# COVID-19 SHIP Mortgage Assistance Implementation

Sponsored by the Florida Housing Finance Corporation's Catalyst Program

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Florida Housing Coalition



## Our Thanks to the Florida Housing Catalyst Program



#### AFFORDABLE HOUSING CATALYST PROGRAM

## Sponsored by the Florida Housing Finance Corporation



we make housing affordable"



# This is the Second Phase of COVID-19 Training

### Builds upon Introductory Webinar:

 Helping Homeowners with COVID-19 SHIP Emergency Assistance

April 14 <a href="https://vimeo.com/407646578">https://vimeo.com/407646578</a>

## **Upcoming COVID-19 Training**

Building a Coordinated Plan to Deploy Federal and State Rental Housing and Homelessness Program Funding May 26 at 10:00 am

https://attendee.gotowebinar.com/register/1736375557717424907



### Overview

- Update on foreclosure moratoriums and mortgage forbearance
- Results of Latest Survey
- Outreach and Intake
- SHIP Staff Presentations
- Forbearance Counseling
- Providing Assistance



## Foreclosure Update

- •Statewide eviction & foreclosure moratorium remains in effect until <u>June 2</u>.
- CARES Act provided additional protection for federally assisted properties or properties backed by a federal mortgage through <u>May</u> <u>17.</u>
- •FHFA & HUD extended the foreclosure moratorium for its single-family mortgages through <u>June 30, 2020.</u>



### Foreclosure Update

- Note: not all federal agencies have extended their moratoria.
- Remember: under the CARES Act, protected borrowers can request forbearance for up to 180 days, with an option to renew for another 180 days up to 1 year.
- CARES Forbearance applies to nearly 70 percent of homeowners with mortgages have loans somehow supported by the federal government



### Forbearance Data

- Mortgage Bankers Association: estimates 8.16%, or 4.1 million homeowners, are in forbearance plans
- Ginnie Mae (FHA or VA loans): 11.26% of mortgages in forbearance
- Fannie and Freddie: 6.25% of mortgages in forbearance
- Last week, FHFA announced a new payment deferral option to allow borrowers the ability to repay the missed payments at the time the home is sold, refinanced, or at maturity.

### Order of Assistance

Consider requiring applicants to seek forbearance before and limiting mortgage assistance to those who are not eligible for forbearance

#### More recommendations on recording:

https://vimeo.com/407646578

Highest Priority: Currently Very Low Income\*

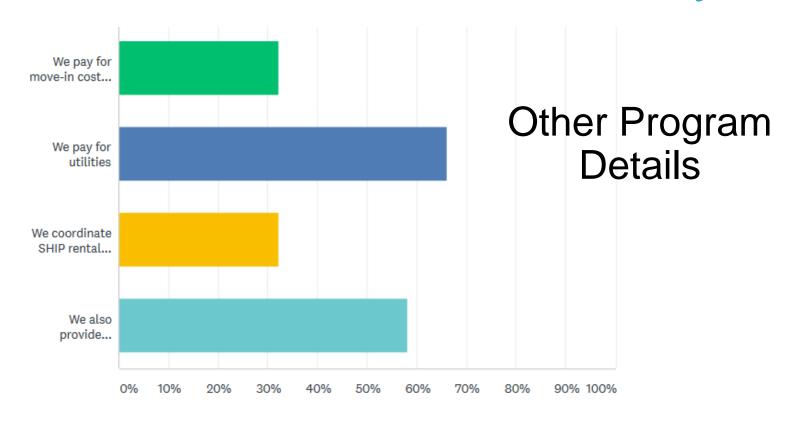
Low Income with current circumstances\*

Lowest Priority: Was not SHIP Eligible before COVID Period

\* Was SHIP Eligible before COVID Period



### Results of Most Recent Survey



ANSWER CHOICES	•	RESPONSES	•	
		32.26%	20	
▼ We pay for utilities		66.13%	41	
▼ We coordinate SHIP rental assistance with local Continuum of Care efforts		32.26%	20	
▼ We also provide mortgage assistance		58.06%	36	

### Communities Offering Mortgage Assistance

**Brevard Cty** 

Cape Coral

Citrus Cty

Clay Cty

Clearwater

Collier Cty

**Coral Springs** 

Daytona Beach

**Deerfield Beach** 

**Delray Beach** 

**Duval County** 

Escambia Cty

Flagler Cty

Fort Lauderdale

Fort Myers

Gainesville

Glades Cty

Hernando Cty

Highlands Cty

Hillsborough Cty

Kissimmee

Lake Cty

Largo

Lauderhill

Lee Cty

Marion County

Manatee County

Melbourne

Miami Beach

Palm Bay

Okaloosa Cty

Orange Cty

Osceola Cty

Palm Beach Cty

Palm Bay

Pensacola

Pasco Cty

Polk Cty

Pompano Beach

Pensacola

**Plantation** 

Port St Lucie

Sarasota Cty

Seminole Cty

St Johns Cty

St. Lucie Cty

St. Petersburg

Tamarac

Tampa

Titusville

West Palm Beach



## Communities that have updated SHIP Strategies to Provide COVID Assistance

Alachua

Boynton Beach

**Broward** 

Charlotte

Citrus

Clay

Clearwater

Collier

**Coral Springs** 

Davie

Deerfield Beach

**DeSoto** 

Flagler

Ft. Lauderdale

Ft. Myers

Ft. Pierce

Gainesville

Hardee

Hialeah

Highlands

Hillsborough

Lake

Lakeland

Largo

Lee

Levy

Manatee

Marion

Miami

Miami Beach

Miami Gardens

Miramar

Okaloosa/

Ft. Walton

Okeechobee

Orange

Orlando

Osceola

Palm Bay

Palm Beach Cty

**Pinellas** 

Polk

Pompano Beach

Putnam

Seminole

St. Johns

St. Lucie

St. Pete

**Tamarac** 

Tampa

Volusia



## How to Learn Where SHIP Emergency Assistance is Available



Welcoming Floridians Home for 40 years



ABOUT FLORIDA HOUSING

LEGAL

**PROGRAMS** 

**MEDIA** 

CONTACT US

Home / PROGRAMS / Special Programs / SHIP - State Housing Initiatives Partnership Program /

#### Local Government Information

Please select from the City or County drop down lists, or the "View All Contacts" information and contacts:

City:

Please select a City... ~

County:

Please select a County...

## Contact local SHIP offices

https://www.floridahou sing.org/programs/sp ecial-programs/ship--state-housinginitiatives-partnershipprogram/localgovernmentinformation



### **Survey: Outreach Activities**

- Letters to recent SHIP recipients
- Media and social media
- coadfl.org
- County/City website
- Community liaisons
- Non-profits
- Neighborhood
   Connection Newsletter

- County Commission meetings
- Notice in newspaper
- Brochure
- Mail-outs, and flyers through partners so we don't get overwhelmed
- Public announcement by City Mayor



## Example of COVID SHIP Mortgage Assistance

#### MORTGAGE PAYMENT ASSISTANCE GRANT

# City of St. Petersburg Housing & Community Development

Linda Byars Housing Finance Coordinator (727) 892-5572 May 20, 2020

www.stpete.org/housing

Linda.Byars@stpete.org



On March 27, 2020, after the March 13, 2020 Declaration of Emergency, the Coronavirus Aid, Relief and Economic Security Act (CARES Act) which provides broad relief for mortgage loan borrowers was signed into law by the President.

Under the CARES Act with SHIP and CDBG and in compliance with 24 CFR 570.207(b)(4) rules and regulations, the City of St. Petersburg created the Mortgage Payment Assistance Grant Program that provides emergency grant funding to its citizens who have been negatively impacted by COVID-19, preventing them from maintaining current mortgage and utility payments.

#### Impacts of COVID-19 include:

- Temporary or permanent unemployment or underemployment
- Health disparities
- Interrupted financial well being
- Drawing savings down
- Increased credit debt
- Forced to shelter at home
- Other work-related income







#### The Grant

- Pays three months consecutive mortgage and utility payments
- Is paid directly to the first mortgage lender and the utility providers
- Cannot exceed a total of \$8,000
- Cannot be used in conjunction with another funding source for the same purpose and same time period (Duplication of Benefits)
- Is available to those who can provide evidence of the impact of CV-19
- Is available only to those who are income eligible at 80% AMI (HUD Handbook 4350.3 Chapter 5, 24 CFR92.203(a)(1) and by (2) 24 CFR92.64(a)(1)(ii) waiver of self-certification)

#### AND is not available if:

- delinquent for payments prior to April 1, 2020
- delinquent for any reason other than from the results of CV-19
- homeowner is obligated to the city for liens or assessments or
- an IRS lien or judgment is active
- applicant has liquid assets exceeding \$4,000
- homeowner is in a forbearance agreement with their lender
- homeowner is in Lis Pendens pending foreclosure







#### Priority Given

- first eligible-first served
- special needs households
- households at or below 50% AMI
- previously assisted purchase assistance recipients
- first mortgage lender demands payment

#### Property

- must be located within the city's municipal boundaries
- occupied as the homeowner's principal homestead residence
- valued at less that 90% of the average sales price established within the Clearwater-Tampa-St. Petersburg geographic area (\$294,601)
- Constructed as a single-family residential dwelling unit
- does not include an auxiliary dwelling units even if classified SFR by Pinellas County Property Appraiser







- Application Documents
  - Application signed by all adult household members to include
    - Social Security Number Collection Notice
    - Federal Misrepresentation Advisory
    - Public Records Disclosure
    - Authorization to Release Information
    - Budget Worksheet
    - Hardship Disclosure
  - Evidence of CV-19 Impact
    - Unemployment Compensation approval
    - Medical confirmation
    - Termination letter
    - Verbal or written verification of employment
  - Photo Identification for all adult household members
  - Birth certificates for household occupants under 18
  - Three months checking account statements and current savings
  - Mortgage loan statement, account number and contact information
  - Utility accounts statements
  - Evidence of approval for Unemployment Compensation
  - Other as necessary







#### Closing Documentation

- Statement of Understanding including Duplication of Benefits
  - A legally binding document that references all rules and regulations that a person or parties must follow while initiating any kind of transaction or deal.
  - Duplication of Benefit Statement references subsequent Federal benefits or charitable donations received by a beneficiary recipient of SHIP and/or CDBG funds in connection with CV-19
- Self-Certification of zero income and questionnaire
- Income Certification
  - Anticipated or projected income based on third-party verification including accepted alternate documentation for employment, public assistance, Social Security, child support, military pay, VA benefits, unemployment, pension/annuity, self-employment, zero income and asset income.
- Award Letter
  - Defines amount and conditions of the Program Grant
- Income Contribution Form
  - Verification of income derived from contribution of family members or others who provide cash payment to the applicant's household
- Verifiable Self-Certification of Income
  - A beneficiary's affirmed statement of income at the time of assistance when standard method of third party verification cannot be documented







## HOUSING and COMMUNITY DEVELOPMENT DEPARTMENT

## MORTGAGE PAYMENT ASSISTANCE GRANT THANK YOU

Linda Byars
Housing Finance Coordinator
(727) 892-5572
Visit us at:

www.stpete.org/housing



### Intake

- Move quickly to accept applications before executive order ends
- Governor's Executive Order is still active
- •The Presidential Proclamation dated
  March 13 (<a href="https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/">https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/</a>) declared a national emergency and does not have an end date



### **Intake Considerations**

- Determine when to open and close the application period based on funding
- Create file checklist with documents required: HANDOUT "Forms for COVID SHIP Rent Assistance"
  - Income Reduction Form
  - Monthly Income Verification Update for Disaster Assistance
  - SHIP Duplication of Benefits Disaster Assistance Agreement with Recipient
  - SHIP Disaster Program Intake Application



## Before Providing Assistance: Technical Revision to SHIP Strategy (HANDOUT)

Replace 'Summary' of your Disaster Strategy: SHIP disaster funds may be used for items such as, but not limited to:

- (f) rental and utility assistance for eligible applicants.
- (g) mortgage and utility payment assistance for eligible applicants."

Recording with more guidance: <a href="https://vimeo.com/407646578">https://vimeo.com/407646578</a>



## Example of COVID SHIP Mortgage Assistance

PRESENTER:

Michael Puchalla,

**Executive Director of** 

HELP (Housing, Education, Lending Programs)

michael@collierhousing.com



## Income Eligibility: Use 2020 Income Limits Chart

 2020 SHIP Income & Rent Limits on FHFC website:

https://www.floridahousing.org/docs/default-source/developers-and-property-managers/ship-and-hhrp---2020-combined-income-and-rent-limits.pdf?sfvrsn=fb78fc7b\_1

- Posted on 4/13/2020
- Use the new SHIP income limits chart for any applicant who has not yet signed an income certification form



## Self-Certification may be used for SHIP COVID Emergency Assistance

- Self-Cert Form can expedite COVID-19 SHIP assistance
- Same policy as HOME Waiver from April 2020
- Permits self-certification of income provided staff conducts income reviews within 90 days after the waiver period ends
- •SHIP & HOME waiver until December 31, 2020
  - Collect income documentation by March 31, 2021



#### Therefore I certify my anticipated gross annual income

Under penalty of perjury, I certify that the information pres The undersigned further understand(s) that providing fals incomplete information may result in the termination of a l county or eligible municipality.

Signature of Applicant	Printed

STATE OF FLORIDA COUNTY OF

Sworn to (or affirmed) and described before me this \_\_\_\_\_ da

(NOTARY SEAL)

Personally Known \_\_\_\_OR Produced Identification\_\_
Type of Identification Produced

## Self-Certification Form for SHIP COVID Emergency Assistance

- Self-Certification Form does
   NOT require a notary
   INSTEAD
  - Housing staff may witness family signature(s)
  - Applicant may sign along with two witnesses
- Inform SHIP emergency recipients of income verification to be collected later

See updated handout



A Fair Question:
What if we assist someone who is not eligible?

- As in the past, pursue repayment
- COVID SHIP assistance may likely be offered as a grant, but attempt to collect repayment
- Local government would not be held responsible to repay the funds to FHFC
- Simply attempt to collect funds and document the file.





# Another Option: Third Party Verification Provided by the Applicant

- Applicant-provided document defined in Section
   5-13 of HUD Handbook 4350.3, Chapter 5
- This is considered third party verification
- Examples: Pay stubs, SSA retirement benefit letter, Unemployment benefit notices





### MORE on Applicant Provided Document

- Documents dated within last 120 days
- Rent & Mortgage Assistance income eligibility may be based on pay stub verification
  - HUD Handbook: "Most recent 4 to 6 consecutive pay stubs"
  - Best Practice- use a specific time frame, like
     1 month of paystubs



### Go Fund Me is not an Asset

Go fund me ONLY converts to an asset if it is deposited into a checking or savings account

Alternatively, the applicant could spend all this money





### Recently Unemployed Applicants

- Applicants do not know when or if they will be re-hired (temporary or permanent)
- Estimate 12 months of income based on current circumstances
- One household member is unemployed or under employed
- •For self employed use a current profit and loss and compare to tax returns. Get a statement that the reduction of income is caused by COVID-19.



## Some Benefits are NOT Counted as Income

- \$600 of weekly federal enhancement to unemployment insurance is NOT included in calculations of income.
- Stimulus checks not counted as income but if deposited in bank account are counted as assets
- One-time assistance from charitable contributions not counted as income



## Forbearance Counseling

#### **CARES Act Forbearance Rule**

- Reduced or suspended payments shall be granted for up to 180 days
- Applies to loans from FHA, USDA, VA, Fannie, Freddie
- During forbearance, servicer cannot charge fees, penalties



# Contracting with a Nonprofit for COVID Forbearance Counseling

Jeff Bagwell, Executive Director Keystone Challenge Fund in Polk County

jeff.bagwell@keystonechallenge.org



#### Counseling Agencies Can Help

- Help borrowers prepare: Interest continues to accrue
- Consider Options After Forbearance
- Best Practice: Work with a HUD approved housing counseling agency

https://www.hud.gov/states/florida/homeownership/hsgcounseling



# SHIP Pays for Housing Counseling



- Pay counselors offering counseling, even if no direct payments provided to homeowners
- Does not have to be connected to a SHIP Strategy
- No LHAP revisions/additions needed to begin
  - Counseling permitted in LHAP Section K 'Support Services and Counseling': "May include but are not limited to: Homeownership Counseling (Pre and Post), Credit Counseling, Tenant Counseling, Foreclosure Counseling"



#### Counseling Activities

Possible Actions to List in "Scope of Work"

- Homeowner Hotline: answer initial questions
- Offer one on one counseling by phone or remote meeting platform
- Provide online forbearance classes
- Full SHIP Files do NOT have to be collected



#### Limit to SHIP Housing Counseling

Limited by the Income Set-aside 100% Allocation and Program Income

- 60% Income Set aside
- 10% Admin

30% available for Housing Counseling





# Help Homeowners Consider Options after Forbearance



Recording <a href="https://vimeo.com/407646578">https://vimeo.com/407646578</a>

Pay the suspended payments all at once

Repayment Plan- Pay over short time

Partial Claim For FHA Loans only

**Extend Modification** Add missed payments to end of loan **Cap and Extend Mod-** Capitalize missed payments and increase number of payments

Flex Mod- Lower interest rate, extend term to lower payments

### **Providing Assistance**

#### **Award Letter/Written Agreement**

 State that monthly assistance will be provided if funds are available and/or until the end of the executive order



### Process for Paying Mortgage Company and Utility Company

- Track monthly payment for both mortgage and utilities on a spreadsheet
- When making monthly payments, avoid accidentally exceeding maximum award
- Final payment may not be full mortgage or utility payment



#### Collect a W-9 Form

Cities and counties paying money to Lenders and Utility Companies need identification information to notify the IRS of the amount.

- Finance Departments may require W-9
- Not a SHIP requirement

### Form W-9 (Rev. October 2018) Department of the Treasury Internal Revenue Service

#### Request for Taxpayer Identification Number and Certification

► Go to www.irs.gov/FormW9 for instructions and the latest information.

- 1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.
- 2 Business name/disregarded entity name, if different from above

### Can you pay three months of mortgage ahead of time?

- No, determine continued eligibility each month before paying an additional mortgage payment
- Income Certification confirms eligibility for up to one year
- Monthly eligibility updates do not involve collecting documents UNLESS household income has changed
- SHIP Office updated on the status of household income on a monthly basis.
  - Phone call, e-mail, document file



### **Administrative Topics**

#### Follow the Income Set-Aside

- •30% of all SHIP funds for Very Low (50% AMI)
- •60% Very Low and Low (up to 80% AMI) includes 30% VLI above
- Spend the Remainder for households up to 140% AMI



#### File Documentation

- Income Reduction Form: document mortgage assistance need
- SHIP Agreement with Applicant: Duplication of Benefits (HANDOUT)
- Copy of recent Monthly Statement with Mortgage Company address/contact information
- Utility bill with account number





#### **Duplication of Benefits**

- Document all sources of emergency assistance that an applicant receives
- Identify each source that paid mortgage payments
- SHIP Agreement with Applicant regarding Duplication of Benefits



#### Contracting Out Work

Follow local Procurement Policy

Opportunity to Expedite:

- Do you have an existing contract for Purchase Assistance or Foreclosure Prevention?
- Work with local procurement officer: amend contract to add COVID-19 mortgage assistance



#### Sub-recipient Agreement

- Sample agreement with a sub-recipient to provide mortgage assistance (HANDOUT)
- Possible activities for Scope of Work
  - Pay mortgage
  - Pay utilities
  - Homeowner hotline
  - One-on-one forbearance counseling sessions
- Sub-recipient receives Service Delivery Fee
- Attachments include sample forms- request for payment, progress report, projected accomplishments

#### Sub-recipient receives Service Delivery Fee

Administrative Activities should be paid from SHIP Administrative Activities:

- Outreach and Pre-Screening
- Applications and Eligibility Determination
- Reporting assistance provided
- Overhead, office space, utilities, copier/computers, etc.

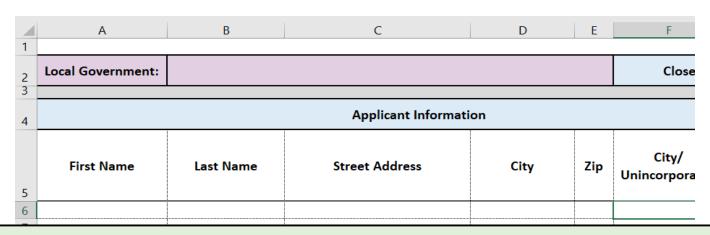
Possible Project Delivery Costs

- Housing Counseling
- •What else?



#### Reporting Disaster Assistance

- Homeownership Disaster Assistance Code 5
- Add each recipient to SHIPDATA Spreadsheet, Funding Type: Grant



	Funding Information							
	Local Strategy Name	Strategy Code	Meets 75% Set- aside	SHIP Funding Amount	Funding Status	Funding Type	Funding Year	Unit Counted In Another Year
I						<b>-</b>		
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#### Resources

HANDOUT: Mortgage Relief Guide from the Consumer Financial Protection Bureau

https://www.consumerfinance.gov/coronavirus/mortgage-and-housing-assistance/

Combines information from all government entities

https://sf.freddiemac.com/ceros/sustaininghomeownership-in-a-crisis-an-interactive-guide-forhomeowners.aspx

 An interactive guide that provides step-by-step information to borrowers to understand what their rights and options are under the CARES Act



## Resource: COVID-19 SHIP Frequently Asked Questions

#### New Content on Topics Including:

- File Documentation
- Technical Revisions
- Rental Assistance
- Mortgage Assistance
- Foreclosure Counseling
- Reporting COVID SHIP Assistance



#### FAQ File Documentation Question

#### Q: Please comment on the documents I want to collect for my SHIP file:

Verifications- Do we need to make three attempts to the third party for verifications? We figured it would be best to do this up front instead of after the fact as this documentation would be needed anyway. A: Not necessarily. You can collect 'applicant-provided documents' as third-party verification. Instead of collecting a VOE, for example, you could collect pay stubs. Applicant-provided documents are items dated within the last 120 days like pay stubs, retirement benefit letters, bank account monthly statements, and unemployment benefit notices. For several years now, applicant-provided documents have been defined in Section 5-13 of HUD Handbook 4350.3, Chapter 5, and are considered third-party verification. Income eligibility for COVID-19 SHIP rent and mortgage assistance may be based on pay stubs and other applicant-provided verifications.

Residential Income Certification (RIC)- The RIC would be based on current income? A: Yes. Although we suggest collecting information of the applicant's "pre-COVID" income as part of prioritizing applications, but the RIC is based on current circumstances, which might include underemployment or unemployment. You must also attempt to collect something in writing to document the current underemployment or unemployment.

Verification of Employment (VOE) - Can this be done by phone? A: Yes, the HUD Handbook 4350.3 allows for verbal verifications of income and assets. You must document the company, who you spoke with, their title, the date time and the information provided, your name and title. You can also use mail, e-mail, and scanned documents that can be e-mailed.

Verification of Deposits (VODs) plus 2 months of bank statements - The VOD may be the hardest to obtain. A: To verify bank accounts, you must either obtain a verification of deposit OR 6 months of bank statements that you can obtain from the applicant.



