Valerie Sciacca

From: Tom Luzon <tom.luzon@fspcares.org>
Sent: Wednesday, June 23, 2021 12:24 PM
To: Homeowner Assistance
Cc: Tom Campbell; Steve Hess; Becky Hunt
Subject: Input on Proposed Homeowner Assistance Fund Plan

Hello,

Thank you for this opportunity.

To begin with, we think that the payment for agency services should be as close as possible to the formula used under the Mortgage Payment Protection (MPP) program.

Our comments about the plan for assistance focuses on "preventing homeowner displacement" primarily since the plan would already help cure defaults and
delinquencies upfront. But displacement can also occur after reinstatement if the homeowner is left burdened with COVID related financial issues which could
contribute to a recurring delinquency. Something we did see some of with the MPP program.

To further protect homeowners from displacement over the long run, we propose that the definition of "Qualified Expenses" be expanded to include expenses incurred
because of COVID related hardship that created a financial burden which threatens continued homeownership. The expenses would have been incurred since January 2020
as a result of a COVID created hardship, that was necessarily paid through the use of credit, whether a credit card or loan, where the date, the vendor, and the amount
can be documented.

Proposed expanded hardships would include:

- Food having to be purchased by borrowing.
- Utilities, *including internet access*, that are either passed due, gone to collection, or have been cut-off.
- Credit cards used to pay insurance premiums for homeowners, auto, health, or life insurance.
- Auto repairs that were paid by credit.
- Auto loan payments that are passed due or re-claim a re-possessed car.
- Tuition payments or job re-training payments paid by credit.
- Credit card payments paid by credit card.
- Collection accounts, charge offs, or judgments that were a result of expenses incurred due to COVID hardship.

If the homeowner could receive this type of assistance along with the mortgage assistance, all within the $35,000 cap, it would offer them a meaningful recovery and go a long
way towards preventing future displacement. Especially if there was a requirement to continue working with a counselor for three months, which the MPP payment plan would help
cover.

Additionally, this represents a unique approach that fulfills an existing need, which does not duplicate other assistance available, including utility assistance which tends to be
capped in other programs and based on a monthly bill.

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