



Equipping Your Counseling Staff for a HUD Performance Review

Tennessee Housing Development Agency

Trainer: Ann DiPetta / ADR Consulting

Today's Agenda

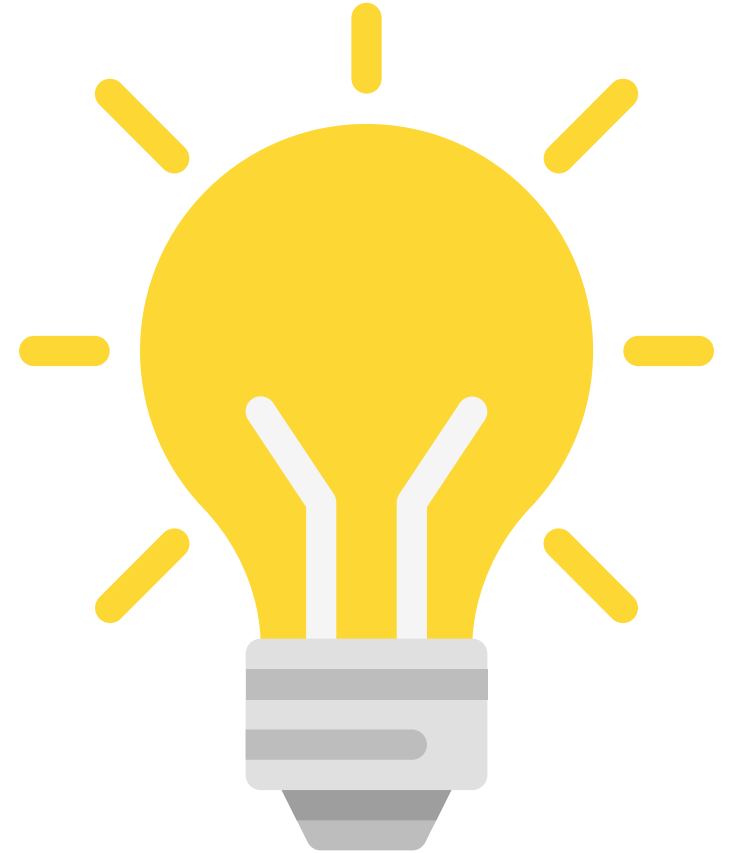
- ☐ Welcome and Introductions
- ☐ Understanding Key HUD Compliance Areas
- ☐ Efficiently in Action: Streamlining your Workflow and Ensuring Compliance
- ☐ Quality Assurance and Self-Monitoring
- ☐ Case Study / Group Discussion
- ☐ Avoiding Pitfalls and Preparing for Audits
- ☐ Leveraging HUD Resources
- ☐ Q&A and Wrap Up



Goals and Objectives

By the end of this session, you'll be able to:

- ☐ Understand key **HUD requirements** for housing counseling agencies
- ☐ Apply **best practices** to maintain compliance
- ☐ Identify **common compliance pitfalls** and be able to avoid them
- ☐ Use **tools and strategies** to streamline documentation and reporting



Ice Breaker: Top Compliance Challenges

- ☐ Name / Organization
- ☐ One compliance-related challenge you have
- ☐ One question you hope to get answered today



Understanding Key HUD Compliance Areas: Agency Approval and Oversight



Agency responsibilities

- ☐ Nonprofit status
- ☐ Agency years of experience
- ☐ Community / geography
- ☐ # of clients served
- ☐ Resources / capacity
- ☐ Staff with 6 mo. experience – at least half

Understanding Key HUD Compliance Areas: Understanding Agency Workplans

- ❑ See 7610.1 REV 6 Section 3-2
- ❑ HUD Resource



Understanding Key HUD Compliance Areas: The Role of Performance Review and Audits

OMB APPROVAL No. 2502-0574 (Exp. 06/30/2025)

U.S. Department of Housing and Urban Development

Office of Housing Counseling

Agency Performance Review

Of a HUD-Approved Housing Counseling Agency or Participating Agency

Public reporting burden for this collection of information is estimated to average 9.5 hours per initial response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Office, Paperwork Reduction Project, to the Office of Information Technology, U.S. Department of Housing and Urban Development, Washington, DC 20410-3600. When providing comments, please refer to OMB Approval No. 2502-0574. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The following information is used to assist HUD in evaluating the managerial and financial capacity of organizations to sustain operations sufficient to implement HUD approved housing counseling programs. The information is required under 24 CFR 214 subpart D. The collection of information assists HUD in reducing its own risk from fraudulent activities or supporting inefficient or ineffective housing counseling programs. HUD publishes a web list of HUD approved housing counseling agencies and maintains a list-free housing counseling hotline. Performance reviews help HUD ensure that individuals seeking assistance from these participating agencies can have confidence in the quality of services that they will receive. This information is collected in connection with the HUD Housing Counseling Program and will be used by HUD to evaluate participating agency compliance with programmatic requirements. The information will not be held confidential.

NOTE: Part A will be completed by the HUD Reviewer, based on housing counseling agency performance, and Part B and C (if applicable) will be completed by the housing counseling agency. The agency will self-certify the responses and are subject to verification. HUD may, at its discretion, request clarification or additional information from an agency. The agency may consult with HUD to determine the specific actions needed to complete the form.

Agency Name:

HCS ID Number:

Address:

Name of Parent Agency, if Applicable:

Parent ID Number, if Applicable:

Reviewer(s):

Review Date:

☐ Onsite Review

☐ Desk Review

INSTRUCTIONS: Use this form to record the results of the Performance Review. Check the "Yes," "No" or "N/A" box for each applicable question.

TO SUPPORT ANSWERS, PROVIDE DETAILED COMMENTS AND DOCUMENTATION, IF APPLICABLE. Housing Counseling Agencies are responsible for the requirements outlined in Parts A and B, and C, if applicable. Housing Counseling Agencies and HUD Reviewers are recommended to review Handbook 7610.1 REV 5, 24 CFR Part 214, and information on HUD's Website at: https://www.hud.gov/program_offices/housing/ahc/hcncr_home, in support of the most current legislative and programmatic requirements for the Department's Housing Counseling Program.

PART A – Complete by HUD Reviewer(s)

PART B – Complete by Housing Counseling Agency, self-certified by Representative of the Housing Counseling Agency

PART C – Complete by Housing Counseling Agency, self-certified by Representative of the Housing Counseling Agency, (if applicable).

Part A – Complete by HUD Reviewer

	GRANT MANAGEMENT	YES	NO	N/A	COMMENTS
1	Did the agency receive HUD Housing Counseling grants or sub-grants since the last performance review? If yes, answer the questions in this section. If no, proceed to question number 7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	Does the agency have adequate billing procedures in place so that it only bills HUD under a grant agreement for the cost of services in excess of the costs billed to other funding sources or fees charged to the client?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	Is the agency maintaining personnel activity reports in compliance with 2 CFR 200.430(i)? Provide supporting documentation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	Does the source documentation show that reimbursed costs are actual and proper? If no, list the questioned costs and reason for possible exclusion in the comments box.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	Do the agency's client notes and/or other documentation in the agency's HUD-Approved Client Management System (CMS) support counselor hours billed and/or reported to the HUD Housing Counseling grant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	Does the agency have documentation to support receipt of leveraged resources cited in the grant application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	MAINTAINING APPROVAL CRITERIA	YES	NO	N/A	COMMENTS
7	Is the agency functioning as a private or public nonprofit organization or a unit of local, county or state government?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- ❑ 7610.1 REV 6 Section 6-3
- ❑ 9910

Do we have to?

Yep

Understanding Key HUD Compliance Areas: Counselor Certification

1. HUD Certification Requirement

- Six core exam topics: Financial Management, Property Maintenance, Homeownership/Tenancy, Fair Housing, Housing Affordability, Delinquency/Default/Eviction avoidance

2. Maintaining Certification

3. HUD certified counselor

4. Must cover housing counseling topics



Understanding Key HUD Compliance Areas: Core Counseling Topics and Standards

Approved Topics: outlined in SECTION 3-6 of 7610.1 REV 6

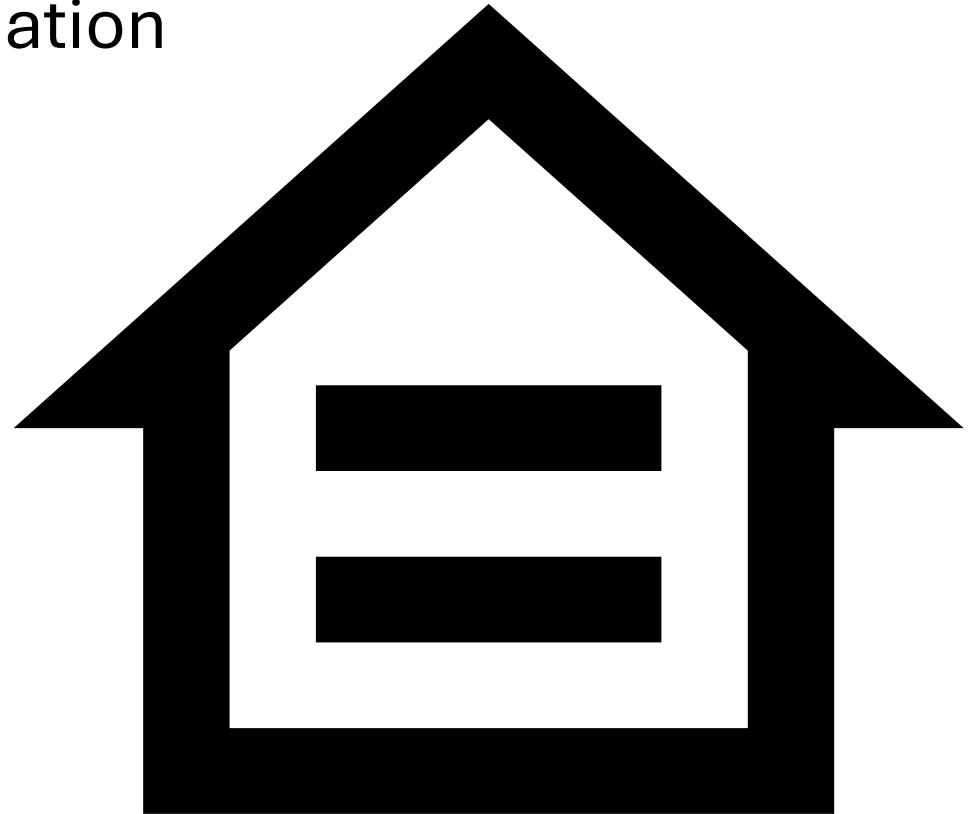
- ☐ Homeownership
 - ☐ pre/post purchase
 - ☐ Resolving delinquency/default
 - ☐ Reverse mortgage
 - ☐ Homeless
 - ☐ Rental housing counseling
 - ☐ Disaster or national emergency assistance
- If offering
topic in
education
must also o
counselin

If offering a topic in education, must also offer counseling

A blue clipboard with a white sheet of paper. The paper has a vertical column of seven empty square checkboxes on the left and seven horizontal lines for text on the right.

Understanding Key HUD Compliance Areas: Fair Housing and Civil Rights Requirements

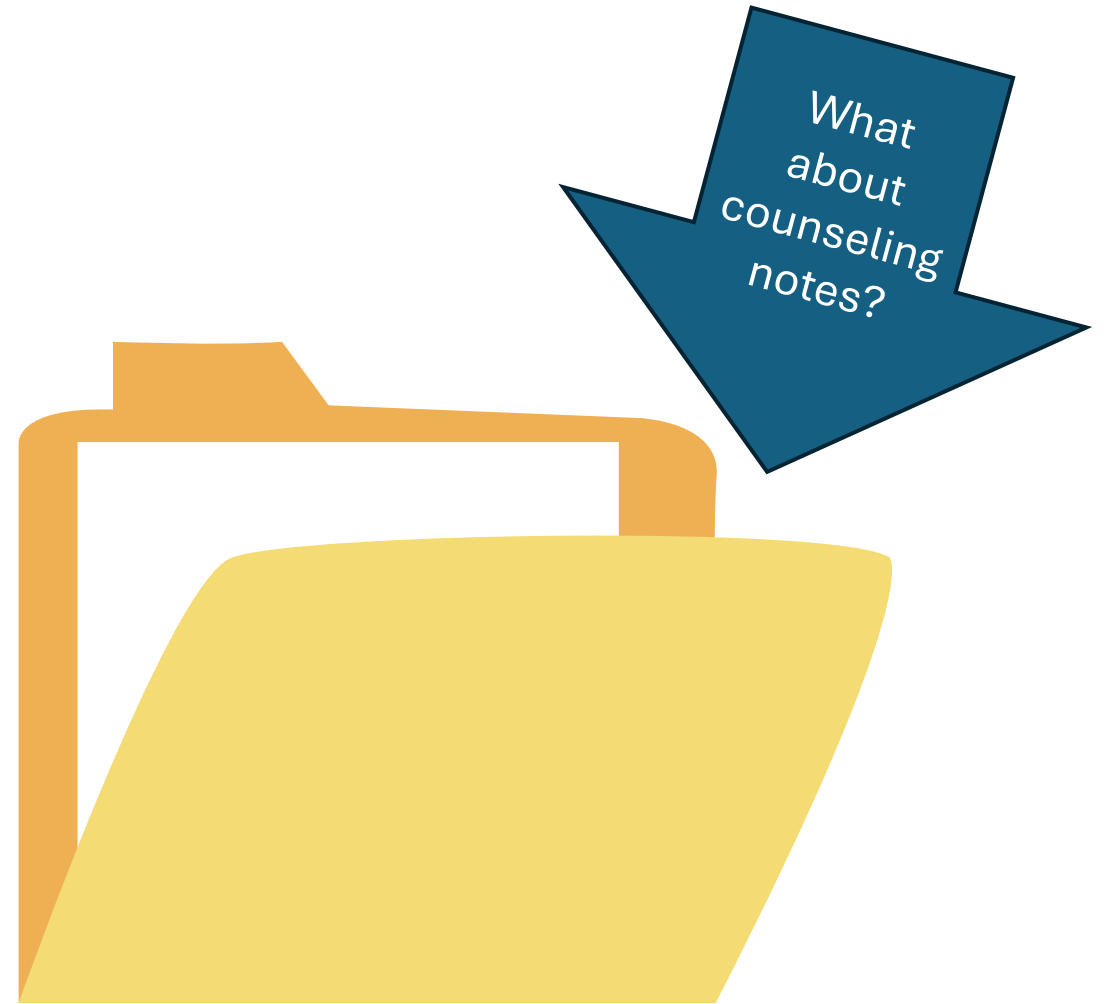
- ☐ Proactive **integration**
- ☐ Recognize and **report** discrimination
- ☐ AFFH



Understanding Key HUD Compliance Areas: File Documentation

Each file must contain:

- ☐ Intake information
- ☐ Authorization / Disclosures
- ☐ Needs Assessment / Action Plan
- ☐ Counseling services provided
- ☐ Budget
- ☐ Referrals
- ☐ Outcome tracking
- ☐ Disclosure of Funding sources
- ☐ Counselor name and HUD ID#



Understanding Key HUD Compliance Areas: File Retention Requirements

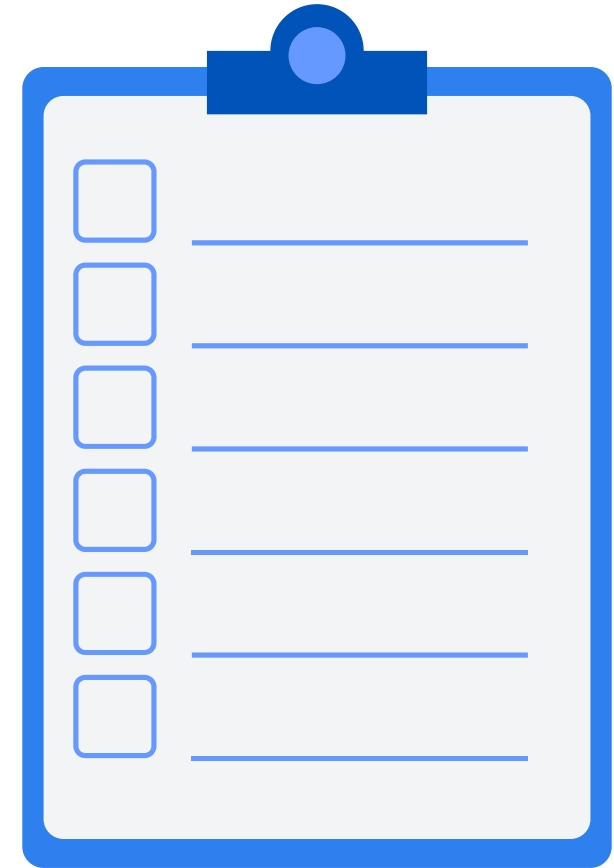
- ☐ Minimum retention: 3 yrs
- ☐ Digital / Paper – must be secure and accessible



Understanding Key HUD Compliance Areas: Group Education Files

- ☐ Attendance
- ☐ Curriculum
- ☐ Instructor / Guest Speaker / HUD Cert #
- ☐ # of hours
- ☐ Fee and ability to pay
- ☐ Evaluation / feedback

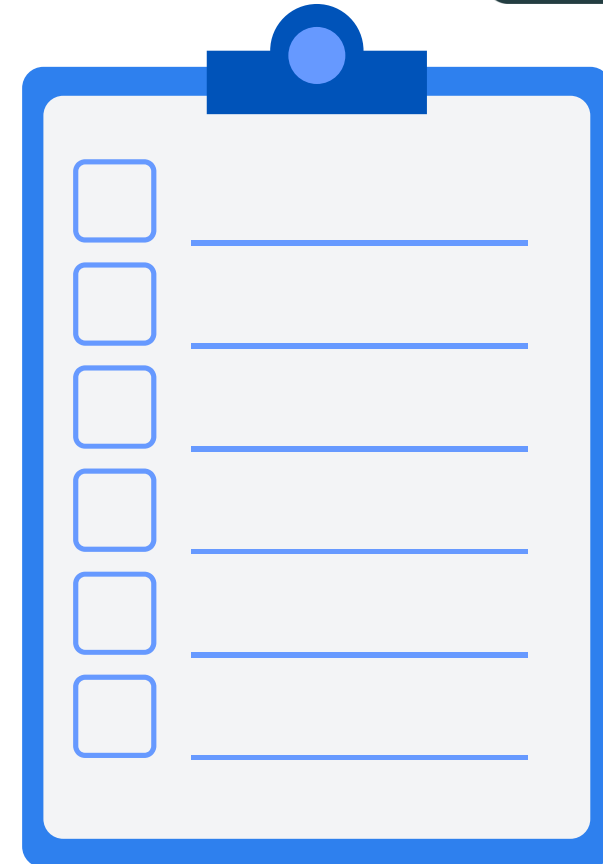
What are your best strategies for collecting disclosures and demographics?



Efficiency in Action: Streamlining Your Workflow and Ensuring Compliance

Effective client intake:

- ☐ Standardized forms and checklists
- ☐ Automated consent and disclosures
- ☐ Leveraging technology
- ☐ Staff support



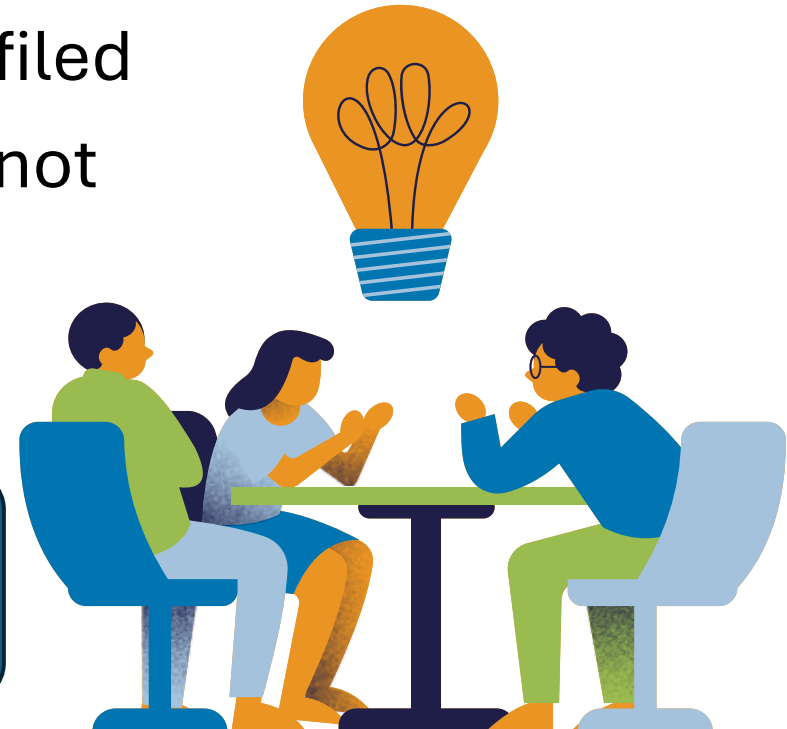
Efficiency in Action: Streamlining Your Workflow and Ensuring Compliance



Client action plans:

- ☐ Develop comprehensive and client-centered action plans
- ☐ Ensure client copy is provided and filed
- ☐ Make action plans a dynamic tool, not just a static document
- ☐ Both sign (and tasks)

GUIDE on HUD Exchange:
<https://www.hudexchange.info/programs/housing-counseling/client-action-plan-guide/>



Efficiency in Action: Streamlining Your Workflow and Ensuring Compliance



Housing Counseling Agency Activity Report

U.S. Department of Housing and Urban Development
Office of Housing Counseling
Federal Housing Commissioner

OMB Approval No: 2502-0622
Exp. 12/31/2024

Read the Public Reporting Statement on page 4 and instructions on pages 5-11 of this form.

1. Counseling Agency Name		2. Reporting Period and Budget	
Agency Name	From:		
Agency ID:	To:		
Agency Type:	Date Submitted:		
Address:	Total Annual Housing Counseling Program Budget, All Sources:		
	\$		
Parent Agency Name (if applicable)			
Agency ID:			
Agency Type:			

	All activities meeting HUD's housing counseling and education requirements	HUD Housing Counseling Program Grantees Only	
		Activities billed to HUD housing counseling grant/subgrant (in part or full) - actual, to date	Counseling and Education Activities Attributing to HUD Housing Counseling Grant Funds - Annual Projection
3. Ethnicity			
a. Hispanic			
b. Not Hispanic			
c. Chose not to respond			
Section 3 Total:			
4. Race			
a. American Indian/Alaskan Native			
b. Asian			
c. Black or African American			
d. Native Hawaiian or Other Pacific Islander			
e. White			
f. More than one race			
g. Chose not to respond			
Section 4 Total:			
5. Income Levels			
a. < 30% of Area Median Income (AMI)			
b. 30 - 49% of AMI			
c. 50 - 79% of AMI			
d. 80 - 100% of AMI			
e. > 100% AMI			
f. Chose not to respond			

Previous editions are obsolete.

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☐ Timely reporting

☐ 9902

Reporting Period Schedule

HUD Fiscal Quarter	Period Covered	Due Date
1st Quarter	October 1 – December 31	Due no later than January 31.
2nd Quarter	October 1 – March 31	Due no later than April 30. Include clients reported in the Quarter 1 report plus new clients served in Quarter 2.
3rd Quarter	October 1 – June 30	Due no later than July 31. Include clients reported in the Quarter 2 report plus new clients served in Quarter 3.
4th Quarter	October 1 – September 30	Due no later than December 31. Include the complete year of client data plus new clients served in Quarter 4.

<https://www.hudexchange.info/programs/housing-counseling/9902/>

Efficiency in Action: Streamlining Your Workflow and Ensuring Compliance



- ❑ Case Management Systems
- ❑ HUD Exchange
<https://www.hudexchange.info/programs/housing-counseling/cms/#overview>

CMS	DATASET VERSION	VENDOR
ARM365	6	OhGee Solutions, LLC
CAP60	6	capLuck
CaseWorthy	6	CaseWorthy, Inc.
CCS - Cambridge Counseling System	6	Cambridge Credit Counseling Corp
CRMNWSHC	6	Northwest Side Housing Center
CSG Engage	6	Community Networks Corporation
Client Management Application (CMA)	6	Client Support Software
Cloverleaf CMS Enterprise	6	Cooperative Processing Resources
Cloverleaf CMS Foundation	6	Cooperative Processing Resources
Counsel Track	6	National Foundation for Debt Management, Inc.
CounselorMax	6	NeighborWorks® America
CreditMaster	6	Garden State Credit Counseling, Inc
DebtHelper	6	Credit Card Management Services, Inc.
DLP - DiversaLink	6	DataFrame LLC
empowOR	6	CSST Software
Fiber	6	Henry Labs, Inc. - Clerkie
FiQuest	6	GreenPath, Inc.
FMS	6	GreenPath, Inc
GRULCMS	6	Grand Rapids Urban League
HANDS	6	Blink Tech
HATS	6	Homewise
HomeKeeper - HUD Connect (via Salesforce)	6	Grounded Solutions Network
HomewardBound	6	Tabor Community Services, Inc.

CMS	DATASET VERSION	VENDOR
ICM	6	Integrated Case Management
INCS	6	Indianapolis Neighborhood Housing Partnership
INDY	6	Money Management International
JusticeServer	6	TechBridge
Kemps Prime	6	Kemp's Case Works, Inc.
LIHSDP	6	Long Island Housing Services, Inc.
LegalServerCMS	6	PS Technologies, Inc
MPact Pro	6	Community Ventures Corporation
MSDC CRM 2.0	6	Mustard Seed Development Center
myCAP	6	Cleverex Systems, Inc.
NACA-Lynx	6	NACA
NeighborWorks Compass	6	NeighborWorks America
Outcome Tracker	6	VistaShare LLC
RxOffice	6	Indisoft LLC
RxOffice	6	RxOffice Inc
ZOHO Elevate	6	Springboard Nonprofit Consumer Credit Management, Inc. dba Credit.org

Efficiency in Action: Streamlining Your Workflow and Ensuring Compliance



Time Saving Tips

- ☐ Automated reminders (follow up)
- ☐ Pre-filled forms
- ☐ File naming conventions
- ☐ Designated admin days or hours
- ☐ Checklists

I need help getting
(and staying)
organized

Checklists
can help!

Quality Assurance and Self-Monitoring

- ☐ Periodic file reviews – how often?
- ☐ Identify areas for improvement
- ☐ See former performance reviews
- ☐ What else?



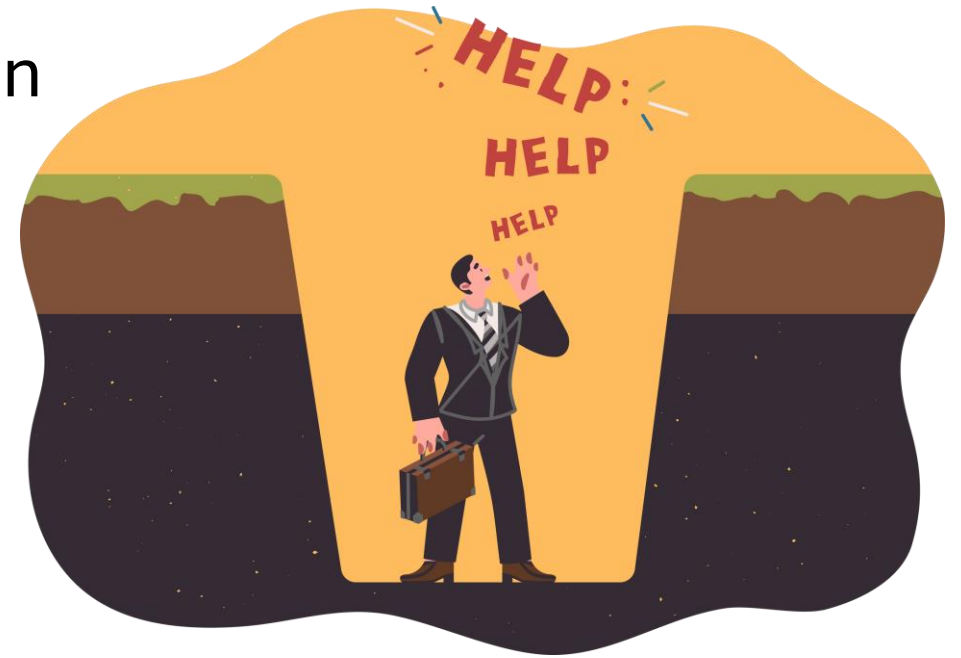
Case Studies / Group Discussion

Let's review and discuss



Avoiding Pitfalls & Prepping for Audits

- ☐ Know common findings
- ☐ Watch for red flags in documentation
- ☐ Prepare for the visit (9910)
- ☐ Check the HCS / CMS
- ☐ Conduct routine internal audits
- ☐ Maintain consistent files
- ☐ Train staff
- ☐ Maintain confidentiality / security
- ☐ Understand conflict of interest
- ☐ Have proper disclosure and referral procedures



Leveraging HUD Resources



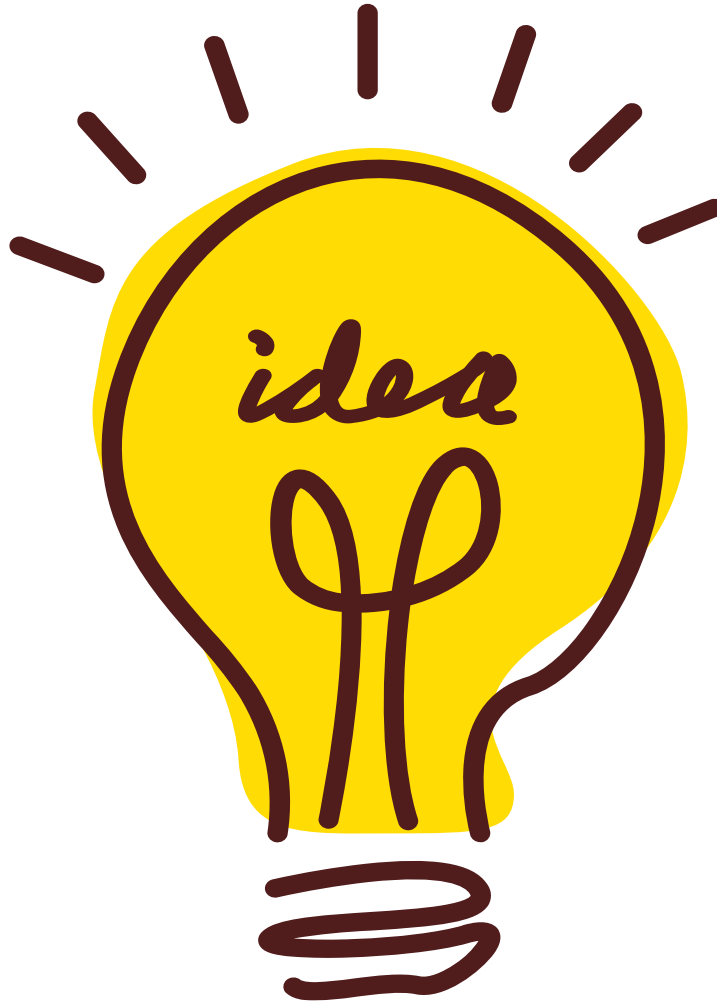
- ☐ HUD Exchange
- ☐ HUD Housing Counselors Website
- ☐ Training
- ☐ Staying up-to-date
- ☐ HUD Handbook 7610.1 REV 6
- ☐ Forms website

<https://www.hud.gov/hudclips/forms>

Knowledge
Check

Q&A and Next Steps

- ☐ Key takeaways
- ☐ Resources and ongoing learning
- ☐ Questions?



ONE MINUTE
REFLECTION:
“What’s one
change I’ll make,
starting tomorrow?
(see handout)”

Tennessee Housing Development Agency

Housing Education Symposium – July 2025

Equipping Your Counseling Staff for a HUD Performance Review

Thank you for joining us! As dedicated housing counselors, you play a vital role in empowering individuals and families to achieve their housing goals. While your commitment to clients comes first, ensuring that your work aligns with HUD compliance is key to the continued success of your housing counseling program.

We believe that strong compliance isn't just about avoiding penalties; it's about upholding the trust placed in us by both HUD and the clients we serve. By adhering to these principles, you contribute directly to the effectiveness and sustainability of your agency's housing counseling services.

This workbook will guide throughout this workshop and can be a resource for the future. Inside, you'll find key information, practical tips, and interactive exercises.

Important items to review:

- ☐ 9902 - <https://www.hudexchange.info/programs/housing-counseling/9902/>
- ☐ 9910 - <https://www.hudexchange.info/resource/5156/form-hud-9910/>
- ☐ 7610.1 REV 6 - <https://www.hudexchange.info/resource/4905/housing-counseling-handbook/>

Notes and Good Ideas

Use this space to make notes on important concepts and new ideas:

Case Studies/Group Discussion – Review and discuss an appropriate response:

* **Scenario 1:** A counselor receives a client file with incomplete intake information.

What HUD compliance regulations are potentially violated in this scenario? What are the immediate steps the counselor should take upon realizing the potential breach? What preventative measures should be implemented to avoid similar incidents in the future?

***Scenario 2:** A housing counselor leaves their laptop open and unattended on their desk for a few minutes while they step away to get a coffee. A new intern, unfamiliar with confidentiality protocols, briefly walks by and glances at the screen, which displays a client's sensitive financial information.

What HUD compliance regulations are potentially violated in this scenario? What are the immediate steps the counselor should take upon realizing the potential breach? What preventative measures should be implemented to avoid similar incidents in the future?

***Scenario 3:** A counselor at a HUD-approved housing counseling agency finishes working with a client and prints several documents for their file. After the client achieves their housing goal, the counselor disposes of the paper documents in a regular trash bin rather than using the designated shredder. Days later, an administrative staff member discovers this during routine cleaning.

What HUD compliance regulations are potentially violated in this scenario? What are the immediate steps the counselor should take upon realizing the potential breach? What preventative measures should be implemented to avoid similar incidents in the future?

***Scenario 4:** Two weeks before a scheduled HUD performance review, the program manager begins reviewing randomly selected client files. They discover that several files are missing signed action plans, which are required for documenting client counseling outcomes. The counselor claims that the plans were discussed verbally and "likely saved somewhere" on their computer but not printed or uploaded to the client management system.

What HUD compliance regulations are potentially violated in this scenario? What are the immediate steps the organization should take? What preventative measures should be implemented to avoid similar incidents in the future?

***Scenario 5:** As the organization prepares its quarterly HUD 9902 report for submission, the compliance director discovers that the number of clients reported in the CMS does not match the totals in the draft 9902 report. Upon investigation, it's revealed that counselors did not consistently close cases in the CMS, and some outcomes were never recorded.

What HUD compliance regulations are potentially violated in this scenario? What are the immediate steps the organization should take? What preventative measures should be implemented to avoid similar incidents in the future?

Compliance Risk Quiz

Test your understanding of HUD requirements: choose the best answer for each question

Question	Options	Answer
1. A counselor leaves a printed client file on their desk overnight in an unlocked office. What HUD regulation is most likely violated?	A) Conflict of interest policy B) Financial reporting requirements C) Confidentiality and privacy requirements D) Fair housing marketing rules	
2. A HUD performance audit is scheduled. What is the first step your agency should take?	A) Conduct an internal file review and audit B) Notify clients to prepare for interviews C) Delete any outdated files D) Call HUD to request a delay	
3. An intern accesses the CMS system using a counselor's login. What is the key compliance risk?	A) Unauthorized financial reporting B) Duplicate client records C) Failure to submit a 9902 report D) Breach of secure system access protocols	
4. What is the minimum period that HUD requires you to retain client files after the last activity?	A) 1 year B) 3 years C) 5 years D) Until the next audit	
5. If a client's signed action plan is missing from the file during a HUD audit, what is the likely consequence?	A) The client will be disqualified from services B) HUD will issue a fine C) The agency may receive a finding and be required to submit a corrective action plan D) The agency will automatically lose funding	

Education File Checklist for Housing Counselors - SAMPLE

This checklist is designed to help housing counseling agencies ensure that all documentation related to educational services (workshops, group sessions, etc.) meets HUD compliance guidelines.

1. Workshop/Program Planning & Details

☐ **Program/Workshop Title:**

- Clear and concise title of the educational offering.

☐ **Date(s) and Time(s) of Session(s):**

- Specific dates and start/end times.

☐ **Location of Session(s):**

- Physical address or virtual platform details (e.g., Zoom link).

☐ **Target Audience:**

- Description of the intended participants (e.g., First-Time Homebuyers, Rental Assistance Applicants, Foreclosure Prevention).

☐ **Learning Objectives:**

- Clearly stated goals for what participants should learn or be able to do after the session.

☐ **Curriculum/Agenda:**

- Detailed outline of topics covered, including time allocations.
- Copies of presentation slides, handouts, and supplementary materials distributed to participants.

☐ **Instructor(s) Information:**

- Name(s) and contact information of all instructors/presenters.
- Documentation of instructor qualifications relevant to the topics taught (e.g., certifications, experience, training).
- Include HUD Certified # for manager/oversight of education program and other relevant certifications

2. Participant Management & Attendance

☐ **Participant Registration / Attendance List:**

- Full names of all registered participants.
- Contact information (phone, email) for follow-up.
- Attendance report

☐ **Demographic Information (as required by HUD for reporting):**

- Collected from each participant (e.g., race, ethnicity, household size, income level). This may be part of a registration form or a separate survey.

☐ **Certificates of Completion:**

- Copies of certificates issued to participants who successfully completed the educational requirements (e.g., for First-Time Homebuyer education).
- Documentation of criteria for certificate issuance.

☐ **Language Accessibility:**

- Documentation of efforts to provide materials or interpretation in languages other than English, if serving diverse populations.

3. Outcomes & Feedback

☐ **Participant Evaluation Forms/Surveys:**

- Copies of feedback forms collected from participants after the session.

☐ **Outcome Tracking:**

- Methods for tracking long-term outcomes of educational participants (e.g., homeownership, rental stability, improved financial behaviors).

Best Practices and Next Steps

- ☐ Create file / documents checklists
- ☐ Conduct internal file review (managers and counselors)
- ☐ Attend other relevant training
- ☐ Do a test run with the 9910
- ☐ Review 9902s for accuracy
- ☐ Update / secure CMS and other online filing security systems
- ☐ Organize financial records and grants documentation
- ☐ Prepare staff for interviews – practice and knowledge of HUD programs
- ☐ Check file retention and disposal activities for compliance
- ☐ Review and address past findings or recommendations
- ☐ Keep communications timely and professional

One change I'll make starting tomorrow:

