

Memorandum



TO: Economic Transformation, Stabilization & Workforce Development Advisory Commission

FROM: Cheryl Cohen, Division Administrator, Commerce

DATE: July 15, 2021

SUBJECT: Homeowner Assistance Fund *UPDATE

Overview: Montana House Bill 632 includes \$50,000,000 for Mortgage Assistance under ARPA Section 3206 (HB 632, Section 14(1)). Section 14(3) of HB 632 permits the Economic Transformation, Stabilization, and Workforce Development Advisory Commission the opportunity to provide recommendations to the Department of Commerce for the use of Mortgage Assistance funds. This update is being brought to afford the commission the ability to make the recommendations. The purpose of the Homeowner Assistance Fund (HAF), as named in ARPA Section 3206, is to prevent homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020.

Allocation Request and Deadlines:

- To be eligible to receive Homeowner Assistance Funds, eligible grantees were required to submit a notice of funds request to the U.S. Department of Treasury by Sunday, April 25, 2021.
- Commerce submitted the required notice of funds request to Treasury on Thursday, April 22, 2021.
- On May 4, 2021, the state received an initial payment in an amount equal to 10% of the total award (\$5,000,000).

No more than 50% of the initial \$5M payment may be used for planning, community engagement, needs assessment, and administrative expenses.

To receive funds beyond the 10% payment, Treasury requires grantees to develop and submit a HAF Plan. This plan must include:

- Data-driven assessment of homeowner needs
- Evidence of public participation and community engagement (including adherence to opening meeting or “sunshine” laws)
- Program design: descriptions; targeting; and best practices
- Performance goals
- Readiness to implement
- Budget

On June 17, 2021, Treasury informed HAF grantees that they expect to release updated guidance and HAF Plan templates shortly and stated, “we expect to maintain flexibility and to extend this deadline.” Treasury’s initial HAF guidance set a deadline of June 30, 2021 for grantees to either submit HAF Plans or notify Treasury of the date by which their HAF Plan will be submitted.

On June 29, 2021, Treasury notified grantees that the deadline to either submit HAF Plans or notify Treasury of the date by which the grantee's HAF Plan will be submitted was extended to July 31, 2021. Commerce is proposing we submit our HAF Plan to U.S. Treasury by September 30, 2021, to allow time for the required needs assessment and community engagement (both underway), Advisory Commission recommendations, formal public comment period, final program design and executive branch approval.

Structure:

Needs Assessment: On June 14, 2021, Treasury provided states with Data to Support HAF Plans (enclosed). The Federal Reserve Bank Mortgage Dashboard (page 2), based on an active loan sample of 48,290, shows Montana's statewide Forbearance Rate at 2.1% (compared to 3.9% national) and statewide Delinquency rate at 1.0% (compared to 1.9% national). The Montana Federal Housing Administration (FHA) unpaid principal balance of loans in forbearance is \$195M (1,188 loans in forbearance, indicating approx. \$165K average unpaid principal balance). The average annual income of households with FHA loans in forbearance is \$54,645. In the list of Montana's Top 20 Servicers by Forbearance Volume (page 5), Montana Board of Housing is shown as number 4 for FHA and number 3 for USDA-RD.

The Montana Board of Housing, as of June 30, 2021, has 211 loans in COVID19 formal forbearance. This represents 4.18% of the total mortgage servicing portfolio. Loans in COVID19 formal forbearance include 136 FHA, 20 USDA-RD, 19 VA loans, and other mortgage revenue bond (MRB) loans. Average loan balance is \$135K. The total estimated amount needed to bring the portfolio current, including estimated payments for partial claims, is \$2.514M.

Pilot Programs: U.S. Treasury encourages HAF grantees to use initial payments to create or fund pilot programs to serve targeted populations, and to focus on programs that are most likely to deliver resources most quickly to targeted populations, such as mortgage reinstatement programs (HAF Guidance, April 14, 2021, Page 6). In addition, Treasury encourages HAF grantees to prioritize assistance to homeowners who have FHA, VA, or USDA-RD mortgages and homeowners who have mortgages made with the proceeds of MRBs or other mortgage programs that target low- and moderate-income borrowers (HAF Guidance, April 14, 2021, Page 7). Commerce is therefore proposing an initial pilot project to provide a mortgage workout / reinstatement loan program for Montana Board of Housing borrowers with FHA, VA, USDA-RD and MRB loans who requested formal COVID19 forbearance and/or have a COVID19 related mortgage delinquency.

Eligibility: Pilot program parameters for a HAF mortgage workout loan / reinstatement program include:

- Homeowner must qualify as an eligible household under ARPA Section 3206 requirements and subsequent Treasury guidance.
- Eligible property type is primary residence, owner-occupied homes located within the State of Montana only;
- Eligible uses for HAF funds will be financial assistance in form of a loan, to allow a homeowner to reinstate their mortgage or pay other housing-related costs related to a period of forbearance, delinquency, or default;
- Maximum \$25,000 loan per HAF eligible household;

- Loan term is ten (10) years at 0% interest, payable in full upon maturity or other triggering action (i.e., sale, refinance, or payoff of primary loan). Note: average life of loan is 7 years, but low or no interest rates in current market appear to be extending the average life of loan;
- Required documentation will include Note and Deed of Trust, recorded as last in line lien on the property.

Montana Board of Housing further recommends considering use of funds for the following: default and foreclosure housing counseling; civil legal aid for qualified residential owner-occupied homeowners that need legal representation in the non-judicial foreclosure process; support of mediation fees for eligible homeowners; interdepartmental coordination with Department of Labor & Industries for referral of unemployed or underemployed borrowers (excluding elderly and persons with disabilities) for existing or potentially newly available employment and job training resources.

Montana Board of Housing staff is consulting with the state of Montana Division of Banking and Financial Institutions to determine required banking and disclosure rules for this proposed HAF loan product. Additional vetting of this proposed HAF workout loan product includes:

- Mortgage servicer administrative requirements for disclosures to the borrower, both up front at time of origination of the HAF workout loan and at time of repayment (and whether repayment is via monthly payments beginning after year 10 or balloon payment if it does not coincide with payment of the first mortgage).
- If structure includes collections of monthly payments rather than balloon payment at time of maturity, administrative duties such as default monitoring and foreclosure activity would be necessary if payments are not made.
- Additionally, if structure includes monthly payments starting after year 10 rather than balloon payment / payable in full at 10 year maturity, considerations for underwriting or qualifying the borrower (including review of borrower's income) would be needed.

The above program parameter recommendations may be updated based on activities under way (i.e., needs assessment, community engagement), Advisory Commission recommendations, further Treasury guidance, direction from the division of banking and financial institutions, legal counsel, state budget office and executive branch and public comment received.

Performance Metrics: Treasury guidance requires HAF grantees to establish goals and benchmarks, by program and by target population (HAF Guidelines, April 14, 2021, Page 7). These goals must identify how we will address homeowner needs identified in our HAF Plan, and Performance Goals must be disaggregated by key characteristics such as mortgage type, racial and ethnic demographics, and/or geographic area (including rural communities). Treasury further requires that we include a goal focused on reducing mortgage delinquency among targeted populations. These metrics will be developed and included in the draft HAF Plan submitted for Advisory Commission review at the August 2021 meeting.

HB 632 Section 27(2) states includes an exception to performance measure requirements for grant applicants under the Mortgage Assistance Program. Commerce proposes transparency reporting for the program to at minimum include:

- (1) number of homeowner applications received;
- (2) number of homeowner applications approved;
- (3) total funds loaned by county – starting at \$10,000 threshold;

This is consistent with transparency reporting for the 2020 CARES Act Emergency Housing Assistance Program and proposed transparency reporting for the 2021 Consolidated Appropriations Act Emergency Rental Assistance Program. Additional Performance Goals required for U.S. Treasury can also be provided.

Recommendation: Advisory Commission recommend the Montana Board of Housing to undertake the HAF pilot program outlined above to provide financial assistance in the form of a loan to allow homeowners to reinstate their mortgage (mortgage payment assistance to bring current) and/ or pay other housing-related costs related to their period of forbearance, delinquency, or default. This proposed pilot project does not include use of funds for principal reduction or facilitating mortgage interest rate reductions.

In addition, we request Advisory Commission concurrence of the proposed timeline:

- Commerce to inform U.S. Treasury by July 31, 2021 that Montana will submit our HAF Plan to Treasury by September 30, 2021.
- Draft HAF Plan submitted to the Advisory Commission for review and input at the August 2021 meeting.
- Release of draft HAF Plan for public comment immediately following the August 2021 meeting.
- Submission of finalized HAF Plan to U.S. Treasury by September 30, 2021, following updates to incorporate Advisory Commission input, formal public comment, and executive branch approval.

Attached Resources:

- U.S. Treasury Homeowner Assistance Fund Guidance
- Montana Data to Support HAF Plans

This is a final copy of the memo.

HOMEOWNER ASSISTANCE FUND GUIDANCE

U.S. DEPARTMENT OF THE TREASURY

April 14, 2021

INTRODUCTION

The Treasury Department is issuing this guidance regarding the Homeowner Assistance Fund (HAF), which was established under section 3206 of the American Rescue Plan Act of 2021 (the ARP). This guidance may be updated, revised, or modified at any time, and the Secretary of the Treasury may waive the terms of this guidance in her sole discretion to the extent permitted by law.

Under the HAF, Treasury will provide financial assistance in an aggregate amount of approximately \$9.9 billion. Treasury will separately publish information regarding the allocation of HAF funding for eligible entities.

PURPOSE OF THE HAF

According to the ARP, the HAF was established to mitigate financial hardships associated with the coronavirus pandemic by providing funds to eligible entities for the purpose of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing.

DEFINITIONS

Treasury will apply the following definitions for purposes of this guidance.

100% of the area median income for a household means two times the income limit for very-low income families, for the relevant household size, as published by the Department of Housing and Urban Development (HUD) in accordance with 42 U.S.C. 1437a(b)(2) for purposes of the HAF.

100% of the median income for the United States means the median income of the United States, as published by HUD for purposes of the HAF.

150% of the area median income for a household means three times the income limit for very-low income families, for the relevant household size, as published by HUD in accordance with 42 U.S.C. 1437a(b)(2) for purposes of the HAF.

Dwelling means any building, structure, or portion thereof that is occupied as, or designed or intended for occupancy as, a residence by one or more individuals.

Eligible entity means (1) a State, (2) the Department of Hawaiian Home Lands, (3) each Indian tribe (or, if applicable, the tribally designated housing entity of an Indian tribe) that was eligible for a grant under Title I of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4111 *et seq.*) for fiscal year 2020, and (4) any Indian tribe that opted out of receiving a grant allocation under the Native American Housing Block Grants program formula in fiscal year 2020.

Financial hardship means 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.

HAF participant means an eligible entity that receives funds from the HAF.

Mortgage means any credit transaction (1) that is secured by a mortgage, deed of trust, or other consensual security interest on a principal residence of a borrower that is (a) a one- to four-unit dwelling, or (b) a residential real property that includes a one- to four-unit dwelling; and (2) the unpaid principal balance of which was, at the time of origination, not more than the conforming loan limit. For purposes of this definition, the conforming loan limit means the applicable limitation governing the maximum original principal obligation of a mortgage secured by a single-family residence, a mortgage secured by a two-family residence, a mortgage secured by a three-family residence, or a mortgage secured by a four-family residence, as determined and adjusted annually under section 302(b)(2) of the Federal National Mortgage Association Charter Act (12 U.S.C. 1717(b)(2)) and section 305(a)(2) of the Federal Home Loan Mortgage Corporation Act (12 U.S.C. 1454(a)(2)).

Socially disadvantaged individuals are those who have been subjected to racial or ethnic prejudice or cultural bias because of their identity as a member of a group without regard to their individual qualities. The social disadvantage must stem from circumstances beyond their control. There is a rebuttable presumption that the following individuals are socially disadvantaged: Black Americans, Hispanic Americans, Native Americans, and Asian Americans and Pacific Islanders. In addition, an individual may be determined to be a socially disadvantaged individual in accordance with the procedures set forth at 13 CFR 124.103(c) or (d).

State means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, and the Commonwealth of the Northern Mariana Islands.

NOTICE OF REQUEST TO RECEIVE HAF PAYMENTS

The ARP requires eligible entities to notify Treasury of their request to receive payment from the HAF. Treasury has published a notice of funds request form, available at <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/homeowner-assistance-fund>, which must be completed, signed by an authorized official of the eligible entity, and returned to Treasury.

If any State (including the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, and the Commonwealth of the Northern Mariana Islands) does not submit a notice of funds request by April 25, 2021, the State will not be eligible for a payment from the HAF, and Treasury will reallocate the funding that was previously allocated to that State among those States that did request funding by the statutory deadline. This reallocation will occur no later than September 7, 2021 (180 days after the enactment of the ARP). The reallocation method will be published after it is determined whether any State has not requested funding from the HAF.

The deadline for an Indian tribe, tribal entity, or the Department of Hawaiian Home Lands to submit a notice of funds request is September 30, 2021.

FINANCIAL ASSISTANCE AGREEMENT

Each eligible entity approved to receive payment from the HAF must enter into a financial assistance agreement with Treasury. A form of the financial assistance agreement is available at <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/homeowner-assistance-fund>.

QUALIFIED EXPENSES

HAF participants may use funding from the HAF only for the following types of qualified expenses that are for the purpose of preventing homeowner mortgage delinquencies, homeowner mortgage defaults, homeowner mortgage foreclosures, homeowner loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship:

1. mortgage payment assistance;
2. financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default;
3. mortgage principal reduction, including with respect to a second mortgage provided by a nonprofit or government entity;
4. facilitating mortgage interest rate reductions;
5. payment assistance for:
 - a. homeowner's utilities, including electric, gas, home energy, and water;
 - b. homeowner's internet service, including broadband internet access service, as defined in 47 CFR 8.1(b) (or any successor regulation);¹
 - c. homeowner's insurance, flood insurance, and mortgage insurance;
 - d. homeowner's association fees or liens, condominium association fees, or common charges; and
 - e. down payment assistance loans provided by nonprofit or government entities;

¹ As of the date of this guidance, the definition of "broadband internet access service" in 47 CFR 8.1(b) is "a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up internet access service. This term also encompasses any service that the [Federal Communications] Commission finds to be providing a functional equivalent of the service described in the previous sentence or that is used to evade the protections set forth in this part."

6. payment assistance for delinquent property taxes to prevent homeowner tax foreclosures;
7. measures to prevent homeowner displacement, such as home repairs to maintain the habitability of a home or assistance to enable households to receive clear title to their properties;
8. counseling or educational efforts by housing counseling agencies approved by HUD, or legal services, targeted to households eligible to be served with funding from the HAF related to foreclosure prevention or displacement, in an aggregate amount up to 5% of the funding from the HAF received by the HAF participant;
9. reimbursement of funds expended by a state, local government, or entity described in clause (3) or (4) of the definition above of “eligible entity” during the period beginning on January 21, 2020, and ending on the date that the first funds are disbursed by the HAF participant under the HAF, for a qualified expense (other than any qualified expense paid directly or indirectly by another federal funding source, or any qualified expenses described in clauses (6), (7), (8), or (10) of this definition); and
10. planning, community engagement, needs assessment, and administrative expenses related to the HAF participant’s disbursement of HAF funds for qualified expenses, in an aggregate amount not to exceed 15% of the funding from the HAF received by the HAF participant.

Funding from the HAF may not be used for any use other than those provided for in this section. Treasury will make available a form for requesting reimbursements under clause (9) above.

ELIGIBLE HOMEOWNERS

Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF if they experienced a financial hardship after January 21, 2020 and have incomes equal to or less than 150% of the area median income. A HAF participant may provide HAF funds only to a homeowner with respect to qualified expenses related to the dwelling that is such homeowner’s primary residence.

HAF participants must require homeowners to attest that they experienced financial hardship after January 21, 2020. The attestation must describe the nature of the financial hardship (for example, job loss, reduction in income, or increased costs due to healthcare or the need to care for a family member).

Income Determinations. With respect to each household applying for assistance, HAF participants may use HUD’s definition of “annual income” in 24 CFR 5.609 or use adjusted gross income as defined for purposes of reporting on Internal Revenue Service (IRS) Form 1040 series for individual federal annual income tax purposes.

HAF participants must have a reasonable basis under the circumstances for determining income for purposes of the requirements described above under “Eligible Homeowners.” Two approaches for income verification are permissible: (1) the household may provide a written attestation as to household income together with supporting documentation such as paystubs, W-2s or other wage statements, IRS Form 1099s, tax filings, depository institution statements demonstrating regular income, or an attestation from an employer; or (2) the household may

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.

HAF participants may provide waivers or exceptions to this documentation requirement as reasonably necessary to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic, or a lack of technological access by homeowners; in these cases, the HAF participant is still responsible for making the required determination regarding household income and documenting that determination.

If a HAF participant chooses to require households to provide supporting documentation for purposes of income determination, Treasury encourages HAF participants to avoid establishing documentation requirements that are likely to be barriers to participation for eligible households, including those with irregular incomes such as from a small business.

TARGETING

Not less than 60% of amounts made available to each HAF participant must be used for qualified expenses that assist homeowners having incomes equal to or less than 100% of the area median income or equal to or less than 100% of the median income for the United States, whichever is greater. Any amount not made available to homeowners that meet this income-targeting requirement must be prioritized for assistance to socially disadvantaged individuals, with funds remaining after such prioritization being made available for other eligible homeowners.

INITIAL PAYMENTS

Treasury will make initial payments from the HAF available to eligible entities that are approved to participate in the HAF, in an amount equal to 10% of the total amount allocated to the eligible entity. In order to receive this initial payment, the eligible entity must (1) enter into the financial assistance agreement with Treasury described above, and (2) commit to use the funds only for qualified expenses other than clause (9) of the "Qualified Expenses" section above. Treasury will make payments to the eligible entity or agency of the eligible entity identified on the eligible entity's notice of funds request. No more than 50% of the initial payment may be used for planning, community engagement, needs assessment, and administrative expenses described in clause (10) of the "Qualified Expenses" section above. An eligible entity that elects not to receive this initial payment may receive its allocated funds after Treasury approves its HAF plan, as described below.

Treasury encourages HAF participants to use these initial payments to create or fund pilot programs to serve targeted populations, and to focus on programs that are most likely to deliver resources most quickly to targeted populations, such as mortgage reinstatement programs.

HAF PLAN

To receive HAF funds beyond the initial 10% payment described above, an eligible entity must develop and submit a plan for its use of HAF funding. These HAF plans will describe in detail

the needs of homeowners within the relevant jurisdiction, the design of each program the eligible entity proposes to implement using HAF funds, performance goals, and information regarding the eligible entity's readiness to implement the programs. In developing HAF plans, Treasury expects that eligible entities will follow their state open meeting or "sunshine" laws (with associated public hearings conducted in a manner appropriate for local public health conditions), and Treasury encourages eligible entities to post draft HAF plans for public comment and hold public hearings. HAF participants will receive funds under the HAF only after Treasury approves a HAF plan. Treasury will provide eligible entities with a template for the HAF plan, which is expected to include the following elements.

By June 30, 2021, eligible entities must submit to Treasury a completed HAF plan or a date by which a HAF plan will be submitted. Treasury will promptly begin reviewing HAF plans that are submitted before June 30, 2021.

- **Homeowner Needs and Engagement:**

- *Data-Driven Assessment of Homeowner Needs:* HAF participants must provide information and data that they use to design their programs in a way that effectively targets eligible homeowners. HAF participants must include data about financial hardships of target homeowners and socially disadvantaged individuals, including data on mortgage delinquencies, defaults, foreclosures, post-foreclosure evictions, and the loss of utilities or home energy services, including trends over time disaggregated by demographic categories and geographic areas.
- *Evidence of Public Participation and Community Engagement:* HAF plans must describe the extent to which their information on homeowner needs reflects their engagement with organizations and individuals representing eligible homeowners, and how the HAF participant allowed for public participation in the development of the HAF plan, including any public hearings.

- **Program Design:**

- *Program Descriptions:* HAF participants must describe each program for which they will use HAF funding. The description must describe the targeted population of homeowners and the financial challenges the program would address based on the data-driven assessment of homeowner needs (e.g., the immediate challenge of mortgage delinquency, or displacement prevention). Each program description must include a description of eligibility requirements; the intended impact on eligible homeowners; the application process; conditions or limitations, including the maximum dollar amount that the program will provide to each homeowner for each type of qualified expense; a description of the payment process; and other available sources of assistance for targeted homeowners. Treasury strongly encourages HAF participants to have one or more programs intended to reduce mortgage delinquency among targeted populations. Treasury encourages HAF participants to consider program designs that leverage utility assistance from other federal programs that have been created expressly for that purpose before using HAF funds for utility assistance.

- *Methods for Targeting HAF Funding:* The HAF plan must describe how the HAF participant will effectively target HAF resources to (1) homeowners having incomes equal to or less than 100 percent of the area median income or equal to or less than 100 percent of the median income for the United States, whichever is greater; and (2) socially disadvantaged individuals. The HAF participant must describe its targeting strategies according to disaggregated characteristics of the targeted population such as income ranges, racial and ethnic demographics, and/or geographic areas (including rural communities), as appropriate for the relevant jurisdiction. Targeting methods may include marketing, community engagement strategies, partnerships with housing counseling agencies or legal aid organizations, or other educational services that are aligned with the HAF participant's program design, in a manner that is culturally and linguistically relevant to the targeted communities.

Treasury encourages HAF participants to prioritize assistance to homeowners who have Federal Housing Administration (FHA), Department of Veterans Affairs (VA), or U.S. Department of Agriculture (USDA) mortgages and homeowners who have mortgages made with the proceeds of mortgage revenue bonds or other mortgage programs that target low- and moderate-income borrowers.

- *Best Practices and Coordination with Other HAF participants:* The HAF participant must describe the extent to which its program descriptions or models are based on best practices and/or the participant's effective implementation of a previous program, including those funded with the initial payment under HAF. The HAF participant should present any evidence that it coordinated with other HAF participants, or plans for such coordination, including with respect to engagement with mortgage servicers that operate in multiple states or with recipients of other large federal grants or financial assistance funds. Further, HAF participants should describe any relevant coordination with federal agencies including FHA, VA, and USDA, as well as with state or local agencies that hold mortgage portfolios that have covenants or targeting requirements that match the HAF participants' HAF targeting strategies and goals.

- **Performance Goals:**

- Each HAF participant must establish goals and benchmarks, by program and by targeted population, for assistance using HAF funds. The performance goals must identify how they address homeowner needs identified by the HAF participant in its plan. Performance goals must be disaggregated by key characteristics such as mortgage type, racial and ethnic demographics, and/or geographic areas (including rural communities), as appropriate for the jurisdiction. Each HAF participant must include a goal focused on reducing mortgage delinquency among targeted populations.

- **Readiness:**
 - *Staffing and Systems:* The HAF participant must describe the staffing and systems in place or planned to ensure effective program delivery, compliance, and reporting, in a manner consistent with applicable program requirements and guidance using the programs described in the plan.
 - *Contracts and Partnerships:* The HAF participant must describe the contractors, partners, and other organizations that are critical to the HAF participant’s program delivery, compliance, and reporting.
 - *Existing and Pilot Programs:* The HAF participant must describe in detail how it used its initial 10% payment, if applicable (as described above under “Initial Payments”).
- **Budget:**
 - The HAF participant must provide a budget, by program, using a template that Treasury will provide.

In lieu of the detailed HAF plans described above, Treasury will provide a streamlined template to be submitted by any HAF participant that is allocated less than \$5 million of HAF funds.

HAF PLAN ASSESSMENTS AND APPROVALS

Treasury will assess HAF plans based on the following factors:

- **Alignment of Community Needs and Program Design:** The extent to which programs are responsive to community needs and based on a best practice model or evidence of the HAF participant’s effective implementation of a previous program or pilot program.
- **Alignment of Performance Goals with Data on Targeted Populations:** The extent to which the performance goals would address the needs of specific eligible populations within targeted communities, in a manner that is appropriate to the jurisdiction.
- **Methods of Targeting:** The extent to which the HAF participant describes targeting methods reasonably likely to result in HAF assistance being made available to eligible homeowners consistent with the targeting requirements described in the ARP and in applicable guidance issued by Treasury. Recognizing that homeowners earning up to 100% of the area median income are overrepresented in portfolios of government-backed and guaranteed mortgages compared to the market as a whole, Treasury will favorably consider the prioritization of assistance to homeowners who have FHA, VA, or USDA mortgages, and to homeowners who have mortgages made with the proceeds of mortgage revenue bonds or other mortgage programs that target low- and moderate-income borrowers, when assessing a HAF participant’s proposed methods of targeting HAF funds.

- **Readiness:** The extent to which the HAF participant demonstrates readiness to implement a program at scale, including having in place policies and procedures for the program and an appropriate mix of staffing, contractors, and partners. Implementation of a pilot program or pre-existing program that successfully targeted resources to the targeted populations will be a strong indication of readiness.
- **Alignment of Budget with Performance Goals:** The extent to which the funding budgeted by program reasonably supports the achievement of the performance goals.

Treasury may approve a HAF plan in whole or in part. If Treasury approves a HAF plan only in part, the HAF participant will be provided an opportunity to address the weaknesses identified by Treasury. Treasury may also return a HAF plan to the HAF participant with recommendations for improvement and resubmission to Treasury for reconsideration. In addition, to enable HAF participants to rapidly receive approval for certain HAF-funded programs that can be developed quickly, a HAF participant may elect to submit multiple HAF plans over time regarding different programs it proposes to implement. After Treasury approves a HAF plan in whole or in part, Treasury will inform the HAF participant of the schedule for disbursements to the participant for purposes of the approved portions of the plan.

In the event that the information required in the HAF plan is not available to a tribe, Treasury will accept alternative information regarding the relevant community. In addition, a HAF plan submitted by a tribe whose population consists largely or entirely of socially disadvantaged individuals may be tailored to reflect the limited effort necessary to target its programs for those individuals.

Treasury will establish a threshold amount below which a HAF participant will not require prior approval from Treasury to reallocate funding from an approved program to be used for a different purpose.

REPORTING AND MONITORING

HAF participants will be required to submit quarterly reports to Treasury that include financial data, targeting data, and other information. Treasury will release additional guidance regarding HAF reporting. HAF participants will be subject to the reporting requirements under 2 C.F.R. Part 200, other than such provisions as Treasury may determine are inapplicable to the HAF.

HAF participants will also be required to submit an annual program report to Treasury regarding the impact of the HAF program.

SANCTIONS

In the event of a HAF participant's noncompliance with applicable law or HAF program requirements or guidance, Treasury may impose additional conditions on the receipt of additional HAF funds by the HAF participant, terminate further payments from the HAF, seek the repayment of previous HAF payments, or take other available remedies.

**HOMEOWNER ASSISTANCE FUND (HAF)
Data to Support HAF Plans**

Data for:	MONTANA
Prepared on:	June 11, 2021

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p.3	Federal Reserve Bank - Bank-Serviced Portfolio Loans Only
p.4	Federal Agencies - Mortgage Data
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The data in this document is being provided to Homeowner Assistance Fund (HAF) grantees to support the development of their HAF plans. It should be used solely for purposes related to HAF. Please do not disclose it except to state agencies or related entities that have a need to know the information in connection with HAF.

Federal Reserve Bank Mortgage Dashboard MONTANA

Number of Mortgages (all active loans in sample)							
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority
MONTANA	48,290	28,899	19,391	9,641	38,649	1,036	47,254
NATIONAL	14,134,435						

Forbearance Rate							
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority
MONTANA	2.1%	2.0%	2.2%	2.2%	2.1%	2.7%	2.1%
NATIONAL	3.9%						

Delinquency Rate							
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority
MONTANA	1.0%	1.0%	1.1%	1.2%	1.0%	2.3%	1.0%
NATIONAL	1.9%						

Data Definitions.

Number of Mortgages - The number of mortgages arises from an approximate two-thirds sample of the U.S. mortgage market; the figures presented here are not scaled up to the market.

Forbearance Rate - Percentage of active loans that servicer indicates are in forbearance

Delinquency Rate - Percentage of active loans that servicer indicates are 30 days past due, but not in forbearance.

Data sources.

The datasets used to generate the accompanying dataset are the following:

- Black Knight Data & Analytics LLC provided by the RADAR Group at the Federal Reserve Bank of Philadelphia
- Federal Housing Finance Agency Low Income Areas file
- U.S. Department of Housing and Urban Development ZIP-Tract crosswalk (2021Q1)

The data is a modified version of the publicly-available Mortgage Analytics and Performance Dashboard (MAPD), a joint effort by the Federal Reserve Banks of Atlanta and Philadelphia.

Federal Reserve Bank Mortgage Dashboard - Bank Serviced Portfolio Loans Only MONTANA

Number of mortgages									
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority	Servicer Assets < \$250bn	Servicer Assets >= \$250bn
MONTANA	2,704	1,626	1,077	486	2,218	0	2,704	0	2,736
NATIONAL	893,220								

Forbearance rate									
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority	Servicer Assets < \$250bn	Servicer Assets >= \$250bn
MONTANA	2.5%	2.8%	2.0%	2.3%	2.5%	N/A	2.5%	N/A	2.6%
NATIONAL	3.4%								

Delinquency Rate									
	Statewide	Rural	Urban	Low-Income	Non-Low-Income	High Minority	Low Minority	Servicer Assets < \$250bn	Servicer Assets >= \$250bn
MONTANA	1.1%	1.2%	0.9%	1.4%	1.0%	N/A	1.1%	N/A	1.1%
NATIONAL	2.5%								

Data Definitions.
Number of Mortgages - The number of mortgages arises from an approximate two-thirds sample of the U.S. mortgage market; the figures presented here are not scaled up to the market.
Forbearance Rate - Percentage of active loans that servicer indicates are in forbearance
Delinquency Rate - Percentage of active loans that servicer indicates are 30 days past due, but not in forbearance.

Data sources.
 The datasets used to generate the accompanying dataset are the following:
 - Black Knight Data & Analytics LLC provided by the RADAR Group at the Federal Reserve Bank of Philadelphia
 - Federal Housing Finance Agency Low Income Areas file
 - U.S. Department of Housing and Urban Development ZIP-Tract crosswalk (2021Q1)

 The data is a modified version of the publicly-available Mortgage Analytics and Performance Dashboard (MAPD), a joint effort by the Federal Reserve Banks of Atlanta and Philadelphia.

MONTANA

Federal Housing Administration

	Active Loans	60-Day Delinquent	90-Day + (SDQ) Delinquent	Average Annual Income - SDQ Loans	Median Annual Income - SDQ Loans	% 90+ Delq NOT in Forbearance	Forbearance #	Unpaid Principal Balance - Loans in Forbearance	Average Annual Income - Forbearance	Median Annual Income - Forbearance	Bankruptcy	Bankruptcy Relief of Stay	Active Foreclosure	Loss Mitigation - ALL Options	Loss Mitigation - Loan Mod	Loss Mitigation - Repymt Plan	# of Black Borrowers in Forbearance	# of Hispanic Borrowers in Forbearance	Other Minority Borrowers (Combined) in Forbearance	# of Black Borrowers 90+ Days Delinquent	# of Hispanic Borrowers 90+ Days Delinquent	Other Minority Borrowers (Combined) 90+ Days Delinquent
MONTANA	18,693	153	1,546	\$54,581	\$51,480	32.73%	1,188	\$195,914,733	\$54,645	\$52,098	32		18	1,386			N/A	39	105	12	58	125
US	7,711,197	90,928	872,068	\$56,523	\$52,565	33.75%	685,017	\$120,843,064,885	\$56,883	\$53,191	41,226		8,685	808,969			151,857	138,925	93,073	190,618	168,534	112,154

United States Department of Agriculture

	Active Loans	60-Day Delinquent	90-Day + (SDQ) Delinquent	Average Annual Income - SDQ Loans	Median Annual Income - SDQ Loans	% 90+ Delq NOT in Forbearance	Forbearance #	Delinquent Amount in Forbearance	Average Annual Income - Forbearance	Median Annual Income - Forbearance	Bankruptcy	Bankruptcy Relief of Stay	Active Foreclosure	Loss Mitigation - ALL Options	Loss Mitigation - Loan Mod	Loss Mitigation - Repymt Plan	# of Black Borrowers in Forbearance	# of Hispanic Borrowers in Forbearance	Other Minority Borrowers (Combined) in Forbearance	# Black Borrowers 90+ Days Delinquent	# Hispanic Borrowers 90+ Days Delinquent	Other Minority Borrowers (Combined) 90+ Days Delinquent
MONTANA	6,562	41	322	\$54,573	\$54,880	28.0%	232	\$1,507,860	\$56,763	\$56,215	5		31	205			1	5	3	2	6	4
US	1,005,395	9,581	83,662	\$55,530	\$54,580	34.3%	54,980	\$322,886,760	\$56,824	\$55,910	4,285		9,549	47,906			6,537	1,404	6,223	9,574	2,085	9,393

Veterans Affairs

	Active Loans	60-Day Delinquent	90-Day + (SDQ) Delinquent	Average Monthly Income - SDQ Loans	Median Monthly Income - SDQ Loans	% 90+ Delq NOT in Forbearance	Forbearance #	Delinquent Amount in Forbearance	Average Monthly Income - Forbearance	Median Monthly Income - Forbearance	Bankruptcy	Bankruptcy Relief of Stay	Active Foreclosure	Loss Mitigation - ALL Options	Loss Mitigation - Loan Mod	Loss Mitigation - Repymt Plan	# of Black Borrowers in Forbearance	# of Hispanic Borrowers in Forbearance	Other Minority Borrowers (Combined) in Forbearance	# Black Borrowers 90+ Days Delinquent	# Hispanic Borrowers 90+ Days Delinquent	Other Minority Borrowers (Combined) 90+ Days Delinquent
MONTANA	14,868	571	793	\$4,350	\$4,354	42.4%	585	\$5,899,406	\$4,318	\$4,361	64	0	67	646	18	43	16	23	25	16	35	35
US	3,347,843	24,142	221,493	\$4,517	\$4,444	37.2%	183,744	\$2,193,350,908	\$4,529	\$4,482	31,459	1,974	22,773	211,534	6,260	21,530	41,134	19,453	7,290	47,571	22,429	8,458

MONTANA

Top 20 Servicers by Forbearance Volume

Federal Housing Administration	U.S. Department of Agriculture	Veterans Affairs
1 FREEDOM MORTGAGE CORPORATION	1 FREEDOM MORTGAGE CORPORATION	1 NATIONSTAR MORTGAGE LLC DBA MR COOPER
2 WELLS FARGO BANK NA	2 FLAGSTAR BANK	2 WELLS FARGO HOME MORTGAGE INC 905796
3 FLAGSTAR BANK FSB	3 MONTANA BOARD OF HOUSING	3 FREEDOM MORTGAGE CORPORATION
4 MONTANA BOARD OF HOUSING	4 WELLS FARGO BANK N.A.	4 PENNYMAC LOAN SERVICES, LLC
5 LOANCARE LLC	5 PENNYMAC LOAN SERVICES, LLC	5 LOANCARE SERVICING CENTER
6 US BANK NA	6 CARRINGTON MORTGAGE SERVICES, LLC	6 US BANK HOME MORTGAGE
7 PENNYMAC LOAN SERVICES LLC	7 LAKEVIEW LOAN SERVICING, LLC	7 FLAGSTAR SAVINGS BANK
8 QUICKEN LOANS, LLC	8 M & T BANK	8 TRUIST BANK
9 MIDFIRST BANK	9 US BANK	9 M&T MORTGAGE CORP
10 M AND T BANK	10 TRUIST BANK	10 QUICKEN LOANS INC.
11 NATIONSTAR MORTGAGE LLC	11 NATIONSTAR MORTGAGE LLC	11 GUILD MORTGAGE CO
12 GUILD MORTGAGE COMPANY LLC	12 STOCKMAN BANK	12 CARRINGTON MORTGAGE SERVICES, LLC
13 CENLAR FEDERAL SAVINGS BANK	13 NEW REZ, LLC	13 CARRINGTON MORTGAGE SERVICES, LLC
14 STOCKMAN BANK OF MONTANA	14 RUSHMORE LOAN MANAGEMENT SERVICES, LLC	14 NAVY FEDERAL CREDIT UNION
15 TRUIST BANK	15 PNC MORTGAGE A DIVISION OF PNC BANK, N.A.	15 NEW PENN FINANCIAL, LLC DBA SHELLPOINT MORTGAGE
16 CARRINGTON MORTGAGE SERVICES LLC	16 DOVENMUEHLE MORTGAGE INC	16 STOCKMAN BANK
17 NEWREZ LLC	17 OPPORTUNITY BANK OF MONTANA	17 RUSHMORE LOAN MNGMT SERVICES LLC
18 DOVENMUEHLE MORTGAGE INC	18 CENLAR, FSB	18 MONTANA BOARD OF HOUSING
19 THE MONEY SOURCE INC	19 FIRST INTERSTATE BANK	19 MONTANA BOARD OF HOUSING
20 PLANET HOME LENDING LLC	20 CITIZENS BANK, N.A.	20 CITIZENS BANK NA

	Federal Housing Administration	U.S. Department of Agriculture	Veterans Affairs
State	Postal Code - State	Postal Code - State	FIPS State Code associated with Analytics Primary Borrower record.
Total Loans	Count of loans with "Active" status where the insurance has not been terminated. An "Active" may be in loss mitigation or active foreclosure.	Count of loans with "Active" status where the insurance has not been terminated. An "Active" may be in loss mitigation or active foreclosure.	Count of loans from the indicated Analytics Snapshot with "Active" status.
30-Day Delinquent	Count of loans from the Active status population where the most recent default episode is 30 to 60 days.	Count of loans from the Active status population where the most recent default episode is 30 to 60 days.	Count of loans from the indicated Analytics Snapshot with "Active" status and Delinquency Category of "31-60 Days". NOTE: Since the reporting timelines of servicers who manually report loan data to VA lag some VA reporting cycles, it is often the case that loans appearing as "31-60 days" delinquent are in fact performing assets. Regardless of reporting timelines, the average roll-rate of loans actually moving from "30-Day" to "60-Day" delinquency is low.
60-Day Delinquent	Count of loans from the Active status population where the most recent default episode is 61 to 90 days.	Count of loans from the Active status population where the most recent default episode is 61 to 90 days.	Count of loans from the indicated Analytics Snapshot with "Active" status and Delinquency Category of "61-90 Days."
90-Days (SDQ) Delinquent	Count of loans from the Active status population where the most recent default episode is 90 plus days delinquent (SDQ). The loan does not have to be in forbearance.	Count of loans from the Active status population where the most recent default episode is 90 plus days delinquent (SDQ). The loan does not have to be in forbearance.	Count of loans from the indicated Analytics Snapshot with "Active" status and Delinquency Category one of "91-120Days", "91+Days", "Foreclosure Start", or "Foreclosure Inventory."
Average Income (SDQ)	Average of income at origination of borrowers 90 plus days delinquent (SDQ). The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Average of income at origination of borrowers 90 plus days delinquent (SDQ). The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Average of Income at Origination associated with Analytics Primary Borrower record for loans meeting above SDQ definition.
Median Income (SDQ)	Median of income at origination of borrowers 90 plus days delinquent (SDQ). The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Median of income at origination of borrowers 90 plus days delinquent (SDQ). The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Median of Income at Origination associated with Analytics Primary Borrower record for loans meeting above SDQ definition.
Average Credit Score (SDQ)	FHA did not provide	USDA did not provide	Average of Credit Score at Origination associated with Analytics Primary Borrower record for loans meeting above SDQ definition.
Median Credit Score (SDQ)	FHA did not provide	USDA did not provide	Median of Credit Score at Origination associated with Analytics Primary Borrower record for loans meeting above SDQ definition.
% of 90-Days (SDQ) Delinquent not in Forbearance	The share of borrowers 90 plus days delinquent (SDQ) that are not in forbearance.	The percentage of borrowers who are 90 plus days delinquent that are not in forbearance.	Count of loans meeting above SDQ definition that also do NOT have Forbearance (see below), divided by count of loans meeting above SDQ definition.
Forbearance Cnt	The count of borrowers in Forbearance. Forbearance includes Formal Forbearance, Special Forbearance, and Repayment Plan.	The number of borrowers in Forbearance	Count of loans from the indicated Analytics Snapshot with "Active" status, that have an Active Default as of the indicated snapshot date, and that have Special Forbearance as the most recent Loss Mit option reported by the servicer, and which have a Loss Mit Start Date, and also an Event Processed Date, prior to the indicated snapshot date.
Forbearance Delinquent Amt	Sum of the unpaid principal balance of loans meeting above Forbearance definition.	Sum of the delinquent balance of loans meeting above Forbearance definition.	Sum of Delinquent Amount as recorded in the indicated Analytics snapshot for loans meeting above Forbearance definition.
Average Income (Forbearance)	Average of income at origination of borrowers in Forbearance. The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Average of income at origination of borrowers in Forbearance. The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Average of Income at Origination associated with Analytics Primary Borrower record for loans meeting above forbearance definition.
Median Income (Forbearance)	Median of income at origination of borrowers in Forbearance. The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Median of income at origination of borrowers in Forbearance. The total annual income is for all borrowers. The income figures ARE NOT adjusted for inflation.	Median of Income at Origination associated with Analytics Primary Borrower record for loans meeting above forbearance definition.
Average Credit Score (Forbearance)	FHA did not provide	USDA did not provide	Average of Credit Score at Origination associated with Analytics Primary Borrower record for loans meeting above Forbearance definition.
Median Credit Score (Forbearance)	FHA did not provide	USDA did not provide	Median of Credit Score at Origination associated with Analytics Primary Borrower record for loans meeting above Forbearance definition.
Bankruptcy	Count of borrowers in Bankruptcy. Borrowers are reported as in bankruptcy with a dismissal/discharge until they are reported as something else.	Number of borrowers reported in active bankruptcy during the previous month. Borrowers will remain in an active bankruptcy status until lender reports otherwise.	Count of loans from the indicated Analytics Snapshot with "Active" status, that have a Bankruptcy Start event which has an Event Processed Date prior to the indicated snapshot date, and that do NOT have a Bankruptcy Update event indicating Dismissal or Discharge which has an Event Processed Date prior to the indicated snapshot date and after the Event Processed Date of the Bankruptcy Start event.
Bankruptcy Relief of Stay	FHA did not provide	USDA did not provide	Count of loans from the indicated Analytics Snapshot with "Active" status, that have a Bankruptcy Start event which has an Event Processed Date prior to the indicated snapshot date, and that have a Bankruptcy Update event indicating Relief of Stay which has an Event Processed Date after Dec-31-2020 and prior to the indicated snapshot date and after the Event Processed Date of the Bankruptcy Start event, and the Bankruptcy Start event does not have a Dismissal or Discharge associated with it.
Active Foreclosure	Count of borrowers in Active Foreclosure. Foreclosure is based first legal action needed to initiate the foreclosure action actually occurring (complaint filed, NOS published, etc.). No occupancy filter is applied. The borrowers is counted as a foreclosure during post-foreclosure sale activity until termination.	Number of borrowers reported in active foreclosure during the previous month. Borrowers will remain in an active foreclosure status until lender reports otherwise.	Count of loans from the indicated Analytics Snapshot with "Active" status and Delinquency Category one of "Foreclosure Start" or "Foreclosure Inventory" that have a Foreclosure Referral event reported by the servicer, and do NOT have a Loss Mitigation event reported by the servicer subsequent to the Foreclosure Referral event, and which have a reported Occupancy Status of "Original Veteran", "Other", "Tenant", or "Transferee".

	Federal Housing Administration	U.S. Department of Agriculture	Veterans Affairs
Loss Mit (All Loss Mit Options)	Count of borrowers in Loss Mitigation. The count includes non-home retention, short sales, and DII, as the calculation.	Count of borrowers in Loss Mitigation. The count includes all payment plans or loan modifications, short sales and DII.	Count of loans from the Indicated Analytics Snapshot with "Active" status, that have an Active Default as of the indicated snapshot date, and that have either Special Forbearance, Loan Modification, or Repayment Plan as the most recent Loss Mit option reported by the servicer, and which have a Loss Mit Start Date, and also an Event Processed Date, prior to the indicated snapshot date.
Loss Mit (Loan Mod)	FHA did not provide	USDA did not provide	Count of loans from the Indicated Analytics Snapshot with "Active" status, that have an Active Default as of the indicated snapshot date, and that have Loan Modification as the most recent Loss Mit option reported by the servicer, and which have a Loss Mit Start Date, and also an Event Processed Date, prior to the indicated snapshot date.
Loss Mit (Repayment Plan)	FHA did not provide	USDA did not provide	Count of loans from the Indicated Analytics Snapshot with "Active" status, that have an Active Default as of the indicated snapshot date, and that have Repayment Plan as the most recent Loss Mit option reported by the servicer, and which have a Loss Mit Start Date, and also an Event Processed Date, prior to the indicated snapshot date.
Share of Borrowers in Forbearance (Black)	The count of Black borrowers in Forbearance. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of borrowers in Forbearance who selected Black as their Race Identifier. Race/Ethnicity are defined based on the primary borrower. Race is counted independent of Ethnicity. Borrower who chose only Black are included in the number. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Count of all loans with "Active" status, in the indicated State, that have Forbearance per the definition above, for which the Analytics Primary Borrower record has a Race designation of "Black", regardless of reported ethnicity.
Share of Borrowers in Forbearance (Hispanic)	The count of Hispanic borrowers in Forbearance. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of borrowers in Forbearance who selected Hispanic for the Ethnicity identifier. Race/Ethnicity are defined based on the primary borrower. Ethnicity is counted independent of Race. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Percent of all loans with "Active" status, in the indicated State, that have Forbearance per the definition above, for which the Analytics Primary Borrower record has an Ethnicity designation of "Hispanic or Latino", regardless of reported race.
Share of Borrowers in Forbearance (Combined)	The count of Combined [Other] borrowers in Forbearance. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of borrowers in Forbearance who selected any race or combination of race identifier that included two or more indicators. Race/Ethnicity are defined based on the primary borrower. Race is counted independent of Ethnicity. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Count of all loans with "Active" status, in the indicated State, that have Forbearance per the definition above, for which the Analytics Primary Borrower record has a Race designation that is one of "American Indian or Alaskan Native", "Native Hawaiian or Pacific Islander", "Asian", "Two or More Races", regardless of reported ethnicity.
Share of Borrowers in SDQ (Black)	The count of Black SDQ borrowers. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of SDQ borrowers who selected Black as their Race Identifier. Race/Ethnicity are defined based on the primary borrower. Race is counted independent of Ethnicity. Borrower who chose only Black are included in the number. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Count of all loans with "Active" status, in the indicated State, that are SDQ per the definition above, for which the Analytics Primary Borrower record has a Race designation of "Black", regardless of reported ethnicity.
Share of Borrowers in SDQ (Hispanic)	The count of Hispanic SDQ borrowers. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of SDQ borrowers who selected Hispanic for the Ethnicity identifier. Race/Ethnicity are defined based on the primary borrower. Ethnicity is counted independent of Race. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Percent of all loans with "Active" status, in the indicated State, that are SDQ per the definition above, for which the Analytics Primary Borrower record has an Ethnicity designation of "Hispanic or Latino", regardless of reported race.
Share of Borrowers in SDQ (Combined)	The count of Combined [Other] SDQ borrowers. Race/Ethnicity are defined based on the primary borrower. White is non-Hispanic and white. Black is non-Hispanic and black, including borrowers that reported two races with one being Black. Hispanic is based on reported ethnicity and can be for any race (white, black, or other). Other includes non-Hispanic and non-Black borrowers reported as American Indian, Asian, Native Hawaiian/Pacific Islander, or multiple races. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	The count of SDQ borrowers who selected any race or combination of race identifier that included two or more indicators. Race/Ethnicity are defined based on the primary borrower. Race is counted independent of Ethnicity. Monthly income and race/ethnicity were collected at origination. Race/ethnicity are self-reported or lender inferred identifications.	Count of all loans with "Active" status, in the indicated State, that are SDQ per the definition above, for which the Analytics Primary Borrower record has a Race designation that is one of "American Indian or Alaskan Native", "Native Hawaiian or Pacific Islander", "Asian", "Two or More Races", regardless of reported ethnicity.
State	Postal Code - State	Postal Code - State	FIPS State Code associated with Analytics Primary Borrower record.
Servicer (1-20)	List the Top 20 Servicers in Forbearance volume by State	Top 20 Servicers in Forbearance Volume by state.	Current Servicer Indicated in the Analytics Primary Borrower record, sorted by loan volume; 1 (Highest volume to 20 lowest, for loans that have a forbearance by definition in the "Descriptive - All Loans" tab.