

## Valerie Sciacca

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**From:** Parrish Little <Parrish.Little@htb.com>  
**Sent:** Wednesday, June 23, 2021 3:30 PM  
**To:** Homeowner Assistance  
**Subject:** Input on Proposed Homeowner Assistance Fund Plan

Please see below for comments on the HAF. Thank you.

1. Marketing: Banks would be a good group to enlist to help bring awareness to the HAF program. We could provide flyers to customers and signage in branch offices or at other sponsored events, but also include information in mailings to borrowers that are past due on their mortgage payments.
2. Program Design: You may experience a high level of fraud with the current design without requiring any third party documentation and only a presumption of meeting the income eligibility criteria based on location. We are aware of significant fraud attempts by individuals against the federal government as part of the PPP stimulus program and unemployment assistance as a result of no documentation requirements.
3. "Any amount not made available to homeowners earning below 100% AMI will be prioritized for socially disadvantaged individuals, those who have been subjected to racial or ethnic prejudices." I'm uncertain as to how the program administrator will determine those applicants that have been subjected to prejudices or if they are in a designated distressed census tract, but my assumption based on the wording would indicate the two are synonymous. There could be consumers that find out about the program late that are eligible, but are unable to meet this additional criteria (i.e., not subjected to prejudices).

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