.3%	1.9%	1.8%	2.3%	6.0%		
Pacific Islander	13.3%	22.2%	8.3%	0.0%	0.0%	0.0%	4.3%	0.0%	2.6%	0.0%	6.1%		
White	14.7%	11.3%	1.5%	1.9%	2.1%	1.7%	1.2%	0.9%	0.6%	0.7%	4.0%		
Not Available	10.6%	4.6%	0.5%	0.3%	0.4%	1.0%	0.0%	0.0%	0.4%	0.1%	2.5%		
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Average	15.6%	11.0%	1.7%	2.1%	2.6%	1.8%	1.4%	1.1%	0.8%	0.9%	3.8%		
Hispanic	14.6%	12.7%	1.1%	2.2%	2.9%	1.4%	2.1%	1.6%	1.5%	0.7%	4.1%		
Non-Hispanic	15.9%	11.2%	1.7%	2.1%	2.6%	1.9%	1.4%	1.1%	0.8%	1.0%	4.3%		

#### Additional Plan Data

	L	oan Appl	ications	by Selec		on Taker		e/Ethnici	ty of Ap	plicant		
						ot mississip 17 HMDA [						
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
	Originated	36.0	21.0	14.0	33.0	34.0	47.0	39.0	34.0	61.0	87.0	406.0
American Indian	Denied	27.0	18.0	11.0	13.0	17.0	21.0	13.0	20.0	18.0	12.0	170.0
Inulan	Denial Rate	42.9%	46.2%	44.0%	28.3%	33.3%	30.9%	25.0%	37.0%	22.8%	12.1%	29.5%
	Originated	210.0	221.0	180.0	199.0	188.0	239.0	229.0	236.0	311.0	357.0	2,370
Asian	Denied	70.0	58.0	55.0	40.0	51.0	63.0	53.0	41.0	53.0	68.0	552.0
	Denial Rate	25.0%	20.8%	23.4%	16.7%	21.3%	20.9%	18.8%	14.8%	14.6%	16.0%	18.9%
	Originated	2,915	2,603	2,440	2,054	2,081	2,403	2,637	3,048	3,813	4,305	28,299
Black	Denied	1,661	1,243	980.0	887.0	895.0	1,059	936.0	1,026	1,161	1,088	10,936
	Denial Rate	36.3%	32.3%	28.7%	30.2%	30.1%	30.6%	26.2%	25.2%	23.3%	20.2%	27.9%
	Originated	30.0	27.0	24.0	24.0	18.0	23.0	23.0	24.0	38.0	40.0	271.0
Pacific Islander	Denied	16.0	13.0	3.0	6.0	7.0	9.0	4.0	6.0	11.0	8.0	83.0
Islander	Denial Rate	34.8%	32.5%	11.1%	20.0%	28.0%	28.1%	14.8%	20.0%	22.4%	16.7%	23.4%
	Originated	13,333	11,819	10,361	10,064	11,319	12,337	12,422	13,984	15,829	17,302	128,770
White	Denied	2,509	2,035	1,928	1,782	1,886	2,058	1,854	1,786	1,984	1,860	19,682
	Denial Rate	15.8%	14.7%	15.7%	15.0%	14.3%	14.3%	33.4%	11.3%	11.1%	9.7%	13.3%
	Originated	758.0	500.0	399.0	356.0	265.0	388.0	463.0	573.0	775.0	970.0	5,447
Not Available	Denied	403.0	285.0	393.0	284.0	161.0	196.0	232.0	255.0	272.0	375.0	2,856
Available	Denial Rate	34.7%	36.3%	49.6%	44.4%	37.8%	33.6%	33.4%	30.8%	26.0%	27.9%	34.4%
	Originated	14.0	6.0	4.0	4.0	6.0	4.0	4.0	3.0	3.0	5.0	53.0
Not Applicable	Denied	31.0	0.0	1.0	1.0	2.0	1.0	2.0	0.0	2.0	0.0	40.0
Applicable	Denial Rate	68.9%	0.0%	20.0%	20.0%	25.0%	20.0%	33.3%	0.0%	40.0%	0.0%	43.0%
	Originated	17,296	15,197	13,422	12,734	13,911	15,441	15,817	17,902	20,830	23,066	165,616
Total	Denied	4,717	3,652	3,371	3,013	3,019	3,407	3,094	3,134	3,501	3,411	34,319
	Denial Rate	21.4%	19.4%	20.1%	19.1%	17.8%	18.1%	16.4%	14.9%	14.4%	12.9%	17.2%
	Originated	254.0	204.0	182.0	180.0	210.0	220.0	292.0	368.0	477.0	590.0	2,977
Hispanic	Denied	97.0	78.0	61.0	50.0	71.0	85.0	77.0	93.0	110.0	87.0	809.0
	Denial Rate	27.6%	27.7%	25.1%	21.7%	25.3%	27.9%	20.9%	20.2%	18.7%	12.9%	21.4%
Non-	Originated	16,255	14,438	12,835	12,208	13,429	14,807	15,028	16,899	19,559	21,568	157,026
Hispani	Denied	4,146	3,262	2,896	2,629	2,759	3,082	2,760	2,780	3,096	2,948	30,358
с	Denial Rate	20.3%	18.4%	18.4%	17.7%	17.0%	17.2%	15.5%	14.1%	13.7%	12.0%	16.2%

#### Loan Applications by Reason for Denial by Race/Ethnicity of Applicant State of Mississippi

				2017 HMDA C					
Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	40.0	164.0	1,770	11.0	3,039	424.0	0.0	5,448	40.0
Employment History	3.0	16.0	110.0	0.0	435.0	44.0	0.0	608.0	3.0
Credit History	52.0	77.0	3,226	13.0	5,064	816.0	0.0	9,248	52.0
Collateral	12.0	27.0	484.0	4.0	1,811	291.0	0.0	2,629	12.0
Insufficient Cash	4.0	9.0	240.0	2.0	482.0	103.0	0.0	840.0	4.0
Unverifiable Information	3.0	22.0	215.0	1.0	456.0	67.0	0.0	764.0	3.0
Credit Application Incomplete	8.0	31.0	475.0	4.0	1,053	260.0	0.0	1,831	8.0
Mortgage Insurance Denied	0.0	1.0	21.0	0.0	34.0	6.0	0.0	62.0	0.0
Other	4.0	28.0	460.0	6.0	970.0	159.0	0.0	1,627	4.0
Missing	44.0	177.0	3,935	42.0	6,338	686.0	40.0	11,262	683.0
Total	170.0	552.0	10,936	83.0	19,682	2,856	40.0	34,319	170.0
% Missing	25.9%	32.1%	36.0%	50.6%	32.2%	24.0%	100.0%	32.8%	683.0%

Denial Rates by Gender of Applicant State of Mississippi 2008–2017 HMDA Data									
Year	Male	Female	Not Available	Not Applicable	Average				
2008	18.4%	26.2%	38.3%	70.8%	21.4%				
2009	17.4%	22.3%	36.3%	0.0%	19.4%				
2010	18.1%	22.0%	46.4%	20.0%	20.1%				
2011	16.7%	21.6%	49.9%	20.0%	19.1%				
2012	15.9%	21.2%	41.2%	25.0%	17.8%				
2013	16.6%	20.5%	32.4%	20.0%	18.1%				
2014	15.2%	17.9%	32.0%	33.3%	16.4%				
2015	13.5%	16.7%	32.4%	0.0%	14.9%				
2016	12.7%	16.8%	26.6%	22.2%	14.4%				
2017	11.4%	14.1%	30.9%	0.0%	12.9%				
Average	15.3%	19.6%	35.5%	31.4%	17.2%				

	Loan Applications by Selected Action Taken by Gender of Applicant State of Mississippi 2008–2017 HMDA Data											
Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
	Originated	12,074	10,435	9,122	8,771	9,852	10,901	11,113	12,488	14,062	15,325	114,143
Male	Denied	2,717	2,204	2,010	1,764	1,859	2,177	1,996	1,951	2,049	1,964	20,691
	Denial Rate	18.4%	17.4%	18.1%	16.7%	15.9%	16.6%	15.2%	13.5%	12.7%	11.4%	15.3%
	Originated	4,770	4,451	4,044	3,742	3,892	4,261	4,418	5,057	6,213	7,058	47,906
Female	Denied	1,694	1,274	1,142	1,032	1,045	1,097	963.0	1,014	1,251	1,160	11,672
	Denial Rate	26.2%	22.3%	22.0%	21.6%	21.2%	20.5%	17.9%	16.7%	16.8%	14.1%	19.6%
	Originated	438.0	305.0	252.0	217.0	161.0	275.0	282.0	353.0	548.0	642.0	3,473
Not Available	Denied	272.0	174.0	218.0	216.0	113.0	132.0	133.0	169.0	199.0	287.0	1,913
Available	Denial Rate	38.3%	36.3%	46.4%	49.9%	41.2%	32.4%	32.0%	32.4%	26.6%	30.9%	35.5%
	Originated	14.0	6.0	4.0	4.0	6.0	4.0	4.0	4.0	7.0	41.0	94.0
Not Applicable	Denied	34.0	0.0	1.0	1.0	2.0	1.0	2.0	0.0	2.0	0.0	43.0
Applicable	Denial Rate	70.8%	0.0%	20.0%	20.0%	25.0%	20.0%	33.3%	0.0%	22.2%	0.0%	31.4%
	Originated	17,296	15,197	13,422	12,734	13,911	15,441	15,817	17,902	20,830	23,066	165,616
Total	Denied	4,717	3,652	3,371	3,013	3,019	3,407	3,094	3,134	3,501	3,411	34,319
	Denial Rate	21.4%	19.4%	20.1%	19.1%	17.8%	18.1%	16.4%	14.9%	14.4%	12.9%	17.2%

Denial Rates by Income of Applicant State of Mississippi 2008–2017 HMDA Data											
Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	42.7%	35.7%	35.3%	34.4%	34.0%	38.3%	38.0%	34.2%	31.9%	30.9%	35.8%
\$30,001-\$50,000	23.4%	20.6%	21.0%	20.2%	19.4%	20.3%	17.8%	16.8%	16.8%	14.9%	19.0%
\$50,001-\$75,000	17.1%	15.4%	15.8%	14.7%	15.4%	15.2%	14.0%	13.2%	12.7%	11.2%	14.2%
\$75,001-\$100,000	13.9%	12.9%	12.6%	13.2%	12.1%	11.2%	10.5%	9.6%	9.2%	8.9%	11.1%
\$100,001_\$150,000	11.4%	9.4%	10.9%	10.7%	10.6%	10.6%	8.8%	8.7%	7.5%	7.5%	9.3%
Above \$150,000	10.6%	7.8%	10.7%	10.1%	7.6%	7.7%	9.5%	8.0%	7.1%	6.8%	8.4%
Data Missing	26.4%	25.0%	43.3%	46.7%	22.2%	29.1%	30.9%	22.2%	25.4%	23.0%	29.3%
Total	21.4%	19.4%	20.1%	19.1%	17.8%	18.1%	16.4%	14.9%	14.4%	12.9%	17.2%

		Loan Ap	plication	s by Inco			: Origina	ted and	Denied			
				า	State of Mi 008–2017 F							
Income		2008	2009	2010	2017	2012	2013	2014	2015	2016	2017	Total
	Loan Originated	1,792	1,946	1,908	1,579	1,576	1,409	1,269	1,341	1,639	1,555	16,014
\$30,000	Application Denied	1,337	1,082	1.041	829.0	812.0	876.0	777.0	698.0	766.0	696.0	8,914
or Below	Denial Rate	42.7%	35.7%	35.3%	34.4%	34.0%	38.3%	38.0%	34.2%	31.9%	30.9%	35.8%
	Loan Originated	5,023	4,922	4,098	3,723	4,006	4,228	4,264	4,940	5,735	6.110	47,049
\$30,001	Application Denied	1,534	1,280	1,087	942.0	964.0	1,074	924.0	994.0	1,158	1,071	11,028
-\$50,000	Denial Rate	23.4%	20.6%	21.0%	20.2%	19.4%	20.3%	17.8%	16.8%	16.8%	14.9%	19.0%
	Loan Originated	4,694	3,931	3,398	3,263	3,529	4,106	4,222	4,794	5,855	6,549	44,341
\$50,001 -\$75,000	Application Denied	970.0	716.0	636.0	563.0	641.0	735.0	688.0	728.0	849.0	824.0	7,350
-\$75,000	Denial Rate	17.1%	15.4%	15.8%	14.7%	15.4%	15.2%	14.0%	13.2%	12.7%	11.2%	14.2%
\$75,001	Loan Originated	2,678	1,984	1,799	1,769	2,032	2,434	2,594	2,842	3,265	3,839	25,236
-	Application Denied	433.0	295.0	259.0	270.0	280.0	307.0	305.0	303.0	329.0	373.0	3,154
\$100, 000	Denial Rate	13.9%	12.9%	12.6%	13.2%	12.1%	11.2%	10.5%	9.6%	9.2%	8.9%	11.1%
<b>.</b>	Loan Originated	1,884	1,416	1,327	1,384	1,640	1,853	2,134	2,399	2,698	3,122	19,857
\$100,001 -150,000	Application Denied	242.0	147.0	163.0	166.0	194.0	219.0	205.0	228.0	218.0	254.0	2,036
-150,000	Denial Rate	11.4%	9.4%	10.9%	10.7%	10.6%	10.6%	8.8%	8.7%	7.5%	7.5%	9.3%
	Loan Originated	991.0	806.0	770.0	847.0	953.0	1,172	1,175	1,362	1,426	1,650	11,152
Above \$150,000	Application Denied	117.0	68.0	92.0	95.0	78.0	98.0	124.0	119.0	109.0	121.0	1,021
\$150,000	Denial Rate	10.6%	7.8%	10.7%	10.1%	7.6%	7.7%	9.5%	8.0%	7.1%	6.8%	8.4%
Data	Loan Originated	234.0	192.0	122.0	169.0	175.0	239.0	159.0	224.0	212.0	241.0	1,967
Data Missing	Application Denied	84.0	64.0	93.0	148.0	50.0	98.0	71.0	64.0	72.0	72.0	816.0
missing	Denial Rate	26.4%	25.0%	43.3%	46.7%	22.2%	29.1%	30.9%	22.2%	25.4%	23.0%	29.3%
	Loan Originated	17,296	15,197	13,422	12,734	13,911	15,441	15,817	17,902	20,830	23,066	165,616
Total	Application Denied	4,717	3,652	3,371	3,013	3,019	3,407	3,094	3,134	3,501	3,411	34,319
	Denial Rate	21.4%	19.4%	20.1%	19.1%	17.8%	<b>18.1%</b>	16.4%	14.9%	14.4%	12.9%	17.2%

Denial Rates of Loans by Race/Ethnicity and Income of Applicant State of Mississippi 2008–2017 HMDA Data								
Race	\$30,000 or Below	\$30,001 - \$50,000	\$50,001 \$75,000	\$75,001 -\$100,000	\$100,001 \$150,000	> \$150,000	Data Missing	Average
American Indian	46.8%	31.8%	31.9%	13.6%	18.3%	19.0%	64.3%	29.5%
Asian	39.5%	18.9%	17.2%	13.7%	9.8%	8.5%	47.4%	18.9%
Black	43.9%	26.2%	21.5%	19.2%	18.0%	18.7%	56.2%	27.9%
Pacific Islander	48.3%	31.6%	14.1%	7.0%	9.7%	14.3%	50.0%	23.4%
White	28.7%	15.3%	11.6%	9.1%	7.7%	7.1%	20.2%	13.3%
Not Available	65.2%	40.0%	28.4%	22.8%	19.4%	17.1%	75.7%	34.4%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	45.5%	43.0%
Average	35.8%	19.0	14.2%	11.1%	9.3%	8.4%	29.3%	17.2%
Non-Hispanic	37.3%	23.0	15.6%	12.1%	10.3%	16.0%	55.9%	21.4%
Hispanic	34.1%	18.0	13.5%	10.5%	8.7%	7.8%	24.6%	16.2%

	Loan Applicatior	is by Incom	Stat	e/Ethnicity te of Mississip -2017 HMDA I	pi · ·	nt: Originat	ed and Deni	ed	
Race		\$30,000 or Below	\$30,001 - \$50,000	\$50,001 \$75,000	\$75,001 -\$100,000	\$100,001 -\$150,000	> \$150,000	Data Missing	Total
	Loan Originated	42.0	105.0	92.0	70.0	58.0	34.0	5.0	406.0
American Indian	Application Denied	37.0	49.0	43.0	11.0	13.0	8.0	9.0	170.0
	Denial Rate	46.8%	31.8%	31.9%	13.6%	18.3%	19.0%	64.3%	29.5%
	Loan Originated	253.0	650.0	573.0	327.0	267.0	290.0	10.0	2,370
Asian	Application Denied	165.0	151.0	119.0	52.0	29.0	27.0	9.0	552.0
	Denial Rate	39.5%	18.9%	17.2%	13.7%	9.8%	8.55	47.4%	18.9%
	Loan Originated	4,746	10,417	7,471	3,041	1,772	683.0	169.0	28,299
Black	Application Denied	3,712	3,695	2,042	724.0	389.0	157.0	217.0	10,936
	Denial Rate	43.9%	26.2%	21.5%	19.2%	18.0%	18.7%	56.2%	23.4%
	Loan Originated	31.0	67.0	79.0	53.0	28.0	12.0	1.0	271.0
Pacific Islander	Application Denied	29.0	31.0	13.0	4.0	3.0	2.0	1.0	83.0
	Denial Rate	48.3%	31.6%	14.1%	7.0%	9.7%	14.3%	50.0%	23.4%
	Loan Originated	10,559	34,536	34,579	20,782	16,927	9,688	1,699	128,770
White	Application Denied	4,252	6,255	4,522	2,079	1,408	735.0	431.0	19,682
	Denial Rate	28.7%	15.3%	11.6%	9.1%	7.7%	7.1%	20.2%	13.3%
	Loan Originated	383.0	1,273	1,544	962.0	805.0	445.0	35.0	5,447
Not Available	Application Denied	719.0	847.0	611.0	284.0	194.0	92.0	109.0	2,856
	Denial Rate	65.2%	40.0%	28.4%	22.8%	19.4%	17.1%	75.7%	34.4%
	Loan Originated	0.0	1.0	3.0	1.0	0.0	0.0	48.0	53.0
Not Applicable	Application Denied	0.0	0.0	0.0	0.0	0.0	0.0	40.0	40.0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	45.5%	43.0%
	Loan Originated	16,014	47,049	44,341	25,236	19,857	11,152	1,967	165,616
Total	Application Denied	8,914	11,028	7,350	3,154	2,036	1,021	816.0	34,319
	Denial Rate	35.8%	19.0%	14.2%	11.1%	9.3%	8.4%	29.3	17.2%
	Loan Originated	391.0	1,010	833.0	340.0	262.0	126.0	15.0	2,977
Hispanic	Application Denied	233.0	302.0	154.0	47.0	30.0	24.0	19.0	809.0
	Denial Rate	37.3%	23.0%	15.6%	12.1%	10.3%	16.0%	55.9%	21.4%
	Loan Originated	15,231	44,772	41,923	23,893	18,767	10,584	1,856	157,026
· · · · · · · · · · · · · · · · · · ·	Application Denied	7,882	9,831	6,544	2,802	1,799	896.0	604.0	30,358
	Denial Rate	34.1%	18.0%	13.5%	10.5%	8.7%	7.8%	24.6%	16.2%

Rates of HALs by Income of Borrower State of Mississippi 2008–2017 HMDA Data											
Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
\$30,000 or Below	23.0%	14.2%	3.1%	4.1%	5.3%	3.6%	3.3%	2.2%	1.8%	3.2%	7.3%
\$30,001-\$50,000	15.8%	8.9%	1.2%	1.9%	2.7%	2.0%	1.2%	1.0%	0.9%	0.9%	4.2%
\$50,001-\$75,000	13.5%	9.8%	1.4%	1.7%	2.2%	1.4%	1.3%	0.9%	0.8%	0.8%	3.7%
\$75,001-\$100,000	13.3%	10.7%	2.1%	1.5%	1.9%	1.6%	1.1%	1.0%	0.4%	0.8%	3.6%
\$100,00-150,000	14.4%	12.5%	1.3%	2.2%	2.1%	1.3%	1.2%	0.8%	0.8%	0.5%	3.7%
Above \$150,000	20.2%	19.7%	1.4%	1.9%	1.8%	2.1%	1.1%	1.3%	0.6%	0.5%	4.9%
Data Missing	12.8%	13.5%	0.0%	1.2%	1.7%	1.7%	0.6%	1.3%	0.5%	0.0%	3.6%
Average	15.6%	11.0%	1.7%	2.1%	2.6%	1.8%	1.4%	1.1%	0.8%	0.9%	3.8%

			Loans b	y HAL S				f Borrow	er			
						Mississipp 7 HMDA Da						
Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
	HAL	4.0	1.0	0.0	0.0	0.0	1.0	0.0	1.0	0.0	0.0	7.0
American Indian	Other	32.0	20.0	14.0	33.0	34.0	46.0	39.0	33.0	61.0	87.0	312.0
mulan	Percent HAL	11.1%	4.8%	0.0%	0.0%	0.0%	2.1%	0.0%	2.9%	0.0%	0.0%	2.2%
	HAL	31.0	24.0	0.0	8.0	10.0	1.0	3.0	2.0	4.0	0.0	83.0
Asian	Other	179.0	197.0	180.0	191.0	178.0	238.0	226.0	234.0	307.0	357.0	1,930
	Percent HAL	14.8%	10.9%	0.0%	4.0%	5.3%	0.4%	1.3%	0.8%	1.3%	0.0%	4.1%
	HAL	627.0	286.0	67.0	69.0	117.0	75.0	61.0	57.0	69.0	100.0	1,428
Black	Other	2,288	2,317	2,373	1,985	1,964	2,328	2,576	2,991	3,744	4,205	22,566
	Percent HAL	21.5%	11.0%	2.7%	3.4%	5.6%	3.1%	2.3%	1.9%	1.8%	2.3%	6.0%
D	HAL	4.0	6.0	2.0	0.0	0.0	0.0	1.0	0.0	1.0	0.0	14.0
Pacific Islander	Other	26.0	21.0	22.0	24.0	18.0	23.0	22.0	24.0	37.0	40.0	217.0
ISIdificel	Percent HAL	13.3%	22.2%	8.3%	0.0%	0.0%	0.0%	4.3%	0.0%	2.6%	0.0%	6.1%
	HAL	1,956	1,334	152.0	189.0	236.0	204.0	149.0	129.0	92.0	115.0	4,441
White	Other	11,377	10,485	10,209	9,875	11,083	12,133	12,273	13,855	15,737	17,187	107,027
	Percent HAL	14.7%	11.3%	1.5%	1.9%	2.1%	1.7%	1.2%	0.9%	0.6%	0.7%	4.0%
	HAL	80.0	23.0	2.0	1.0	1.0	4.0	0.0	0.0	3.0	1.0	114.0
Not Available	Other	678.0	477.0	397.0	355.0	264.0	384.0	463.0	573.0	772.0	969.0	22,566
Available	Percent HAL	10.6%	4.6%	0.5%	0.3%	0.4%	1.0%	0.0%	0.0%	0.4%	0.1%	2.5%
	HAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Not Applicable	Other	14.0	6.0	4.0	4.0	6.0	4.0	4.0	3.0	3.0	5.0	48.0
Applicable	Percent HAL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	HAL	2,702	1,674	223.0	267.0	364.0	285.0	214.0	189.0	169.0	216.0	6,303
Total	Other	14,594	13,523	13,199	12,467	13,547	15,156	15,603	17,713	20,661	22,850	159,313
	Percent HAL	15.6%	11.0%	1.7%	2.1%	2.6%	1.8%	1.4%	1.1%	0.8%	0.9%	3.8%
	HAL	37.0	26.0	2.0	4.0	6.0	3.0	6.0	6.0	7.0	4.0	2,290
Hispanic	Other	217.0	178.0	180.0	176.0	204.0	217.0	286.0	362.0	470.0	586.0	97.0
	Percent HAL	14.6%	12.7%	1.1%	2.2%	2.9%	1.4%	2.1%	1.6%	1.5%	0.7%	4.1%
	HAL	2,587	1.622	220.0	258.0	351.0	278.0	205.0	183.0	159.0	211.0	129,595
Non-	Other	13,668	12,816	12,615	11,950	13,078	14,529	14,823	16,716	19,400	21,357	5,863
Hispanic	Percent HAL	15.9%	11.2%	1.7%	2.1%	2.6%	1.9%	1.4%	1.1%	0.8%	1.0%	4.3%

	Loans by HAL Status by Income of Borrower State of Mississippi 2008–2016 HMDA Data											
Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
	HAL	413.0	277.0	60.0	65.0	83.0	51.0	42.0	29.0	29.0	50.0	1,049
\$30,000	Other	1,379	1,669	1,848	1,514	1,493	1,358	1,227	1,312	1,610	1,505	13,410
or Below	Percent HAL	23.0%	14.2%	3.1%	4.1%	5.3%	3.6%	3.3%	2.2%	1.8%	3.2%	7.3%
<b>\$00.004</b>	HAL	795.0	438.0	51.0	71.0	110.0	83.0	51.0	51.0	51.0	55.0	1,701
\$30,001 -\$50,000	Other	4,228	4,484	4,047	3,652	3,896	4,145	4,213	4,889	5,684	6,055	39,238
-\$30,000	Percent HAL	15.8%	8.9%	1.2%	1.9%	2.7%	2.0%	1.2%	1.0%	0.9%	0.9%	4.2%
A.5.0.004	HAL	636.0	385.0	46.0	56.0	79.0	58.0	53.0	42.0	47.0	55.0	1,402
\$50,001 \$75,000	Other	4,058	3,546	3,352	3,207	3,450	4,048	4,169	4,752	5,808	6,494	36,390
-\$75,000	Percent HAL	13.5%	9.8%	1.4%	1.7%	2.2%	1.4%	1.3%	0.9%	0.8%	0.8%	3.7%
\$75,001	HAL	356.0	212.0	38.0	27.0	38.0	39.0	28.0	28.0	12.0	30.0	778.0
_	Other	2,322	1,772	1,761	1,742	1,994	2,395	2,566	2,814	3,253	3,809	20,619
\$100,000	Percent HAL	13.3%	10.7%	2.1%	1.5%	1.9%	1.6%	1.1%	1.0%	0.4%	0.8%	3.6%
<b>A</b> 4 9 9 9 9 4	HAL	272.0	177.0	17.0	30.0	34.0	25.0	26.0	18.0	21.0	17.0	620.0
\$100,001 -150.000	Other	1,612	1,239	1,310	1,354	1,606	1,828	2,108	2,381	2,677	3,105	16,115
-150,000	Percent HAL	14.4%	12.5%	1.3%	2.2%	2.1%	1.3%	1.2%	0.8%	0.8%	0.5%	3.7%
	HAL	200.0	159.0	11.0	16.0	17.0	25.0	13.0	18.0	8.0	9.0	467.0
Above \$150.000	Other	791.0	647.0	759.0	831.0	936.0	1,147	1,162	1,344	1,418	1,641	9,035
\$100,000	Percent HAL	20.2%	19.7%	1.4%	1.9%	1.8%	2.1%	1.1%	1.3%	0.6%	0.5%	4.9%
	HAL	30.0	26.0	0.0	2.0	3.0	4.0	1.0	3.0	1.0	0.0	70.0
Data Missing	Other	204.0	166.0	122.0	167.0	172.0	235.0	158.0	221.0	211.0	241.0	1,897
missing	Percent HAL	12.8%	13.5%	0.0%	1.2%	1.7%	1.7%	0.6%	1.3%	0.5%	0.0%	3.6%
	Other	2,702	1,674	223.0	267.0	364.0	285.0	214.0	189.0	169.0	216.0	6,303
Total	HAL	14,594	13,523	13,199	12,467	13,547	15,156	15,603	17,713	20,661	22,850	159,313
	Percent HAL	15.6%	11.0%	1.7%	<b>2.1%</b>	2.6%	1.8%	1.4%	1.1%	0.8%	0.9%	3.8%

## **Socially Disadvantaged Homeowners**

Outreach to socially disadvantaged homeowners will be a priority with materials and resources provided to streamline their involvement with the Program. For purposes of the Program, "socially disadvantaged individuals" are those who have been subjected to racial or ethnic prejudice or cultural bias because of their identity as a member of a group without regard to their individual qualities. For purposes of the Program, the following individuals are considered socially disadvantaged if they self-identify as such: Black Americans, Hispanic Americans, Native Americans, and Asian Americans and Pacific Islanders.

Based on Census data, Mississippi homeowners include socially disadvantaged individuals. Through self-attestation and demographic information collected from the Program application, MHC will target and prioritize assistance for socially disadvantaged homeowners who have experienced a COVID-19 hardship. Comparing householder data to the current race and ethnic demographics illustrates the statewide potential of socially disadvantaged populations.

Did MHC communicate with mortgage servicers regarding the development of its program design?
☑ Yes
□ No

Did MHC communicate with other HAF participants regarding the development of its program design? I yes

 $\Box No$ 

Community Engagement

Has MHC 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 - see below.
□ No

Provider Name	Provider Address	Provider Website	Provider Primarily Serves LMI Households	Provider Addresses Impacts of Housing Discrimination
North MS Rural Legal Services	5 County Rd. 1014 Oxford, MS 38655	www.nmrls.com	Yes	Yes
D&E, A Housing and Economic Empowerment Center	416 Marion Ave McComb, MS 39648	www.depower.org	Yes	Yes
MS Faith Based Coalition for Community Renewal	1770 Ellis Ave St. 205 Jackson, MS 39204	www.msfbc.com	Yes	Yes

## Has MHC requested and received input regarding its HAF planning process from community- based organizations that serve potentially eligible homeowners? ⊠ Yes - see below.

 $\Box No$ 

Organization Name	Organization Address	Organization Website	Organization Primarily Serves LMI Households	Organization Addresses Impacts of Housing Discrimination
HEED Housing Education and Economic Development	3405 Medgar Evers Blvd. Jackson, MS 39213	www.heedhousing.org	Yes	Yes
MS Center for Justice	5 Old River Pl. Ste. 203 Jackson, MS 39202	www.mscenterforjustice.org	Yes	Yes

Mississippi Home Corporation has engaged in meetings and conference calls with housing counseling agencies, legal service providers and servicers to receive feedback on the plan and the applicants to be served. We have reached out to neighboring State Agencies (Alabama and Louisiana) with affordable housing programs and have requested delinquency and forbearance information from their master servicers. These state agencies participating in MHC down payment assistance programs. This informed MHC's decisions on the best ways to utilize the housing counselors to assist applicants, particularly since Mississippi is a largely rural and low-income state. Further, MHC's engagement in its Hardest Hit Fund Home Saver Program ("HHF Program") informed its decisions on plan development and the ways to quickly provide assistance to homeowners in need. In addition, MHC staff have participated regularly in calls with the Housing Policy Council, which includes many of the largest servicers in the country, to discuss the best way to assist homeowners as efficiently as possible, as well as ways to implement consistent programs across the country.

Mississippi feedback from these groups included the following suggestions, which were incorporated into the Plan:

- Allow assistance for second position liens for reinstatement and monthly payments.
- Allow the qualification of owned mobile homes for applicants who do not own the land.
- Accept private sector lenders.
- Keep Program options and documentation simple to avoid onerous documentation requirements.
- Ensure that language used will allow ineligible individuals to determine they do not qualify.
- Utilize the Common Data File

# Has MHC consulted with localities or tribal governments in its jurisdiction regarding the needs of eligible homeowners in its jurisdiction?

Yes - see below.

 $\Box No$ 

MHC has contacted the Mississippi Band of Choctaw Indians (the "Tribe"), which is a grantee recipient of the HAF program. MHC is coordinating with the Tribe for those homeowners whose reinstatement amount exceeds \$3000 of the Tribe's program guidelines.

# Has MHC provided an opportunity for public input requesting its HAF Plan through public hearings or published materials?

X Yes

 $\Box No$ 

Does MHC 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?

 $\boxtimes$  Yes  $\Box$  No

MHC will update its assessment of community needs within the year to determine whether its Program design should be updated, by utilizing additional data from mortgage servicers regarding foreclosures and delinquencies as well as information from utility providers to determine if utility assistance should be a component of the Program. Additionally, as the Program is further developed and implemented, MHC intends to continue to engage the community, focusing on the homeowners directly.

### **Program Design**

#### **Overall Program Objectives**.

The Program's overall objectives are as follows:

- To implement a statewide program that will provide mortgage relief and a chance of sustained homeownership to Mississippi's most vulnerable homeowners who have encountered financial hardship due to the pandemic and who are without other loss mitigation options.
- To prioritize assistance to socially disadvantaged groups who are historically the most vulnerable homeowners and who have been negatively impacted from the pandemic.
- To establish an application process that will provide eligible homeowners with a streamlined and effective method for receiving assistance, especially those in most dire financial need.

MHC will offer the following program design elements:

⊠ Mortgage payment assistance.

 $\boxtimes$  Financial assistance to allow a homeowner to reinstate a mortgage or to pay other housingrelated costs related to a period of forbearance, delinquency, or default.

Payment assistance for homeowner's insurance, flood insurance, and mortgage assistance.

Payment assistance for homeowner's association fees or liens, condominium association fees, or common charges.

Payment assistance for down payment assistance loans provided by nonprofit or government entities; and

⊠ Payment assistance for delinquency property taxes to prevent homeowner tax foreclosures.

See attached Program Term Sheet.

Does MHC anticipate adding additional program design elements to this HAF Plan within one year of submission?

□ Yes ⊠ No

## **Documentation of 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 MHC allow income to be determined in this way?

🛛 Yes

 $\Box No$ 

Mississippi Home Corporation anticipates permitting a fact-specific proxy for household income in instances, to be defined by MHC, including location within low-income zip code. Attestations will be required for hardship type and certifications will be required for income. We acknowledge that loan servicers may have other income documentation requirements for a loan reinstatement or modification, separate from the HAF program guidelines.

Under the HAF guidance, HAF participants may provide waivers or exceptions to this documentation requirement as reasonably necessary to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic, or a lack of technological access by homeowners; in these cases, the HAF participant is still responsible for making the required determination regarding household income and documenting that determination. Will the Participant allow applicants to request such waivers or exceptions?

□ No

## **Eligible Mortgage Types**

⊠ First Mortgages

Second Mortgages

□ Reverse Mortgages (Home Equity Conversion Mortgages, Single-Purpose Reverse Mortgages, or Proprietary Reverse Mortgages)

☑ Loans Secured by Manufactured Housing (secured by a real estate or a dwelling)

 $\boxtimes$  Contracts for Deed or Land Contract (if it's a credit transaction secured by a consensual security interest in the dwelling)

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## **Methods for Targeting HAF Resources**

MHC is prioritizing assistance, including reaching and serving socially disadvantaged individuals. As explained previously, individuals who self-identify as Black Americans, Hispanic Americans, Native Americans, and Asian Americans and Pacific Islanders are considered socially disadvantaged individuals for purposes of the Program. To avoid exacerbating existing disparities, MHC will make a direct and concerted effort to reach and serve socially disadvantaged individuals. These efforts will include providing community outreach, forming partnerships with housing counseling agencies and community partners and conducting targeted marketing and outreach strategies through MHC's marketing vendor, which has experience in reaching socially disadvantaged individuals.

## Marketing Strategies

## 1. Press Release

Following the Facebook live a Press Release will be sent out to the statewide media list (roughly 300 media personnel & stations) detailing the program and summarizing the Facebook live. The same press release will then go out to the necessary MailChimp lists. The press release and fb live will come the day the program application is opened.

## 2. Social Media

Social media platforms will be heavily utilized during the entirety of the program. We will run targeted campaigns to underserved communities and specifically target low-income counties throughout the state. This means we will go in and select those specific counties deemed racially and ethnically concentrated areas of poverty and make a targeted effort to advertise in those areas—this will make those ads show up on citizens who live or travel through those areas' devices.

- 3. Radio Ads -- this includes low-income targeted areas as well as minority radio stations.
- 4. Television Ads
- 5. News Appearances
- 6. Print/digital Media
- 7. Targeting of religious institutions, WIN Job Centers, food pantries, civil rights organizations, school districts, community and state colleges and other entities, specifically in low-income areas.

The goal is to provide these institutions with "messaging packets" (marketing material) in the form of:

- o Flyers
- Posters
- o Emails
- Other tangible items

It is important to note that many of MHC's advertising methods will be ongoing and continuous. These methods will contain but are not limited to:

- Social media Platforms
  - Specifically targeted advertising designated regions as well as the whole state.
- Google Ads
- Print/Digital Media Stories
- News Appearances
- TV Ads
- Radio Advertising
- Tangible Advertising in Targeted areas, organizations, and institutions
  - o Flyers
  - Posters
  - o Emails
  - o Mail-outs

We will be modeling our marketing efforts based off our ERA-RAMP outreach, which has been extremely successful. It will be done in phases deemed necessary based upon demand.

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.

## **Public Communications**

Will MHC 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?

 $\boxtimes$  Yes  $\square$  No

If yes, please indicate whether the public communications campaign will include communications that primarily target the following populations:

- $\boxtimes$  Homeowners earning less than 100% of area median income
- $\boxtimes$  member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society.
- $\boxtimes$  resident of a majority-minority Census tract.
- $\boxtimes$  resident of a U.S. territory, Indian reservation, or Hawaiian Homeland.
- $\boxtimes$  homeowners that reside in persistent poverty counties.
- $\boxtimes$  individual with limited English proficiency.

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# Please indicate in which languages, in addition to English, public communications to targeted populations will be undertaken:

- $\boxtimes$  Spanish
- □ Chinese
- $\boxtimes$  Vietnamese
- □ Korean
- $\Box$  Tagalog
- □ Russian
- $\Box$  Arabic
- □ Haitian Creole
- □ other\_\_\_\_\_

Will MHC 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

 $\Box$  No

## Outreach

Will MHC 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

□ No

If yes, please indicate whether the community outreach efforts will include partnerships with organizations that primarily target the following populations:

- $\boxtimes$  member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society:
- $\boxtimes$  resident of a majority-minority Census tract.
- ⊠resident of a U.S. territory, Indian reservation, or Hawaiian Homeland.
- $\boxtimes$  homeowners that reside in persistent poverty counties.

 $\boxtimes$  individual with limited English proficiency.

# Please indicate in which languages, in addition to English, community outreach efforts to targeted populations will be undertaken:

 $\boxtimes$  Spanish

□ Chinese	
🖾 Vietnamese	
□ Korean	
□ Tagalog	
□ Russian	
□ Arabic	
Haitian Creole	
□ other	

Housing Counseling and Legal Services

Will the Participant facilitate access for eligible households to housing counseling or legal services?

Yes Yes

 $\square$  No

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 Impacts of Housing Discrimination
Mississippi for Community Development	110 Yazoo Ave. Ste. 225 Clarksdale, MS 38614		Yes	Yes
Hancock Resource Center	454 Highway 90, Ste. B Waveland, MS 39576	www.hancockrc.org	Yes	Yes
MS Faith Based Coalition	1770 Ellis Ave. Ste 205 Jackson, MS 39204	www.msfbc.com	Yes	Yes
D&E, A Housing and Economic Empowerment Center	416 Marion Ave. McComb, MS 39648	www.depower.org	Yes	Yes
HEED Housing Education and Economic	3405 Medgar Evers Blvd. Jackson, MS 39202	www.heedhousing.org	Yes	Yes

Voice of Calvary Ministries	531 W. Capitol St. Jackson, MS 39203	www.vocm.org	Yes	Yes
Mississippi Housing Partnership	1217 N. West St. Jackson, MS 39202	www.mshousingpartnership.org	Yes	Yes
Mercy Housing and Human Development	1135 Ford St. Gulfport, MS 39507	www.mhhd.org	Yes	Yes

The role of housing counseling agencies under the HAF program focus to intake, application processing and triage, although foreclosure prevention counseling may include a range of activities depending on the client's financial situation and the severity of the mortgage delinquency. Housing counseling agencies may choose to have certain staff members dedicated to intake with more experienced staff members completing applications and facilitating communication with the Servicer. Trained counselors will work with each homeowner to complete an individualized application to address the homeowner's particular needs, and the counselor will complete an action plan assessing mortgage sustainability, loss mitigation options, and other counseling services needed.

As mentioned previously, housing counselors will provide intake to determine applicant vulnerability for sustainability. Housing counselors will work with applicants and provide their existing knowledge of available relief to understand what loss mitigation options may be available to homeowners. The Housing Counselor will work with applicants upfront and provide information of various options available for a sustainable mortgage. MHC has provided a welcome letter in the HAF application that include "Know Your Options" as it relates to receiving HAF funds and loss mitigation options.

### **Targeting Specific Groups of Homeowners**

## Will MHC conduct outreach specifically tailored to target potentially eligible households that?

- A have mortgage or mortgage assistance contracts held or backed by MHC.
- $\boxtimes$  have mortgage backed by any of the following agencies.
- Federal Housing Administration, Department of Veterans Affairs; U.S. Department of Agricultural. ⊠ have privately held mortgages.

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

- $\boxtimes$  Spanish
- $\Box$  Chinese
- $\Box$  Vietnamese
- □ Korean

- □ Tagalog
- $\square$  Russian
- $\Box$  Arabic
- □ Haitian Creole
- □ other\_\_\_\_\_

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

🛛 Yes

 $\Box$  No

## **Performance Goals**

MHC will collect the following metrics as key performance indicators to track the progress and success of the HAF Program.

- MHC will measure performance by evaluating the following:
- The number of households served and the dollar amount by which the assistance reduced mortgage loan delinquency, assisted homeowners to exit forbearance plans, and fully reinstated previously delinquent mortgage loans.
- The number and percentage of applicants that receive assistance through the Program (versus the number and percentage denied assistance).
- The number of households who are no longer in the Program and reach an alternative outcome or program completion/transition.

MHC's goals include preventing 800 home losses the first twelve (12) months of the program.

MHC will continuously monitor and audit this program to identify and implement incremental improvements. Frequency of these periodic qualitative assessments will occur quarterly or as required by Treasury. MHC will continue to engage in feedback to meet the evolving needs of homeowners and servicers. MHC is committed to transparency and will provide Program information and updates through a public-facing website.

Further, the development of the Program implements best practices established through the numerous state programs operated by MHC and the current programs funded through the Emergency Rental Assistance funds. Additionally, MHC is an active participant in national groups such as National Council of State Housing Agencies (NCSHA) and Council of State Community Development Agencies (COSCDA), which allows for exposure to and review of other states' best practices. MHC will continue to take part in brainstorming, discussion and feedback sessions with other state housing agencies. MHC will implement a set of internal controls that will aid in increased effectiveness and efficiency of program administration, provide reliable financial reporting, and help ensure compliance with all applicable laws and regulations. These quality controls to ensure program integrity include a 100% review of all declined applications and a review of 10% of total application volume MHC staff are familiar with detection of fraud and adherence to Program regulations.

## **Readiness**

### **Staffing, Systems and Contractors**

Does the Participant anticipate needing to hire additional staff to implement this HAF Plan?  $\boxtimes$  Yes

 $\Box$  No

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

 $\boxtimes$  Yes

 $\Box$  No

Does the Participant have policies or procedures that govern the implementation of each HAF program design element described in this HAF Plan?

 $\boxtimes$  Yes

 $\Box No$ 

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

 $\boxtimes$  Yes

 $\Box No$ 

If yes, has the documentation for that pre-existing program been adapted to HAF requirements (please answer yes if the pre-existing program already complied with HAF program requirements)?

 $\boxtimes$  Yes

 $\Box$  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? X Yes

 $\Box No$ 

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

 $\boxtimes$  Yes

 $\Box$  No

## Staffing

In order to develop and operate a program of this size and scope, certain systems and staffing structures are needed. MHC is actively assessing and anticipating those systems and staffing structures to ensure a sustainable infrastructure for the life of the Program. MHC has existing staff, with extensive experience in the Hardest Hit Fund mortgage prevention program, who will support the Program administration as part of an integrated management approach to provide comprehensive oversight and management of the Program. Plans will be made to develop and increase staff positions to meet additional needs should they arise.

Anticipated needs include:

- Management.
- Departmental staff.
- Financial processing.
- Compliance staff and legal counsel; and
- Outside partners including housing counseling agencies and application processors.

## Systems

For effective Program delivery, MHC will utilize a public-facing website and housing counseling agencies. Homeowners will complete applications online. Assistance will be available through the support of local partners and counseling agencies. Ongoing and regular compliance processes will be handled through existing internal compliance departments. Policies, procedures, and internal controls will be developed, and the necessary internal audits performed. The legality of all processes and policies will be ensured through engagement of MHC's outside general counsel.

## **Contracts and Part**nerships

Contracts and partnerships will be utilized to ensure the success of the HAF Program and will play a critical role. MHC will utilize the Common Data File to communicate with lenders/servicers and lenders/servicers will execute a HAF Partner Agreement. Program partner requirements for private non-mortgage lenders include providing a delinquency quote, contact information, and ACH account information. AmeriNat's services are utilized for underwriting decisions for applications.

## **Applicant Intake and Eligibility Review – Housing Counseling Agencies**

MHC will contract with housing counseling agencies serving various communities across Mississippi. Services provided will include assisting applicants complete the online application, reviewing the application for completeness, reviewing documents supplied by the client for appropriateness, making a recommendation to MHC on client eligibility for funding, and staying in touch with clients who have received funding to ensure they remain in compliance with the requirements.

## **Use of Initial Payment**

What amount of the HAF funds that MHC has received been disbursed to eligible homeowners? MHC has used \$633,133.73 for reinstatement to eligible homeowners.

## How much of the HAF funds that MHC has reviewed been obligated? 0

Has MHC begun accepting applications from homeowners for any HAF-funded programs?  $\boxtimes$  Yes  $\square$  No

If yes:

How many households have applied for HAF assistance? 2225

How many households has MHC provided with assistance using HAF funds? 125

How many households has MHC provided with housing counseling or legal funds 0

HAF Pilot program has been utilized to help homeowners for reinstatement and 3 months of ongoing payments. HAF funds has been used to support organizational expenses associated with administering the HAF Pilot Program.

## **Budget**

#### **Budgeting of HAF Funds by Program Design Element**

Specify the amounts of HAF funds that MHC proposes to allocate to each of the following program design elements:

#### Amount \$72,281,675.00

\$72,281,675.00

Mortgage Payment Assistance and Mortgage Reinstatement

Mortgage Reinstatement

Payment Assistance for Homeowner's Insurance

Payment Assistance HOA fees or liens

Payment Assistance for Down Payment Assistance Loans

Payment Assistance for Delinquent Property Taxes

Subtotal:

(Enter sum of amounts entered)

Specify MHC's allocations for the following:

Counseling Services

Legal Services

If MHC is seeking reimbursement for any previous expenses, please specify the expenses and amounts below, providing sufficient detail for Treasury to determine whether the expense is within the definition of "qualified expenses" in the HAF guidance:

Expense Type:

If MHC proposes to use HAF funds for administrative expenses, please specify the proposed expense and amounts below, providing sufficient detail for Treasury to determine whether the expense is within the definition of "qualified expense" in the HAF guidance:

Expense Type:

Subtotal: \$72,281,675.00

## **Points of Contact**

Primary Contact Name: Tina Jones Agency/Office: Mississippi Home Corporation E-mail: <u>tina.jones@mshc.com</u> Phone Number: 601-718-4678 Reporting Contact: Same

Additional Contact Name: Lisa Coleman Agency/Office: Mississippi Home Corporation E-mail: Lisa.Coleman@mshc.com Phone Number: 601-718-4757

## **Authorized Official Information**

Authorized Official Name: Tina Jones

Authorized Official's Email Address: Tina.Jones@mshc.com

Authorized Official's Title: VP of Homeowner Preservation