



CMIS NEWS UPDATE: January 19, 2010  
HUD FHA UPDATE:

## WAIVER OF THE HUD 90 DAY NO FLIPPING RULE?

A New One Year Stimulus for the Secondary Real Estate Seller & Investor Markets

A Related Discussion of Foreclosures, REOs, Vacant, NSP, Damaged Property,  
New Appraisal Rules, New Property Inspection Rules, Fannie Mae's First Look,  
& HUD's New MM III Contract and P260 Software System

[Special Urgent Industry Call to Action to Grant Fast Track  
HUD Damaged & Vacant Property Resale Waiver Procedures](#)

By Richard Ivar Rydstrom, Esq.  
Chairman, CMIS Mortgage Coalition  
[www.cmismortgagecoalition.org](http://www.cmismortgagecoalition.org)  
[rrydstrom@gmail.com](mailto:rrydstrom@gmail.com) | (949) 678-2218

### Limited Waiver of the HUD/FHA 90 Day Resale or Buy-Sell Rule:

U.S. Department of Housing and Urban Development (HUD) Assistant Secretary for Housing-Federal Housing Commissioner David H. Stevens, issued a temporary waiver of regulation 24 CFR Section 203.37a(b)(2) which generally prohibited the quick turnaround or resale of FHA insured properties, within 90 days, unless the transaction qualified for limited exceptions. Simply put, FHA borrowers will have greater access to buy and resell within a 90 day period, various types of troubled or foreclosed properties, including HUD-owned properties, bank-owned properties, or properties resold through private sales. The waiver will be effective February 1, 2010 for one year unless terminated or renewed by HUD. Note that there was already a waiver issued on June 9, 2008 exempting sales of REO properties acquired by mortgagees, whether sold directly or by subsidiaries or vendors, extended on May 15, 2009 for all loans for which sales agreements were signed on or before May 10, 2010. This most recent temporary waiver should enhance access to Federal Housing Administration (FHA) mortgage insurance and facilitate the **buy-rehab-sell** secondary real estate market for the following types of sales, from the following sellers (generally as enunciated in the June 2006 broadened exemption list of Section 203.37a(c)):

- ✓ Foreclosures
- ✓ Real estate owned (REOs)
- ✓ Single family homes (SFHs)
- ✓ HUD (REOs, and SFHs in revitalization areas)
- ✓ FHA/Ginnie Mae
- ✓ Government Sponsored Enterprise (GSEs: Fannie, Freddie, FHLB)

- ✓ Federal and state agencies
- ✓ Federal and state chartered financial institutions
- ✓ “Properties sold through private sales for resale”
- ✓ Employers in employment relocations situations
- ✓ Sellers of inherited properties
- ✓ Declared Disaster Areas (per HUD Mortgagee Letter)
- ✓ Vacant properties
- ✓ Neighborhood Stabilization Program (NSP) non-profits, grantee land-banks, etc.
- ✓ Damaged properties

Where is the line drawn between acceptable buy-sell activity and prohibited flipping? The HUD Secretary placed the following limitations on the waiver to help guide buyers and sellers, during what-is-to-become, a buy-sell bonanza:

**Limitations of Waiver:**

1. All transactions must be arms-length, with no identity of interest between the buyer and seller of other parties participating in the sales transaction. Some ways that the lender can ensure that there is no inappropriate collusion or agreements between parties is to assess and determine the following:
  - a. The seller holds title to the property;
  - b. LLCs, corporations, or trusts that are serving as sellers were established and are operated in accordance with applicable state and Federal law;
  - c. No pattern of previous flipping activity exists for the subject property, as evidenced by multiple title transfers within a 12-month time frame (chain of title information for the subject property can be found in the appraisal report);
  - d. The property was marked openly and fairly, via MLS, auction, For Sale by Owner offering, or developer marketing (any sales contracts that refer to an “assignment of contract of sale,” which represents a special arrangement between seller and buyer may be a red flag).
2. In cases in which the sales price of the property is 20 percent or more over and above the seller’s acquisition cost, the waiver will only apply if the lender:
  - a. Justifies the increase in value by retaining in the loan file supporting documentation and/or a second appraisal which verifies that the seller has completed sufficient legitimate renovation, repair, and rehabilitation work on the subject property to substantiate the increase in value or, in cases where no such work is performed, the appraiser provides appropriate explanation of the increase in property values since the prior title transfer; and
  - b. Orders a property inspection and provides the inspection report to the purchaser before closing. The lender may charge the borrower for this inspection. The use of FHA-approved inspectors or 203(k) consultants is not required. The inspector must have no interest in the property or relationship with the seller, and must not receive compensation for the inspection from any party other than the lender. Also, the inspector may not compensate anyone for the referral of the inspection. Additionally, the inspector may not receive any compensation for referring or recommending contractors to perform any repairs recommended by the inspection, and may not be involved with performing any repairs recommended by the inspection. At a minimum, the inspection must include:

- i. The property structure, including the foundation, floor, ceiling, walls and roof;
- ii. The exterior, including siding, doors, windows, appurtenant structures such as decks, and balconies, walkways and driveways;
- iii. The roofing, plumbing systems, electrical systems, heating and air conditioning systems;
- iv. All interiors; and
- v. All insulation and ventilation systems, as well as fireplaces and solid-fuel-burning appliances.

3. The waiver is limited to forward mortgages, and does not apply to the Home Equity Conversion Mortgage (HECM) for Purchase program.

The Secretary also made several findings including public policy findings, in part and in no particular order of priority, as follows:

- a. The properties sold by HUD and other exempted entities are usually obtained through foreclosure.
- b. Since the promulgation of Section 203.37a, the volume of foreclosures has increased dramatically, especially over the past two years. In examining its policy regarding the 90-day resale restriction contained in Section 203.37a, FHA finds that a temporary relaxation of its eligible property requirements can also help address the foreclosure crisis.
- c. FHA finds that eliminating the 90-day resale restriction for buyers will give FHA a greater opportunity to dispose of its single family REO properties in a way that maximizes return to the FHA mortgage insurance fund; and also, permitting buyers to use FHA-insured financing to purchase other bank-owned properties, or properties sold through private sales for resale, will help create market conditions that will allow homes to resell as quickly as possible, thus helping to stabilize real estate prices as well as helping to stabilize neighborhoods and communities where foreclosure activity has been high.
- d. HUD REO, many bank-owned properties, and properties sold through private sales are often sold in an “as is” state, without repairs or warranties. Many of these homes require repairs and are purchased by buyers with the financial means and necessary resources to complete needed rehabilitation work and return the homes to the market at fair market prices.
- e. Acquiring, rehabilitating, and then reselling these properties to prospective homeowners take less than 90 days.

The Secretary also made several determinations including, in part:

1. To help facilitate the return of repaired and habitable properties to the market in a timely fashion, additional exemptions to the 90-day resale restriction period must be granted for the purchase of properties by investors. This policy change will help to sell properties that may otherwise remain vacant for up to 90 days, while offering affordable housing options to buyers wishing to use FHA-insured financing.
2. All other guidance concerning property flipping prohibition remains unchanged.

### **Caution Still Blowing in the Wind:**

HUD Secretary Donovan said, "As a result of the tightened credit market, FHA-insured mortgage financing is often the only means of financing available to potential home buyers," indicating that the policy change will come with strict guidelines and conditions that prevent predatory practices.

### **Fannie Mae's First Look Program:**

Fannie Mae already announced a new First Look program intended to give owners and NSP buyers a 15 day advantage, as follows:

Fannie Mae released its FIRST LOOK Program (Q4 2009) to benefit Buyers using public funds and owner-occupants. The First Look Program allows a 15 DAY window for owner-occupants and buyers using public funds to exclusively purchase the property. Only after that 15 DAY FIRST LOOK period will other buyers or investors be allowed to purchase the property. First Look allows local non-profit organizations to purchase and rehab foreclosed (REO) homes for the Neighborhood Stabilization Program (NSP) and supply counseling, education, down payment assistance, gap financing, closing cost assistance, for low to moderate income buyers. Buyers using NSP funds may also obtain Deposit Waivers, a Reserved Contract Period which allows re-negotiation with an NSP-required appraisal, and a 15 day Extension of Time to Close (up to 45 days).

### **Neighborhood Stabilization Program (NSP):**

In terms of the Neighborhood Stabilization Program (NSP) non-profits or grantee land-banks, HUD has allocated at least \$6 billion into the program. On January 14, 2010, HUD funded 60 grantees (states, local governments and non-profit housing developers) awards totally \$2 billion. Pursuant to HUD, the grantees are to collaborate to acquire land and property; to demolish or rehabilitate abandoned properties; and/or to offer down-payment and closing cost assistance to low-to-middle homebuyers. Grantees can also create "land banks" to assemble, temporarily manage, and dispose of foreclosed homes. According to hud.gov, in 2009, HUD funded \$4 billion to over 300 grantees nationwide. See HUD Grantee link and example state lists below. For the "Methodology for Allocation of \$3.92 billion of Emergency Assistance for the Redevelopment of Abandoned and Foreclosed Homes" see the HUD link below.

### **Damaged Properties Hurdles Remain:**

However, "damaged" properties will still face the need for a HUD on-site inspection and approval waiver which is known to take months. HUD must now fast track the damaged property waiver procedure to allow for the transfer of damaged properties to qualified buyers who assume the duties to rehabilitate and the enhanced anti-blight code violation costs and risks.

Conveyance of Damaged Property: HUD has introduced its new MM III Contract and P260 Software System which will handle the Conveyance of Damaged Property. How FIRST LOOK and the HUD 90 DAY WAIVER programs will interplay or influence the new HUD MM III Contract and its new P260 Software System and rules - remain to be seen. Generally DAMAGED PROPERTIES are not transferrable without first being repaired or without obtaining Special Inspection and Approval - which can take months.

**Call to Action:**

Public policy now supports a fast track HUD **damaged and vacant property waiver procedure** for qualified buyers. Sellers, who are often institutions, governments, and non-profit (land-banks) are ready, willing and able to contract with a buyer to assume all concomitant risks, repairs and rehabilitation. Sellers should have a fast track waiver and be alleviated from this burden. We need to open up the damaged and vacant property resale pipe-lines starting February 1, 2010 along with the HUD 24 CFR Section 203.37a(b)(2) waiver.

**References to Materials:**

**HUD Rules Available at:**

CMIS What's New!

Jan. 19, 2010 Waiver of HUD 90-Day Resale Flipping Rule [Click Here](#)

[www.cmismortgagecoalition.org/CMIS\\_News\\_Update\\_HUD\\_FHA\\_Insurance\\_Waiver\\_90\\_day\\_no\\_flip\\_rule.pdf](http://www.cmismortgagecoalition.org/CMIS_News_Update_HUD_FHA_Insurance_Waiver_90_day_no_flip_rule.pdf)

[http://portal.hud.gov/portal/page/portal/HUD/press/press\\_releases\\_media\\_advisories/2010/HUDNo.10-012](http://portal.hud.gov/portal/page/portal/HUD/press/press_releases_media_advisories/2010/HUDNo.10-012)

**HUD NSP Grantee Allocation List by State is located at:**

<http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/nsp1.cfm>

**HUD NSP Grantee Methodology Link is located at:**

[http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/nspfa\\_methodology.pdf](http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/nspfa_methodology.pdf)

**HUD NSP Grantee State Examples Attached:**

HUD Grantee List is Available By State Online at the link indicated herein. Examples of State Allocations are Reprinted Herein for California, Florida, Nevada, Arizona, Ohio, & Texas:

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
CA	CALIFORNIA STATE PROGRAM	\$145,071,506	5.4%	Medium	6.7%	Low
CA	ALAMEDA COUNTY	\$2,126,927	5.0%	Low	6.7%	Low
CA	ANAHEIM	\$2,653,455	6.7%	Low	6.7%	Low
CA	ANTIOCH	\$4,049,228	7.7%	High	6.7%	Low
CA	APPLE VALLEY	\$3,064,836	10.3%	High	6.7%	Low
CA	BAKERSFIELD	\$8,982,836	8.4%	High	6.7%	Low
CA	CHULA VISTA	\$2,830,072	6.2%	Low	6.7%	Low
CA	COMPTON	\$3,242,817	10.8%	High	6.7%	Low
CA	CONTRA COSTA COUNTY	\$6,019,051	4.8%	Medium	6.7%	Low

CA	CORONA	\$3,602,842	7.4%	Medium	6.7%	Low
CA	ELK GROVE	\$2,389,651	6.7%	Low	6.7%	Low
CA	FONTANA	\$5,953,309	9.9%	Medium	6.7%	Low
CA	FRESNO	\$10,969,169	9.4%	High	6.7%	Low
CA	FRESNO					
CA	COUNTY	\$7,037,465	9.3%	High	6.7%	Low
CA	HEMET	\$2,888,473	10.8%	High	6.7%	Low
CA	HESPERIA	\$4,590,719	11.2%	High	6.7%	Low
CA	KERN					
CA	COUNTY	\$11,211,385	9.7%	High	6.7%	Low
CA	LANCASTER	\$6,983,533	10.4%	High	6.7%	Low
CA	LONG BEACH	\$5,070,310	6.8%	Medium	6.7%	Low
CA	LOS					
CA	ANGELES	\$32,860,870	6.8%	Medium	6.7%	Low
CA	LOS					
CA	ANGELES					
CA	COUNTY	\$16,847,672	5.6%	Low	6.7%	Low
CA	MODESTO	\$8,109,274	10.8%	High	6.7%	Low
CA	MORENO					
CA	VALLEY	\$11,390,116	11.2%	High	6.7%	Low
CA	OAKLAND	\$8,250,668	8.1%	High	6.7%	Low
CA	ONTARIO	\$2,738,309	9.3%	Low	6.7%	Low
CA	ORANGE					
CA	COUNTY	\$3,285,926	4.0%	Low	6.7%	Low
CA	PALMDALE	\$7,434,301	9.5%	High	6.7%	Low
CA	POMONA	\$3,530,825	8.2%	High	6.7%	Low
CA	RANCHO					
CA	CUCAMONGA	\$2,133,397	6.3%	Low	6.7%	Low
CA	RIALTO	\$5,461,574	11.4%	High	6.7%	Low
CA	RICHMOND	\$3,346,105	9.1%	High	6.7%	Low
CA	RIVERSIDE	\$6,581,916	9.2%	Medium	6.7%	Low
CA	RIVERSIDE					
CA	COUNTY	\$48,567,786	8.9%	High	6.7%	Low
CA	SACRAMENT					
CA	O	\$13,264,829	8.9%	Medium	6.7%	Low
CA	SACRAMENT					
CA	O COUNTY	\$18,605,460	7.3%	High	6.7%	Low
CA	SAN					
CA	BERNARDINO	\$8,408,558	11.8%	High	6.7%	Low
CA	SAN					
CA	BERNARDINO					
CA	COUNTY	\$22,758,188	9.6%	High	6.7%	Low
CA	SAN DIEGO	\$9,442,370	5.0%	Low	6.7%	Low
CA	SAN DIEGO					
CA	COUNTY	\$5,144,152	5.2%	Low	6.7%	Low
CA	SAN JOAQUIN					
CA	COUNTY	\$9,030,385	10.5%	Low	6.7%	Low
CA	SAN JOSE	\$5,628,283	4.0%	Low	6.7%	Low
CA	SANTA ANA	\$5,795,151	8.8%	High	6.7%	Low
CA	STANISLAUS					
CA	COUNTY	\$9,744,482	11.3%	High	6.7%	Low
CA	STOCKTON	\$12,146,038	12.3%	High	6.7%	Low
CA	VALLEJO	\$2,657,861	9.7%	Low	6.7%	Low
CA	VICTORVILLE	\$5,311,363	11.1%	High	6.7%	Low
CA	VISALIA	\$2,388,331	7.1%	High	6.7%	Low

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
FL	FLORIDA STATE PROGRAM	\$91,141,478	6.5%	Medium	8.0%	Medium
FL	BOYNTON BEACH	\$2,963,311	8.4%	High	8.0%	Medium
FL	BREVARD COUNTY	\$5,269,667	7.0%	Low	8.0%	Medium
FL	BROWARD COUNTY	\$17,767,589	8.8%	Medium	8.0%	Medium
FL	CAPE CORAL	\$7,065,484	11.9%	Low	8.0%	Medium
FL	COLLIER COUNTY	\$7,306,755	9.4%	Low	8.0%	Medium
FL	CORAL SPRINGS	\$3,378,142	7.9%	Medium	8.0%	Medium
FL	DEERFIELD BEACH	\$2,005,699	9.2%	Medium	8.0%	Medium
FL	DELTONA	\$6,635,909	10.6%	High	8.0%	Medium
FL	ESCAMBIA COUNTY	\$4,565,918	6.5%	High	8.0%	Medium
FL	FT LAUDERDALE	\$3,700,096	7.4%	Medium	8.0%	Medium
FL	FT MYERS	\$2,297,318	12.4%	High	8.0%	Medium
FL	HIALEAH	\$5,385,046	11.1%	Medium	8.0%	Medium
FL	HILLSBOROUGH COUNTY	\$19,132,978	7.8%	Medium	8.0%	Medium
FL	HOLLYWOOD	\$7,534,603	9.3%	Medium	8.0%	Medium
FL	HOMESTEAD CITY	\$2,887,010	9.8%	High	8.0%	Medium
FL	JACKSONVILLE -DUVAL	\$26,175,317	6.9%	High	8.0%	Medium
FL	KISSIMMEE	\$2,371,749	9.4%	High	8.0%	Medium
FL	LAKE COUNTY	\$3,136,967	6.7%	Low	8.0%	Medium
FL	LAKELAND	\$2,005,781	7.9%	High	8.0%	Medium
FL	LAUDERHILL	\$4,293,288	12.2%	High	8.0%	Medium
FL	LEE COUNTY	\$18,243,867	11.2%	Medium	8.0%	Medium
FL	MANATEE COUNTY	\$5,283,122	7.9%	Low	8.0%	Medium
FL	MARGATE	\$2,106,555	9.9%	Medium	8.0%	Medium
FL	MARION COUNTY	\$6,324,055	8.2%	Medium	8.0%	Medium
FL	MIAMI-DADE COUNTY	\$62,207,200	8.8%	Medium	8.0%	Medium
FL	MIAMI	\$12,063,702	9.4%	High	8.0%	Medium
FL	MIAMI GARDENS CITY	\$6,866,119	12.4%	High	8.0%	Medium
FL	MIRAMAR	\$9,312,658	10.2%	High	8.0%	Medium
FL	NORTH MIAMI	\$2,847,089	10.7%	High	8.0%	Medium
FL	ORANGE COUNTY	\$27,901,773	7.3%	Medium	8.0%	Medium

FL	ORLANDO	\$6,730,263	7.3%	High	8.0%	Medium
FL	PALM BAY	\$5,208,104	10.3%	Medium	8.0%	Medium
FL	PALM BEACH					
FL	COUNTY	\$27,700,340	7.6%	Medium	8.0%	Medium
FL	PASCO					
FL	COUNTY	\$19,495,805	8.4%	High	8.0%	Medium
FL	PEMBROKE					
FL	PINES	\$4,398,575	7.9%	Low	8.0%	Medium
FL	PINELLAS					
FL	COUNTY	\$8,063,759	6.5%	Low	8.0%	Medium
FL	PLANTATION	\$2,016,309	7.4%	Low	8.0%	Medium
FL	POLK COUNTY	\$14,586,258	8.6%	High	8.0%	Medium
FL	POMPANO					
FL	BEACH	\$4,366,157	8.9%	Medium	8.0%	Medium
FL	PORT ST					
FL	LUCIE	\$13,523,132	11.3%	High	8.0%	Medium
FL	SARASOTA					
FL	COUNTY	\$7,140,861	8.3%	Low	8.0%	Medium
FL	SEMINOLE					
FL	COUNTY	\$7,019,514	5.9%	Medium	8.0%	Medium
FL	ST					
FL	PETERSBURG	\$9,498,962	7.9%	High	8.0%	Medium
FL	SUNRISE	\$3,494,986	9.7%	Medium	8.0%	Medium
FL	TAMARAC	\$4,772,218	9.9%	High	8.0%	Medium
FL	TAMPA	\$13,600,915	8.7%	High	8.0%	Medium
FL	VOLUSIA					
FL	COUNTY	\$5,222,831	7.4%	Low	8.0%	Medium
FL	WEST PALM					
FL	BEACH	\$4,349,546	8.7%	High	8.0%	Medium

Note: Foreclosure start rate is sum of foreclosure starts over 18 months; estimated for local areas. Risk score based on vacancies in Census Tracts with high rates of high cost loans. See methodology.

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
NV	NEVADA STATE PROGRAM	\$24,287,240	6.2%	Low	8.6%	Low
NV	CLARK COUNTY	\$22,829,062	9.1%	High	8.6%	Low
NV	HENDERSON	\$3,205,044	7.1%	Low	8.6%	Low
NV	LAS VEGAS	\$14,775,270	9.6%	High	8.6%	Low
NV	NORTH LAS VEGAS	\$6,837,736	11.0%	High	8.6%	Low

Note: Foreclosure start rate is sum of foreclosure starts over 18 months; estimated for local areas. Risk score based on vacancies in Census Tracts with high rates of high cost loans. See methodology.

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
AZ	ARIZONA STATE PROGRAM	\$38,370,206	5.0%	Low	5.6%	Medium
AZ	AVONDALE CITY	\$2,466,039	7.2%	Medium	5.6%	Medium
AZ	CHANDLER	\$2,415,100	4.2%	Low	5.6%	Medium
AZ	GLENDALE	\$6,184,112	7.0%	High	5.6%	Medium
AZ	MARICOPA COUNTY	\$9,974,267	5.4%	Low	5.6%	Medium
AZ	MESA	\$9,659,665	5.8%	Medium	5.6%	Medium
AZ	PHOENIX	\$39,478,096	7.1%	High	5.6%	Medium
AZ	PIMA COUNTY	\$3,086,867	3.5%	Medium	5.6%	Medium
AZ	SURPRISE TOWN	\$2,197,786	6.0%	Low	5.6%	Medium
AZ	TUCSON	\$7,286,911	5.5%	Medium	5.6%	Medium

Note: Foreclosure start rate is sum of foreclosure starts over 18 months; estimated for local areas. Risk score based on vacancies in Census Tracts with high rates of high cost loans. See methodology.

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
OH	OHIO STATE PROGRAM	\$116,859,223	6.3%	Medium	6.7%	High
OH	AKRON	\$8,583,492	10.3%	High	6.7%	High
OH	BUTLER COUNTY	\$4,213,742	5.1%	Low	6.7%	High
OH	CANTON	\$3,678,562	12.3%	High	6.7%	High
OH	CINCINNATI	\$8,361,592	7.1%	High	6.7%	High
OH	CLEVELAND	\$16,143,120	12.7%	High	6.7%	High
OH	COLUMBUS	\$22,845,495	6.9%	High	6.7%	High
OH	CUYAHOGA COUNTY	\$11,212,447	6.7%	Low	6.7%	High
OH	DAYTON	\$5,582,902	12.1%	High	6.7%	High
OH	ELYRIA	\$2,468,215	10.0%	High	6.7%	High
OH	EUCLID	\$2,580,464	11.6%	High	6.7%	High
OH	FRANKLIN COUNTY	\$5,439,664	4.1%	Low	6.7%	High
OH	HAMILTON CITY	\$2,385,315	8.4%	High	6.7%	High
OH	HAMILTON COUNTY	\$7,970,490	5.8%	Low	6.7%	High
OH	LAKE COUNTY	\$3,402,859	6.3%	Low	6.7%	High
OH	LORAIN	\$3,031,480	12.2%	High	6.7%	High
OH	MIDDLETOWN	\$2,144,379	9.6%	High	6.7%	High
OH	MONTGOMERY COUNTY	\$5,988,000	6.5%	Low	6.7%	High
OH	SPRINGFIELD	\$2,270,009	10.3%	High	6.7%	High

OH	STARK COUNTY	\$4,181,673	6.3%	Low	6.7%	High
OH	SUMMIT COUNTY	\$3,767,144	4.3%	Medium	6.7%	High
OH	TOLEDO	\$12,270,706	10.5%	High	6.7%	High
OH	YOUNGSTOWN	\$2,708,206	14.7%	High	6.7%	High

Note: Foreclosure start rate is sum of foreclosure starts over 18 months; estimated for local areas. Risk score based on vacancies in Census Tracts with high rates of high cost loans. See methodology.

State	Community	NSP Allocation	Local Foreclosure Rate	Local Abandonment Risk	Statewide Foreclosure Rate	Statewide Abandonment Risk
TX	TEXAS STATE PROGRAM	\$101,996,848	3.2%	Medium	3.7%	High
TX	ARLINGTON	\$2,044,254	3.8%	Low	3.7%	High
TX	DALLAS	\$7,932,555	3.7%	Medium	3.7%	High
TX	DALLAS COUNTY	\$4,405,482	4.6%	Medium	3.7%	High
TX	EL PASO	\$3,032,465	5.1%	Low	3.7%	High
TX	FORT BEND COUNTY	\$2,796,177	3.4%	Low	3.7%	High
TX	FORT WORTH	\$6,307,433	4.2%	High	3.7%	High
TX	GARLAND	\$2,040,196	5.0%	Medium	3.7%	High
TX	GRAND PRAIRIE	\$2,267,290	5.3%	High	3.7%	High
TX	HARRIS COUNTY	\$14,898,027	4.5%	Low	3.7%	High
TX	HIDALGO COUNTY	\$2,867,057	8.2%	High	3.7%	High
TX	HOUSTON	\$13,542,193	4.1%	Medium	3.7%	High
TX	MESQUITE	\$2,083,933	5.9%	High	3.7%	High
TX	SAN ANTONIO	\$8,635,899	3.9%	Medium	3.7%	High
TX	TARRANT COUNTY	\$3,293,388	2.9%	Medium	3.7%	High

Note: Foreclosure start rate is sum of foreclosure starts over 18 months; estimated for local areas. Risk score based on vacancies in Census Tracts with high rates of high cost loans. See methodology.