



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

TO: Alex Goodenough, Office of Information and Regulatory Affairs

FROM: Ryan Law, Deputy Assistant Secretary
Office of Privacy, Transparency, and Records

SUBJECT: Justification for Emergency Processing: Homeowner Assistance Fund (HAF)
Interim Report Templates, Guidance and FAQs

Pursuant to the Office of Management and Budget (OMB) procedures established at 5 C.F.R. § 1320.13, the Department of the Treasury (Treasury) requests emergency processing for the Homeowner Assistance Fund (HAF) program's Interim Report Guidance and FAQs and templates, revising OMB Control Number 1505-0269.

On March 11, 2021, the American Rescue Plan Act was signed into law, and established the Homeowner Assistance Fund program. This program is intended to mitigate financial hardships associated with the coronavirus pandemic by providing funds to eligible entities for the purpose of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing.

On April 14, 2021, Treasury published the [Homeowner Assistance Fund Guidance](#) that HAF participants need to comply with to fulfill their reporting requirements. Treasury has directly engaged with various interested agencies and stakeholders as well as required HAF Participants submitting plans to provide input on reporting and metrics. In recognition of open questions from recipients and external stakeholders on HAF eligible uses, the HAF program, in coordination with policy, Office of General Counsel (OGC) and Office of Recovery Programs (ORP) leadership, recommended a series of updates to reporting requirements and timelines included in the FAQs and Reporting Guidance.

Treasury is currently working on developing the interim reporting portal that is expected to go live around February 14, 2022 but will also require outreach and communication with recipients throughout the remainder of December and January. Recipients will use this portal to transmit the necessary reporting information. As a result, Treasury is requesting a waiver from the requirement to publish notice in the Federal Register seeking public comment for the following reasons:

- Treasury will need to provide the Interim Report guidance to recipients well ahead of the Portal launch date and provide a high degree of certainty that it will not change, so that recipients can gather the necessary information and build their own tools/processes to comply within a 2 month timeframe. Similarly, the recipients will also need the final

templates published to have confidence to invest in properly building out their processes for compliance and reporting.

- The Interim Report is intended as a one-time, preliminary report that will include information that will also be collected as part of the upcoming Quarterly Reports expected to launch in April, 2022. Given the overlap in information collected and the timeframe for interim reporting, Treasury believes it will be more constructive to seek public comment on the Quarterly Report.
- An emergency approval of the Interim Report and opportunity for public comment for the Quarterly Report will also reduce duplication of efforts and align the timing better with the expected PRA renewal for the HAF program information collections prior to 05/31/2022.

For these reasons, Treasury requests emergency processing and approval as soon as possible for the FAQs and Reporting Guidance, which set forth substantially all the information collections of the interim reporting. Treasury plans to publish the FAQs and Reporting Guidance on December 8, 2021.