

**GRAND TRAVERSE BAND
HOMEOWNERS ASSISTANCE FUND
POLICY**

Adopted: October 2021

INTRODUCTION

This program was established under section 3206 of the American Rescue Plan Act of 2021 (the ARP) 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 GTB Tribal Member homeowners experiencing financial hardship after January 21, 2020 through qualified expenses related to mortgages and housing.

Not less than 60% of amounts made available to each Tribe must be used for qualified expenses to assist homeowners having incomes equal to or less than 100% of the area median income. Any amount not made available to homeowners that meet this income targeting requirement must be prioritized for assistance to socially disadvantaged individuals, with funds remaining after such prioritization being made, available for the other eligible homeowners having incomes equal to or less than 150% of the area median income.

SECTION 1 - ELIGIBILITY

- Homeowner must have experienced a Qualified Financial Hardship after January 21, 2020.
 - 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, foreclosure, loss of utilities or home energy services, or displacement for a homeowner.
 - 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 but not limited to: medical expenses, inadequate medical insurance, increase in household size, or costs to reconnect utility services directly related to coronavirus pandemic 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.
- Homeowner must have owned the home on or after January 21, 2020.
- Homeowner must currently own and occupy the property as their primary residence.
- Homeowner must be a Member of the Grand Traverse Band of Ottawa and Chippewa Indians.
- Homeowner applicant must own and occupy the 6 County Service Area property (Antrim, Benzie, Charlevoix, Grand Traverse, Leelanau, Manistee) for a minimum of six consecutive months plus one day as their primary residence.
- Homeowner must meet the Homeowner Income Eligibility Requirements: Incomes equal to or less than 150% of the area median income. (see Section 2 - Income Limit Summary and Documentation)

Eligible Legal Ownership Structures

- Those where the home is owned by a “natural person” (i.e., LLP, LP, S-Corp, or LLC do not qualify). Where the estate of a deceased natural person is the ownership entity, the owner may be eligible, subject to review by the Authority.
- Those where the homeowner has transferred their ownership right into nonincorporated, Living Trusts, provided the homeowner occupies the home as the primary/principal residence.
- Those where the home is under a Purchaser’s Interest in a Land Contract valid under Michigan law.
- Those where the home is owned by a certificate of title.

Eligible Properties

- 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.
- Manufactured homes permanently affixed to real property and taxed as real estate.
- Mobile homes not permanently affixed to real property.

Ineligible Properties

- Vacant, lacking a dwelling, or abandoned.
- 2nd homes.
- Investment property. 1 to 4-unit properties where the homeowner/landlord has received Emergency Rental Assistance Funds.

Eligible mortgage types

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

SECTION 2 – Income Limits Summary and Documentation

ANTRIM COUNTY – HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$83,250	\$88,600
Greater of 150% AMI or 100% of U.S. Median Income	\$79,900	\$80,550	\$90,600	\$100,650	\$108,750	\$116,800	\$124,850	\$132,900

BENZIE COUNTY - HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$81,450	\$87,050	\$92,700
Greater of 150% AMI or 100% of U.S. Median Income	\$79,900	\$84,250	\$94,800	\$105,300	\$113,750	\$122,150	\$130,600	\$139,000

CHARLEVOIX COUNTY - HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$82,050	\$87,700	\$93,350
Greater of 150% AMI or 100% of U.S. Median Income	\$79,900	\$84,850	\$95,450	\$106,050	\$114,550	\$123,050	\$131,550	\$140,000

GRAND TRAVERSE COUNTY - HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$85,000	\$91,800	\$98,600	\$105,400	\$112,200
Greater of 150% AMI or 100% of U.S. Median Income	\$89,250	\$102,000	\$114,750	\$127,500	\$137,700	\$147,900	\$158,100	\$168,300

LEELANAU COUNTY - HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$79,900	\$85,250	\$91,550	\$97,850	\$104,150
Greater of 150% AMI or 100% of U.S. Median Income	\$82,850	\$94,700	\$106,550	\$118,350	\$127,850	\$137,300	\$146,800	\$156,250

MANISTEE COUNTY - HAF Income Limits FY2021								
	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person	8-Person
Greater of 100% AMI or 100% U.S. Median Income	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$79,900	\$80,000	\$85,150
Greater of 150% AMI or 100% of U.S. Median Income	\$79,900	\$79,900	\$87,100	\$96,750	\$104,500	\$112,250	\$120,000	\$127,750

Submit 2020 Income Taxes or most recent income documentation. See chart for list of acceptable documents. Not all sources may apply.

Income Source	Acceptable Documents
Employment wages	Paystubs from last 30 days or Employer signed form or letter confirming wages or Verification of income or reduction of hours/pay form
Self-employment	Profit and loss statement(s) for the three most recent months
Net rental income, income from interest bearing assets, royalty income, interest from estates and trusts	Most recent statement
Social Security, pensions, retirement, annuities, disability, death benefits	Current benefits letter
Unemployment insurance, worker's compensation, severance compensation	Payment history reflecting gross benefit amount, deductions, and recent payments
Any public assistance (General Assistance or TANF) payments from state or local income support office	Current benefits letter
Child support, family support, alimony	Current benefits letter
Armed forces pay	Two current statements

**Under limited circumstances, GTB Housing may rely on a written attestation from the applicant without further documentation of household income. GTB Housing has the discretion to provide waivers or exceptions to this documentation requirement to accommodate disabilities, extenuating circumstances associated with the coronavirus pandemic, or a lack of technological access. However, GTB Housing remains responsible for making the required determination regarding an applicant's household income and documenting that determination.

SECTION 3 - APPLICATION PROCEDURES

Application Requirement

The application is the basic record of each family applying for admission to the Program. Each applicant is required to provide any and all information requested and to sign the application and all supporting documents. All information and statements made by the applicant are subject to verification. Providing false statements or making any materially false, fictitious, or fraudulent statement or representation, or making or using any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or representation renders the applicant ineligible and may subject the applicant to criminal and/or civil sanctions. Incomplete applications will not be accepted.

Application Procedure

- Applications are accepted by GTB Housing. Each application shall reflect the date and time received and shall bear the initial of the employee who accepted the application.
- An application may be submitted either by an eligible household or by a lender/mortgage holder on behalf of household. All adult household members must sign the application and an

authorization for release of information, which is required for third party verification. All GTB HAF participants must submit an application.

- The application and all information relating to the family's eligibility shall be maintained in a file, along with all relevant correspondence. Files will be placed in one of three categories, as follows:
 - “Eligible” - Applicant has met initial eligibility requirements and has been placed on the waiting list for the program;
 - “Ineligible” - Applicant has not met initial eligibility requirements and/or has been determined to be ineligible for the program; or
 - “Inactive” – Applicant has not updated the application within thirty (30) days of notification.
- If during the application intake and screening process, it is determined that the applicant is ineligible for program participation, the applicant will be informed of such determination, and the application classified as ineligible. In such instances, sufficient information and findings pertaining to the denial of services will be documented for the file. A certified letter with return receipt requested will be mailed to the applicant within thirty (30) days of the date of denial. The notice shall specify the grounds for the denial of service and advise the applicant of his/her right to appeal the decision pursuant to the Grievance Policy and Procedure of the GTB Housing.
- Upon request, a disabled person may receive assistance from GTB Housing or a representative of his/her choice in completing the application.
- All incoming applications must be added into the HAF Spreadsheet for tracking.

Verification and Documentation of Application Information

Information submitted by each Applicant shall be verified to assure that the information is true and correct. Complete and accurate verification records will be maintained. Each applicant shall provide the following documents to substantiate his or her Indian status, identity, income and other conditions of eligibility. At a minimum, a complete application includes:

- Application and Attestation completed with all required information;
- Copy of Social Security cards for all household members;
- Copy of Tribal Membership Card for head of household, if applicable;
- Copy of deed, proof of homeownership or copy of mortgage statement;
- Household income verification documentation;
- Copy of utility bills;
 - Bills must be in Applicant’s name or in the name of the spouse of the Applicant.
- Documentation proving that that the assistance is for Applicant’s primary residence, which may include but is not limited to a lease, a deed, utility bills, tax records, etc.; and
- Documentation demonstrating that the Applicant’s household has experienced a reduction in income, incurred significant costs, or experienced other financial hardship after January 21, 2020.

SECTION 4 - SELECTION OF PARTICIPANTS

Prioritization of Applications

Applications will be prioritized as follows:

- Homeowners who have Federal Housing Administration (FHA), Department of Veterans Affairs (VA), or U.S. Department of Agriculture (USDA) mortgages and homeowners who have mortgages made with the proceeds of mortgage revenue bonds or other mortgage programs that target low- and moderate-income borrowers will receive the highest priority.
- Applications will then be further prioritized in the following order:
 - Households whose income is equal to or less than 50% of the area median income or equal to or less than 50% of the median income of the United States, whichever is greater.
 - 50% of the area median income for a household means the income limit for very low-income families, for the relevant household size, as published by the Department of Housing and Urban Development (HUD) in accordance with 42 U.S.C. 1437a(b)(2) for purposes of the HAF.
 - 50% of the median income for the United States means half the median income of the United States, as published by HUD for purposes of the HAF.
 - Households whose income is between 51% and 100% of the area median income or between 51% and 100% of the median income of the United States, whichever is greater.
 - 100% of the area median income for a household means two times the income limit for very low-income families, for the relevant household size, as published by the Department of Housing and Urban Development (HUD) in accordance with 42 U.S.C. 1437a(b)(2) for purposes of the HAF.
 - 100% of the median income for the United States means the median income of the United States, as published by HUD for purposes of the HAF.
 - Households whose income is between 101% and 150% of the area median income or between 101% and 150% of the median income of the United States, whichever is greater.
- Notification of Selected Applicants. GTB Housing shall notify applicants who are selected for Program participation in writing in 14 days.

SECTION 5 - PRIORITIZATION TO ELIGIBLE QUALIFIED EXPENSES

1. Mortgage/housing loan payments and/or reinstatement (including escrows),
2. Property taxes,
3. Land Contracts and Reverse Mortgages,
4. Mobile home and/or lot payment assistance,
5. Condominium/homeowners' association fees or common charges,
6. Homeowner's insurance, flood insurance, and mortgage insurance,
7. Utilities (including electric, gas, home energy and water/sewer),
8. Internet services (including broadband as defined in 47 CFR 8.1(b).)

SECTION 6 – FUNDING

Payable to the homeowner except in cases of delinquency, default or forbearance in which the payment will be made directly to the service provider (lender, county, provider)

Monthly bills or statements must be submitted in order to be direct paid or paid to the Tribal Member.

Reinstatement assistance will not be applied to delinquent accounts for the period prior to January 21, 2020.

Assistance will be structured as a non-recourse grant and maximum amount of assistance per homeowner will not exceed \$20,000.

Assistance to be provided under the HAF Program is subject to availability of funds. No applicant or household determined to be eligible is entitled to or has a property right to receive funding under the HAF Program. When funding for the HAF Program is fully-expended, the HAF Program will terminate. GTB Housing may terminate this Program at any time.

Assistance will be granted in 3-month intervals with recertification at the end of each interval based on availability of funds. GTB shall provide Financial Assistance for a period not to exceed twelve (12) months subject to the availability of funds.

Homeowners that have received funds through the Emergency Rental Assistance Program (ERAP) shall be subject to a twelve (12) month limit between the two programs. The homeowner may qualify for assistance with any qualified expenses in 3-month intervals with recertification at the end of each interval based on availability of funds for up to twelve (12) months that were not covered by ERAP.