

# Needs Assessment and Plan for the Homeowner Assistance Fund

Florida Department of Economic Opportunity

Approved by the United States Department of the Treasury on February 9, 2022

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# **Executive Summary**

The Homeowner Assistance Fund (HAF) was established under Section 3206 of the American Rescue Plan Act of 2021 and provides \$676,102,379 in financial assistance to Florida through the United States Department of the Treasury (Treasury). The purpose of the HAF is to mitigate financial hardships associated with the COVID-19 pandemic by preventing homeowners' mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacement. The Florida Department of Economic Opportunity (DEO or the Department) has been designated to manage and operate the HAF on behalf of the state of Florida.

In accordance with Treasury's Homeowner Assistance Fund Guidance (the Treasury Guidance), which was issued on April 14, 2021 and revised on August 2, 2021, DEO has developed this Needs Assessment and Plan (Plan). Under the Treasury Guidance, eligible HAF participants must (a) own a one to four-unit residence that is their primary residence, (b) have experienced a financial hardship after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date), and (c) have incomes that are less than or equal to 150 percent of the area median income (AMI) or 100 percent of the median income in the United States, whichever is greater. At least 60 percent of the HAF funds must be used to assist recipients whose incomes are less than or equal to 100 percent of HAF funds towards recipients whose incomes are less than or equal to 100 percent of the AMI. For any HAF program funds not used for recipients whose incomes are less than or equal to 100 percent of the AMI, Treasury requires the prioritization of funds to Socially Disadvantaged Individuals<sup>1</sup> (as defined in the Treasury Guidance). View the HAF and Treasury Guidance.

There are an estimated 7.7 million homeowners in Florida across numerous market segments. They include homeowners with mortgages that are in forbearance or are delinquent and homeowners with and without mortgages who may be delinquent on or have difficulty paying their property taxes, homeowner and flood insurance, or utilities.

Florida's approach to administering HAF financial assistance will help homeowners become current on their mortgages and remain in their homes by focusing on reducing the burden required to receive assistance and to distribute payments in an impactful manner. DEO plans on using data analytics on publicly-available data sets, as well as those provided by private industry partners, to focus on prioritizing HAF resources to homeowners meeting income requirements and Socially Disadvantaged Individuals (as defined in the Treasury Guidance). To that end, this Plan outlines the homeownership landscape in Florida, estimates the impact that the Coronavirus pandemic has had on homeowners, and describes relief programs designed to avoid foreclosure and/or displacement of low- and moderate-income and Socially Disadvantaged Individuals.

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<sup>&</sup>lt;sup>1</sup> "Socially Disadvantaged Individual" means an individual who (i) identifies as Black American, Hispanic American, Asian American or Native American (*i.e.*, Alaska Native, Native Hawaiian, or an enrolled member of a Federally or State recognized Indian Tribe); (ii) has limited English proficiency; (iii) is a resident of a majority-minority Census tract; or (iv) lives in a persistent-poverty county (*i.e.*, a county that has had 20% or more of its population living in poverty over the past 30 years as measured by the three most recent decennial censuses). If the individual who is applying for the HAF Program attests that he or she is a "socially disadvantaged individual" pursuant to clause (i) or (ii) or DEO verifies that the household qualifies pursuant to clause (iii) or (iv), then the household will qualify for "Socially Disadvantaged Individual" targeting.

### Introduction

### Overview

On March 1, 2020, the Florida Department of Health announced there were two presumptive positive cases of COVID-19 in Florida.<sup>2</sup> Soon after, Governor Ron DeSantis declared a public health emergency in the state of Florida and took measures to protect Floridians.

Throughout the Spring of 2020, like the rest of the nation, the public health emergency led to significant impacts on Florida's health system and economy. For millions of Floridians, the pandemic's impact resulted in working from home, but for many, the closure of non-essential businesses and stay-at-home orders meant temporary reduction or loss of income, and in some cases, long-term unemployment. The pandemic's impact on job loss, as well as the pace of the ongoing recovery, has varied across Economic Development Districts (EDDs), industry, and demographics.

### Department of Economic Opportunity

DEO assists Governor DeSantis in working with the Florida Legislature, state agencies, business leaders, and economic development professionals to formulate and implement coherent and consistent policies and strategies designed to promote economic opportunities for all Floridians. DEO advances Florida's economy by championing the state's economic development vision and by administering state and federal programs and initiatives to help visitors, citizens, businesses, and communities. DEO works with private, public, and not-for-profit partners to create safe, healthy, and affordable housing opportunities for all Floridians. DEO also ensures that the state's goals and policies relating to economic development, workforce development, community planning and development, and affordable housing are fully integrated with appropriate implementation strategies.

DEO's duties include, but are not limited to:

- Managing housing and community renewal programs in the state, including the HAF;
- Managing the activities of public-private partnerships and state agencies in order to avoid duplication and promote coordinated and consistent implementation of programs in areas including tourism; international trade and investment; business recruitment, creation, retention, and expansion; minority and small business development; rural community development; commercialization of products, services, or ideas developed in public universities or other public institutions; and the development and promotion of professional and amateur sporting events;
- Developing a statewide five-year strategic plan to address the promotion of business formation, expansion, recruitment, and retention in order to create jobs; and
- Promoting viable, sustainable communities by providing technical assistance and guidance on growth and development issues, grants, and other assistance to local communities.

In order to carry out DEO's mission, there are five divisions within DEO, including the Division of Community Development (which is overseeing the HAF), the Division of Strategic Business Development, the Division of Workforce Services, the Division of Finance and Administration, and the Division of Information Technology. The Department works closely with other state agencies, public-private partnerships, local governments, and quasi-governmental organizations to carry out its mission. Florida Housing Finance Corporation, the state's housing finance agency charged with administering

<sup>&</sup>lt;sup>2</sup> Department of Health (http://www.floridahealth.gov)

state and federal resources to provide affordable homeownership and rental housing options for the citizens of Florida, has supported DEO in development of the HAF plan.

The Treasury supplied a preliminary data template to Florida to facilitate planning and budgeting for utilizing the provided Homeowner Assistance Funds. This data indicated that Florida had 928,620 active mortgage loans in the state of which 4.6 percent were in forbearance. According to recent publications from Black Knight, Inc., a mortgage data provider, and the Mortgage Bankers Association, it is estimated that, on average, homeowners in forbearance have been in forbearance for 12 months. In order for the Plan to assist the mortgagee with reinstatement and assist with future escrow obligations of insurance and taxes, the Plan includes prospective financial support.

Although approximately 43,000 homeowners are in forbearance, it is estimated that not all will agree to participate in the programs under the Plan or provide the required documents and information.

# **Best Practices and Coordination with Other HAF Participants**

DEO is well positioned to quickly and efficiently launch the HAF program. The Department is experienced in designing and implementing programs quickly and effectively, targeting those most in need based on household circumstances and geography, and is particularly well suited for designing programs to be responsive to the need at hand. This has occurred with respect to housing solutions provided after natural disasters like recent hurricanes and economic disasters, including the Great Recession. The Department has vast experience delivering grant and forgivable loan programs to Floridians through other federal and state housing programs, including HUD's CDBG programs, and more than half a dozen annually funded state programs. Best practices for program administration have been gleaned from previous program experiences, as well as housing finance agencies across the nation.

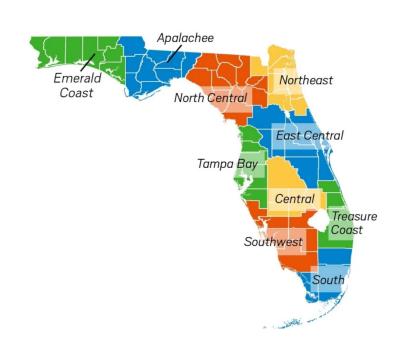
Program expertise sharing occurs regularly across state agencies with regard to multiple design elements for the HAF program. Coordination and collaboration have been vital to DEO's planning process. The National Council of State Housing Agencies (NCSHA) has provided a useful convening platform with weekly calls to think through some of the complexities found in addressing the demands of the program. DEO dedicated staff time to ensure representation at the NCSHA HAF meetings, at which states shared program design ideas, discussed compliance requirements, and collaborated to build strong programs and outreach efforts. The ideas shared and questions posed at these meetings helped inform DEO's program design and targeted outreach strategies, which are reflected in this plan. DEO will continue attending meetings with other state agencies held through NCSHA and on a regional basis as program design and implementation progress.

In addition to partnering with other states, DEO engages a variety of partners across the state on a regular basis. The strength of these partnerships will help ensure the success of the HAF program. DEO has partnered with local governments, lending institutions, housing counseling organizations, and nonprofit groups. DEO expects many of these strong partnerships to continue for the duration of the HAF program.

DEO has longstanding partnerships with many federal and state agencies. Through our program outreach efforts, we have consulted with private sector partners to provide input on this plan, including banks, credit unions, mortgage servicers, and financial services associations. We have also consulted with not-for-profit organizations that will aid in the communication and outreach efforts to low-income and socially disadvantaged communities.

# Homeownership Landscape in Florida

The state is home to more than twenty-one million (21,000,000) people, living in approximately nine million seven hundred thousand (9,700,000) housing units<sup>3</sup>. The state is administratively divided into sixty-seven (67) counties<sup>4</sup>, four hundred and eleven (411) cities, towns, and villages<sup>5</sup>, and twenty four (24) workforce regions.<sup>6</sup> The state is also organized into ten (10) EDDs<sup>7</sup> including Apalachee region, Central Florida region, East Central Florida region, North Central Florida region, Northeast Florida region, South Florida region, Southwest Florida region, Tampa Bay region, Treasure Coast region, and West Florida region. The EDDs are used in this document to describe the state's demographic, economic, and housing conditions and how they vary geographically.



MAP 1: REGIONAL ECONOMIC DEVELOPMENT DISTRICTS (EDDs)

Source: Google Analytics

Approximately sixty-five percent (65%) of households own their homes. African American and Hispanic American households are less likely to own their homes than the general population—fewer than a third of homeowners are African American or Hispanic American in Florida. Approximately fifty percent (50%) of African American and Hispanic American households own their homes<sup>8</sup>.

<sup>&</sup>lt;sup>3</sup> U.S. Census Bureau QuickFacts: Florida https://www.census.gov/quickfacts/FL

<sup>&</sup>lt;sup>4</sup> Number of Florida's Counties (https://www.stateofflorida.com)

<sup>&</sup>lt;sup>5</sup> Number of Florida's Cities, Towns, & Villages (http://www.floridaleagueofcities.com)

<sup>6</sup> https://www.fedconline.org/regions/

<sup>&</sup>lt;sup>7</sup> https://www.eda.gov/resources/directory/states/fl.htm

<sup>&</sup>lt;sup>8</sup> U.S. Census Bureau QuickFacts: Florida <a href="https://www.census.gov/quickfacts/FL">https://www.census.gov/quickfacts/FL</a>

# TABLE 1: HOMEOWNERS & HOMEOWNERSHIP RATES BY EDDs (ALL RACES/ETHNICITIES & AFRICAN AMERICAN AND HISPANIC AMERICAN HOUSEHOLDS)

Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2015-2019, Summary Tables B25003, B25003H

	All Races & Ethnicities African American & Hispanic Ame			nic American	
EDD	Homeowning Households	Homeownership Rate	Homeowning Households	% of All Homeowners	Homeownership Rate
Apalachee Region	111,412	61.2%	30,495	27.4%	46.1%
Central Florida Region	217,080	69.8%	54,014	24.9%	55.2%
East Central Florida	1,009,906	66.7%	271,431	26.9%	51.4%
Emerald Coast Region	251,449	66.8%	39,847	15.8%	49.9%
North Central Florida	130,585	64.9%	24,354	18.6%	45.7%
Northeast Florida	416,166	65.5%	97,568	23.4%	49.1%
South Florida Region	899,692	56.0%	570,493	63.4%	50.4%
Southwest Region	514,659	74.0%	71,579	13.9%	53.5%
Tampa Bay Region	945,430	66.5%	197,235	20.9%	49.2%
Treasure Coast Region	562,462	71.0%	130,358	23.2%	53.2%
Statewide	5,058,841	65.4%	1,487,374	29.4%	50.7%

Most homeowners in Florida live in single-family homes, approximately eighty percent (80%). Of more than five million (5,000,000) owner-occupied housing units, about four million (4,000,000) are one-unit detached or attached dwellings. Another five hundred and fifty thousand (550,000) units are in small and large multifamily buildings, and about four hundred and fifty thousand (450,000) homeowning households live in mobile homes, both in manufactured home communities (MHCs) or on privately-owned land. (See Table 2.)

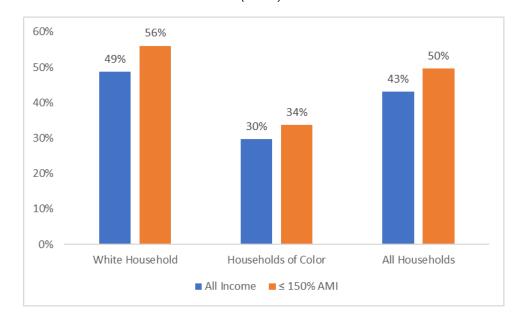
### TABLE 2: OWNER-OCCUPIED HOUSING TYPES IN FLORIDA

Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2015-2019, Summary Table B25032

	Housing Units		Population	
	#	% of total	#	% of total
1 Unit	4,047,508	80.0%	11,245,958	84.5%
2-4 Units	100,348	2.0%	204,070	1.5%
5+ Units	448,611	8.9%	807,677	6.1%
Mobile Home	452,952	9.0%	1,035,830	7.8%
Boat, RV, Van, etc.	9,422	0.2%	16,366	0.1%
All Housing Types	5,058,841	100.0%	13,309,901	100.0%

Approximately fifty-seven percent (57%), or more than two million eight hundred thousand (2,800,000), of households have a mortgage. White households are more likely than African American and Hispanic American households to own their homes unencumbered from debt; forty-nine percent (49%) versus thirty percent (30%), respectively. In addition, lower income households, regardless of their race and ethnicity, are slightly more likely to own their homes without a mortgage; fifty percent (50%) for households making less than one hundred fifty percent (150%) of the AMI versus forty-three percent (43%) for households of all incomes. (See Figure 1.)

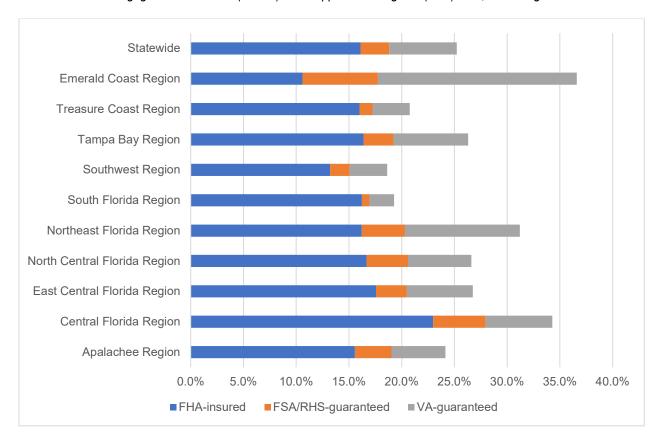
FIGURE 1: SHARE OF HOMEOWNERS WHO OWN THEIR HOMES FREE AND CLEAR
Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2015-2019, Public Use Microdata Sample
(PUMS)



According to Home Mortgage Disclosure Act (HMDA) data on home loans originated between 2007 and 2019, about twenty-five percent (25%) of homeowners in the state with mortgages financed their homes with non-conventional loans secured by the Federal Housing Administration (FHA), the U.S. Department of Veterans Affairs (VA) or the United States Department of Agriculture's (USDA) Rural Housing Service or Farm Service Agency (RSA/FSA) (See Figure 2.) Because they generally offer more flexible qualification requirements, non-conventional loans are more prevalent among lower income and Socially Disadvantaged borrowers. About twenty-five percent (25%) of homeowners in the state with mortgages financed their homes with non-conventional loans secured by the Federal Housing Administration (FHA), the U.S. Department of Veterans Affairs (VA), or the United States Department of Agriculture's (USDA) Rural Housing Service or Farm Service Agency (RSA/FSA) (See Figure 2).

### FIGURE 2: SHARE OF GOVERNMENT-SECURED MORTGAGES

Source: Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) data, loans originated 2007 - 2019

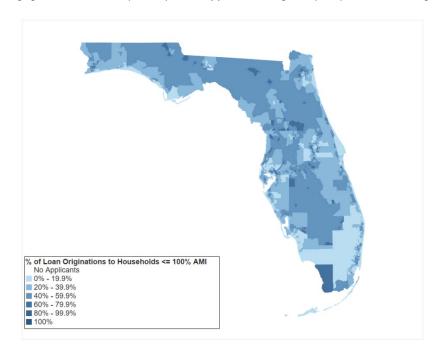


The same HMDA data shows that approximately thirty-two percent (32.5%) of loans originated between 2007 and 2019 were for households with incomes at or less than the median. Approximately seven percent (7.3%) of loan originations were for African American and Hispanic American households with incomes at or less than one hundred and fifty percent (150%) of the AMI. Analysis of the data at the census tract level reveals that most of these low-income households, and particularly African American and Hispanic American households, are concentrated in cities, as well as the suburban areas of Florida. (See Maps 2 and 3 on the following page).

<sup>&</sup>lt;sup>9</sup> Area median income varies based on location and household size. HMDA data includes the income of the borrower household and is available at the census tract level, but it does not include household size. Our analysis used the 3-person income limits to estimate the percentage of AMI for households in the HMDA data.

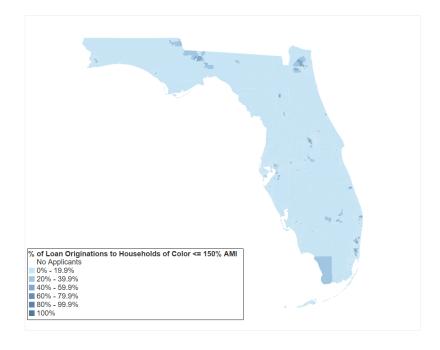
### MAP 2: SHARE OF LOAN ORIGINATIONS TO LOW-INCOME HOUSEHOLDS

Source: Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) data, loans originated 2007 - 2019



### MAP 3: SHARE OF LOAN ORIGINATIONS TO LOW- AND MODERATE-INCOME AFRICAN AMERICAN AND HISPANIC AMERICAN HOUSEHOLDS

Source: Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) data, loans originated 2007 - 2019



# **Coronavirus Pandemic Impact**

COVID-19 created extenuating circumstances for millions of homeowners across the United States. Impacted households fell behind on their mortgages and related homeownership expenses due to an economic downturn that was beyond their control. In the most recently released Household Pulse Survey of adults living in owner-occupied housing units published by the United States Census Bureau (Census Bureau) for the week of May 26 - June 7, 2021, 11 percent (or 613 thousand) of 5.5 million Florida participants responded "No" to a question asking if their household is currently caught up on mortgage payments. Seventy-six percent of the survey participants from Florida who responded being behind on mortgage payments are of socially disadvantaged backgrounds as defined in the HAF Guidance released by the Treasury.

Homeowners will soon face an expiration of the foreclosure moratorium. Furthermore, as of the publication of this Plan, many homeowners who entered into mortgage forbearance agreements early into the pandemic will be within the three to six month limit on the duration of these agreements.

The table below represents outstanding loans as of February 1, 2020, with US Bank that are under protection due to COVID-19. The table provides the loan amount owed to each Investor, the number of loans in active COVID-19 forbearance, the number of loans not under COVID forbearance protection, etc.

	COVID-19 Protection						
Investor	\$ Amount Owed (average) (1)	# Active Forbearance program (1)	# Not on COVID-19 Forbearan ce program or Payment Deferral (1)	# Previously on Forbearance, transitioned to final resolution (1)	# Not Previously on Forbearance, transitioned to final resolution (1)	Total Amount Owed	
Fannie	\$ 11,784	1,218	117	349	0	\$ 19,843,549	
Freddie	\$ 13,879	43	3	26	0	\$ 999,319	
FHA	\$ 10,499	2,435	324	1,132	9	\$ 40,852,854	
VA	\$ 9,641	43	16	49	1	\$ 1,041,214	
USDA	\$ 9,266	61	9	44	0	\$ 1,056,275	
Private / Portfolio	\$ 6,403	18	6	4	0	\$ 179,277	
Total		3,818	475	1,604	10	\$ 63,972,487	
(1) Occupied First Lien Mortgage where loan is due for 2/1/20 or later. Must be past due for two payments							
Source: Table Provided by Florida Housing Finance Corporation, June 2021							

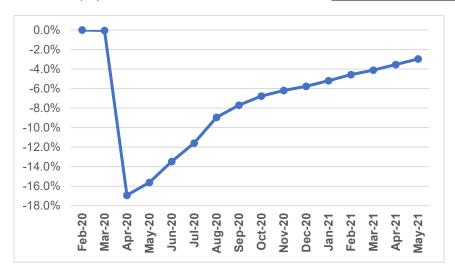
As part of the HAF program, housing counseling services may be provided. Homeowners may receive guidance to bring delinquent mortgage loans current, subject to program limits. Beyond bringing eligible homeowners current on delinquencies, the program will seek to facilitate payments for transition months (forward-looking) and lessen the burden of the application process by allowing homeowners to "provide a written attestation as to household income and the HAF participant may use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household's geographic area" in alignment with HAF Guidance. Due to fluid market conditions and to retain flexibility, DEO expects to update its HAF plan, program standard operating procedures, and budgeted allocations for programs to meet the needs of impacted homeowners in Florida. This plan has been developed with a focus

on expeditious distribution of HAF resources to prevent the displacement of Florida's homeowners as a result of the pandemic, while also conforming to the HAF Guidance released on August 2, 2021.

In addition to challenges faced by homeowners, using recent data from the Household Pulse Survey collected by the Census Bureau, the Center on Budget and Policy Priorities (CBPP) estimates that, in Florida, about fifteen percent (15%) of respondents are not caught up on rent and about 27 percent (27%) reported their household had difficulty paying for usual expenses such as food, rent or mortgage, car payment, medical expenses, or student loans in the last seven days.<sup>10</sup>

The pandemic's impact on job loss, as well as the pace of the ongoing recovery, has varied across EDDs, industry, and demographics. Employment levels in the state bottomed out in May 2020, when employment was down seventeen percent (17%) statewide as compared to February 2020, before the pandemic hit.

FIGURE 3: CHANGE IN EMPLOYMENT, FEBRUARY 2020 - APRIL 2021
Source: Local Area Unemployment Statistics, Bureau of Labor Statistics, https://www.bls.gov/eag/eag.fl.htm

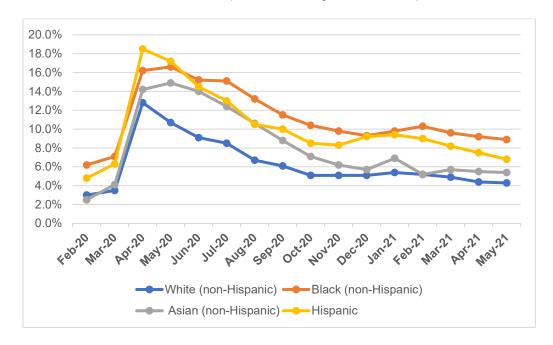


<sup>&</sup>lt;sup>10</sup> Tracking the COVID-19 Recession's Effects on Food, Housing, and Employment Hardships. Center on Budget and Policy Priorities. <a href="https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and">https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and</a>

Patterns of unemployment have also varied by demographic categories, both at the onset of the pandemic and over the course of the recovery, with Hispanic, Black, and Asian populations seeing higher unemployment rates than non-Hispanic White populations.

FIGURE 4: UNEMPLOYMENT RATE BY RACE/ETHNICITY, FEBRUARY 2020 - APRIL 2021

Source: USA Facts. <a href="https://usafacts.org/covid-recovery-hub/">https://usafacts.org/covid-recovery-hub/</a>



# **Evidence of Public Participation and Community Engagement**

Florida's HAF Plan was developed after extensive consultation with affordable housing advocates and stakeholders. Shortly after receiving initial guidance from the Treasury, DEO began holding informal discussions with interested parties about the top-level goals and principles DEO should consider in developing an effective suite of programs to help homeowners who have experienced financial hardship during the coronavirus pandemic.

Early in the plan development process, DEO held meetings with advocates and stakeholders from around the state, including community development corporations, homeless advocacy organizations, and mortgage lenders and servicers. This gave DEO the opportunity to benefit from the advice of those representing a wide range of perspectives and experiences. There were several themes that had strong support from most, if not all, of the participants. Among these are streamlining distribution and eligibility requirements, focusing on internal operations and efficiencies, ensuring data integrity, creating durable, productive support networks, and leveraging relationships with leaders who are trusted in the communities that are being targeted. We were encouraged to focus efforts first on programs designed to help homeowners retain their homes.

On July 12, 2021, DEO published a description of proposed programs under this Plan and invited written public input via a dedicated email address. We incorporated suggestions in several of the comments that we received in this Plan.

### **Homeowner Needs Assessment**

### **Assessment Methodology**

The State used a variety of data sets and industry surveys in order to determine the extent to which various types of homeowners may be at risk of default, eviction, foreclosure, or housing instability. Utilizing a combination of public and proprietary data, including the Home Mortgage Disclosure Act (HMDA) loan-level data, Census Bureau American Community Survey (Census ACS) 5-Year Estimates, and zip code-level Mortgage Analytics and Performance Dashboard (MAPD) data on loan performance collected. The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities, giving public officials information that helps them make decisions and policies, and shedding light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy. HMDA was originally enacted by Congress in 1975 and is implemented by Regulation C.<sup>11</sup> By reviewing homeowner occupied loans and applying estimated forbearance rates provided by Treasury, Florida can begin estimating target populations.

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<sup>&</sup>lt;sup>11</sup> https://www.consumerfinance.gov/data-research/hmda/

State of Florida – HMDA Data			
Tenure by Units in Structure	Number of Homeowner Occupied Loans		
1, detached	3,857,273		
1, attached	338,112		
2	25,192		
3 or 4	74,687		
5 to 9	89,190		
10 to 19	79,636		
20 to 49	123,865		
50 or more	172,567		
Mobile home	466,686		
Boat, RV, van, etc.	10,311		
Owner-Occupied Housing Units:	5,237,519		

Note: Average margin of error is 5.76%

State of Florida - HMDA Data			
Florida Counties	Number of Homeowner Occupied Loans		
Alachua County, FL	53,913		
Baker County, FL	6,544		
Bay County, FL	46,488		
Bradford County, FL	6,316		
Brevard County, FL	171,269		
Broward County, FL	428,682		
Calhoun County, FL	3,665		
Charlotte County, FL	61,262		
Citrus County, FL	52,144		
Clay County, FL	55,746		
Collier County, FL	104,852		
Columbia County, FL	17,953		
DeSoto County, FL	8,418		
Dixie County, FL	5,111		
Duval County, FL	203,977		
Escambia County, FL	74,504		
Flagler County, FL	32,008		
Franklin County, FL	3,317		
Gadsden County, FL	12,509		
Gilchrist County, FL	5,368		
Glades County, FL	3,743		
Gulf County, FL	4,271		
Hamilton County, FL	2,976		

State of Florida - HMDA Data				
Hardee County, FL	5,105			
Hendry County, FL	8,185			
Hernando County, FL	58,814			
Highlands County, FL	31,436			
Hillsborough County, FL	308,217			
Holmes County, FL	5,418			
Indian River County, FL	46,440			
Jackson County, FL	11,975			
Jefferson County, FL	4,443			
Lafayette County, FL	1,835			
Lake County, FL	100,010			
Lee County, FL	199,589			
Leon County, FL	60,192			
Levy County, FL	12,717			
Liberty County, FL	1,855			
Madison County, FL	4,986			
Manatee County, FL	105,902			
Marion County, FL	104,381			
Martin County, FL	50,361			
Miami-Dade County, FL	451,932			
Monroe County, FL	19,078			
Nassau County, FL	26,081			
Okaloosa County, FL	49,459			
Okeechobee County, FL	10,033			
Orange County, FL	255,793			
Osceola County, FL	63,554			
Palm Beach County, FL	381,611			
Pasco County, FL	147,225			
Pinellas County, FL	273,128			
Polk County, FL	162,088			
Putnam County, FL	20,472			
St. Johns County, FL	71,338			
St. Lucie County, FL	84,050			
Santa Rosa County, FL	48,252			
Sarasota County, FL	137,028			
Seminole County, FL	112,228			
Sumter County, FL	50,446			
Suwannee County, FL	11,062			
Taylor County, FL	5,732			
Union County, FL	2,616			

State of Florida - HMDA Data			
Volusia County, FL	152,225		
Wakulla County, FL	9,185		
Walton County, FL	20,467		
Washington County, FL	6,861		
Total for Florida	5,058,841		

Note: Average margin of error is 3.58%

# **Estimating Target Populations**

Through targeted marketing and outreach programs driven by data analytics, DEO will target low-income homeowners and Socially Disadvantaged Individuals first. From a loan prioritization perspective, homeowners with VA, FHA, and USDA mortgage loans will be prioritized.

Table 3 shows the number of owner-occupied homes with a mortgage and without, disaggregated by pre-pandemic income and Socially Disadvantaged status.

TABLE 3: HOUSEHOLDS IN OWNER-OCCUPIED HOUSING UNITS BY MORTGAGE STATUS, INCOME & SOCIALLY DISADVANTAGED STATUS

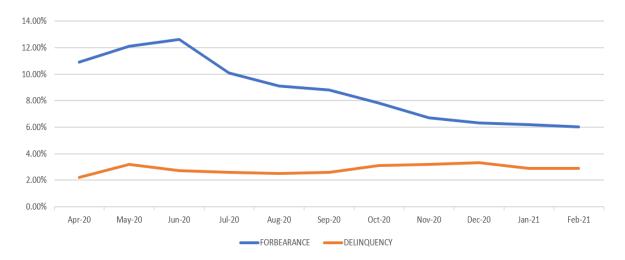
Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2015-2019, Summary Table B25081, Public Use Microdata Sample (PUMS)

	With a Mortgage	Without a Mortgage	Total
All Households	2,875,285	2,183,556	5,058,841
<= 100% AMI	1,024,308	1,232,744	2,257,052
100-150% AMI	599,514	365,455	964,969
Total HH <= 150% AMI	1,623,822	1,598,199	3,222,021
Socially Disadvantaged Households	1,045,076	442,298	1,487,374
<= 100% AMI	381,485	226,583	608,069
100-150% AMI	235,808	87,141	322,949
Total HH <= 150% AMI	617,293	313,724	931,018

Using the above analysis of estimated target applicant populations, population segments are further broken down by their vulnerability to foreclosure and displacement. Target populations in need of assistance may be homeowners with a mortgage who are coming out of a forbearance plan, homeowners without a mortgage who were unable to pay their real estate tax obligations, homeowners in MHCs who may be delinquent on their home loan, homeowners in condominiums who are delinquent on association fees, and homeowners in cooperatives who are delinquent on their maintenance fees.

FIGURE 5: FLORIDA STATE FORBEARANCE & DELINQUENCY RATES, APRIL 2020 - FEBRUARY 2021

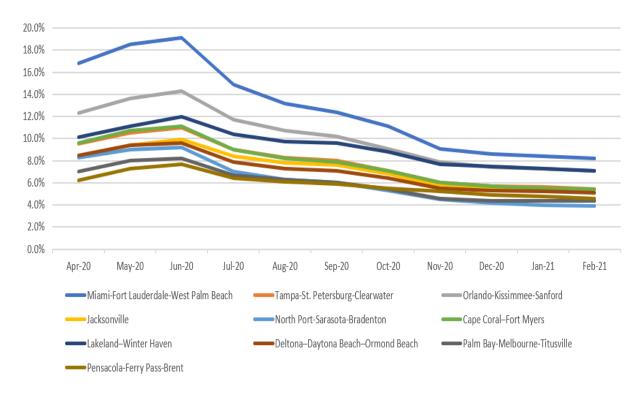
Source: Mortgage Analytics and Performance Dashboard (MAPD) data, April 2020 – February 2021, accessed from Federal Reserve Bank of Atlanta



The federal CARES Act, passed in March 2020, provides forbearances for homeowners with federally backed mortgages. If the loan is not backed by the government, the CARES Act will not require the bank to provide forbearance or delay foreclosure. Soon, homeowners will start facing an expiring forbearance moratorium and delinquency rates are expected to increase.

FIGURE 6: FORBEARANCE RATES BY METROPOLITAN AREAS, APRIL 2020 - FEBRUARY 2021

Source: Mortgage Analytics and Performance Dashboard (MAPD) data, April 2020 – January 2021, accessed from Federal Reserve Bank of Atlanta



Florida has a statewide forbearance rate of approximately 4.60 percent (4.60%), which is greater than the national average of 3.90 percent (3.90%). Figure 6 shows that forbearance rates were much higher – both during the peak and as the crisis has eased – in the Miami, Fort Lauderdale, and West Palm Beach area and the Orlando-Kissimmee-Sanford area, as compared to the rest of the state. Using Fannie Mae and Freddie Mac publicly available databases containing loan data, DEO is establishing a maximum possible universe of eligible homeowners who would qualify for assistance under the HAF guidelines. Analysis of the origination dates and delinquency dates of the loans will assist in determining whether homeowners are in need of assistance as a result of COVID-19 or if they were delinquent prior to situational changes that arose from COVID-19, as well as the duration and seriousness of the delinquency. Leveraging the average mortgage size in Florida and area median income, DEO can better approximate the number of eligible homeowners and establish a maximum payment amount.

# **Program Design**

Florida's programs will mitigate financial hardships associated with the COVID-19 pandemic by providing funds to eligible homeowners to prevent homeowner delinquencies, defaults, foreclosures, and homeowner displacement. The primary goal of the programs is for homeowner retention and reduced delinquencies among homeowners receiving assistance. Among other criteria described below, an eligible homeowner is one experiencing financial hardship after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date), associated with the COVID-19 pandemic.

Based on the needs assessment presented earlier in this Plan, Florida has seen a significant number of homeowners fall behind in housing payments. While data used shows mortgage-related needs, less

visible through traditional data sources is the need for associated housing costs like utilities, insurance, and taxes outside of escrow that can jeopardize homeownership if left unpaid. The program intends to allow for a broad menu of eligible uses so that DEO is well positioned to address the need both quantified by our data resources and the associated housing costs for which we have limited current data but that programmatically could place a homeowner in jeopardy of losing their home.

The American Rescue Plan Act of 2021 provides \$676,102,379 in financial assistance to Florida. Up to 15 percent (15%) of this allocation may be used in administrative fees to execute the program. Over time, programs and their budgets may be adjusted to best meet homeowner demand and prevent homeowner delinquencies, defaults, foreclosures, and homeowner displacement. DEO will dedicate at least \$574,687,022, or eighty-five percent (85%), to assist homeowners. No more than fifteen percent (15%) will be used for the administration of the program.

DEO's HAF Plan includes several programs covering a broad range of assistance for Florida homeowners. This includes mortgage payment assistance, which will constitute the largest allocation, property tax assistance, homeowner, mortgage and flood insurance assistance, utility relief, and counseling programs to assist homeowners in forbearance or at risk of foreclosure.

With a focus on expeditious distribution of funds to eligible homeowners, the programs will be separated into two phases. The first-phase pilot program will focus on initiating awareness and outreach for Florida's HAF program by targeting eligible expenses for which data access allows payments to start flowing from the program. The second-phase programs will have a broader focus and will include other financial burdens of homeownership. In any program discussed, DEO will seek to facilitate payment directly to the entity that is owed by the eligible homeowner.

### First-Phase (Pilot) Program

### Mortgage Assistance Program - Pilot/Phase I

DEO is in the process of developing and implementing an income-targeted pilot program focused on loans in forbearance. The program will be facilitated with assistance from the Florida Housing Finance Corporation, which was incorporated by the Florida Legislature for the purpose of providing a range of affordable housing opportunities for residents of Florida.

As DEO begins the pilot program and awaits final approval of the Plan from the Treasury, DEO intends to continue to conduct outreach with lenders, mortgage servicers, and other organizations. This will allow DEO to gain a better perspective for how program design impacts Florida homeowners, mortgage servicers, and program administrators. The launch of the pilot program will allow DEO to work with institutions to refine the Mortgage Assistance Program before expanding to a broader target during the second phase.

Beyond bringing eligible homeowners current on delinquencies, the program will seek to facilitate payments for transition months (forward-looking) and lessen the burden of the application process by allowing homeowners to "provide a written attestation as to household income and the HAF participant may use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household's geographic area" in alignment with HAF Guidance. The goal of this

program will be to focus on the customer experience and information gathering to allow for an effective implementation of second-phase programs.

### Second-Phase Programs

During Florida's second phase, DEO will put an emphasis on proactively engaging with partners associated with the below programs to market the opportunities available to qualifying Floridians. This may include social media, pamphlets and leave-behinds, and email communications. When exchanging data pertaining to mortgages, DEO will seek to utilize a Common Data File (CDF) for sharing information consistently to help streamline the process and receive consistent data among the plan participants. A Common Data File was created in September 2010 to facilitate the sharing of loan level information between housing finance agencies and mortgage loan servicers. Treasury encourages the continued use of CDF for the HAF program.

Once DEO receives authorization from Treasury, the Plan will be implemented. The Plan may be amended to capture changes resulting from any pilot-identified deficiencies or Treasury recommendations.

### Mortgage Payment Assistance Program

The Mortgage Payment Assistance Program will provide mortgage support with future monthly mortgage payments and escrow payments, including mortgage insurance premium payments. The program will assist income-eligible Florida homeowners who have experienced an eligible financial hardship related to the COVID-19 pandemic. A key takeaway from a mortgage assistance program implemented in the state previously is that effective mortgage assistance programs should not only bring eligible homeowners current, but also provide additional means, so that the homeowner is not at risk of falling back into delinquency in the immediate future

The Mortgage Payment Assistance Program will be available to eligible Florida homeowners, regardless of lender or loan servicer. For more information regarding the Mortgage Payment Assistance Program, please see <u>Appendix A</u>.

### Mortgage Reinstatement Program

The Mortgage Reinstatement Program will provide mortgage support with payments for qualifying households to assist with mortgage and escrow arrears. The program will assist income-eligible Florida homeowners who have experienced an eligible financial hardship related to the COVID-19 pandemic. The Mortgage Reinstatement Program will provide income-qualified, eligible homeowners assistance in curing their first and subordinate mortgage loan arrearages, which may also include payments needed to reinstate their loans from foreclosure or deferred payments. The Mortgage Reinstatement Program will be available to eligible Florida homeowners, regardless of lender or loan servicer. For more information regarding the Mortgage Reinstatement Program, please see Appendix A.

### <u>Down Payment Loan Assistance Program</u>

The Florida Down Payment Loan Assistance Program will assist in preserving homeownership and creating housing stability by preventing foreclosure and displacement through the Homeowner Assistance Fund. The Down Payment Loan Assistance Program will do so by providing financial assistance for income-qualified, eligible homeowners to assist in curing their down payment assistance loan arrearages, which may also include payments needed to reinstate their loans from foreclosure or deferred payments. For income qualified, eligible homeowners, the Down Payment Loan Assistance Program may also pay all or a portion of future interest on and principal of down payment assistance

loans. The Down Payment Loan Assistance Program will be available to eligible Florida homeowners, regardless of lender or loan servicer. For more information regarding the Down Payment Loan Assistance Program, please see <u>Appendix A</u>.

### Delinquent Property Tax Assistance Program

The Delinquent Property Tax Assistance Program will provide support to eligible homeowners by paying all or a portion of homeowners' property tax arrears. The Delinquent Property Tax Assistance Program will assist income-eligible Florida homeowners who have experienced a financial hardship related to the COVID-19 pandemic. DEO will seek to engage tax collector's offices, specifically those in low- to moderate-income zip codes to maximize income-targeting for the Plan. For more information regarding the Delinquent Property Tax Assistance Program, please see <u>Appendix A</u>.

### Property Tax Assistance Program

The Florida Property Tax Assistance Program will assist in preserving homeownership and creating housing stability by preventing foreclosure and displacement through the Homeowner Assistance Fund. The Property Tax Assistance Program will do so by providing financial assistance for income-qualified, eligible homeowners, to assist in paying all or a portion of future property taxes due for up to 18 months. The Property Tax Assistance Program will assist income-eligible Florida homeowners who have experienced a financial hardship related to the COVID-19 pandemic. DEO will seek to engage tax collector's offices, specifically those in low- to moderate-income zip codes to maximize income-targeting for the Plan. For more information regarding the Property Tax Assistance Program, please see Appendix A.

### Homeowner Insurance Assistance Program

The Homeowner Insurance Assistance Program will provide financial assistance for income-qualified, eligible homeowners, to assist in paying homeowner and flood insurance premiums that are part of an escrow shortfall. For income-qualified, eligible homeowners, the Homeowner Insurance Assistance Program may also pay all or a portion of future homeowner and flood insurance premiums due for up to 18 months. The program will assist income-eligible Florida homeowners who have experienced an eligible financial hardship related to the COVID-19 pandemic. DEO will seek to work with mortgage servicers and insurers to review their loan portfolios and market the program. For more information regarding the Homeowner Insurance Assistance Program, please see Appendix A.

### **Utility Assistance Program**

The Utility Assistance Program will support eligible homeowners by assisting with delinquent utility bill payments, including electric, gas, home heating oil, water, and sewer. The Utility Assistance Program may also make future payments for up to 18 months. The Utility Assistance Program will provide assistance to eligible Florida homeowners who have experienced an eligible financial hardship related to the COVID-19 pandemic. DEO will seek to work with utility providers to find qualified homeowners and market the program. For more information regarding the Utility Assistance Program, please see Appendix A.

### Internet Service Assistance Program

The Internet Service Assistance Program will support eligible homeowners by assisting with delinquent internet service payments. The Internet Service Assistance Program may also make future bill payments for up to 18 months. The Internet Service Assistance Program will provide assistance to eligible Florida homeowners who have experienced an eligible financial hardship related to the COVID-19 pandemic. DEO will seek to work with internet service providers to find qualified homeowners and market the program. For more information regarding the Utility Assistance Program, please see <u>Appendix A</u>.

### Housing Counseling

To enhance program coordination, outreach to eligible homeowners, and efficient use of funds, DEO also proposes allocating program funds for housing counseling services. The proposed counseling program will support homeowners with incomes that are less than or equal to one hundred and fifty percent (150%) of the AMI or one hundred percent (100%) of the median income in the United States, whichever is greater, who are experiencing financial hardships related to COVID-19. The proposed Housing Counseling Program will provide this support in an accessible and effective manner.

# Methods for Targeting HAF Funding

Through a data-driven approach, DEO will coordinate with lending, loan servicing, community, not-for-profit and government partners to identify the homeowners meeting the HAF targeting requirements. To that end, DEO will tailor an outreach and marketing plan to reach those communities most effectively and optimize the impact of the HAF across the state, including those households whose income is less than or equal to 100 percent (100%) of the AMI or 100 percent (100%) of the median income in the United States, whichever is greater.

DEO will also target "Socially Disadvantaged Individuals" pursuant to the Treasury Guidance. A "Socially Disadvantaged Individual" is an individual who (i) identifies as Black American, Hispanic American, Asian American or Native American (*i.e.*, Alaska Native, Native Hawaiian, or an enrolled member of a Federally or State recognized Indian Tribe); (ii) has limited English proficiency; (iii) is a resident of a majority-minority Census tract; or (iv) lives in a persistent-poverty county (*i.e.*, a county that has had 20% or more of its population living in poverty over the past 30 years as measured by the three most recent decennial censuses). If the individual who is applying for the HAF Program attests that he or she is a "socially disadvantaged individual" pursuant to clause (i) or (ii) or DEO verifies that the household qualifies pursuant to clause (iii) or (iv), then the household will qualify for "Socially Disadvantaged Individual" targeting.

DEO understands that the most well-intended program will not make an impact if it does not reach the population it is intended to serve; with this in mind, DEO will work tirelessly to design a program that meets the needs of the homeowners in need of assistance across HAF qualified expenses.

DEO may employ the following strategies and tactics both statewide and in targeted markets:

- Develop the brand and build online presence for program information.
- Develop a statewide digital marketing campaign.
- Leverage media, state and local partnerships to promote program awareness to target audiences.
- Use alternate media, trade and non-profit organizations, niche publications, direct mail, and email marketing to reach rural areas, hard-hit industries, and socially disadvantaged groups.

Targeted outreach may also be built into the Housing Counseling Program. Additional statewide targeted outreach will take place in the form of a grassroots approach backed by data analytics to focus efforts in areas deemed to be the most susceptible to home displacement. In order to be on the forefront of advocating for the equitable distribution of HAF funding, specifically reaching those socially underserved and disadvantaged communities, DEO will utilize the data gathered to identify which communities of Homeowners are disproportionately impacted and target those populations with priority to drive participation and increase access to the program funding across applicable qualified expense categories. Teams may conduct targeted canvassing and marketing efforts, if necessary, to seek out those identified as hard to serve due to social, language, and economic barriers.

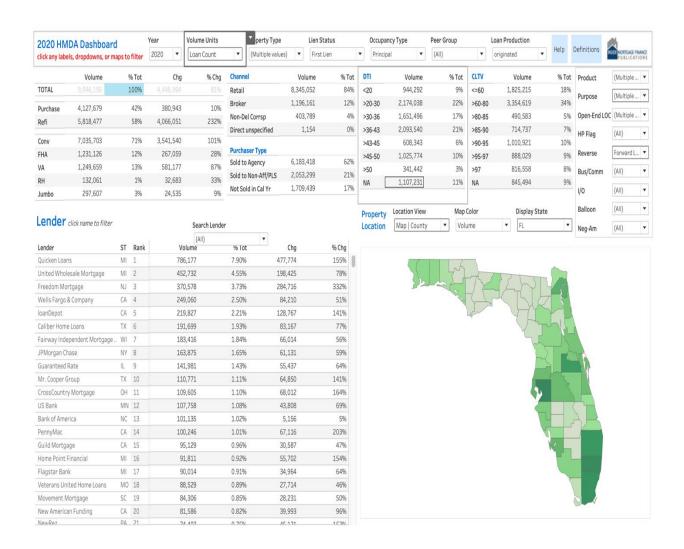
For past efforts in reaching homeowners in need, digital advertising was the most successful paid advertising in terms of statewide outreach, cost, and return on investment. TV and radio advertising had a much higher cost per applicant. However, based on some of the rural target counties, we will explore both paid and Public Service Announcement placements on rural radio stations and in local publications to reach socially disadvantaged individuals who may be among those lacking internet access. We will pay particular attention to stations and publications that target specific racial and ethnic groups.

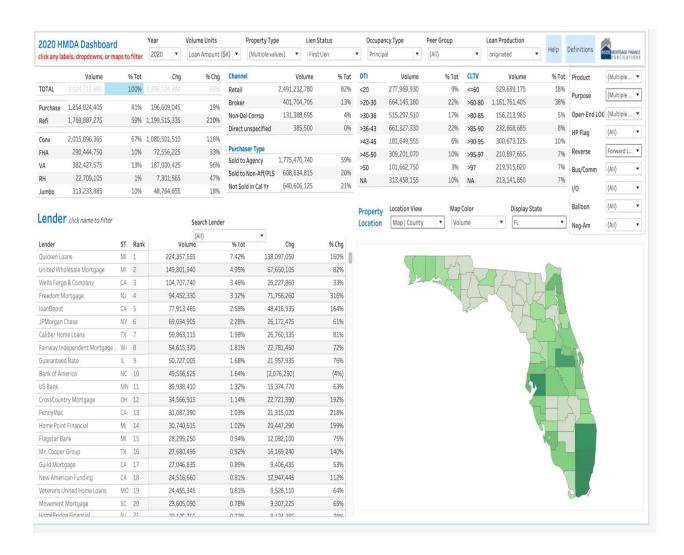
Non-traditional outreach may prove to be more effective in reaching some of the targeted populations. Based on guidance from local partners on what will work best in their communities, different methods may be employed. DEO is compiling a growing list of organizations and stakeholders who serve the geographic areas or the demographic groups identified for enhanced outreach. We plan to add to this list as we identify successful avenues of outreach.

### **Marketing Outreach**

The state of Florida will authorize a reasonable portion of the administrative budget to be dedicated to paid media, including placing HAF advertisements on television, radio, print publications, and to support direct mail and digital advertising. Based on the program operated in the state during the last financial crisis, we have identified media and marketing channels that had the highest pull-through rates, as well as information about which channels were most successful in reaching borrowers in Socially Disadvantaged communities. The effectiveness of these ads will be monitored for efficacy at reaching qualified applicants under the HAF program.

The first methodology used to identify potential applicants is through HMDA data for first liens filed in 2020. DEO will use the HMDA information to further develop a picture of the demographics and averages on lenders, Debt-to-Incomes (DTI), Loan-to-Values (LTV), mortgage servicers of these loans, etc., to assist and serve Florida homeowners in need under the HAF.





The following HMDA tables represent an example of Applications Received, Loans Originated, Applications Approved but Not Accepted, Applications Withdrawn, and Incomplete Applications for Miami, Port St. Lucie, and Fort Lauderdale homeowners that range from low- to high-end AMI (less than 50% or 120% or more of the AMI) by Race and Ethnicity.

	Applications Received for Miami, Port St. Lucie, and Fort Lauderdale, FL			
All Races & Ethnicities	LESS THAN 50% OF	MSA/MD MEDIAN	120% OR MORE OF MSA/MD MEDIAN	
Race	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
American Indian or Alaska Native	21	\$5,255,000	191	\$57,995,000
Asian	90	\$20,960,000	1,459	\$542,185,000
Black or African American	557	\$95,045,000	3,711	\$1,031,185,000
Native Hawaiian or Other Pacific Islander	22	\$3,370,000	106	\$27,490,000
White	3,435	\$977,465,000	58,345	\$22,001,445,000
2 or more minority races	11	\$1,855,000	79	\$21,535,000
Joint	33	\$10,495,000	818	\$340,250,000
Free Form Text Only	3	\$675,000	11	\$2,535,000
Race Not Available	1,147	\$343,265,000	12,811	\$5,160,255,000
Ethnicity	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
Hispanic or Latino	3,026	\$710,260,000	45,416	\$15,108,020,000
Not Hispanic or Latino	1,346	\$431,570,000	18,555	\$8,314,325,000
Joint	67	\$19,905,000	2,934	\$1,148,830,000
Free Form Text Only	5	\$755,000	44	\$11,010,000
Ethnicity Not Available	875	\$295,895,000	10,582	\$4,602,690,000

	Loans Originated for Miami, Port St. Lucie, and Fort Lauderdale, FL				
All Races & Ethnicities	LESS THAN 50% OF MSA/MD MEDIAN		120% OR MORE OF MSA/MD MEDIAN		
Race	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan	
American Indian or Alaska Native	7	\$2,475,000	96	\$30,670,000	
Asian	10	\$2,760,000	747	\$285,095,000	
Black or African American	126	\$22,690,000	1814	\$533,530,000	
Native Hawaiian or Other Pacific Islander	4	\$1,100,000	47	\$13,495,000	
White	886	\$255,360,000	33686	\$12,511,850,000	
2 or more minority races	0	\$0	34	\$11,370,000	
Joint	8	\$1,990,000	477	\$194,095,000	
Free Form Text Only	0	\$0	3	\$705,000	
Race Not Available	181	\$53,005,000	6026	\$2,554,300,000	
Ethnicity	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan	
Hispanic or Latino	745	\$176,415,000	26177	\$ 8,758,515,000	
Not Hispanic or Latino	315	\$113,545,000	9921	\$ 4,372,725,000	
Joint	15	\$4,955,000	1716	\$ 687,710,000	
Free Form Text Only	1	\$175,000	16	\$4,230,000	
Ethnicity Not Available	146	\$44,290,000	5100	\$2,311,930,000	

	Applications Approved but Not Accepted for Miami, Port St. Lucie, and Fort Lauderdale, FL				
All Races & Ethnicities	LESS THAN 50% OF MSA/MD MEDIAN		120% OR MORE OF MSA/MD MEDIAN		
Race	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan	
American Indian or Alaska Native	0	\$0	3	\$315,000	
Asian	3	\$505,000	42	\$11,210,000	
Black or African American	13	\$2,275,000	101	\$26,655,000	
Native Hawaiian or Other Pacific Islander	1	\$105,000	3	\$385,000	
White	126	\$42,520,000	1411	\$499,375,000	
2 or more minority races	0	\$0	3	\$985,000	
Joint	3	\$705,000	12	\$12,790,000	
Free Form Text Only	0	\$0	0	\$0	
Race Not Available	31	\$11,215,000	346	\$144,590,000	
Ethnicity	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan	
Hispanic or Latino	103	\$ 30,775,000	1058	\$323,400,000	
Not Hispanic or Latino	44	\$ 15,020,000	497	\$217,335,000	
Joint	0	\$0	71	\$26,565,000	
Free Form Text Only	0	\$0	1	\$265,000	
Ethnicity Not Available	30	\$0	294	\$128,740,000	

	Applications Withdrawn for Miami, Port St. Lucie, and Fort Lauderdale, FL			
All Races & Ethnicities	LESS THAN 50% OF MSA/MD MEDIAN		120% OR MORE OF MSA/MD MEDIAN	
Race	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
American Indian or Alaska Native	2	\$610,000	30	\$11,750,000
Asian	16	\$4,220,000	300	\$117,250,000
Black or African American	116	\$22,740,000	726	\$206,960,000
Native Hawaiian or Other Pacific Islander	3	\$505,000	18	\$4,410,000
White	591	\$191,105,000	10541	\$4,200,295,000
2 or more minority races	4	\$680,000	14	\$4,030,000
Joint	4	\$1,180,000	147	\$64,575,000
Free Form Text Only	0	\$0	2	\$380,000
Race Not Available	242	\$91,010,000	2571	\$1,132,525,000
Ethnicity	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
Hispanic or Latino	502	\$ 129,140,000	7962	\$2,796,070,000
Not Hispanic or Latino	268	\$ 96,250,000	3761	\$1,736,465,000
Joint	17	\$ 4,975,000	528	\$220,840,000
Free Form Text Only	2	\$ 260,000	7	\$1,855,000
Ethnicity Not Available	189	\$ 81,425,000	2091	\$986,945,000

	Incomplete Applications for Miami, Port St. Lucie, and Fort Lauderdale, FL			
All Races & Ethnicities	LESS THAN 50% OF MSA/MD MEDIAN		120% OR MORE OF MSA/MD MEDIAN	
Race	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
American Indian or Alaska Native	2	\$510,000	16	\$3,720,000
Asian	15	\$3,925,000	119	\$39,195,000
Black or African American	49	\$9,185,000	211	\$57,295,000
Native Hawaiian or Other Pacific Islander	8	\$1,010,000	9	\$1,905,000
White	282	\$84,050,000	3185	\$1,242,525,000
2 or more minority races	2	\$720,000	7	\$1,295,000
Joint	6	\$1,390,000	49	\$19,075,000
Free Form Text Only	0	\$0	0	\$0
Race Not Available	220	\$72,890,000	1266	\$425,600,000
Ethnicity	Number of Applications	Amount of Loan	Number of Applications	Amount of Loan
Hispanic or Latino	278	\$65,020,000	2567	\$834,345,000
Not Hispanic or Latino	126	\$42,040,000	1125	\$512,955,000
Joint	10	\$3,170,000	160	\$59,550,000
Free Form Text Only	0	\$0	4	\$1,120,000
Ethnicity Not Available	170	\$63,450,000	1006	\$382,640,000

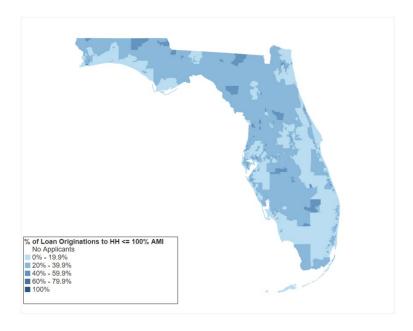
# TABLE 5: CENSUS TRACTS WHERE SHARES OF LOW-INCOME AND LOW-INCOME African AMERICAN AND HISPANIC AMERICAN HOUSEHOLDS EXCEED 50 PERCENT

Source: Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) data, loans originated 2007 – 2019.

EDD	CTs >50% Loan Orig. to HHs <=100% AMI			CTs >50% Loan Orig. to AA & HA Households <=150% AMI	
	#	% of total CTs	#	% of total CTs	
Apalachee Region	35	41.2%	7	8.2%	
Central Florida Region	86	60.6%	2	1.4%	
East Central Florida Region	190	34.3%	23	4.2%	
Emerald Coast Region	57	37.5%	3	2.0%	
North Central Florida Region	40	44.4%	2	2.2%	
Northeast Florida Region	97	43.9%	25	11.3%	
South Florida Region	59	19.3%	31	10.2%	
Southwest Florida Region	58	20.4%	1	0.4%	
Tampa Bay Region	196	31.4%	8	1.3%	
Treasure Coast Region	152	21.9%	30	4.3%	
statewide	970	30.8%	132	4.2%	

### MAP 6: SHARE OF LOW-INCOME HOME BUYERS

Source: Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) data, loans originated 2007 – 2019



In addition to paid media, the state will launch and sustain a targeted social media campaign aimed at these same micro geographies. Social media will be utilized in partnership with community-based leaders, faith-based leaders, and local elected officials to amplify the social media messaging through stakeholders who have direct ties to the impacted communities.

DEO will leverage public and proprietary data and analysis from itself and its partners to develop a population of homeowners that meet the program target criteria and who have assistance needs across the qualified expenses outlined in the HAF Guidance. Supporting the administration of federal programs to help communities across the state is core to DEO's mission, which is to assist the Governor in advancing Florida's economy by championing the state's economic development vision and by administering state and federal programs and initiatives to help visitors, citizens, businesses, and communities. Based on this experience, DEO will approach outreach and marketing in a way that provides the most benefit to Floridians and drives program participation.

### **Performance Goals**

DEO will monitor ongoing performance based on several parameters to ensure that the programs are operating efficiently and in accordance with HAF homeowner targeting requirements. Given the goals of the program, we aim to stabilize the households and, when possible, to stabilize both the household and the region to ensure a more prosperous Florida. DEO plans to measure performance at the end of the program in the following ways:

Program Design Element	Metrics of Success	Goal
Mortgage payment assistance	Number of home losses avoided by eligible homeowners who received program funds.	At least 10,000 during the term of the program
Allow homeowners to reinstate mortgages or pay other housing-related costs	Number of home losses avoided by eligible homeowners who received program funds.	At least 10,000 during the term of the program
Mortgage principal reduction	N/A	
Facilitating mortgage interest rate reductions	N/A	
Payment assistance for homeowner's utilities (e.g., electric, gas, home energy, and water)	Number of eligible homeowners who received program funds whose utilities were not disconnected.	At least 5,000 during the term of the program

Payment assistance for homeowner's internet service (e.g., broadband)	Number of eligible homeowners who received program funds whose internet services were not disconnected.	At least 2,500 during the term of the program
Payment assistance for homeowner's, flood, and mortgage insurance	Number of eligible homeowners who received program funds were able to maintain homeowner's or flood insurance.	At least 10,000 during the term of the program
Payment assistance for homeowner's association fees or liens, condominium association fees, or common charges	N/A	
Payment assistance for down payment assistance loans provided by nonprofit or government entities	Number of home losses avoided by eligible homeowners who received program funds.	At least 500 during the term of the program
Payment assistance for delinquent property taxes to prevent homeowner tax foreclosures	Number of home losses avoided by eligible homeowners who received program funds.	At least 5,000 during the term of the program
Measures to prevent homeowner displacement	Number of home losses avoided by eligible homeowners who received HAF program funds.	At least 20,000 during the term of the program

The state of Florida may also measure performance in the following ways:

### <u>Homeowner Delinquency</u>

DEO will evaluate the impacts on homeowners who applied and were approved for specific programs under this Plan. This will include how funding impacted the mortgage delinquency for the homeowner and will be disaggregated by race, age, ethnicity, and geographic location. DEO's goal is to reduce mortgage delinquency among homeowners who have received HAF funds from DEO with household median incomes that are less than or equal to 100 percent (100%) of the area median income and/or Socially Disadvantaged Individuals.

### Homeowner Performance

DEO may track the specific parcel over time to track foreclosures, sheriff's sales, and property transitions. Collecting parcel numbers based on geo-locating addresses for applicants will provide us with the ability to track the property prior to application and post-application. We will be able to compare delinquency, foreclosure, and short-sales over time. This historical view allows us to determine if it was a troubled property prior to the COVID-19 crisis, and how each property fared after assistance.

### **Targeting**

Target populations and regions will be identified based on a combination of economic instability in the wake of the COVID-19 crisis and demonstrated patterns of delinquency and forbearance. To determine the effectiveness of our targeting strategy, we will disaggregate application data by multiple factors, including race, ethnicity, and geography. We will compare our targeting data, which highlights areas of expected highest need, to actual applications. If applications appear to be missing in areas that are identified as highest need, DEO will modify its outreach strategy to effectively target those who are most in need. This analysis will essentially gauge the penetration rate for HAF funding in areas that were determined high need as part of our housing needs assessment.

# **Payment Process**

DEO will disburse the HAF assistance directly to mortgage lenders/servicers, land contract holders, manufactured/mobile home lenders, local taxing authorities, property and flood insurance carriers, utility service providers, and internet/broadband service providers. Once a homeowner completes a program application, provides the required documentation, and is approved for the program, the funds will be disbursed by wire, ACH, and/or bank check to the appropriate party.

### Readiness to Proceed

DEO is home to the Division of Community Development, which is charged with administering existing federally funded programs of similar scope including four programs under the Community Development Block Grant Program to develop viable communities by providing decent housing and a suitable living environment and by expanding economic opportunities, principally for persons of low- and moderate-income. Additionally, DEO is partnering with Florida Housing Finance Corporation, the state's housing finance agency charged with administering state and federal resources to provide affordable homeownership and rental housing options for the citizens of Florida. This experience allows the HAF Plan to reflect the needs of Floridians. Many of the Florida proposed programs have programs with data that would facilitate a qualification process. DEO will maximize its use of the data to speed up the process and remove lengthy qualifications to promote a positive customer experience.

### Staffing and Systems

DEO staff is well positioned to launch the HAF program efficiently and effectively. The experience gained through administering similar federal programs prepared staff to manage statewide homeowner assistance for those in dire need due to economic turmoil. DEO successfully launched hurricane-related disaster recovery programs and other federal programs in a timely and effective manner. The same expeditious attention will be provided to the HAF program. DEO has subject matter experts on staff who were crucial to the success of these programs and will be assisting in the rollout of the HAF. They will continue to share their expertise with other staff, ensuring their knowledge is used to benefit the entire program.

DEO may procure software, call center, payment processing, or other related program administration services. DEO plans to select vendor(s) and services needed as soon as possible. After the selection of vendor(s), DEO will work quickly to finalize procedures for the operation of the program.

### Reporting and Compliance

DEO staff across departments will ensure HAF compliance and reporting requirements are met. Administering numerous federal programs prepared DEO to take on such efforts. DEO will be able to

utilize the existing reporting framework to quickly adapt systems to capture necessary data for the HAF program. DEO will also ensure any selected vendors will partner with internal reporting staff and adhere to all reporting requirements established by Treasury and the state.

DEO has a dedicated quality assurance team to ensure accurate reporting and compliance of the HAF program applications. It is anticipated that an internal group of DEO staff with specialized skills, and with the assistance of an accounting firm, will review applications and loan documents to ensure quality control.

### **Partnerships**

In addition to DEO's experienced staff, partnerships may be formed with qualified vendors to administer various aspects of the HAF program. DEO staff met with stakeholders through various HAF meetings. The data gathered from these meetings helped DEO better align this Plan with both the Treasury requirements and industry standards. DEO will identify professional, efficient vendors with high levels of customer service to assist in program administration. After the vendors have been identified, contracts will be awarded to ensure compliance with all federal and state requirements and to ensure quality service for Florida homeowners. These partnerships will be crucial to the delivery of the program and DEO will ensure all reporting and compliance metrics are met.

## **APPENDIX A - Program Term Sheets**

### **Mortgage Assistance Program**

1. Program Overview	The Florida Mortgage Assistance Program will assist in preserving homeownership and creating housing stability by preventing foreclosure and displacement through the Homeowner Assistance Fund.  For income qualified, eligible homeowners, the Mortgage Assistance Program will do so by curing arrearages on their first and subordinate mortgage loans, down payment assistance loans, manufactured home loans, escrow accounts (which may also include payments needed to reinstate their loans from foreclosure or deferred payments) and homeowner insurance policies, flood insurance policies and property taxes (without duplication). In addition, for income qualified, eligible homeowners, the Mortgage Assistance Program will pay all or a portion of future interest on and principal of first mortgages, subordinate mortgages, manufactured home loans, down payment loans, escrow payments, homeowner and flood insurance policy premiums and property taxes for up to 18 months (without duplication).		
2. Mortgage Assistance Program Goals	To provide financial assistance to eligible Florida homeowners to prevent foreclosure and displacement, therefore preserving homeownership and providing housing stability to Floridians in need.		
3. Targeted Population of Homeowners	Based on the data-driven assessment of homeowner needs, DEO will strategically target Florida homeowners whose household income is less than or equal to 100 percent of the area median income or the median income in the United States, whichever is greater, and Socially Disadvantaged Individuals.		
4. Eligible Homeowners	<ul> <li>"Eligible Homeowners" for the Mortgage Assistance Program must satisfy the following criteria:</li> <li>The homeowner must have experienced a Qualified Financial Hardship after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date), and provide an attestation, describing the nature of the financial hardship.</li> <li>The homeowner must currently own and occupy the property as their primary residence.</li> <li>The homeowner must meet the Homeowner Income Eligibility Requirements for the household.</li> </ul>		

The homeowner must complete and sign qualifying hardship affidavit/attestation, application, terms of service, consent forms, and any other documentation required by DEO. The homeowner must provide all necessary documentation to satisfy program guidelines within timeframes established by DEO, including selfcertification or attestation of income and Socially Disadvantaged Individual status, as applicable. Co-owners may not separately apply for program assistance. "Eligible Legal Ownership Structures" include only the Eligible Legal Ownership following: Structures Those where the home is owned exclusively by one or more natural persons; or Those where the homeowner has transferred their ownership right into non-incorporated, revocable living trust and the homeowner occupies the home as their primary/principal residence. 6. Qualified A "Qualified Financial Hardship" is a material reduction in **Financial** income or material increase in living expenses associated Hardship with the coronavirus pandemic that has created or increased a risk of mortgage delinquency, mortgage default, foreclosure, loss of utilities or home energy services, or displacement for a homeowner (including a hardship that began before January 21, 2020, but continued after that date). Reduction of Income - Documented temporary or permanent loss of earned income directly related to the coronavirus pandemic after January 21, 2020 (e.g., job loss or reduction in working hours). Increase in living expenses – Documented increase in out-of-pocket household expenses directly related to the coronavirus pandemic after January 21, 2020 (e.g., increased costs to care for a family member).

	Homeowner Income Eligibility Requirements	To be eligible for assistance under the Mortgage Assistance Program, homeowners must have incomes that are less than or equal to 150 percent of the area median income or 100 percent of the median income in the United States, whichever is greater.		
8.	Homeowner Prioritization	DEO will prioritize funding to the following populations:		
		<ul> <li>At least 70% of the financial assistance made available under the programs in the Plan (including the Mortgage Assistance Program) will be, in the aggregate, used for qualified expenses for homeowners whose incomes are less than or equal to 100 percent of the area median income or the median income in the United States, whichever is greater.</li> </ul>		
		<ul> <li>Amounts not made available to homeowners who meet the above income-targeting requirement will be prioritized for assistance to Socially Disadvantaged Individuals.</li> </ul>		
		All remaining funds not otherwise prioritized will be made available for other Eligible Homeowners.		
	Eligible Properties	"Eligible Properties" are residential properties that are located in Florida, which are:		
		Single-family (attached or detached) properties;		
		Condominium units;		
		<ul> <li>One to four-unit properties where the homeowner is living in one of the units as their primary residence;</li> </ul>		
		<ul> <li>Manufactured homes permanently affixed to real property and taxed as real estate; or</li> </ul>		
		<ul> <li>Mobile homes not permanently affixed to real property.</li> </ul>		
		Ineligible residential properties include:		
		Vacant or abandoned residences;		
		Second homes; and		
		Investment properties.		

10. Eligible Uses of Mortgage Assistance	The following housing obligations are eligible for paymer under the Mortgage Assistance Program:			
Program Proceeds	<ul> <li>First mortgage loan payment(s) (principal, interest and late fees and charges);</li> </ul>			
	Subordinate mortgage loan payment(s) (principal, interest and late fees and charges);			
	Manufactured/mobile home loan payment(s) (principal, interest and late fees and charges);			
	<ul> <li>Down payment assistance loan payment(s) (principal, interest and late fees and charges);</li> </ul>			
	Escrow payments;			
	Property taxes (including late fees and charges);			
	Homeowner insurance premiums (including late fees and charges); and			
	Flood insurance premiums (including late fees and charges).			
11. Maximum Per Household Mortgage Assistance Program Assistance	The maximum Mortgage Assistance Program financial assistance per household will be \$50,000 and the maximum HAF assistance per household will be \$50,000 (inclusive of Mortgage Assistance Program financial assistance).			
12. Assistance Type	The financial assistance will be structured as a non-recourse grant.			
13. Payout of Mortgage Assistance Program Assistance	DEO will disburse Mortgage Assistance Program payments for mortgage loans, manufactured home loans, down payment assistance loans and escrow account payments (including applicable late charges and fees) directly to lenders or loan servicers. DEO will disburse the amount quoted by the lender/servicer and any discrepancies will be required to be resolved by the homeowner and lender/servicer.			
	To the extent not otherwise escrowed, DEO will disburse Mortgage Assistance Program payments for property taxes to the applicable tax collector and insurance policy premiums (including applicable late charges and fees) to the applicable insurance company. DEO will disburse the amount quoted by the tax collector or insurer and any discrepancies will be			

	required to be resolved by the homeowner and tax collector or insurer.	
14. Program Launch	Pending approval by Treasury, DEO is endeavoring to launch the program to the public statewide in the first quarter of 2022.	
	together with supporting documentation (e.g., paystubs, W2s or other wage statements, IRS Form 1099s, tax filings, depository institution statements demonstrating regular income, or an attestation from an employer);  • Attestation that the homeowner is a "Socially Disadvantaged Individual" (if applicable);  • Mortgage statement for each loan (e.g., first mortgage, second mortgage, etc.);  • Manufactured/mobile home loan statement;  • Down payment assistance loan statement;  • An updated escrow statement (if applicable);	

	<ul> <li>An updated property tax statement (to the extent not escrowed or otherwise readily available);</li> </ul>		
	<ul> <li>An updated homeowner insurance policy statement (to the extent not escrowed);</li> </ul>		
	<ul> <li>An updated flood insurance policy statement (to the extent not escrowed);</li> </ul>		
	<ul> <li>Social security number card or unique identifier as shown on a legal document, such as a federal tax return;</li> </ul>		
	<ul> <li>Payee's contact and account information if not listed on monthly statement; and</li> </ul>		
	<ul> <li>Any additional documents and information that DEO may require.</li> </ul>		
16. Program Partner Requirements	Lenders/servicers may be required to agree to communicate using the Common Data File (CDF).		
	Private non-mortgage lenders, including manufactured/mobile home lenders, homeowner and flood insurers and tax collectors may be required to provide a written account statement, contact information, and/or ACH account information.		

#### UTILITY, INTERNET SERVICE AND HOA FEE ASSISTANCE PROGRAM

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1. Program Overview	The Florida Utility, Internet Service and Homeowner Association (HOA) Fee Assistance Program will assist in preserving homeownership and creating housing stability by preventing foreclosure and displacement through the Homeowner Assistance Fund.		
	The Utility, Internet Service and HOA Fee Assistance Program will do so by providing financial assistance for income-qualified, eligible homeowners to assist in making delinquent utility payments (including electric, gas, home heating oil, water, and sewer), internet service payments, and HOA fees (including HOA fees necessary to satisfy liens).		
	For income qualified, eligible homeowners, the Utility, Internet Service and HOA Fee Assistance Program may also pay all or a portion of future utility payments, internet service payments, and HOA fees for up to 18 months.		
2. Utility, Internet Service and HOA Fee Assistance Program Goals	The goal of the Utility, Internet Service and HOA Fee Program is to provide financial assistance to eligible Florida homeowners to bring utility accounts, internet service accounts, and HOA fees current and to help pay all or a portion of such expenses of homeownership in the future to prevent foreclosure and displacement, therefore preserving homeownership and providing housing stability to Floridians in need.		
3. Targeted Population of Homeowners	Based on the data-driven assessment of homeowner needs, DEO will strategically target Florida homeowners whose income is less than or equal to 100 percent of the area median income or the median income in the United States, whichever is greater, and Socially Disadvantaged Individuals.		
4. Eligible Homeowners	"Eligible Homeowners" for the Utility, Internet Service and HOA Fee Assistance Program must satisfy the following criteria:		
	The homeowner must have experienced a Qualified Financial Hardship after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date), and provide an attestation, describing the nature of the financial hardship.		
	The homeowner must currently own and occupy the property as their primary residence.		
	The homeowner must meet the Homeowner Income Eligibility Requirements for the household.		

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	<ul> <li>The homeowner must complete and sign qualifying hardship affidavit/attestation, application, terms of service, consent forms, and any other documentation required by DEO.</li> <li>The homeowner must provide all necessary</li> </ul>
	documentation to satisfy program guidelines within timeframes established by DEO, including self-certification or attestation of income and Socially Disadvantaged Individual status, as applicable.
	<ul> <li>Co-owners may not separately apply for program assistance.</li> </ul>
5. Eligible Legal Ownership Structures	"Eligible Legal Ownership Structures" include only the following:
Guadares	Those where the home is owned exclusively by one or more natural persons; or
	Those where the homeowner has transferred their ownership right into non-incorporated, revocable living trust and the homeowner occupies the home as their primary/principal residence.
6. Qualified Financial Hardship	A "Qualified Financial Hardship" is a material reduction in income or material increase in living expenses associated with the coronavirus pandemic that has created or increased a risk of mortgage delinquency, mortgage default, foreclosure, loss of utilities or home energy services, or displacement for a homeowner (including a hardship that began before January 21, 2020, but continued after that date).
	<ul> <li>Reduction of Income – Documented temporary or permanent loss of earned income directly related to the coronavirus pandemic after January 21, 2020 (e.g., job loss or reduction in working hours).</li> </ul>
	<ul> <li>Increase in living expenses – Documented increase in out-of-pocket household expenses directly related to the coronavirus pandemic after January 21, 2020 (e.g., increased costs to care for a family member).</li> </ul>
7. Homeowner Income Eligibility Requirements	To be eligible for assistance under the Utility, Internet Service and HOA Fee Assistance Program, homeowners must have incomes that are less than or equal to 150 percent of the area median income or 100 percent of the median income in the United States, whichever is greater.

8. Homeowner Prioritization	<ul> <li>At least 70% of the financial assistance made available under the programs in the Plan (including the Utility, Internet Service and HOA Fee Assistance Program) will be, in the aggregate, used for qualified expenses for homeowners whose incomes are less than or equal to 100 percent of the area median income or the median income in the United States, whichever is greater.</li> <li>Amounts not made available to homeowners who meet the above income-targeting requirement will be prioritized for assistance to Socially Disadvantaged</li> </ul>	
	Individuals.  All remaining funds not otherwise prioritized will be made available for other Eligible Homeowners.	
9. Eligible Properties	<ul> <li>"Eligible Properties" are residential properties that are located in Florida, which are:</li> <li>Single-family (attached or detached) properties;</li> <li>Condominium units;</li> <li>One to four-unit properties where the homeowner is living in one of the units as their primary residence;</li> <li>Manufactured homes permanently affixed to real property and taxed as real estate; or</li> <li>Mobile homes not permanently affixed to real property.</li> <li>Ineligible residential properties include:</li> <li>Vacant or abandoned residences;</li> <li>Second homes; and</li> <li>Investment properties.</li> </ul>	

Utility, Internet Service and HOA Fee payments, including electric, gas, home heating oil, water, and sewer, are eligible uses of the Utility, Internet Service and HOA Fee Assistance Program.  The following housing obligations are eligible for payment under the Utility, Internet Service and HOA Fee Program:  • Electric, gas, home heating oil, water, and sewer payment(s) (including any late fees and charges);  • Internet service payment(s) (including any late fees and charges); and  • HOA fee payment(s) (including any late fees and charges).		
The maximum Utility, Internet Service and HOA Fee Assistance Program financial assistance per household will be \$35,000 and the maximum HAF assistance per household will be \$50,000 (inclusive of Utility, Internet Service and HOA Fee Assistance Program financial assistance).		
The financial assistance will be structured as a non-recourse grant.		
DEO will disburse Utility, Internet Service and HOA Fee Assistance Program payments directly to the utility service providers (including electric, gas, home heating oil, water, and sewer service providers), internet service providers, and HOAs (or the applicable management company on behalf of the HOA).  DEO will disburse the amount quoted by the utility service provider, internet service provider, or HOA and any discrepancies will be required to be resolved by the		
homeowner and the utility service provider, internet service provider, or HOA, as applicable.		
Pending approval by Treasury, DEO is endeavoring to launch the program to the public statewide in the first quarter of 2022.		
The following documents may be required:  • Application;  • Consent form;		

•	Terms	οf	Service:
•	1 011113	OI.	OCI VICE.

- Qualifying written hardship attestation identifying and certifying the eligible hardship and that it occurred after January 21, 2020 (including a hardship that began before January 21, 2020, but continued after that date);
- If the eligible property is located in a census tract in which the median income satisfies the median income requirements of the Utility, Internet Service and HOA Fee Assistance Program, then a qualifying written income attestation certifying the homeowner's household income;
- If the eligible property is not located in a census tract in which the median income satisfies the median income requirements of the Utility, Internet Service and HOA Fee Assistance Program, then a qualifying written income attestation certifying the homeowner's household income together with supporting documentation (e.g., paystubs, W2s or other wage statements, IRS Form 1099s, tax filings, depository institution statements demonstrating regular income, or an attestation from an employer);
- Attestation that the homeowner is a "Socially Disadvantaged Individual" (if applicable);
- An updated utility account statement, internet service account statement and/or HOA fee account statement, as applicable;
- Social security number card or unique identifier as shown on a legal document, such as a federal tax return; and
- Any additional documents and information that DEO may require.

# 16. Program Partner Requirements

Utility service providers, internet service providers, and HOAs may be required to provide a written account statement, contact information, and/or ACH account information.

#### HOUSING COUNSELING AND EDUCATION PROGRAM

1. Program Overview	The Florida Housing Counseling and Education Program will assist in preserving homeownership and creating housing stability by preventing foreclosure and displacement through the Homeowner Assistance Fund.  The Housing Counseling and Education Program will do so by providing housing counseling and education through housing counseling agencies certified by the US Department of Housing and Urban Development for income-qualified,
2. Housing Counseling and Education Program Goals	eligible homeowners.  To provide housing counseling and educational services to eligible Florida homeowners to help to preserve homeownership and provide housing stability to Floridians in need.
3. Targeted Population of Homeowners	Based on the data-driven assessment of homeowner needs, DEO will strategically target Florida homeowners whose income is less than or equal to 100 percent of the area median income or the median income in the United States, whichever is greater, and Socially Disadvantaged Individuals.
4. Homeowner Income Eligibility Requirements	To be eligible for assistance under the Housing Counseling and Education Program, homeowners must have incomes that are less than or equal to 150 percent of the area median income or 100 percent of the median income in the United States, whichever is greater.
5. Payout of HAF Assistance	DEO will disburse Housing Counseling and Education Program payments to HUD-certified housing counseling agencies in consideration for services rendered under the Housing Counseling and Education Program.
6. Program Launch	Pending approval by Treasury, DEO is endeavoring to launch the program to the public statewide in the first quarter of 2022.