

Homeowner Assistance Fund Plan Summary of Public Comment

Wyoming's draft Homeowner Assistance Fund (HAF) Plan was released for public comment on August 23rd, 2021. A virtual Town Hall was held September 1st and written comments were accepted through September 3rd. Public comments and frequently asked questions are summarized below.

Comments

- 3,000-4,000 potential delinquent mortgages is a fair estimate of need in Wyoming.
- A \$15,000 maximum benefit per household is fair. Benefits should be paid to the servicer on behalf of the homeowner.
- Strong assurances and eligibility checks should be instituted to prevent fraud and misuse of funds.
- Electronic application materials and educational outreach to all stakeholders is encouraged.

Homeowner Questions

- *Will funds be available to assist with a down payment or purchase of a house or mobile home?*
 - Not at this time. The mortgage reinstatement program is designed to reinstate existing mortgages to prevent foreclosure and loss of housing. If funds remain available, additional programs may be considered.
- *Will assurances be made so the money is not misused and only goes to eligible individuals?*
 - Yes. Applications will require attestations, supporting documentation, and information from the servicer to determine eligibility. Payments will be made directly to servicers.
- *Will homeowners be eligible for ongoing payments for future mortgage payments?*
 - Not at this time. If funds remain available, additional programs may be considered.
- *Will funds be available to build more affordable, entry-level housing, both to rent and to own?*
 - No. Development of new housing stock is not a federally allowed HAF expense.
- *Are there other options available for homeowners that do not meet the income eligibility guidelines?*
 - The authorizing federal statute limits HAF assistance to homeowners with household income at or below 150% of area median income (AMI). Please contact Wyoming 2-1-1 <https://wy211.communityos.org/> for information on additional assistance that may be available in your community.

Servicer Questions

- *How will banks apply to receive Wyoming's HAF funds?*

- The federal homeowner assistance fund identifies homeowners as the fund beneficiaries. Homeowners will apply to the program individually. Applications will include a third party authorization allowing the servicer to release information about the homeowner's loan to the state in order to make an eligibility determination and to make payment. Banks will not be able to apply for HAF funds without the consent and participation of individual borrowers.
- *How will HAF funds be allocated across servicers?*
 - The federal homeowner assistance fund identifies homeowners as the fund beneficiaries. Homeowners will apply to the program individually and HAF funds will be awarded based on an eligibility determination for that individual homeowner. Funds will then be paid to the servicer on the homeowner's behalf.
- *Will homeowners and servicers be required to exhaust the loss mitigation waterfall before applying for HAF assistance?*
 - No. Homeowners and servicers are not required to conduct loss mitigation prior to using HAF funds. HAF funds may be used to avoid loss mitigation procedures, if appropriate.
- *Will this program be targeted to homeowners on forbearance?*
 - Homeowners currently on forbearance are eligible for the mortgage reinstatement program.
- *Will Wyoming use the common data file (CDF)?*
 - The common data file (CDF) was developed for use with the Hardest Hit Fund (HHF). Wyoming was not an HHF state, and has proposed using a modified CDF for the HAF program.
- *Will Wyoming use its own FTP site, or a servicer-owned site, for data sharing?*
 - A decision has not been made on if Wyoming will use only a state FTP site or also servicer-owned sites for data sharing.
- *How can servicers register for the program?*
 - Information on servicer registration is forthcoming.
- *Are there any reporting requirements for the servicers for HAF funds received?*
 - Treasury has not released reporting guidance for the HAF funds. Based on Wyoming's experience with the emergency rental assistance program, HAF and servicers should be prepared to report detailed information at the borrower level to the federal government for this program.