



215 SW Washington Street, Suite 200  
Portland, OR 97204

T 503.242.1745  
F 503.242.1072

HOBBSSTRAUS.COM

## MEMORANDUM

October 1, 2025

TO: TRIBAL HOUSING CLIENTS

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

RE: ***Tribal Housing Update: Homeownership Assistance Fund Webinar***

---

This memo provides a brief update on a webinar presented by the United States Department of the Treasury (Treasury) regarding the Homeownership Assistance Fund (HAF) Program on September 30, 2025. The presenters were Jen Parisien (Policy Advisor for Treasury) and Courtney Coffin (Outreach Manager for Treasury's HAF Program), along with Maria Danz (Director of NAIHC Training and Technical Assistance Program).

Courtney Coffin provided the substantive content during the meeting. She began by noting that there are some important dates coming up. On November 17, 2025, your HAF Program Annual Report is due, along with your regular quarterly report. The portal will open on October 15, 2025 to submit those reports. You must submit **both** an annual report and a quarterly report. The quarterly reports capture quantitative data, and annual reports capture more qualitative data. Further, you must submit these reports even if you have not spent any of your HAF funding. Your reporting requirements do not end until you have submitted your two Final Reports (meaning you have closed out your HAF program).

The HAF Program was established pursuant to the American Rescue Plan Act (ARPA) in 2021, as a response to the COVID-19 pandemic. The goal was to provide funding to struggling homeowners to keep them from being displaced from their homes. The qualified expenses for HAF Programs are: mortgage assistance, other payment assistance (property taxes, utilities, insurance, HOA/COA fees, and existing down payment assistance loans), other measures to prevent displacement, HAF Counseling/Legal Services (up to 5% of award); administrative expenses (up to 15% of the total award).

In one year (September 30, 2026), Tribes/ TDHE will need to close out their HAF programs. That is the last date that you can "obligate" your HAF award funds.

In order to submit your reports, you need to go to the Treasury HAF Program Portal. You can access that Portal as follows:

Using Login.gov - <https://portal.treasury.gov/compliance>

Using ID.me - <https://portal.treasury.gov/cares/s/slt>

Once you get to the page for report, you can click on the “compliance reports” and drill down to your Tribe. You can edit the report directly on the website.

Treasury has observed that there are three definitions (regarding items that must be reported on) about which they receive the most questions:

**Obligations:** an order placed for property and services, entry into contracts, subawards and similar transactions that require payment by the Tribe with HAF funds.

**Program Income:** funds earned (aside from interest) from the expenditure of HAF Program funds. There is very little of this in the HAF program, but some areas that could result in program income are the receipt of homeowner loan repayments or improper payments.

**Earned Interest:** interest earned on the HAF award amount annually during each year of the award period of performance. Any amounts of annual earned interest over \$500 must be repaid to Treasury.

One of the key pages for the report contains the Design Elements Obligations and Expenditures. This lays out what you have identified as the Design Elements for your HAF Program (what you are going to spend money on, and in what amounts). You can edit the entries on this page, including moving budget entries and adding new Design Elements (i.e., new program components). You can also submit a request for budget reallocation. HAF participants must seek prior approval from Treasury to reallocate funding when the change will involve more than 10% of your award being moved around. The process for requesting a budget proposal is set out here: <https://home.treasury.gov/system/files/136/HAF-Tribal-Allocation-Process-032823.pdf>

There are also some other key questions on the Annual Report, that focus on compliance with the statutory program requirements:

- Did your program expend at least 60% of monetary HAF assistance to homeowners with less than the greater of 100% AMI or US Median Income?
- Please enter the dollar amounts of Monetary HAF assistance that have been Obligated to Homeowners with incomes less than the greater of 100% AMI or US Median Income.
- Please enter the dollar amounts of Monetary HAF assistance that have been Expended to Homeowners with incomes less than the greater of 100% AMI or US Median Income

Treasury has weekly HAF Tribal Office Hours, every Wednesday at 3 pm Eastern. You can register to attend at:

<https://ustreasury.zoomgov.com/meeting/register/vJIsceyhqToiEm3KAHMcLlL8LgWvGiTMXwY>

In addition, Treasury has scheduled several HAF Reporting Overview Sessions at 3 pm Eastern Time on the following dates:

- Wednesday, October 15, 2025 (reports available on this date)
- Wednesday, October 29, 2025
- Wednesday, November 12, 2025

You can register to attend at:

<https://ustreasury.zoomgov.com/meeting/register/vJIsceyhqToiEm3KAHMcLlL8LgWvGiTMXwY>

If you have expended your HAF award or do not plan to spend anymore, and you can complete your administrative activities by November 17, 2025, and you are interested in an early closeout of your HAF Program, Treasury is providing an Early Closeout Session on Thursday, October 30, 2025 at 3 pm Eastern Time. You can register to attend at:

[https://ustreasury.zoomgov.com/meeting/register/Vu\\_pfBkEQ5a6XVyBP7F72w](https://ustreasury.zoomgov.com/meeting/register/Vu_pfBkEQ5a6XVyBP7F72w)

In addition, there are several online resources for Early Closeout:

- HAF Early Closeout Checklist:  
<https://home.treasury.gov/system/files/136/HAF-EarlyCloseout-Checklist.pdf>
- HAF Closeout Resource:  
[https://home.treasury.gov/system/files/136/HAF\\_Closeout\\_Resource.pdf](https://home.treasury.gov/system/files/136/HAF_Closeout_Resource.pdf)
- HAF Closeout Reporting User Guide:  
[https://home.treasury.gov/system/files/136/HAF\\_CloseoutReportingUserGuide.pdf](https://home.treasury.gov/system/files/136/HAF_CloseoutReportingUserGuide.pdf)

The steps to request early closeout involving, first, requesting early closeout in the “Closeout” tab in the Treasury portal. Next, check the box and certify your early closeout request submission. Treasury will review the request and either deny/grant, or ask for more information. After your Final Quarterly and Annual Reports are submitted you may not expend or obligate any more HAF award funds.

### ***Conclusion***

If you have any questions about this memorandum or any of the topics discussed in this memorandum, please contact Ed Clay Goodman ([egoodman@hobbsstrauss.com](mailto:egoodman@hobbsstrauss.com)). Ed may also be reached at 503-242-1745.