Summary of Public Comments on the Housing Assistance Fund

As required by U.S. Treasury guidance, the Connecticut Housing Finance Authority (CHFA) held a Homeownership Assistance Fund (HAF) Plan public comment period between September 8 and 17, 2021 and received 26 formal written comments. CHFA also held individual meetings with several stakeholders, including Connecticut's Congressional Delegation offices and the Connecticut General Assembly's Banks and Housing Committees. Finally, CHFA held a virtual public hearing on Friday, September 17. Below are the primary comments and concerns from the public comment period:

Public Comments	Result
Several advocates raised concerns about the requirement for applicants to complete a "Back-to-Basics" financial fitness and foreclosure prevention class. Specifically, they questioned whether the class was necessary, as it is not a Treasury requirement. They also questioned the logistics of the classes and how applicants would participate.	The Plan does not require classes for a reinstatement only grant, and education is offered to applicants who need forward payment assistance.
Advocates and elected officials urged CHFA actively promote non-digital application options and to pursue non-digital media and outreach efforts.	The marketing and outreach section of the HAF Plan has been revised to more clearly describe the non-digital outreach plan.
Several comments urged CHFA to expand the qualified expenses eligible for assistance to include non-delinquent mortgages, utility assistance, and home repairs. Other comments asked that CHFA more clearly define financial hardship, specifically to include those who are "underemployed" and to further define what is included in the asset test for those who certify they have over $20,000 in liquid assets.	The plan has been revised to clearly define these and other important terms in the HAF Plan. This money was implemented to help homeowners stay in their homes. There are other programs available for utility assistance. If/when CHFA finds those programs to be insufficient, a utility assistance component to the HAF Plan can be implemented.
CHFA was also asked to explain the reasoning behind the requirement for mortgages to be current as of October 21, 2019 to be eligible for assistance. The requirement for mortgage or other qualified expenses to be current as of October 21, 2019 is not required by the Treasury Guidance, which would allow all pre-January 21, 2020 qualified expenses to be covered if the homeowner is otherwise eligible.	Based on the limited availability of funds and purpose of ARPA in aiding those homeowners who were adversely affected by COVID-19, the significant delinquency of housing expenses for three months prior to the onset of the pandemic is a reasonable indicator of financial distress that was not COVID-19 related.

CHFA was asked to clarify what would happen to an application if the HAF program is unable to make the applicant current on their mortgage.	A HAF fund administrator cannot compel a servicer/investor or creditor of other qualified expenses to accept HAF funds. If an arrearage exceeds a grant award, applicants would be encouraged to work with their servicers to use the full breadth of loan retention options available, including HAF.
CHFA received a number of requests and questions concerning assistance to small non-owner occupied landlords.	The HAF program is unable to assist these households, as the statute enacted by Congress requires that the property be one to four units and that it is the principle residence of the applicant.

Any questions regarding these public comments can be directed to: hafct@chfa.org