



## MEMORANDUM

June 23, 2021

To: TRIBAL HOUSING CLIENTS

From: Ed Clay Goodman  
HOBBS, STRAUS, DEAN & WALKER, LLP

Re: ***Tribal Consultation on the Implementation of the Homeowner Assistance Fund***

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The U.S. Department of Treasury (“Treasury”) issued a Dear Tribal Leader Letter on June 16, 2021 (via email only) announcing that it is holding a consultation on the Implementation of the Homeowner Assistance fund on Tuesday, July 13, 2021 at 2:00 PM EDT. Treasury also encouraged the submission of written comments by Friday, July 23, 2021 at 11:59 EDT.

As previously reported, the March 2021 American Rescue Plan Act (“ARPA”) provided approximately \$9.961 billion to the Homeowner Assistance Fund (“HAF”), which includes a nearly \$500 million set aside for tribes, tribally designated housing entities, and the Department of Hawaiian Homelands.<sup>1</sup>

Treasury is specifically seeking input on the following questions:

- Does the [guidance posted on April 14, 2021](#) on use of funds for administrative costs help address concerns expressed during consultation about covering related program expenses? Reference “Qualified Expenses, #9 and #10” on the guidance.
- Does the guidance posted on April 14, 2021 help overcome documentation barriers for homeowners who may request assistance?
- In implementing the HAF Program, are there any barriers to participation that Tribal governments or TDHEs are experiencing that keep homeowners, particularly those most vulnerable to foreclosure or financial hardship, from accessing this funding?
- How has your experience been in working with mortgage servicing companies either helped or hindered your program’s ability to keep homeowners stably and safely housed?
- What kinds of programs to assist homeowners do you anticipate will be most important for your tribal members?
- Would your tribe be open to technical assistance from Treasury in the design or implementation of your HAF program?

You can register for the consultation [here](#). Comments should be submitted to [tribal.consult@treasury.gov](mailto:tribal.consult@treasury.gov).

If you have any questions about the consultation discussed in this memorandum or would like assistance preparing comments, please do not hesitate to contact me at [egoodman@hobbsstrauss.com](mailto:egoodman@hobbsstrauss.com), or by phone at (503) 242-1745.

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<sup>1</sup> For more information on the HAF Program please see our memoranda dated May 7, 2021 and April 16, 2021.