HAFP-0210-Oregon Housing and Community Services Treasury Feedback for Resubmission of Plan

Please revise the HAF plan by providing a response to the question(s).

Completeness

Your plan lists Ryan Vanden Brink as the Authorized Official, while the original application for HAF payments was signed by Caleb Yant. To ensure prompt payment upon approval, the Authorized Official needs to be the same as the signatory on the original application for HAF payments. If you need to establish a new authorized representative for HAF payments, a request should be submitted by email to HAF@treasury.gov.

Homeowner Needs and Community Engagement Data

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

Community Engagement and Public Participation

- Please describe any coordination you intend with Tribes or Tribal entities.
- Please provide an update indicating any public comments you have received since you submitted your HAF Plan, from which organization you received any such comment, and whether you have responded to the comments.

Ongoing Assessment of Homeowner Need

• No questions.

Program Design

- Please explain how the sources of data listed in the section on Homeowner Needs informed the Program Design Elements included in your plan.
- Will there be a method in your HAF program, early in the process of engaging with a household, to evaluate immediate threats to the housing stability of applicants, which may need to be addressed under an expedited or prioritized timeline (e.g. HOA liens, tax delinquencies, utility shut off)?
- Please describe how your program will utilize housing counselors or legal services to assist homeowners in evaluating loss mitigation options available for their mortgage. Your description should include:

- whether your program will connect homeowners with housing counseling or legal services early in the process.
- the role housing counseling or legal services providers will play in supporting homeowners' efforts at engaging in loss mitigation.
- How will your program leverage resources available through a loss mitigation process to benefit
 eligible homeowners and how will your program avoid using HAF funds in ways that duplicate
 relief that available loss mitigation options might provide?
- Please explain what steps, if any, your program will take to assist the homeowner in determining whether a HAF-resolution will result in a sustainable monthly payment?
- Are you anticipating increased winter home energy costs and their potential impact on the homeowners that HAF will serve?

Eligibility

- Please provide the rationale for establishing the following additional eligibility requirements specified in your plan, including how you determined these requirements will not create unnecessary barriers to participation by eligible homeowners:
 - No conviction in past 10 years for money laundering, fraud, or tax evasion.

Outreach

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

Prioritization

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

Performance Goals

- Please explain how you intend to communicate your progress towards performance to the public.
- Please indicate which three metrics will serve as the best indicators of the success of your program.
- Please indicate whether you intend to disaggregate metrics by income, race, gender, etc.
- Please consider including as an additional metric the number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of HAF funds to resolve the homeowner's defaults or delinquencies.

Readiness

- Please provide the most recent available information about your program's readiness, including staffing, contractors, etc..
- Is your program prepared to launch upon approval and, if not, by what date will you be ready to launch following approval?
- Please provide updated information about your progress in spending the initial 10% payment from your jurisdiction's full allocation and the status of any pilot assistance already offered or made available to homeowners.

Budget

- Your total allocation amount is \$90,927,920.00 Our records indicate that you have received an initial 10% payment of \$9,092,792.00, and that upon plan approval, you may draw up to \$81,845,128.00
 - The total budget in your draft HAF plan is for \$78,985,498.00. Please confirm your budget is correct, and that at this time, you wish to receive less than your remaining allocation. If necessary, please revise your budget, including the initial 10% that was paid in your initial payment.
- Your budget allocates \$13,328,954.00 to administrative expenses, which is greater than 15% of the amount you have requested, the maximum permitted under HAF guidance. Please adjust your administrative expense budget so that it falls within the 15% limit.