

# **United States Department of the Treasury**

## **Homeowner Assistance Fund Plan Submitted by Oregon Housing and Community Services**

HAF Grantee Plan Name  
**HAFP-0210**

# United States Department of the Treasury

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

Allocation Amount	\$5 Million or Greater
Submission Date	12/22/2021 4:42 PM
Total Plan Requested Amount	\$90,927,920.00
Record Type	State
Application Record	<a href="#">SLT-0080</a>
HAF Grantee Plan Status (external)	Approved

# Homeowner Needs and Community Engagement

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## **What Quantitative Data Has Informed the Participant's Planning?**

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

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

**Yes**

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

**US Treasury – Treasury provided data, contributed by a number of federal agencies, including information on mortgage delinquencies and forbearances, breakdowns by demographic factor, and concentration among mortgage servicers.**

**Atlanta Fed – Data supplied by the Atlanta Fed, including forbearance, foreclosure, and delinquency data. The Oregon Needs Analysis only used the forbearance data from this source in the analysis.**

**CoreLogic – CoreLogic is a mortgage data company that collects data on mortgages including delinquencies and foreclosures. Foreclosure and delinquency data were used from this source.**

**HUD -Data comes from the CHAS dataset which is data collected from the American Community Survey that is configured for HUD. Cost Burden and income data in the Needs Analysis come from the CHAS. Tables 1,8, and 9 were used. Table 1 collects information on race and income level by tenure. Table 8 collects information on cost burden and income level by tenure. Table 9 collects information on cost burden and race by tenure.**

**Mortgage Servicer and Investor Data – Oregon obtained sample data from several mortgage servicers and an investor related to Oregon mortgages, forbearances, covid hardships, delinquencies, foreclosures, and demographics.**

**Oregon Foreclosure Avoidance Program Data – Oregon reviewed data of homeowners that are in pre-foreclosure status as determined by servicers that are required to participate in this state-run program.**

**Sheriff's Data – Oregon continues to review foreclosure sale notices posted on the Sheriff's Sale website as required under Oregon law.**

**Property Tax Delinquency and Foreclosure Data – Oregon reviewed a sampling of property tax delinquencies and county foreclosure actions obtained from a title company and court filings.**

**Community Based Organizations, Housing Counselors, NCSHA, and Housing Attorneys – Oregon contacted, individually and in groups, housing advocates, a DOJ attorney, and foreclosure attorneys to ground truth data**

In its HAF planning process, has the Participant obtained and reviewed quantitative data or studies regarding which demographic segments in its jurisdiction have historically experienced discrimination in the housing or housing finance market?

**Yes**

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

**Each of the resources cited in the above answer, plus:**

**The Joint Centers for Housing Studies. (2021). The State of the Nation's Housing.**

**<https://www.jchs.harvard.edu/state-nations-housing-2021>. This report compiles and analyzes housing data at the national level to explain housing issues facing the country.**

**Oregon Housing and Community Services. (2021). Implementing a Regional Housing Analysis Methodology: Approach, Results, and Initial Recommendations. EcoNorthwest.**

**<https://www.oregon.gov/ohcs/about-us/Pages/housing-needs.aspx>. This report, commissioned by the Oregon Legislature, explores the regional needs for affordable and available housing across the state.**

**Community Based Organizations, Housing Counselors, NCSHA, and Housing Attorneys – Oregon contacted, individually and in groups, housing advocates, a DOJ attorney, and foreclosure attorneys to ground truth data obtained from other sources.**

**Resources and Targeting Tools – Oregon reviewed Oregon-specific data and resources as well as national information on the pandemic impacts, homeownership, reinstatement and assistance options, and targeting methodologies.**

**Data from the Census Bureau – Data on demographics comes from the American Community Survey (ACS). Tables B25003A-I from the 5-year estimates, 2015-2019, were used to collect racial demographic information for homeowners in Oregon.**

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

**Yes**

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

**Utility providers: no, Oregon determined there were other utility assistance options, that those were disbursed differently in a way that would cause confusion and administrative burdens with HAF, and decided not to begin with a utility assistance option. Therefore, we did not review utility data.**

**Tax data: Oregon obtained a report on property tax delinquencies statewide, which could not be broken out to residential or primary residence levels. Oregon also reviewed a sampling of property tax delinquencies (back to 2015 to gauge averages) and county foreclosure actions obtained from a title company and court filings to get an idea of volume and status (these could be better broken out to estimate residential and primary residence but without certainty). Data was useful for agency review but not reliable enough for inclusion in the needs analysis.**

In the following text box, please list any source not listed above of quantitative information, including sources of data on the performance of any of the Participant's previously implemented programs, that the Participant used to inform its HAF planning process, briefly describe how the data informed the Participant's planning.

**Hardest hit fund data: Oregon reviewed data from its HHF programs, including demographic data, and included some of that data in the HAF Plan. Oregon also reviewed reports on other states' HHF programs and spoke with other states on national and direct calls about HHF and Cares Act programs.**

Did the Participant communicate with mortgage servicers regarding the development of its program design?

**Yes**

Did the Participant communicate with other HAF participants regarding the development of its program design?

**Yes**

**How Has Community Engagement and Public Participation Informed the Participant's Planning?**

Treasury will assess the extent to which a Participant's assessment of homeowner needs has been informed by and reflects input from organizations and individuals representing eligible homeowners, including any opportunities for public participation in the development of the Participant's plan. Treasury will pay particular attention to the extent of the Participant's engagement with populations that are the subject of statutory targeting requirements.

Has the Participant requested and received input on its HAF planning process from providers of housing counseling services or providers of legal assistance to homeowners facing foreclosure or displacement?

**Yes**

**Provider information**

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

<b>Provider Name</b> <b>Provider Address</b> <b>Provider Website</b>	<b>Provider Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Legal Aid Services of Oregon</b> 520 SW 6th Avenue, Suite 700 ,Portland,Oregon 97204 <a href="https://lasoregon.org/">https://lasoregon.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Elemental Law</b> 7805 SW 40th Ave., #19025 ,Portland,Oregon 97280 <a href="https://elemental.law/">https://elemental.law/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Oregon Law Center</b> 520 SW 6th Avenue, Suite 700 ,Portland,Oregon 97204 <a href="https://oregonlawcenter.org/">https://oregonlawcenter.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Oregon DOJ, Consumer Protection</b> na ,Salem,Oregon 97301 <a href="https://www.doj.state.or.us/consumer-protection/">https://www.doj.state.or.us/consumer-protection/</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>17 Statewide Homeownership Centers providing housing counseling</b> Please see list of 17 on next tab ,Statewide,Oregon 97301 <a href="http://Conducted engagement through various age...">http://Conducted engagement through various age...</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

Yes

### Community Information

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

<b>Organization Name</b> <b>Organization Address</b> <b>Organization Website</b>	<b>Organization Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Condensed public meeting attendance list</b> Includes homeownership centers, governments, nonprofits, agencies, Salem, Oregon 97301 <a href="http://Please see upload next tab">http://Please see upload next tab</a>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Oregon Housing Alliance</b> Monthly HAF presentation to and feedback from homeownership workgroup Organization with nearly 100 nonprofit housing members, Salem, Oregon 97301 <a href="https://www.oregonhousingalliance.org/our-members/">https://www.oregonhousingalliance.org/our-members/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Governor's Racial Justice Council</b> HAF presentation and feedback across subcommittees, Salem, Oregon 97301 <a href="https://www.oregon.gov/gov/policy/racial-justic...">https://www.oregon.gov/gov/policy/racial-justic...</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Oregon Manufactured Housing Advisory Committee</b> Solicited program advice related to MH and chattel loans, Salem, Oregon 97301 <a href="http://none">http://none</a>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Yes**

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

**Yes**

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

**Oregon hosted virtual public meetings on June 17th and July 1st to discuss the HAF plan, Oregon housing data and needs analysis, to ground truth the data and needs analysis with stakeholders, and to review and receive comment on program planning. The video recordings were posted online with the slides. HAF introductions and updates were provided to at least three virtual, public housing council meetings and two OHCS housing partner calls, and the video recordings were posted. The council videos are accessible to persons with disabilities. Oregon's draft needs analysis, reinstatement program terms, and payment assistance program terms were posted, in English only, online, for comment for one week. Due to timing constraints, Oregon was unable to make the posting accessible to persons with disabilities or individuals without reliable internet access. Oregon did push the notice with document links out by the HAF constant contact and by direct email to foreclosure attorneys, a sampling of mortgage servicers,**

**the Oregon Bankers Association, NW Credit Union Assoc, Catholic Charities, Assoc of Oregon Counties, Oregon Assoc of Libraries, Oregon Realtors, Oregon Homebuilders, Oregon Mortgage Bankers Assoc, Immigrant and Refugee Comm Org, Consulate of Mexico, Hispanic Metro Chamber of Commerce, and every individual that registered to attend either HAF public meeting.**

## **How Will the Participant Continue to Assess the Needs of Eligible Homeowners?**

Treasury anticipates that an ongoing process of assessing the needs of eligible homeowners will help address the needs of potentially eligible homeowners as economic conditions change over time.

Does the Participant plan to update its assessment of community needs within the next year to determine whether its HAF program design should be updated to address changing needs of potentially eligible homeowners?

**Yes**

What additional data would be helpful to the Participant as it seeks to assess homeowner needs over time?

**Updates to the regular data compiled from various sources on homeowners in Oregon and nationally. In addition, if servicers or investors were able to provide disaggregated data on their borrowers in Oregon and nationally: changes in forbearance, reinstatement, loss mitigation, and foreclosure statistics to see what is working and what can be improved. It would be interesting to see the same data from each of the HAF participants, even if they are running slightly different programs. Data on nontraditional lending products: private mortgages, chattel loans, HUD-owned loans, land sale contracts, etc.**



# Program Design

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## **What are the Program Design Elements Through Which the Participant Will Deliver HAF Assistance to Eligible Homeowners?**

A program design element is a specific activity or program, which is consistent with a qualified expense category, under which a Participant will disburse HAF funds in accordance with the HAF Plan. Please note that multiple program design elements may fit under a single qualified expense category; for example, a mortgage assistance program that has different terms for federally backed mortgages and manufactured-home mortgages may constitute two separate program design elements, for which case the Participant provides a separate term sheet or other description for each program design element.

HAF participants must have at least one program design element intended to reduce mortgage delinquency among targeted populations. Treasury encourages HAF participants to consider program design elements that address homeownership preservation for targeted populations in areas where there is a sustained trend of increasing property taxes or utility costs, including for households that do not have mortgages.

Please identify each qualified expense category in which the Participant will offer a program design element by checking the boxes below.

- mortgage payment assistance
- mortgage principal reduction, including with respect to a second mortgage provided by a nonprofit or government entity
- payment assistance for homeowner's utilities, including electric, gas, home energy, and water
- payment assistance for homeowner's insurance, flood insurance, and mortgage insurance
- payment assistance for delinquent property taxes to prevent homeowner tax foreclosures
- payment assistance for down payment assistance loans provided by nonprofit or government entities
- financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default
- facilitating mortgage interest rate reductions
- payment assistance for homeowner's internet service, including broadband internet access service, as defined in 47 CFR 8.1(b)
- payment assistance for homeowner's association fees or liens, condominium association fees, or common charges
- measures to prevent homeowner displacement, such as home repairs to maintain the habitability of a home or assistance to enable households to receive clear title to their properties

For each program design element that the Participant will offer, the Participant is required to upload a term sheet or other description, that, at a minimum, provides the following information regarding that program design element. Term sheets for all of Participant's HAF programs may be uploaded together as one document.

<b>Title</b>	<b>Upload Date</b>
2021.09.29 HAF UST Reinstatement Prog Terms	9/30/2021 5:46 AM
2021.09.29 HAF UST Payment Asst Prog Terms	9/30/2021 5:46 AM
2021.09.29 HAF UST Plan	9/30/2021 12:37 PM
2021.12.22 HAF UST Payment Asst Prog Terms revised	12/22/2021 4:40 PM
HAF public meeting participants	9/30/2021 3:20 PM
2021.12.22 HAF UST Reinstatement Prog Terms revised	12/22/2021 4:40 PM
2021.12.22 Oregon HAF UST repsonse	12/22/2021 4:14 PM

A HAF participant may elect to revise its HAF Plan over time to add or subtract program design elements. Does the Participant anticipate adding additional program design elements to this HAF Plan within one year of this submission?

**No**

Treasury has provided sample term sheets to assist HAF participants in developing their HAF plans. Participants may use these sample term sheets, in whole or in part, as part of their submission. To the extent the Participant intends to structure the program differently with respect to significant program terms described in the Sample Term Sheets, Treasury will, in the course of its review of the HAF Plan, request a justification for how the alternate approach will further the objectives of the HAF, including targeting and prioritization requirements. In the chart below, the HAF Participant may provide a justification for significant deviations from the terms described in the sample term sheets upon initial submittal. (optional for initial submission)

<b>Program Design Element</b>	<b>Deviation from sample terms</b>	<b>Justification</b>

<p>Prioritizing FHA, VA, USDA, and revenue bond borrowers</p>	<p>Oregon is not prioritizing these borrowers unless they fall within a different Oregon priority, such as being at-risk of foreclosure, SDI, rural, low income (see HAF Plan pp. 23 &amp; 18-20)</p>	<ul style="list-style-type: none"> <li>• Oregon is not prioritizing applications to homeowners who have Federal Housing Administration (FHA), Department of Veterans Affairs (VA), or U.S. Department of Agriculture (USDA) mortgages or homeowners who have mortgages made with the proceeds of mortgage revenue bonds or other mortgage programs that target low- and moderate-income borrowers. Oregon understands targeting these loans would identify income-eligible borrowers. However, these borrowers also have the greatest number of investor forbearance, reinstatement, and loss mitigation options so, as a category of borrowers, they are less at risk of foreclosure and displacement. If these borrowers fall into one of Oregon’s other priority categories, such as active foreclosure, they will be prioritized. Further, Oregon is not precluding these borrowers from applying and receiving assistance. We feel that this decision furthers the Treasury guidance and sample terms’ goal of not replacing other available loss mitigation resources. Where there is potential conflict between this priority encouragement and Treasury’s desire to supplement – not replace – other loss mitigation, we decided this approach furthers the objectives of HAF and will still prioritize those borrowers if there are no other loss mitigation options (placing them in the at-risk of foreclosure priority category).</li> </ul>
<p>Reservation of funds for rural homeowners</p>	<p>While not a deviation, it is an addition to reserve a proportionate amount for assistance to rural Oregon homeowners</p>	<ul style="list-style-type: none"> <li>• Oregon’s intention to reserve proportionate program funds for rural homeowners does not deviate from Treasury guidance or sample terms, which are silent on the rural assistance prioritization. However, the Treasury guidance encourages focus on rural communities through prioritizing USDA loans and in crafting targeting and performance goals. Oregon believes this reservation of assistance, described as a prioritization category in the program terms, furthers the objectives of HAF</li> </ul>

<p>Payment of certain attorney fees, collection costs, charges not actually paid</p>	<p>Treasury’s sample terms permit (“may” but not “shall”) payment of “reasonably required legal fees” and property charges. Oregon’s terms take the inverse approach, excluding attorney fees, collection costs, and charges not actually paid to third parties without authorization under the program manuals.</p>	<p>For pandemic-impacted borrowers, Oregon’s foreclosure moratorium prohibited not only foreclosures but the assessment of late fees and other charges, which implies that legal or collections costs would not be warranted. Therefore, Oregon plans to craft manuals that more specifically lay out when certain fees, legal fees, or collection fees were “reasonably required” and will be paid. Oregon may also make exceptions where this rule increases the risk of foreclosure to an otherwise qualified borrower. Oregon believes this furthers the purpose of the statement in Treasury’s sample terms while allowing Oregon to determine how that statement is placed into practice.</p>
<p>Designating certain unoccupied (vacant) properties eligible</p>	<p>By Oregon's reading, providing assistance for a property that is not currently occupied as a borrower’s primary residence is allowed under the guidance and sample terms. Both Treasury guidance and the sample terms limit assistance to a homeowner’s primary residence. The Treasury’s payment assistance sample terms expressly define “primary residence” to include “a dwelling to be made habitable so it may serve as the homeowner’s primary residence.” This definition focuses on the homeowner’s intention rather than the current status of the property. Oregon’s interpretation is not prohibited elsewhere: the definition if mortgage is tied to the definition of dwelling, which “means any building, structure, or portion thereof that is occupied as, or designed or intended for occupancy as, a residence by one or more individuals.” (emphasis added). Again, current occupancy is not a requirement if the intention is for the property to be a homeowner’s primary residence.</p>	<p>In Oregon vacant and abandoned land or homes are ineligible unless the vacancy is because of a physical hazard event, casualty loss, or natural disaster. This provision shifts relevant properties into the eligible category. But in order for the vacant property (or unit) to be eligible, Oregon requires that – at the time of mortgage origination and homeowner displacement – the property was the homeowner’s primary residence. Oregon’s program terms categorize second home, vacation homes, and investment property that is not a primary residence as ineligible property. The program terms will further clarify how to make these determinations when the triggering events have occurred. This will help Oregon meet homeowner needs identified in the planning process.</p>

<p>Fast tracking applications for homeowners displaced by natural disasters</p>	<p>While not a deviation, within each of the other categories of applicants and prioritizations, Oregon plans to fast track applicants who experienced both a qualifying coronavirus pandemic-related financial hardship and loss or displacement from their homes because of natural disasters</p>	<p>We feel this furthers the objectives of HAF – as these homeowners are otherwise qualified – and meets an urgent and ongoing Oregon homeowner need that was raised repeatedly in our stakeholder and public outreach. Oregon’s “prioritization” by fast tracking homeowners displaced as a result of natural disaster within each other prioritization category or within the general pool of applicants. This is a narrower category of borrowers than in the first change: just those displaced as a result of natural disasters. OHCS believes fast tracking these borrowers is appropriate given the circumstances, the borrower need, and the strong advocacy and support we received in the stakeholder and public engagement phases of HAF program development. For these reasons, we believe these deviations from other states – but not Treasury guidance or the sample terms, which are silent – furthers both HAF and Oregon homeowners assistance objectives.</p>
<p>Reinstatement requirement to exhaust other loss mitigation options</p>	<p>The sample terms state that HAF funds will only be used to supplement other loss mitigation options or where they are essential for a homeowner to qualify for the other loss mitigation options. Oregon did not include this requirement in its reinstatement terms .</p>	<p>Oregon law and CFPB rule require servicers to reach out to borrowers that self-identified coronavirus hardships (and sometimes those that did not) about resolution options. Oregon does plan to ask the applicant to attest that they have sought servicer loss mitigation options but does not plan to require proof of application or a denial notice. Instead, Oregon has included language in its terms encouraging servicers and other recipients to negotiate funding gap resolutions with servicer loss mitigation options. In addition, Oregon’s servicer collaboration agreements encourage servicers to work with borrowers on funding gap resolutions and other loss mitigation options. We believe this meets the intended Treasury goal using an alternative method.</p>

<p>Requirement to exhaust all forbearance options (payment assistance)</p>	<p>Sample payment assistance terms require borrowers to exhaust all other forbearance options first.</p>	<p>Oregon will not require borrowers to exhaust all other forbearance options. We received feedback that to do so may unnecessarily increase arrears. We also learned that some servicers are requesting and granting forbearances beyond the covid forbearances. If traditional forbearance options are limited under loan terms, this program rule would require borrowers to use up all possible forbearance options for the loan. It could also cause servicers to term limit forbearance options with unintended consequences for other borrowers. In addition, the Stabilization Track of the Forward Payment Assistance Program does not require an ongoing financial hardship so such a requirement would preclude assistance. Finally, practically, Oregon’s Forward Payment Assistance Program will open nearly two years after the hardship date when most borrowers will have exhausted their other forbearance options. Oregon believes this deviation is reasonable to operate the Stabilization Track (see HAF Plan pp.25-26) and in light of the circumstances and tailored program terms.</p>
<p>Income eligibility in Oregon's payment assistance program</p>	<p>Treasury sets general eligibility at or below 150% AMI or 100% US median, but with a requirement to provide 60% to 100% AMI or below, or 100% US median or below. This implies the programs should follow the same or similar approach.</p>	<ul style="list-style-type: none"> <li>• Oregon constrained eligibility for this program to homeowners with income at or below 100% AMI for two main reasons. First, it will help ensure Oregon meets the Treasury requirement of providing 60% of assistance to homeowners at this income level, doing so in a more administratively feasible way. Second, we believe low-income homeowners have a greater need for payment assistance because they are more likely to be adversely cost burdened and because unemployed or underemployed homeowners will have lower incomes by virtue of their change in income from pre-pandemic levels.</li> </ul>

<p>Payment assistance requirement of a continuing hardship</p>	<p>In addition to a continuing hardship track of the payment assistance program, Oregon proposes to operate a stabilization track for Eligible Homeowners that do not qualify for the Hardship Track may qualify for the Stabilization Track to increase long-term housing stability. OHCS will not exceed three months of payment assistance, not to exceed a total of \$3,750 per household. To qualify for this track, households must be cost burdened by paying more than 35% of their household income toward housing (Eligible Costs). There is no requirement of a continuing hardship. Please see the HAF Plan pp.25-26.</p>	<p>Oregon’s needs analysis and stakeholder and public engagement directly influenced the design of the stabilization track, which also further the HAF objectives. Low-income borrowers that are cost burdened will have limited servicer loss mitigation options. For some borrowers, housing cost burden will be the result of a job change or income loss and may constitute a pandemic-related qualifying financial hardship. For borrowers that were cost burdened prior to the pandemic, suffered a qualifying hardship, but do not have an ongoing hardship, the Stabilization Track will help increase their housing and financial stability, pay down other debt, or rebuild emergency savings. Further, if borrowers qualify for this track, they will qualify for Oregon's reinstatement program even if they cannot afford their mortgages due to the cost burden. For this tailored track, OHCS believes this deviation furthers the HAF objectives and it was strongly encouraged in Oregon’s needs analysis and engagement.</p>
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### Documentation of Homeowner Income

Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF only if they have incomes equal to or less than 150% of the area median income or 100% of the median income for the United States, whichever is greater. In addition, not less than 60% of amounts made available to each HAF participant must be used for qualified expenses that assist homeowners having incomes equal to or less than 100% of the area median income or equal to or less than 100% of the median income for the United States, whichever is greater. The HAF guidance describes permissible ways for HAF participants to determine homeowner income.

Under the HAF guidance, one permissible approach for determining income is for (1) the household to provide a written attestation as to household income and (2) the HAF participant to use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household’s geographic area. Will the Participant allow income to be determined in this way?

**Yes**

If yes, please describe the fact-specific proxy or proxies to be used for the income determination.

**Income demographics based upon geographical area, such as zip code or census tract as taken from one or more trusted sources. Income information based upon review and approval of other assistance programs, such as unemployment benefits (Oregon is investigating other benefits providers we might partner with). Oregon's program manuals will deal with these options and parameters of use of the proxies.**

Under the HAF guidance, HAF participants may provide waivers or exceptions to this documentation requirement as reasonably necessary to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic, or a lack of technological access by homeowners; in these cases,

the HAF participant is still responsible for making the required determination regarding household income and documenting that determination. Will the Participant allow applicants to request such waivers or exceptions?

Yes

## Eligible Mortgage Types

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

- First Mortgages
- Reverse Mortgages (Home Equity Conversion Mortgages, Single-Purposes Reverse Mortgages, or Proprietary Reverse Mortgages)
- Contracts for Deed or Land Contract (if it is a credit transaction secured by a consensual security interest in a dwelling)
- Second Mortgages
- Loans Secured by Manufactured Housing (secured by real estate or dwelling)

If the Participant excludes any of the forgoing mortgage types from one or more program design elements, explain the exclusion.

N/A

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

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

## Defining Socially Disadvantaged Individual

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

**Applicants will have an opportunity to disclose whether they are a SDI on the HAF application. OHCS will encourage our intake partners to explain SDI status and its role in HAF. In addition, Oregon plans to identify the indicators in the Treasury definition so that we may more broadly track those indicators. Oregon will also complete targeted outreach in those geographical areas and with SDI populations. Similar to the urban institute tool and rental assistance tools, Oregon developed a prioritization tool to evaluate applications based upon zip code and other fact-based data, including SDI data elements to help with overall application processing prioritization.**



## Public Communications

Will the Participant engage in a public communications campaign to raise awareness among targeted populations about the availability of HAF resources, in media such as television, newspapers, online media, or social media?

**Yes**

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

- Homeowners earning less than 100% of area median income
- member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- resident of a majority-minority Census tract; (3)
- resident of a U.S. territory, Indian reservation, or Hawaiian Home Land
- homeowners in persistent poverty counties;
- individual with limited English proficiency

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

**Spanish; Chinese; Vietnamese; Russian**

## Outreach

Will the Participant engage in outreach through partnerships with organizations that focus primarily on serving homeowners earning incomes below 100% of area median income or socially disadvantaged individuals and that have the capacity to engage targeted communities in a culturally and linguistically relevant manner to encourage the submission of applications for HAF resources from targeted populations?

**Yes**

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

- member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- resident of a majority-minority Census tract; (3) individual with limited English proficiency;
- resident of a U.S. territory, Indian reservation, or Hawaiian Home Land;
- homeowners that reside in persistent poverty counties;
- individual with limited English proficiency.

## Housing Counseling and Legal Services

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

Yes

If yes, please identify below the providers of housing counseling or legal services that have indicated to the Participant that they are willing and able to support homeowners receiving assistance under the Participant's HAF programs.

<b>Provider Name</b> <b>Provider Address</b> <b>Provider Website</b>	<b>Provider Primarily Serves LMI Households</b>	<b>Provider Addresses Impact of Housing Discrimination</b>
<b>Legal Aid Services of Oregon</b> 520 SW 6th Avenue, Suite 700 , Portland, Oregon 97204 <a href="https://lasoregon.org/">https://lasoregon.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Oregon Law Center</b> 520 SW Sixth Ave #700 , Portland, Oregon 97204 <a href="https://oregonlawhelp.org/">https://oregonlawhelp.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Elemental Law</b> 7805 SW 40th Ave., #19025 , Portland, Oregon 97280 <a href="https://elemental.law/">https://elemental.law/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Center for Nonprofit Legal Services</b> 225 W Main St. , Medford, Oregon 97501 <a href="https://cnpls.org/">https://cnpls.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Comm Connection of NE Oregon</b> 2802 Adams Avenue , La Grande, Oregon 97850 <a href="https://ccno.org/">https://ccno.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Dev NW</b> 528 Cottage Street NE, Suite 304 , Portland, Oregon 97301 <a href="https://www.devnw.org/">https://www.devnw.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>ACCESS</b> 3630 Aviation Way , Medford, Oregon 97504 <a href="https://www.accesshelps.org/">https://www.accesshelps.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>NAYA Family Center</b> 5135 NE Columbia Boulevard , Portland, Oregon 97218 <a href="https://nayapdx.org/about/contact/">https://nayapdx.org/about/contact/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>African American Alliance for Homeownership</b> 825 NE 20th Ave, Suite 225 , Portland, Oregon 97232 <a href="https://www.aaah.org/">https://www.aaah.org/</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<b>Hacienda</b> 6700 NE Killingsworth St. , Portland, Oregon 97218 <a href="https://haciendacdc.org/">https://haciendacdc.org/</a>	✓	✓
<b>Community Action Team</b> 125 North 17th Street , St Helens, Oregon 97051 <a href="https://www.cat-team.org/">https://www.cat-team.org/</a>	✓	✓
<b>Neighbor Impact</b> 2303 SW 1st Street , Redmond, Oregon 97756 <a href="https://www.neighborimpact.org/">https://www.neighborimpact.org/</a>	✓	✓
<b>Neighborworks Umpqua</b> 605 SE Kane St. , Roseburg, Oregon 97470 <a href="https://www.nwumpqua.org/">https://www.nwumpqua.org/</a>	✓	✓
<b>Comm Action Program of East Central Oregon</b> 721 SE 3rd St, Suite D , Pendleton, Oregon 97801 <a href="https://www.capeco-works.org/">https://www.capeco-works.org/</a>	✓	✓
<b>Columbia Cascade Housing Corp</b> 500 East 2nd street. , The Dalles, Oregon 97058 <a href="https://www.mid-columbiahousingauthority.org/">https://www.mid-columbiahousingauthority.org/</a>	✓	✓
<b>Community in Action</b> 915 SW 3rd Avenue , Ontario, Oregon 97914 <a href="https://communityinaction.info/">https://communityinaction.info/</a>	✓	✓
<b>Portland Comm Reinvestment Initiatives</b> 6329 NE Martin Luther King Jr. Blvd , Portland, Oregon 97211 <a href="http://pcrihome.org/">http://pcrihome.org/</a>	✓	✓
<b>Bienestar</b> 448 S. First Ave. Ste 100 , Hillsboro, Oregon 97123 <a href="https://www.bienestar-or.org/">https://www.bienestar-or.org/</a>	✓	✓
<b>Housing Authority of Yamhill County</b> 135 NE Dunn Place , McMinneville, Oregon 97128 <a href="https://www.hayc.org/">https://www.hayc.org/</a>	✓	✓
<b>Open Door Housing Works</b> 34420 SW Tualatin Valley Highway , Hillsboro, Oregon 97123 <a href="http://www.odhw.org/eng/">http://www.odhw.org/eng/</a>	✓	✓
<b>Klamath Housing Authority</b> 1445 Avalon St. , Klamath Falls, Oregon 97603 <a href="http://www.klamathhousing.org/">http://www.klamathhousing.org/</a>	✓	✓

### Targeting specific groups of homeowners

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

- ✓ have mortgages or mortgage assistance contracts held or backed by the Participant?

have mortgages backed by any of the following agencies: Federal Housing Administration; Department of Veterans Affairs; U.S. Department of Agriculture?

have privately held mortgages?

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

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

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

**Spanish; Chinese; Vietnamese; Russian**

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

**Yes**

## Performance Goals

Treasury will consider the goals and benchmarks the Participant proposes to use to measure the effectiveness of its programs, including whether those goals address the homeowner needs identified by the Participant, the extent to which the goals are disaggregated by key homeowner characteristics as appropriate for the jurisdiction, and whether they include a goal focused on reducing mortgage delinquency.

Please describe Participant's goals and benchmarks for each of its programs with the following program design elements.

<b>Program Design Element</b>	<b>Metric of Success</b>	<b>Goal</b>
Mortgage Reinstatement	Reduction in 90+ day delinquency rate	With other available options, reduce 2.6% to pre-pandemic average of 1%
Mortgage Reinstatement	Number of homeowners exiting forbearance into regular payments	Help 1,000 homeowners reinstate with HAF
Mortgage Payment Assistance	Avoid a foreclosure crisis	With other options, maintain near .4% statewide average after end of moratorium
Mortgage Payment Assistance	See reinstatement points	Same as reinstatement goals as complimentary program
Payment Assistance for Homeowner's Insurance	Will be administered as part of the reinstatement and payment asst programs	See reinstatement goals
Payment Assistance for Delinquent Property Taxes	Will be administered as part of the reinstatement and payment asst programs	See reinstatement goals
Mortgage Reinstatement	SDI homeownership rates	Maintain rate of SDI homeownership in Oregon
Payment Assistance for HOA fees or liens	Will be administered as part of the reinstatement and payment asst programs	See reinstatement goals
Payment Assistance for Down Payment Assist. Loans	Will be administered as part of the reinstatement and payment asst programs	See reinstatement goals

# Readiness

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## **Staffing, Systems and Contractors**

Treasury seeks information regarding the Participant's organizational capacity to implement its HAF Plan.

Does the Participant anticipate needing to hire additional staff to implement this HAF Plan?

**Yes**

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

**No**

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

**Yes**

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

**No**

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

**Yes**

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

**No**

## **Use of Initial Payment**

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

What amount of the HAF funds that the Participant has received been disbursed to eligible homeowners?

**\$0.00**

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

**Yes**

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

**\$0.00**

How many households have applied for HAF assistance?

**5**

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

**0**

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

**0**

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

**As of June 30, 2021 Oregon has used initial HAF funds for staff to complete stakeholder and public engagement, prepare a needs analysis and draft program terms for public comment, and to take steps to build capacity, research third-party contractors and partners, and to continue planning a pilot and main programs responsive to Oregon homeowner needs and feedback. Oregon's pilot opened November 30, 2021, which is phase one targeting the most at-risk homeowners, prior to the end of Oregon's foreclosure moratorium on December 31, 2021.**

# Budget

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

Specify the amounts of HAF funds that the Participant proposes to allocate to each of the following program design elements, if offered:

Measure	Amount
Mortgage Payment Assistance	\$23,481,376.00
Mortgage Principal Reduction	\$0.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$5,000,000.00
Payment Assistance for Delinquent Property Taxes	\$4,000,000.00
Mortgage Reinstatement	\$40,817,590.00
Facilitate Mortgage Interest Rate Reduction	\$0.00
Payment Assistance for Homeowner's Insurance	\$800,000.00
Payment Assistance for Down Payment Assist. Loans	\$1,500,000.00
Payment Assistance for Homeowners Utilities	\$0.00

### **Other measures to prevent homeowner displacement**

Measure	Amount
None expected with these programs	\$0.00

Displacement Prevention Sub-Total	<b>\$75,598,966.00</b>
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### **Counseling or Legal Services**

The Participant may allocate up to 5% of its HAF funds for counseling or educational efforts by housing counseling agencies approved by the Department of Housing and Urban Development or a tribal government, or legal services, target to households eligible to be served with funding from the HAF related to foreclosure prevention or displacement.



<b>Specify the Participant's allocations for the following</b>	<b>Amount</b>
Counseling or Educational Services	\$500,000.00
Legal Services	\$1,500,000.00

Services Sub-Total	<b>\$2,000,000.00</b>
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### Reimbursement of Funds Expended After January 21, 2020

As described in the HAF guidance, HAF funds may be used for reimbursement of certain expenses between January 21, 2020 and the date when the first HAF funds are disbursed by the HAF participant under the HAF for a qualified expense (with certain limitations, as set forth in the HAF guidance).

<b>Type of Expense</b>	<b>Amount</b>
None expected with these programs	\$0.00

Reimbursement Sub-Total	<b>\$0.00</b>
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### Allocation of Administrative Expenses

<b>Type of Expense</b>	<b>Amount</b>
Interstate travel (outreach clinics, seminars, etc.)	\$300,300.00
Program administration costs (third party data processing, customer service, IT, etc.)	\$3,675,129.00
Attorney General Legal Fees	\$20,000.00
Publicity and Publications (eg. marketing, outreach, documentation)	\$345,000.00
Professional services (interpretation, temporary workers)	\$225,000.00
Intake assistance (to extent not covered in counseling, education, and legal)	\$50,000.00
Personal Services (9 FT staff/benefits for 4 years and estimated indirect time allocations to HAF)	\$4,811,070.00
Telecommunications (staff phones) and services (phone conferencing), dues and subscriptions (software licenses, secure email, domain, efax), equipment	\$97,216.00
Office space, facilities, equipment, office expenses, taxes, expendable property, and indirect cost allocations to HAF	\$3,017,379.00
Agency Program Costs (lien and satisfaction recording fees)	\$787,860.00

Administrative Expenses Sub-Total	<b>\$13,328,954.00</b>
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<b>Total Plan Requested Amount</b>	<b>\$90,927,920.00</b>
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Amount Requested Confirmation:

**Yes**

# Contacts

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Please identify up to three contacts for the Participant- a primary contact, a designated point of contact for reporting, and an additional contact.

## Primary Contact

Name: **Ryan Vanden Brink**

Agency/Office: **Oregon Housing and Community Services**

Email: [ryan.vandenbrink@hcs.oregon.gov](mailto:ryan.vandenbrink@hcs.oregon.gov)

Phone Number: **9717203775**

## Reporting Contact

Name: **Heather Kessinger**

Agency/Office: **Oregon Housing and Community Services**

Email: [heather.kessinger@hcs.oregon.gov](mailto:heather.kessinger@hcs.oregon.gov)

Phone Number: **5039866725**

## Additional Contact

Name: **Cassandra Cooper**

Agency/Office: **Oregon Housing and Community Services**

Email: [cassandra.cooper@hcs.oregon.gov](mailto:cassandra.cooper@hcs.oregon.gov)

Phone Number: **5039866858**

## Proprietary or Otherwise Non-Public Information

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

**No**

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

## Title VI Assurances

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

Title	Upload Date
2021.09.30 OHCS HAF Title VI Assurance	9/30/2021 1:05 PM

# Official Certification

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I (the undersigned) certify that the information provided in the HAF submission is accurate and complete after reasonable inquiry of people, systems, and other information available to the HAF Participant. The HAF participant and I acknowledge that any materially false, fictitious, or fraudulent statement or representation (or concealment or omission of material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 U.S.C. § 1001 and also may subject me and HAF Participant to civil penalties and/or administrative remedies for false claims or otherwise, (including 31 U.S.C. §3729 et seq.). I am an authorized representative of HAF Participant with authority to make the above certifications and representations on behalf of the HAF Participant.

Name of HAF Participant:

**Oregon Housing and Community Services**

Name and Title of Certifying Official

Name: **Ryan Vanden Brink**

Title: **Assistant Director of Homeowner Assistance Programs**

Telephone: **9717203775**

Email: [ryan.vandenbrink@hcs.oregon.gov](mailto:ryan.vandenbrink@hcs.oregon.gov)