



June 23, 2021

Secretary Michael Kennealy  
Executive Office of Housing and Economic Development  
Room 2101  
1 Ashburton Place  
Boston, MA 02108

RE: Comments on Homeowner Assistance Fund, Draft Implementation Framework

Dear Secretary Kennealy:

I am pleased to offer MACDC's comment on the draft Implementation Framework on the Homeowner Assistance Fund. The draft Framework is a thoughtful, holistic approach to delivering financial resources in a timely manner. We offer the following comments which we believe will build upon the Framework and allow the Commonwealth to maximize its impact.

- There is an error on slide 4, under Eligibility, where it states that the financial hardship must occur after January 21, 2021. According to the U.S. Treasury HAF Guidance, to be eligible, homeowners must have experienced a hardship after January 21, 2020.
- It is important that adequate resources be dedicated to the nonprofit organizations who will be involved in providing counseling to homeowners, and also to community-based organizations who will provide outreach to communities who may not otherwise be successfully reached. These include populations who do not speak English as their primary language, immigrant communities, communities of color, and others. As you know from our experience with the MGCC Small Business Grant program, engaging a broad diverse network of community-based organizations is essential to reaching many of the most vulnerable households.
- We appreciate that the draft Framework provides an opportunity for homeowners without readily available access to income documentation to provide a written attestation and acceptable proxies to document income eligibility.
- The Treasury Guidance states that not less than 60% of funds must be used for qualified expenses that assist homeowners with incomes equal to or less than 100% of the greater of Area Median Income or the median income for the United States. To ensure compliance, we recommend that applications for these funds be restricted to homeowners meeting this income standard for at least the first 30 days. This 30-day period may need to be extended further depending on the rate of utilization. Again, our experience with PPP and small business grants underscores the need for such a head start.
- After that period, we recommend that, for an additional 30 days, application for these funds be restricted to homeowners with incomes at or below 100% of the greater of AMI and median income for the U.S., and other homeowners who meet the definition of "Socially

Disadvantaged Individuals”: Black Americans, Hispanic Americans, Native Americans, and Asian Americans and Pacific Islanders.

- The draft Framework does not provide detail on the Targeting and Outreach Plan for prioritized/disadvantaged groups. In developing this detailed plan, we encourage EOHEd to engage community-based organizations in the process, to benefit from their experience with serving hard-to-serve communities. We think the state will need to engage agencies with the capacity to offer counseling services as well as those that can do outreach and referrals. There are several existing networks that can be tapped for these purposes, including the Division of Bank’s Chapter 206 grantees, CHAPA’s Homeownership Collaborative members and other HUD Certified Counseling agencies.

We appreciate your commitment to providing these critical resources to the Commonwealth’s homeowners who have experienced financial hardship resulting from the COVID-19 pandemic. If you have any questions, or want more information, please reach out to me at 617-379-5922, or at [joek@macdc.org](mailto:joek@macdc.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Kriesberg".

Joe Kriesberg, President

Cc: Chrystal Kornegay, MassHousing  
Don Bianchi, MACDC