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Idaho Homeowner Assistance Fund Plan As submitted to the U.S. Treasury Portal (Pending Approval)

It is anticipated that the Idaho Legislature will authorize the appropriation of the Idaho Homeowner Assistance Fund during the 2022 Legislative session, which begins in January 2022. After legislative approval IHFA will be ready to start working with homeowners within thirty days.

To provide public comment on the Idaho Homeowner Assistance Plan:

Email: housingcounseling@ihfa.org

Introduction and Purpose

Welcome to the U.S. Treasury Department's submission portal for the Homeowner Assistance Fund (HAF) Plan.

In the HAF, an eligible entity (the "Participant") is (1) a state, the District of Columbia, or U.S. territory; (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.

A HAF Participant must submit its HAF Plan using this portal if it has been allocated \$5 million or more in the HAF. If a HAF Participant has been allocated less than \$5 million, it should not use this form; a different form has been made available for smaller allocations.

In the fields below, you will submit your HAF Plan, organized around the following plan elements:

- Homeowner Needs and Community Engagement
- Program Design
- Performance Goals
- Readiness
- Budget

After completing the form, please click on the Submit Form button to sign and submit the HAF Plan.

Once the HAF Plan is submitted, Treasury will review the plan. Treasury may approve a HAF Plan in whole or in part. If Treasury identifies weaknesses in any elements of your HAF Plan, the Participant will be provided an opportunity to revise and resubmit those elements. Upon Treasury's approval of the HAF Plan, Treasury will initiate steps to transmit the requested allocation amount. Treasury will evaluate HAF Plans as described in the HAF guidance, available here. Please refer to the HAF guidance for definitions of terms used in this portal and additional information regarding the HAF.



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United States Department of the Treasury

Homeowner Assistance Fund Plan

Homeowner Needs and Community Engagement

What Quantitative Data Has Informed the Participant's Planning?

Treasury will assess the extent to which a Participant has, in the course of its HAF planning process, relied on quantitative data, including from community-based organizations or organizations that serve potentially eligible homeowners.

In its HAF planning process, has the Participant obtained quantitative data from mortgage servicers, private data providers, government entities, community-based organizations, or other sources to inform its planning about how to target and best serve eligible homeowners with mortgage delinquencies, defaults, foreclosures?

Yes

If yes, please list and, briefly describe each source of quantitative data.

Sources of Data:

- ·Data provided by Treasury Treasury provided data, contributed by a number of federal agencies, including information on mortgage delinquencies and forbearances, breakdowns by demographic factors, and concentration among mortgage servicers.
- ·Data from Idaho Housing and Finance Association Idaho Housing and Finance Association analyzed its servicing portfolio for Idaho loans and was able use that data to forecast overall need across the state. Data included comprehensive numbers on forbearances, mortgage delinquencies and length of delinquency as well as demographics and loan types. IHFA is one of, if not the largest servicer of federally backed loans in Idaho.
- ·Data from the Mortgage Bankers Association- Idaho used the MBA quarterly reports to review delinquency and forbearance rates in Idaho
- ·Congressional Research Service- Unemployment Rates During the COVID-19 Pandemic
- ·United States Census Bureau- 2019 American Community Survey- Data used to determined owner occupied rates and overall demographics in Idaho.
- ·Idaho Department of Commerce- Idaho's Federal Community Development and Affordable Housing Programs 2020-2024 Five- Year Consolidated Plan and 2020 Action Plan- Information on the percentage of cost burdened Idahoans as related to housing costs.

·Federal Reserve Bank of Atlanta- Mortgage Analytics and Performance. This site provided Idaho with data on mortgage forbearance by zip code and includes data on the minority and low-income share of residents in each state. IHFA has used this data to determine zip codes to target our outreach and marketing efforts for this program. In addition, these statistics support the need for homeowner assistance across Idaho.

·Idaho Department of Labor, Research & Analysis and Public Affairs- Data on unemployment by county.

·Urban Institute (2021)- Credit Health During the COVID 19 Pandemic

In its HAF planning process, has the Participant obtained and reviewed quantitative data or studies regarding which demographic segments in its jurisdiction have historically experienced discrimination in the housing or housing finance market?

Yes

If yes, please list and, briefly describe each source of quantitative data.

Study and Data Description:

· Idaho Analysis of Impediments to Fair Housing Choice (2021).

Idaho Housing and Finance Association gathers key data on those who have historically experienced discrimination in housing and the housing finance market within its jurisdiction annually in a report titled Idaho Analysis of Impediments to Fair Housing Choice. This report looks at key demographics including population, age, disability, household size, income and poverty, race and ethnicity and those with limited English proficiency (LEP). This report also provides data on the housing market, including tenure, cost burdened families, rental market, ownership market, and housing inventory. Lastly this report looks at economic indicators such as employment, unemployment, industries, and commuting. This data is aggregated from various sources including LEHD Origin Destination Employment Statistics (LODES) Dataset, US Census ACS 5-Year, and the Bureau of Labor Statistics Local Area Unemployment Statistics. This report is updated annually and reviewed to ensure IHFA's commitment to furthering support for fair housing. This data was used to help determine which areas and demographics IHFA will target with its HAF plan.

In its HAF planning process, has the Participant obtained quantitative data from utility providers or entities charged with assessing and collecting property taxes or relied on quantitative data or studies to inform its planning about how to target and best serve eligible homeowners at risk of displacement due to utility arrearage or tax foreclosure?

Yes

If yes, please list and, briefly describe each source of quantitative data.

Sources of Quant. Data:

·Data obtained from Lereta Tax Services – IHFA uses Lereta Tax services for its servicing portfolio. We have used this service throughout the pandemic to understand the property tax delinquencies across the state.

In the following text box, please list any source not listed above of quantitative information, including sources of data on the performance of any of the Participant's previously implemented programs, that the Participant used to inform its HAF planning process, briefly describe how the data informed the Participant's planning.

Other Sources:

IHFA is currently administrating the Emergency Rental Assistance Program across Idaho as provided by the U.S. Department of Treasury. IHFA plans to use similar procedures and processes to administer the HAF program. These include:

Dedicated staff to answer questions, take phone applications, review applications, and provide housing counseling referrals. IHFA will have a dedicated phone line/extension to handle these calls.

In 2013, IHFA was selected to administrate the Emergency Homeowner's Loan Program as a substantially similar state. IHFA successfully administered the program and provided millions of dollars of mortgage assistance to Idahoans during the recession to help prevent foreclosure and stabilize housing. IHFA has experience in providing large-scale assistance programs and has resources available to succeed. IHFA will use best practices from both the Emergency Rental Assistance Program and the former Emergency Homeowners Loan Program to provide a detailed, yet streamlined process for Idaho homeowners to save their homes and get back on track with their mortgages.

Did the Participant communicate with mortgage servicers regarding the development of its program design?

Yes

Did the Participant communicate with other HAF participants regarding the development of its program design?

Yes

How Has Community Engagement and Public Participation Informed the Participant's Planning? Treasury will assess the extent to which a Participant's assessment of homeowner needs has been informed by and reflects input from organizations and individuals representing eligible homeowners, including any opportunities for public participation in the development of the Participant's plan. Treasury will pay particular attention to the extent of the Participant's engagement with populations that are the subject of statutory targeting requirements.

Has the Participant requested and received input on its HAF planning process from providers of housing counseling services or providers of legal assistance to homeowners facing foreclosure or displacement? **Yes**

Provider Information

If yes, please list such providers, including the providers' address and website. Please indicate by checking the appropriate box below if the provider's primary purpose is to serve low- and moderate-income households or to address the impacts of housing discrimination on one or more demographic groups in the Participant's jurisdiction.

Idaho Housing and Finance Association

565 W Myrtle St Boise, Idaho 83702 www.idahohousing.com

Provider Primarily Serves LMI Households: True

Provider Addresses Impact of Housing Discrimination: True

NeighborWorks Boise

3380 W. Americana Terrace Boise, Idaho 83706 www.nwboise.org

Provider Primarily Serves LMI Households: True

Provider Addresses Impact of Housing Discrimination: True

NeighborWorks Pocatello

206 North Arthur Street Pocatello, Idaho 83204 www.nwpocatello.org

Provider Primarily Serves LMI Households: True

Provider Addresses Impact of Housing Discrimination: True

Has the Participant requested and received input regarding its HAF planning process from community-based organizations or organizations that serve potentially eligible homeowners?

Yes

Community Information

If yes, please list such organizations, including the providers' address and website if available. Please indicate by checking the appropriate box below if the provider's primary purpose is to serve low- and moderate-income households or to address the impacts of housing discrimination on one or more demographic groups in the Participant's jurisdiction.

Twin Falls Branch-Idaho Housing and Finance Association 844 Washington St. N. Ste. 300, Twin Falls, Idaho 83301 www.idahohousing.com
Organization Primarily Serves LMI Households= true
Provider Addresses Impact of House Discrimination=true

Lewiston Branch-Idaho Housing and Finance Association 2338 Nez Perce Drive, Lewiston, Idaho 83501 www.Idahohousing.com Organization Primarily Serves LMI Households= true Provider Addresses Impact of House Discrimination=true

Idaho Falls Branch- Idaho Housing and Finance Association 1235 Jones St., Idaho Falls, Idaho 83401 www.idahohousing.com Organization Primarily Serves LMI Households= true Provider Addresses Impact of House Discrimination=true Coeur d'Alene Branch- Idaho Housing and Finance Association 915 W. Canfield, Coeur d'Alene, Idaho 83815 www.idahohousing.com Organization Primarily Serves LMI Households= true Provider Addresses Impact of House Discrimination=true

Idaho Housing and Finance Association 565 W. Myrtle, Boise, Idaho 83702 www.idahohousing.com Organization Primarily Serves LMI Households= true Provider Addresses Impact of House Discrimination=true

Idaho Legal Aid Services
1447 S. Tyrell Lane, Boise, Idaho 83706
https://www.idaholegalaid.org/
Organization Primarily Serves LMI Households= true
Provider Addresses Impact of House Discrimination=true

Intermountain Fair Housing Council 4696 W. Overland Rd Suite 140, Boise, Idaho 83705 www.ifhcidaho.org Organization Primarily Serves LMI Households= false Provider Addresses Impact of House Discrimination=true

Boise Regional REALTORS
9550 Bethel Ct, Boise, Idaho 83709
www.boirealtors.com
Organization Primarily Serves LMI Households= false
Provider Addresses Impact of House Discrimination=true

Idaho Mortgage Lenders Association
PO Box 2362, Boise, Idaho 83701
www.idahomortgagelenders.org
Organization Primarily Serves LMI Households= false
Provider Addresses Impact of House Discrimination=false

Has the Participant consulted with localities or tribal governments (cities, counties, or rural communities) in its jurisdiction regarding the needs of eligible homeowners in its jurisdiction?

Yes

Has the Participant provided an opportunity for public input regarding its HAF Plan through public hearings or published materials?

Yes

If yes, please indicate whether a proposed or draft plan was published, please describe where details about the comment solicitation were posted, for how long, in what languages, and whether any efforts were made to make the posting accessible to persons with disabilities or individuals without reliable internet access.

Public Input Details:

IHFA has done significant research and community engagement on the housing needs of citizens across Idaho during the Covid-19 pandemic. IHFA regularly engages with social service organizations across the state to provide affordable housing and work to stabilize housing for all Idahoans.

IHFA collaborates and communicates regularly with over one hundred different agencies including counties and cities to ensure that all communities, especially those that are economically and socially disadvantaged have a voice and have resources available to them. As a state housing and finance agency and as a loan servicer, IHFA is deeply engaged with the housing needs across the state. With offices in five different regions, IHFA has first-hand knowledge of the needs across the entire state.

IHFA is a HUD approved housing counseling agency. In mid-2020, IHFA saw a need to engage the community on the topics of forbearance and housing stability. IHFA created a statewide housing counseling campaign targeting those on forbearance or those needing housing assistance. The outreach was aimed at helping Idahoans:

- Understand forbearance and next steps
- Identify resources and solutions for housing problems
- Give information about housing resources, rights, and responsibilities
- Provide financial planning tools
- Review credit reports and help with a debt-reduction plan
- Develop a budget with homeownership in mind
- Apply for housing assistance
- Prioritize and budget for housing stability
- Help to identify solutions for maintaining utilities
- Make referrals to Idaho Legal Aid for landlord/tenant issues

Through this community outreach campaign, IHFA has been able to see the housing related needs affecting Idahoans specifically resulting from the COVID-19 pandemic.

Idaho Housing and Finance Association held a Public Hearing on June 9, 2021, to take public testimony on the Idaho Homeowner Reinstatement Program. IHFA followed public meeting law in Idaho.

How Will the Participant Continue to Assess the Needs of Eligible Homeowners? Treasury anticipates that an ongoing process of assessing the needs of eligible homeowners will help address the needs of potentially eligible homeowners as economic conditions change over time.

Does the Participant plan to update its assessment of community needs within the next year to determine whether its HAF program design should be updated to address changing needs of potentially eligible homeowners?

Intention to Update:

Yes

What additional data would be helpful to the Participant as it seeks to assess homeowner needs over time?

Additional Data:

- -Monthly data related to loan delinquency.
- -Data on manufactured housing loans
- -Income levels
- -Unemployment rates

Program Design

What are the Program Design Elements Through Which the Participant Will Deliver HAF Assistance to Eligible Homeowners?

A program design element is a specific activity or program, which is consistent with a qualified expense category, under which a Participant will disburse HAF funds in accordance with the HAF Plan. Please note that multiple program design elements may fit under a single qualified expense category; for example, a mortgage assistance program that has different terms for federally backed mortgages and manufactured-home mortgages may constitute two separate program design elements, for which case the Participant provides a separate term sheet or other description for each program design element.

HAF participants must have at least one program design element intended to reduce mortgage delinquency among targeted populations. Treasury encourages HAF participants to consider program design elements that address homeownership preservation for targeted populations in areas where there is a sustained trend of increasing property taxes or utility costs, including for households that do not have mortgages.

Please identify each qualified expense category in which the Participant will offer a program design element by checking the boxes below.

- X mortgage payment assistance
- X mortgage payment assistance
- X mortgage principle reduction
- X mortgage principal reduction, including with respect to a second mortgage provided by a nonprofit or government entity
- X payment assistance for homeowner's utilities, including electric, gas, home energy, and water

- X payment assistance for homeowner's insurance, flood insurance, and mortgage insurance
- X payment assistance for delinquent property taxes to prevent homeowner tax foreclosures
- X payment assistance for down payment assistance loans provided by nonprofit or government entities
- X financial assistance to allow a homeowner to reinstate a mortgage or to pay other housingrelated costs related to a period of forbearance, delinquency, or default
- X facilitating mortgage interest rate reductions
 - payment assistance for homeowner's internet service, including broadband internet access service, as defined in 47 CFR 8.1(b)
- X payment assistance for homeowner's association fees or liens, condominium association fees, or common charges

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

For each program design element that the Participant will offer, the Participant is required to upload a term sheet or other description that, at a minimum, provides the following information regarding that program design element. Term sheets for all of Participant's HAF programs may be uploaded together as one document.

See Attachment-Idaho HAF Term Sheet

- Brief description Explain how the funds will be used (e.g., what type of homeowner expense the funds will be used for). If applicable, describe how the funds may be used in combination with other assistance programs (e.g., loan servicer loss-mitigation programs).
- Maximum amount of assistance per homeowner Specify the maximum amount of assistance that each homeowner will be eligible to receive under the program design element.
- Eligibility criteria and documentation requirements Explain all homeowner, mortgage, property, or other eligibility criteria for the program design element (other than the mandatory eligibility requirements set forth in the HAF guidance). In addition, list any documentation that will be required from homeowners to establish such eligibility. Provide a justification for each additional eligibility or documentation requirement beyond those required under the HAF guidance, including an explanation of how the Participant determined that such requirement will not create barriers to participation for eligible households.

- Form of assistance Indicate whether the funds will be provided in the form of grants, forgivable loans, or other assistance. If the funds will be provided through forgivable loans, specify the terms for forgiveness. If the Participant proposes to provide the assistance in a form other than grants or forgivable loans, provide the reasoning for the proposed terms. If the Participant proposes to establish a home repair program, explain all criteria that will be used to determine whether a homeowner is eligible for the program (e.g., contractor licensing, repair contract requirements, zoning).
- Payment requirements Indicate to whom payments will be made (e.g., to homeowners or to a third party) and any additional requirements there may be to complete a payment (e.g., bulk payment requirements for payees, method of determining amount of payment).

A HAF participant may elect to revise its HAF Plan over time to add or subtract program design elements. Does the Participant anticipate adding additional program design elements to this HAF Plan within one year of this submission?

No

Treasury has provided sample term sheets to assist HAF participants in developing their HAF plans. Participants may use these sample term sheets, in whole or in part, as part of their submission. To the extent the Participant intends to structure the program differently with respect to significant program terms described in the Sample Term Sheets, Treasury will, in the course of its review of the HAF Plan, request a justification for how the alternate approach will further the objectives of the HAF, including targeting and prioritization requirements. In the chart below, the HAF Participant may provide a justification for significant deviations from the terms described in the sample term sheets upon initial submittal. (optional for initial submission)

N/A

Documentation of Homeowner Income

Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF only if they have incomes equal to or less than 150% of the area median income or 100% of the median income for the United States, whichever is greater. In addition, 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. The HAF guidance describes permissible ways for HAF participants to determine homeowner income.

Under the HAF guidance, one permissible approach for determining income is for (1) the household to provide a written attestation as to household income and (2) the HAF participant to use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household's geographic area. Will the Participant allow income to be determined in this way?

No

Under the HAF guidance, 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. Will the Participant allow applicants to request such waivers or exceptions? **Yes**

Eligible Mortgage Types

Please indicate which of the following mortgage types are eligible to be assisted under one or more of the Participant's program design elements.

- X First Mortgages
- X Reverse Mortgages (Home Equity Conversion Mortgages, Single-Purposes Reverse Mortgages, or Proprietary Reverse Mortgages)
- X Contracts for Deed or Land Contract (if it is a credit transaction secured by a consensual security interest in a dwelling)
- X Second Mortgages
- X Manufactured Housing Loans
- X Loans Secured by Manufactured Housing (secured by real estate or dwelling)

If the Participant excludes any of the forgoing mortgage types from one or more program design elements, explain the exclusion.

Explanation of Exclusion

N/A

How Will the Participant Target HAF Resources Consistent with Statutory Requirements? The Participant must describe how it will target HAF resources in accordance with the HAF guidance. Targeting strategies are affirmative efforts to inform, encourage the participation of, and facilitate access to resources for targeted households, including by offering multiple intake formats, engaging with nonprofit organizations (e.g., housing counselors or legal services organizations) to provide additional pathways into the program, and providing community outreach, 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.

Defining Socially Disadvantaged Individual

Please describe the process the Participant will use to determine whether a homeowner is a "socially disadvantaged individual" as defined in the HAF guidance.

Defining Socially Disadvantage

As part of the HAF application and intake process, participants will be asked if the meet any of the following criteria:

(1) member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society, (2) resident of a majority-minority Census tract; (3) individual with limited English proficiency; (4) resident of an Indian reservation, or (5) individual who lives in a persistent-poverty county, meaning any county that has had 20% or more of its population living in poverty over the past 30 years as measured by the three most recent decennial censuses.

Criteria for numbers 2 and 5 above will be based on counties that meet the criteria. IHFA will predetermine this and automatically include individuals if their home is within those counties.

Public Communications

Will the Participant engage in a public communications campaign to raise awareness among targeted populations about the availability of HAF resources, in media such as television, newspapers, online media, or social media?

Public Communications

Yes

If yes, please indicate whether the public communications campaign will include communications that primarily target the following populations:

- X Homeowners earning less than 100% of area median income
- X member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- X resident of a majority-minority Census tract; (3)
- X resident of a U.S. territory, Indian reservation, or Hawaiian Home Land
- X homeowners in persistent poverty counties;
- X individual with limited English proficiency

Please indicate in which languages, in addition to English, public communications to targeted populations will be undertaken:

Which Languages

Chinese

Vietnamese

Korean

Tagalog

Russian

Arabic

Haitian Creole

Chosen

X Spanish

X Other

Please list any other languages.

Other Languages:

IHFA contracts with a service called Language Line that allows for interpretative service for 240 different languages. We will be able to use Language Line for all of our interpretation needs. If there is a need for marketing in languages other than Spanish or English we will translate material accordingly.

Outreach

Will the Participant engage in outreach through partnerships with organizations that focus primarily on serving homeowners earning incomes below 100% of area median income or socially disadvantaged individuals and that have the capacity to engage targeted communities in a culturally and linguistically relevant manner to encourage the submission of applications for HAF resources from targeted populations?

Yes

If yes, please indicate whether the community outreach efforts will include partnerships with organizations that primarily target the following populations:

- X member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- X resident of a majority-minority Census tract; (3) individual with limited English proficiency;
- X resident of a U.S. territory, Indian reservation, or Hawaiian Home Land;

X homeowners that reside in persistent poverty counties;X individual with limited English proficiency.

Please indicate in which languages, in addition to English, community outreach efforts to targeted populations will be undertaken:

Chinese
Vietnamese
Korean
Tagalog
Russian
Arabic
Haitian Creole
Other
X Spanish

Housing Counseling and Legal Services
Will the Participant facilitate access for eligible households to housing counseling or legal services?

Yes

If yes, please identify below the providers of housing counseling or legal services that have indicated to the Participant that they are willing and able to support homeowners receiving assistance under the Participant's HAF programs.

Idaho Housing and Finance Association
565 W Myrtle St., Boise, Idaho 83702
www.idahohousing.com
Provider primarily serves LMI Households= True
Provider Addresses Impact of Housing Discrimination= True

NeighborWorks Pocatello
206 N Arthur Ave. , Pocatello, Idaho 83204
www.nwpocatello.org
Provider primarily serves LMI Households= True
Provider Addresses Impact of Housing Discrimination= True

NeighborWorks Boise
3380 W Americana Terrace Ste.120 , Boise, Idaho 83706
www.nwboise.org
Provider primarily serves LMI Households= True
Provider Addresses Impact of Housing Discrimination= True

Idaho Legal Aid Services 1447 S Tyrell Lane , Boise, Idaho 83706 www.idaholegalaid.org

Provider primarily serves LMI Households= True

Provider Addresses Impact of Housing Discrimination= True

Targeting specific groups of homeowners

Will the Participant conduct outreach specifically tailored to target potentially eligible households that:

- X have mortgages or mortgage assistance contracts held or backed by the Participant?
- X have mortgages backed by any of the following agencies: Federal Housing Administration; Department of Veterans Affairs; U.S. Department of Agriculture?
- X have privately held mortgages?

What Efforts will be Made to Address Barriers to HAF Program Participation for Potentially Eligible Homeowners, Including Those with Limited English Proficiency or Who are Disabled? Targeted outreach may be needed to reach homeowners who are likely to experience barriers to access, including persons with limited English proficiency and those with disabilities.

Indicate all of the languages, in addition to English, in which the Participant's HAF application and other program documents will be made available.

Chinese

Vietnamese

Korean

Tagalog

Russian Arabic

Haitian Creole

Other

X Spanish

Will the Participant's HAF applications and other program documents be provided in forms that are accessible to persons with disabilities?

Yes

Performance Goals

Treasury will consider the goals and benchmarks the Participant proposes to use to measure the effectiveness of its programs, including whether those goals address the homeowner needs identified by the Participant, the extent to which the goals are disaggregated by key homeowner characteristics as appropriate for the jurisdiction, and whether they include a goal focused on reducing mortgage delinquency.

Please describe Participant's goals and benchmarks for each of its programs with the following program design elements.

Mortgage Payment Assistance

Metric for Success:

Number of households that are able to receive one month additional assistance to help them get back on track and assist in resuming regular monthly payments.

Goal: 3000 homeowners

Mortgage Reinstatement

Metric for Success:

Overall number of households that are able to reinstate their loans and successfully resume making affordable monthly payments.

Goal: 5000 homeowners that have mortgages reinstated.

Payment Assistance for Homeowners Utilities

Metric for Success:

Homeowners that are able to resolve delinquent payments for utilities (power, sewer, trash, gas, water) in conjunction with mortgage reinstatement.

Goal: 500

Payment Assistance for Homeowner's Insurance

Metric for Success:

Overall number of households that will receive assistance with delinquent insurances.

Goal: 5000

Payment Assistance for HOA fees or liens

Metric for Success:

Overall number of households that will receive assistance with past due HOA fees, liens, condominium association fees, or common charges.

Goal: 500

Payment Assistance for Delinquent Property Taxes

Metric for Success:

Overall number of households that will receive assistance with servicer fronted property taxes or homeowner paid, past due, property taxes to prevent foreclosures. Overall number of tax related delinquencies paid off.

Goal: 5000 homeowners

Staffing, Systems and Contractors

Treasury seeks information regarding the Participant's organizational capacity to implement its HAF Plan.

Does the Participant anticipate needing to hire additional staff to implement this HAF Plan?

Does the Participant anticipate significant information technology system upgrades to implement this HAF Plan?

Yes

Does the Participant have policies or procedures that govern the implementation of each HAF program design element described in this HAF Plan?

Yes

Will the Participant use HAF funds to assist eligible households through a program that was operational before the Participant first received HAF funds?

No

Will the Participant use any third-party contractor or partner to conduct program administration (such as reviewing applications, determining eligibility, processing payments, conducting reporting, and reviewing compliance) for some or all of the Participant's HAF programs?

No

Budget

Budgeting of HAF Funds by Program Design Element

Specify the amounts of HAF funds that the Participant proposes to allocate to each of the following program design elements, if offered:

Mortgage Payment Assistance	\$7,500,000.00
Mortgage Principal Reduction	\$5,000,000.00
Payment Assistance for Homeowner's Internet Service	\$0.00
Payment Assistance for HOA fees or liens	\$1,000,000.00
Payment Assistance for Delinquent Property Taxes	\$10,000,000.00
Mortgage Reinstatement	\$30,013,659.45
Facilitate Mortgage Interest Rate Reduction	\$3,000,000.00

Payment Assistance for Homeowner's Insurance \$4,000,000.00

Payment Assistance for Down Payment Assist. Loans \$0.00

Payment Assistance for Homeowners Utilities \$700,000.00

Sub-Total: \$61,213,659.45

Counseling or Legal Services

The Participant may allocate up to 5% of its HAF funds for counseling or educational efforts by housing counseling agencies approved by the Department of Housing and Urban Development or a tribal government, or legal services, target to households eligible to be served with funding from the HAF related to foreclosure prevention or displacement.

Specify the Participant's allocations for the following:

Counseling or Educational Services \$2,421,771.55

Legal Services \$800,000.00

Sub-Total: \$3,221,771.55

Reimbursement of Funds Expended After January 21, 2020

As described in the HAF guidance, HAF funds may be used for reimbursement of certain expenses between January 21, 2020 and the date when the first HAF funds are disbursed by the HAF participant under the HAF for a qualified expense (with certain limitations, as set forth in the HAF guidance).

If the Participant is seeking reimbursement for any previous expenses, please specify the expenses and amounts below, providing sufficient detail for Treasury to determine whether the expense is within the definition of "qualified expenses" in the HAF guidance:

Sub-Total:

\$0.00

Allocation of Administrative Expenses

As described in the HAF guidance, up to 15% of a HAF participant's allocation may be used for administrative expenses. If the participant proposes to use HAF funds for administrative expenses, please specify the proposed expenses and amounts below, providing sufficient detail for Treasury to determine whether the expense is within the definition of "qualified expenses" in the HAF guidance:

Administration of intake, eligibility review, escalations, and disbursal of assistance. \$1,500,000.00

Call center operations including language line and accessibility services.

\$1,500,000.00

Outreach by organizations with experience and capacity for reaching low-to-moderate income homeowners and socially disadvantaged populations.

\$1,500,000.00

Compliance and technical assistance.

\$500,000.00

Technology Vendors \$2,500,000.00

Sub-Total: \$7,500,000.00

Total Plan Requested Amount:

Total Plan Requested Amount \$71,935,431.00

Amount Requested Confirmation:

Allocation Amount Confirmation

Yes

Contacts

Please identify up to three contacts for the Participant- a primary contact, a designated point of contact for reporting, and an additional contact.

Primary Contact

Name: Susan Semba

Agency/Office: Idaho Housing and Finance Association

Email: susans@ihfa.org Phone Number: 2083314726

Reporting Contact

Name: Heather Bowman

Agency/Office: Idaho Housing and Finance Association

Email: heatherb@ihfa.org

Phone Number: 2083314847

Additional Contact

Name: Chuck Kracht

Agency/Office: Idaho Housing and Finance Association

Email: chuckk@ihfa.org Phone Number: 2084247084

Title VI Assurances

You must provide on behalf of the HAF Participant assurances that the HAF Participant will comply with Title VI of Civil Rights Act of 1964. Please download the assurances, then review, sign, and upload the signed copy to this page before submitting the HAF Plan.

Download the Title VI assurances document.

State of Idaho Assurances Aug 31, 2021

Official Certification

I (the undersigned) certify that the information provided in the HAF submission is accurate and complete after reasonable inquiry of people, systems, and other information available to the HAF Participant. The HAF participant and I acknowledge that any materially false, fictitious, or fraudulent statement or representation (or concealment or omission of material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 U.S.C. § 1001 and also may subject me and HAF Participant to civil penalties and/or administrative remedies for false claims or otherwise, (including 31 U.S.C. §3729 et seq.). I am an authorized representative of HAF Participant with authority to make the above certifications and representations on behalf of the HAF Participant.

Name of HAF Participant

State of Idaho

Name and Title of Certifying Official

Name: David Fulkerson Telephone: 2088543072

Title: Deputy Administrator/State Financial Officer

Email: david.fulkerson@dfm.idaho.gov



www.idahohousing.com

Homeowner Assistance Fund Plan

PROGRAM DESIGN

Program Template: Idaho Homeowner Assistance Program

Date: August 31, 2021 (updated 12/9/21)

Term Sheet

Program Design Elements:

- 1. Allow homeowners to reinstate mortgages or pay other housing related costs
- 2. Mortgage payment assistance (For one additional month post reinstatement, if maximum assistance has not been reached)
- 3. Mortgage principal reduction, including with respect to a second mortgage provided by a non-profit or government (To be used as a last resort after all other loss mitigation options.)
- 4. Payment Assistance for homeowner's utilities, including electric, gas, home energy, and water
- 5. Payment Assistance for homeowner's, flood, and mortgage insurance
- 6. Payment assistance for homeowners' association fees or liens, condominium association fees, or common charges
- 7. Payment assistance for delinquent property taxes to prevent homeowner tax foreclosures

NOTE- We are encompassing all seven of the above listed Design Elements into one reinstatement/assistance program.

Criteria	Program Terms
Brief Description	
	This program will provide funds to eliminate or reduce past due payments and other delinquent amounts, including payments under a forbearance plan, on forward mortgages, reverse mortgages, loans secured by manufactured homes, or contracts for deed.
	HAF Funds may be used to bring the account fully current, with no

remaining delinquent amounts, and to repay amounts advanced by the lender or servicer on the borrower's behalf for property charges, including property taxes, hazard insurance premiums, flood or wind insurance premiums, ground rents, condominium fees, cooperative maintenance fees, planned unit development fees, homeowners' association fees or utilities that the servicer advanced to protect lien position. Payment may also include any reasonably required legal fees.

Provide payment assistance for up to one month in conjunction with mortgage reinstatement unless maximum amount of assistance has already been reached.

For mortgage reinstatement, funds may be used to help homeowners resolve delinquent payments for utilities (power, sewer, trash, gas, water) only if the outstanding past due amount is deemed to be a barrier to the homeowner resuming regular monthly mortgage payments. HAF funds may be used to pay prospective charges in full including interest or reasonable required legal fees and under circumstances in which a delinquency threatens access to utility services. The provided assistance must bring the homeowner's account current.

For a homeowner that is concurrently going through loss mitigation stemming from a coronavirus pandemic related delinquency, HAF funds may be used for loss mitigation measures intended to result in a permanently sustainable monthly payment for borrowers that are unable to resume their monthly mortgage payment that is reset due to investor offered loss mitigation. Funds may be used to effect principal reductions; reduce the rate of interest; recast payment terms; repay funds advanced by the servicer on the borrower's behalf; and as otherwise appropriate to ensure such assistance, when leveraged with other available loss mitigation options and results in a sustainable monthly payment amount for the borrower.

For homeowner's without a mortgage or who have a reverse mortgage, provide funds to resolve property charge defaults that threatens a homeowner's ability to sustain ownership of the property. HAF funds may be used to pay past due property taxes, HOA fees, condominium fees, or cooperative maintenance or common charges that threaten sustained ownership of the property. Past due hazard

	insurance may be covered for those with a reverse mortgage only. Must be brought current by program assistance. For homeowner's without a mortgage or that have a reverse mortgage and are behind on utilities, due to circumstances related to the COVID-19 pandemic, funds may be used to help homeowners resolve delinquent payments for utilities (power, sewer, trash, gas, water) only if the outstanding past due amount is deemed to be a barrier to the homeowner maintaining their home, being displaced, or creating an unsafe or unsanitary environment. All other eligibility requirements must be met.
	IHFA will make reasonable efforts to have HAF participants identify their loss mitigation options prior to, or in conjunction with providing HAF assistance. HAF funds may be used to supplement other loss mitigation options offered by the servicer under investor requirements or where, without HAF funds, the homeowner would not qualify for that loss mitigation option.
HAF Reinstatement Program Goal	To mitigate financial hardships associated with the coronavirus pandemic by providing eligible Idaho homeowners assistance for the purposes of reinstating their delinquent mortgages, resume affordable mortgage payments, and avoid foreclosure and displacement.
Size of HAF Reinstatement Program	Idaho Housing and Finance Association will utilize up to \$64,435,431 of its total HAF allocation for this program. Remaining \$7,500,000 is for administrative costs.
Targeted Population of Homeowners and Financial Challenges Program Seeks to Address	IHFA will target Idahoans who are socially disadvantaged and those who are low-to-moderate income. Goal #1: Help low and moderate-income households return to housing stability by assisting with past due mortgage amounts accrued while on COVID-19 forbearance plans. Goal #2: Stabilize the mortgage delinquency across Idaho. Goal #3: Assist cost-burdened Idaho families attempting to exit forbearance plans and get back on track. Goal #4: Prevent disadvantaged and low-to-moderate income households from displacement.
Homeowner Eligibility	 "Eligible Homeowners" for Idaho's HAF Reinstatement programs must meet the following criteria: Homeowner must have experienced a Qualified Financial Hardship after January 21, 2020. Homeowner must have owned the home on or before January 1, 2020. Homeowner must currently own and occupy the property as their primary residence. Homeowner must meet the Homeowner Income Eligibility

	Descriptores on to
Eligible Legal Ownership Structures	Requirements. Homeowner must be delinquent by at least one installment payment or otherwise in default, as reflected in documentation from the payee or the payee's agent. Delinquency includes missed payments during a forbearance period. Homeowners without a mortgage loan or who have a reverse mortgage that are delinquent on state property taxes, HOA's or Condo Association dues, hazard Insurances(reverse mortgages only), or utilities (power, sewer, trash, gas, water) and are at risk of being displaced may be eligible for assistance if they meet all other eligibility requirements. Delinquencies must have occurred after January 21, 2020. Homeowner must attest that they experienced a financial hardship after January 21, 2020. The attestation must describe the nature of the financial hardship. Homeowners who have previously filed for bankruptcy but who are no longer in bankruptcy must provide proof of court ordered "discharge" or "dismissal". Homeowner must complete and sign Affidavit, Application, Disclosures, and 3rd Party Authorization forms Homeowner agrees to provide all necessary documentation to satisfy program guidelines within timeframes established by Idaho Housing and Finance Association, including self-certification or attestation of socially disadvantaged status, as applicable. The original, unpaid principal balance of the homeowner's first mortgage or housing loan, at the time of origination, was not greater than the conforming loan limit in effect at time of origination. Special consideration will be given to FHA, VA and USDA loans. Homeowner will provide a statement of current ability to resume any required regular payments after account is reinstated or brought current. Self attestation will be required. Co-owners are not permitted to separately apply for HAF Program assistance. "Eligible Legal Ownership Structures" include only the following: Those where the home is owned by a "natural person" (i.e.,
	 LLP, LP or LLC do not qualify) Those where the homeowner has transferred their ownership right into non- incorporated, Living Trusts, provided the homeowner occupies the home as the primary/principal residence.
Qualified Financial Hardship	A "Qualified Financial Hardship" is a material reduction in income or material increase in living expenses associated with the coronavirus pandemic that has created or increased a risk of mortgage delinquency, mortgage default and foreclosure, loss of utilities or home energy

	services, and displacement of a homeowner.
	services, and displacement of a nomeowner.
	 Reduction of Income – Documented temporary or permanent loss of earned income [after January 21, 2020]. Increase in living expenses – Documented increase in out-of-pocket household expenses such as, medical expenses, inadequate medical insurance, increase in household size, or costs to reconnect utility services directly related to the coronavirus pandemic [after January 21, 2020]. Applicant attestation as to financial hardship after January 21, 2020, including description of the nature of the financial hardship (job loss, reduction in income, etc.)
Homeowner	To be eligible for assistance under the Idaho HAF Reinstatement
Income Eligibility	Program, homeowners must have incomes equal to or less than 150%
Requirements	of the area median income as published by HUD or 100% of the median
	income for the United States, whichever is greater.
	Income Determination: Applicant attestation as to household income,
	plus supporting documentation, including paystubs, W-2s or other wage
	statements, IRS Form 1099, tax filings, depository institution statements
Homeowner	demonstrating regular income, or an employer attestation.
Prioritization	Idaho Housing and Finance Association will prioritize funding to the following populations:
	 Not less than 60% will 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. Amounts not made available to homeowners that meet the above income-targeting requirement will be prioritized for assistance to socially disadvantaged individuals as long as they have incomes equal to or less than 150% of the area median income or 100% of the median income for the United States, whichever is greater. "Socially Disadvantaged Individuals" are those whose ability to purchase or own a home has been impaired due to diminished access to credit on reasonable terms as compared to others in comparable economic circumstances, based on disparities in homeownership rates in the HAF participants jurisdiction as documented by the U.S. Census. The impairment must stem from circumstances beyond their control. Indicators of impairment under this definition may include being (1) member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society, (2) resident of a majorityminority Census tract; (3) individual with limited

	English proficiency; (4) resident of an Indian reservation, or (5) individual who lives in a persistent-poverty county, meaning any county that has had 20% or more of its population living in poverty over the past 30 years as measured by the three most recent decennial censuses." (Treasury Guidance Dated 8/2/2021) All remaining funds not otherwise prioritized will be available for other Eligible Homeowners.
Eligible Properties	 "Eligible Properties" are those that are: Single-family (attached or detached) properties Condominium units 1 to 4-unit properties where the homeowner is living in one of the units as their primary residence. [EXCLUSION: If the homeowner of a 1-4 unit property has received payments from the Emergency Rental Assistance Program, they may be ineligible to receive funds under the HAF Program.] Manufactured homes permanently affixed to real property and taxed as real estate Manufactured homes permanently affixed to real property that are on a leasehold tribal land, be subject to the mortgage lien, and be insured by a title policy. Single-Family (attached or detached) properties that are on leasehold tribal land, be subject to a mortgage lien, and be insured by a title policy. Ineligible properties are those that: Vacant or abandoned Mobile homes not permanently affixed to real property 2nd homes
	Investment property
Eligible Uses of HAF Reinstatement Program Proceeds	Housing obligations as listed below and not incurred/billed prior to January 21, 2020. Mortgages that are due for November 1, 2019 forward <u>may</u> be eligible. "Eligible Uses of HAF Reinstatement Program Proceeds": Mortgages listed below must be held by a servicer with an NMLS number. This would include federally backed and privately funded mortgages.
	 Existing first mortgage lien loan payment (principal, interest, taxes, insurance, and mortgage insurance, and HOA dues), to include any escrow shortages. Subordinate mortgage lien payment (P&I) Manufactured home loan monthly payment (principal, interest, taxes, insurance, and HOA dues) to include escrow shortages. Land Contract monthly payment (P&I) (For lease held property

	 loans, specifically those associated with tribal lands across Idaho). Homeowner's association fees, condominium association fees or common charges. For a homeowner that is concurrently going through loss mitigation stemming from a coronavirus pandemic related delinquency, HAF funds may be used for loss mitigation measures intended to result in a permanently sustainable monthly payment for borrowers that are unable to resume their monthly mortgage payment that is reset due to investor offered loss mitigation. Funds may be used to effect principal reductions; reduce the rate of interest; recast payment terms; repay funds advanced by the servicer on the borrower's behalf; and as otherwise appropriate to ensure such assistance, when leveraged with other available loss mitigation options and results in a sustainable monthly payment amount for the borrower. Homeowner's hazard, flood and/or mortgage insurance Homeowner's delinquent property taxes to prevent homeowner tax foreclosure Homeowner delinquent utility payments. Funds may be used to help homeowners resolve delinquent payments for utilities (power, sewer, trash, gas, water) only if the outstanding past due amount is deemed to be a barrier to the homeowner resuming regular monthly mortgage payments, or if the outstanding past due amount is deemed to be a barrier to the homeowner maintaining their home, being displaced, or creating an unsafe or unsanitary environment. Counseling or educational efforts by housing counseling agencies approved by HJID or a tribal government or logal sendices.
	an unsafe or unsanitary environment.
Maximum Per Household	Idaho Housing and Finance Association will not exceed its "Maximum Per
HAF Assistance	Household HAF Assistance" amount of \$50,000 per household.
Form of Assistance	Assistance will be structured as an interest free loan, payable upon sale and transfer of the property. For a transfer based on sale of the property, the loan will be forgiven if the homeowner's net proceeds from the sale do not cover the HAF loan amount. The loan may be forgivable after ten years.
Payout of HAF	Idaho Housing and Finance Association will disburse HAF assistance
Assistance/Payment	directly to mortgage lender/servicer or land contract holder, the Idaho
requirements	State Tax Commission, Hazard Insurance Provider, Homeowners' Association/Condominium Association, or utility provider. Funds will not
	Association, Condominant Association, or utility provider. Funds will not

	be issued to borrowers or any other parties than those listed above. Payments to lenders/servicers are only authorized to those lenders/services that hold an NMLS number. No private party mortgages are eligible.
	Funds will not be issued to borrowers or any other parties
	Idaho Housing and Finance Association will make no more than one disbursement to each payee, per application.
	Idaho Housing and Finance Association will disburse the amount quoted by the lender/servicer, tribal land contract holder, State Tax Commission, hazard insurance provider, HOA or condominium association or utility provider. Any discrepancies to be resolved by the homeowner.
	If homeowner's past due amount exceeds the amount that Idaho Housing and Finance Association can provide, homeowner may pay the difference, and Idaho Housing and Finance Association will pay the max of their limit.
	HAF assistance will be prioritized to Eligible Uses of HAF Reinstatement
	Program Proceeds as follows: 1) Mortgage/housing loan reinstatement (including escrows), 2) Property taxes and homeowner's insurances (hazard and mortgage)
	3) Condominium/homeowners' association fees
	Disbursement to mortgage/housing lender/servicer may include up to the next <i>one</i> scheduled monthly payment ("Additional Assistance") if funds are available not to exceed the Maximum Per Household HAF Assistance.
	Eligible homeowners will be allowed to apply more than once; provided they have not exceeded the maximum household amount and that program funds are still available. Applicants will be required to submit a new application and provide proof of new COVID-19 hardship.
Program Launch	The application and intake process is designed and will be operated in a manner to avoid barriers to equitable access and allow flexibility, particularly with regard to documentation requirements. Homeowners will apply for assistance either through the online portal or over the telephone.
Program Duration	The period of performance for the HAF award begins on the date hereof and ends no later than September 30, 2026, or sooner as defined by US Treasury. HAF recipients shall not incur any obligations to be paid with the funding from this award after such period of performance ends.
	Idaho Housing and Finance Association plans to disburse all funds

	by the end of the Financial Agreement term, September 30, 2026,
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A collection Decree	or sooner as defined by the US Treasury.
Application Process	Idaho applicants will be able to apply through an online portal and by telephone with IHFA staff.
Required Application	Idaho Homeowner Reinstatement Program Application
Documents	Third Party Authorization (TPA) and Disclosure Form
	Signed acknowledgement that Idaho HAF assistance is in the
	form of a Loan due upon transfer by sale of the property.
	Qualifying hardship attestation and supporting documentation
	from homeowner certifying and identifying the eligible hardship and that it occurred after January 21, 2020, as required
	 Mortgage Statement for each lien (e.g., first mortgage, second mortgage).
	 Social Security Number card <u>or</u> unique identifier as shown on a legal document, such as federal tax return
	 Income documentation; W2's, paystubs, previous years' tax returns or alternative income documents as applicable.
	 Homeowners' association, condominium association or common charges statements showing delinquent amount.
	 Homeowner's hazard, flood and/or mortgage insurance statement showing past due amounts
	Homeowner's delinquent property tax bill if not escrowed
	Statement of current ability to resume regular monthly
	payments after reinstatement and self attestation
	Past due utility bills, if applicable Applicant most applicable and applicable information if
	Applicant must provide each payee's contact and account information if
Eligibility Determination	not listed on monthly statement.
Notes	IHFA staff summarizes their determination of the applicant's eligibility
Notes	and status in case notes; summary to include applicable details to
	support the decision and advance the case through the pipeline and/or
Overlite Company (OC)	action taken.
Quality Control (QC)	Idaho Housing and Finance Association will ensure program integrity by undertaking system- generated, random selection of case reviews after
	eligibility determination and prior to funding; 100% review of all declined
	cases and a reasonable selection of each staff's pipeline based on tenure
	and performance, starting with 10% of volume decreasing to a minimum
HAT Assistance Association	of three cases weekly.
HAF Assistance Approval	Description for a sixten as a second the Basilian as Ba
and Funds Disbursement	Reservations for assistance may not exceed the Maximum Per
	Household HAF Assistance amount of \$50,000; program staff will
	summarize funding details based on applicant's request and generally prioritized as follows:
	1) mortgage/housing payment reinstatement
	2) property taxes and homeowner's insurances
	3) condominium /homeowners' association fees

	Funds will be paid, as applicable, to the mortgage servicer or other third-party payee authorized by the servicer, or other third party authorized to collect eligible charges in accordance with reinstatement instructions received from the payee. Payments may be made through electronic transmission for any payees that accept funds in this manner. For other payees, funds will be sent directly by check or other payment method accepted by the mortgage servicer or authorized payee.
Program Partner Requirements	 Lender/servicers to execute a HAF Partner agreement and agree to communicate using the Common Data File (CDF) format that will be used by other HFA's administering the HAF program. Private lenders, including Land Contract payees to provide written delinquency quote, contact information, and ACH account information. All servicers/payees will need to provide a current signed W9.
Program Leverage with	Idaho Housing and Finance Association will undertake best effort
Other Financial Resources	approach to leverage the assistance that might be available for
	homeowners through other federal programs that have been created
	expressly for that purpose before using HAF funds.
Program Exclusions	 Private mortgages not held by a lender/servicer with an NMLS number. Mortgages that are current at the time of application. Mortgages that are due for payments prior to November 1, 2019. Homeowners without a mortgage or that have a reverse mortgage that have Taxes, HOA's, utilities, or Insurances due prior to January 21, 2020. Ineligible properties: Vacant or abandoned Mobile homes not permanently affixed to real property 2nd homes Investment property