



Final Transcript

HUD – US DEPT OF HOUSING & URBAN DEVELOPMENT: Stakeholders Meeting – HC Handbook Revision

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SPEAKERS

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Connie Barton

PRESENTATION

Moderator Ladies and gentlemen, thank you for standing by and welcome to the HUD Housing Counseling Program Handbook call. At this time all participants are in a listen-only mode. Later we will conduct a question and answer session. [Operator instructions.] As a reminder, this conference is being recorded.

I'd now like to turn the call over to our host, Mr. Ben Yanetta. Please go ahead.

Ben Thank you, Brad. Hello, everyone. Thank you all for joining us today. As Brad just mentioned, you all are in a listen-only mode. And we will open up for questions at several points throughout the presentation.

I'd like to begin, though, by just going over a few housekeeping items. This, as Brad mentioned, is being recorded. And we are going to post this training on our HUD Exchange website under the Training Webinar

Archives, and you'll be able to view it or share this with colleagues that weren't able to join us here today.

We're going to have several polling questions throughout the presentation. We ask that you provide as much feedback as you'd like. That's the purpose of these calls, we want to get as much involvement from you as humanly possible.

When we have the polling questions we're actually going to try something new this time, or, I'm sorry, not the polling questions, but if you have a question to ask we're going to try something new. We feel like to facilitate better feedback we're not going to ask for your names or anything. When they ask for your name, if you'd press the star zero to talk to an operator, you can ask them to give you a number instead, or you can make up a fake name. We want you to be able to share as freely as you'd like, and we have no reason to collect your name anyway.

In addition to asking questions through the Q&A line by pressing star then zero, you can also type it directly into the webinar interface. And we'll be monitoring those questions as they come in, and we may interrupt the presentation a couple of times to answer some questions that come in that way.

But the conversation doesn't have to end with this webinar. You can always send questions or comments to housing.counseling@hud.gov with anything else you'd like to share regarding this. And if you put "7610 Stakeholder Feedback" in the subject line of the email that you send there, it will get routed to the correct person quicker and then we can get your feedback that way.

And, again, we are going to archive this presentation. If you haven't used the HUD Exchange website before, there's lots of great information up there, as well as previous webinars, including this one. It will take us a couple of days to get it uploaded, but it will be up there shortly.

At the end of the presentation there will be a really brief survey. Please give us your feedback. Let us know what we can do to improve these trainings and feedback meetings in the future. We really do go through all that information, so your feedback is appreciated.

At this time I'd like to turn it over to Stephanie Williams to start us off.

Stephanie

Thank you, Ben, very much. Good afternoon, everyone, and welcome again to the Housing Counseling Program Handbook Stakeholders' Feedback call. We really value your time, and your interest, and your feedback, so thank you very much for participating in the stakeholder call today.

Within the Office of Housing Counseling I am a member of the Office of Policy and Grant Administration. It is our office within the Office of Housing Counseling that's taking the lead with the handbook revision. And I've had the pleasure of speaking to some of you before, either by a prior feedback call or in person, about some of the efforts that the Office of Housing Counseling is engaging in, in order to revise the handbook.

OHC finds a great deal of value in convening stakeholder meetings, for several reasons. The stakeholder meetings provide an opportunity for communication and interaction between you, and HUD, and also with each other in these forums. It gives the Office of Housing Counseling a good opportunity to evaluate your input on program policy and procedures that helps to serve as a checks and balance to make sure that we're not operating in a vacuum and that we take into consideration and value what you say about the day to day implementation of the program requirements.

The stakeholder meetings are also a nice opportunity to share best practices and challenges. That's the way we all learn, and keep current, and find out the best way to work within the program and also serve clients. And then finally, the meetings give OHC some insight into how we can best help you as housing counselors to achieve your goals, and again with the end result of serving our clients as best we can.

So, the agenda for today's meeting, we're going to hit a few points. First, we'll talk a little bit about the reasons for the Housing Counseling Program handbook revision. We will update you about the work of the OHC Handbook Revision team. And we'll also invite your feedback on program policy issues.

So, many of you are aware, I'm sure, that the handbook was last updated in May of 2010, and a lot has changed since then. Some of these changes are a result of the Dodd-Frank Act requirements for housing counseling. Tied to that of course are counselor certification, which we will not address on this call but which impacts the handbook as it stands now and is one of the main reasons for revising the handbook.

And then some of the reasons for revising the handbook are as simple yet realistic as changes in technology. In the last revision of the handbook in 2010 there was language that introduced and approved the use of Skype for delivering counseling services and talked about providing one-on-one counseling in alternative formats. That was a big deal then, but we know that technology has advanced further and there are also different expectations in the market and that consumers have, and different experiences that help to shape policy and our decision making, and so the time is definitely ripe to revise our handbook.

So that you know what we have been working on, on our end, the Housing Counseling Handbook Revision team is a group of OHC colleagues who are working across all of OHC's offices, that is the Office of Policy and Grant Administration, Oversight and Accountability, and Outreach and Capacity Building. All of us come to the team and discussions with our own areas of expertise and reflect the broader knowledge of OHC and coming together to revise this guidance in the handbook.

And then with respect to feedback on program policy issues, during the course of this call we're going to tee up several issues for discussion, and we'll also have some polling questions, and we'll invite you to weigh in.

A year ago the Office of Housing Counseling convened a stakeholder meeting, and that meeting focused primarily on format. We were asking what types of functionalities would be helpful to you in a revised handbook, so things such as including hyperlinks within the handbook and just referencing and linking to all of the resources that the Housing Counseling Program makes available to you outside of the handbook, like toolkits, or webinars, or other types of guidance, mortgagee letters, etc. The idea is to make the handbook more of a one stop shop than it is at this time.

So, today rather than focusing just on format, although we welcome any comments or questions that you have on that topic area, we're going to get a little bit more into content with some of the issues that we'll pose to you. I also want to make a point that handbook revision is in some ways not a simple task. There is a lot of material and information to cull through and to think through. But we're also restrained by the Housing Counseling Program regulations, and so some of the changes that we would like to make and see a need to make, and that you may even address on this call might require rule making.

So, at the same that we are, the Handbook team that is, revising the handbook, we're also making notes for the Rule Making team for areas where we would like to push ahead and try to make changes if we can. That will have to come about in the handbook at a later date, once the updated reg, when that does happen at some point, gives us the ability to do that.

The other thing that I'd like to end on before we get started with our slides here, we would like for you to be as vocal as you can on this call during this hour and a half that we have. Sometimes it is difficult to think of all of your input during the course of the call, so please feel free to email the housing counseling email address. As Ben Yanetta mentioned, and you'll see the address again at the end of the presentation, if you have any thoughts or feedback that you'd like to give that you weren't able to fully express during the course of the call but you might want to provide a more thoughtful response on, we definitely welcome that.

And we'd like to stress again that your calls today, if you'd like to make any comments or pose any questions, you can do that anonymously. You don't have to give your name, if that happens to give you comfort and give you a little bit more freedom in expressing your thoughts.

So, with that we'll move to the next slide. Most of you are familiar with the handbook. It is a resource and a tool that is important to your participation in the program. And you may even have the handbook in front of you, or pulled up on your screen, but just to kind of ground our conversation and frame where we are, we've included a list of the handbook chapters here.

So, Chapter 1 is General Program Information. Chapter 2: Obtaining HUD Approval. Chapter 3: Delivery of Housing Counseling Services. Chapter 4: Reverse Mortgage Housing Counseling. Chapter 5: Recordkeeping and Reporting. That's actually the topic that we're going to start off with. Chapter 6: Performance Criteria and Monitoring. Chapter 7: Funding. Chapter 8: Appeals. And then following Chapter 8 there are a few appendices that include information about HUD office contracts, other HUD handbooks, website addresses, and HECM protocol. But we're all on the same page now, knowing what we're talking about.

I'll mention when we talk about the various issues in the presentation today, they're not in order of priority. They're just how we pulled the

information together. And of course this is not an exhaustive list, and we do hope to have future calls after today's call.

So, we'll begin with a polling question. Our Polling Question 1 gives us an opportunity to find out who is on the line, and gives you an opportunity to know who is on the call with you as well. So, the first question is: What type of organization are you representing? Are you representing an: Intermediary, Multi-State organization; State housing finance agency; Local housing counseling agency; or an Affiliate or Sub-Grantee?

And if you would please, Jane, open the polls, and everyone take a moment to click on your response so that we know who we've got in our discussion today.

Alright, Number 1 is usually the easy question out of the gate, so I'm sure everyone has finished responding. And, Jane, I'm going to ask you to please close the polls and also share with us what the results are.

Moderator

Okay. Well, we have 22% Intermediary; 5% Multi-State organization; 13% State housing finance agency; then the bulk of our viewers are 42% Local housing counseling agencies; and then we have 19% Affiliates or Sub-Grantees.

Stephanie

Excellent. Great. Okay. Thanks very much. That's a good representation across the board. The intermediaries who are on the call, some of them, HUD, the Office of Housing Counseling had a conference last week in Washington at the HUD headquarters specifically targeted to intermediary organizations within the Housing Counseling Program, and we began to get some good feedback on some of these issues then. Hopefully, if any of you are on the line again you'll share your thoughts and comments again with this wider audience. And it will be good just to hear from all of you regardless of the type of organization you represent.

So, on our next slide, recordkeeping and reporting, well, it doesn't matter whether you're representing an intermediary, MSO, SHFA, LHCA, affiliate, or sub-grantee, because recordkeeping and reporting applies to everyone, and it is a really important part of participating in the program. We expect that you have some strong thoughts and opinions about recordkeeping and reporting, and so we're going to begin with a discussion on client files.

The Office of Housing Counseling has found from our discussions revising the handbook, which are informed by our work as points of contact, your points of contact in the Office of Housing Counseling that provide you with technical assistance and questions that we get from the OHC mailbox and just generally as a part of the program, that recordkeeping and reporting relating to client files has some challenges. And one of the things that we are considering and would like to hear from you on is in the area of financial analysis and budget.

And so specifically we're looking for, what are the reasons or circumstances where financial analysis and/or budget may not be feasible. And then tied to that, we want to hear from you about client follow up, what are some of the reasons why client follow up is not possible. And in that same vein discussion of alternatives, we'd like to know when you find that the discussion of alternatives with clients may be challenging. And so, operator, I'm going to invite you to open up the line so we can begin discussion. And again, anyone dialing in does not have to provide their name, but you're more than welcome to do so if you like.

Moderator

[Operator instructions]

Stephanie

So, while we're waiting for a question to be asked, and, operator, please do cue us when someone is ready to speak, some of the things, just to kind of frame the discussion a little bit more on financial analysis and budget, we've gotten some feedback that one circumstance where financial analysis or budget may not be feasible is if it's, say, a rental counseling scenario related to a landlord/tenant issue. Well, it's not a question of affordability of the apartment and the budget of the client, or a financial analysis may not be applicable in that particular scenario, or you may have someone coming to your agency who is seeking homeless counseling and there may not be much information for that particular client to provide. So, things of that nature we're looking to hear from.

The same with follow up. If you're dealing with a client who is in an emergency situation it may be difficult to get a hold of that client. But we'd like to hear about some other reasons. So, those are some of the things that we've heard and that we're hearing and grappling with along with you, trying to figure out the most effective way to shape our requirements and not pose any unnecessary burdens to you or to the clients. So, has anyone dialed in with a question?

Moderator Just now we had somebody go to an operator, so it will be just a moment here.

Stephanie Okay.

Moderator [Operator instructions]

Stephanie So, some of the feedback that we've gotten has come as a result of conducting performance reviews and reviewing client files, where we see the recordkeeping and report that's being done, and a point of contact's own observation from the files, or agencies just contacting the Office of Housing Counseling directly with a question or wanting clarification. And fortunately the lines of communication between the Office of Housing Counseling and you, agencies that we work so well with, has been very good and free flowing. So, you don't hesitate to come to us with some of the concerns and feedback that you have, even outside of formal calls.

Jovan Stephanie, this is Jovan.

Stephanie Yes?

Jovan You have a couple of comments.

Stephanie Oh, please.

Jovan One was that when all the issues with the clients that were in trouble have been fulfilled then there's no need for follow up. So, then you wouldn't have any contact with them. And the other is that, I guess that's pretty straightforward, and the other was when they don't have any income that you can't do a thorough financial analysis of them because they're lacking so much information.

Stephanie Okay. That seems consistent with some of the things that we've heard.

Moderator And we can go to a party on the phone line, if you'd like.

Stephanie Yes. Thank you.

Moderator You're welcome. I'm going to open Line 604.

Linda Hi. This is Linda. The comment regarding the financial analysis and budget is really difficult with any walk-in or homeless clients that we

receive, because normally they don't have the documentation or the ability to secure it. And follow up is almost impossible because of the transient nature.

Stephanie

Thank you. Yes, very good. Very good comment. We see the challenge in that. And one of the things that we hear with respect to some of the requirements is there isn't always a one-size-fits-all requirement. There are exceptions. I think the handbook generally recognizes exceptions and tries to make allowances for them where possible, and I think this is one of those areas that we're looking to. So, thank you for your comment and for letting us know what some of the challenges are that you're facing.

I would maybe broaden it a little bit just to ask, if you as a counselor are having trouble with following up, or the financial analysis and budget does not seem feasible for that particular client, how are you documenting your files to indicate that? Is it just a note that you're writing so far within your CMS? How are you explaining that, or documenting that in your client files?

Linda

In the case notes.

Stephanie

In the case notes.

Linda

Yes.

Stephanie

Okay. Good. Alright, thank you very much.

Moderator

And we can go on to the next party in the queue. It will be—

Jovan

[Indiscernible].

Moderator

Pardon me. Should I open it, or no?

Jovan

Oh no. Go right ahead.

Stephanie

Yes, please. If someone is waiting, please.

Moderator

And it's going to be Line 627. Your line is open.

Karen

Hi. This is Karen Emerson from Northwest Michigan Community Action. I think it's a great opportunity. I don't think I've ever had this with HUD. So, thank you for doing this.

As far as being a manager of programming with HUD in a local housing counseling agency, I often hear my counselors talk about how they can't really always get to a financial analysis and budget. Though that's a foundation of all our programming, but it may not be as thorough. Sometimes they feel like they have to run through that if there's more of a housing crisis issue.

Stephanie

Okay.

Karen

So, that's one thing that, sometimes, like you said, one-size-fits-all. I agree with the homeless prevention. I agree with the rental. I just think sometimes you can't get that far in a first session and we shouldn't be throwing those particular files out as HUD.

The next thing with follow up, I think it's a little too comprehensive. I've been instructing my staff to basically, if you can even get a hold of that person and they tell you over the phone, "I'm done. I've been done with this counseling. Please document it in the notes and close that file out." Because having to go through the whole contact system and all that, sometimes I think our customers are starting to feel harassed. So, that's my input.

Stephanie

Okay. Thank you, Karen. Well, that is certainly not the result that we want, clients feeling harassed.

Karen

Right.

Stephanie

Yes, it sounds like from what you've described that the close out process needs to come sooner than additional follow up. So, that's an area that we'll look at just to make sure that it's clear, because I think everyone would agree that overkill on this issue is not necessary. On the other hand, we do want to make sure that clients are being fully served and given the attention that they need to make sure their housing needs are met.

Karen

Well, don't you think we tend to go to the extreme, it seems like. At one time, yes, my counselors too kept files open forever because they thought the person was going to come back, that they wanted to be a homeowner.

Stephanie

Right.

Karen

And I think we've gone so far to the other extreme now that if a customer comes in really realize, they basically say, "Well, it looks like I have some

things to work on.” And the counselor says, or the coach says, “We’ve got to set that appointment.” “No. I don’t think I want to right now.” I think the case should be closed right then. And I don’t think it feels clear enough to the counselors.

Stephanie Got you. Very good feedback. Thank you very much, Karen.

Karen Oh, you’re welcome.

Stephanie Is there another comment, or shall we move on?

Moderator You can go ahead and move on. There’s nobody in the queue right now.

Stephanie Okay. Very good. Thank you very much. So, our Polling Question 2 is, it’s general but I think is open enough where we can get some of your input, we’ve touched on it a little bit already, but the question asks: Do you think follow up procedures and time periods are reasonable with regard to recordkeeping? And if you would please respond: Yes, the current follow up procedures are fine; or No, adjustments to the procedure are needed. And you should find the polling question on your screen now.

Jane, I’m going to ask that you close the poll. Well, this is pretty good, I guess. We’re almost at the 50/50 mark, with “no” winning out by a bit, that adjustments to the procedure are needed, and 41% of you said that the current follow up procedures are fine.

So, without beating a dead horse on this issue, it would be helpful if anyone has any follow up feedback about where adjustments to the procedures might be needed. I think that Karen Emerson, who just weighed in with her thoughts, was saying that the follow up seems like it might be on the too extreme side and bordering on harassing customers, which we certainly don’t want. If anyone has any other specific comments for where adjustments to the procedure are needed, and operator, I’ll invite you to open up the line and ask anyone to queue up and talk about that.

Moderator Sure.

Stephanie As we’re waiting for that to happen I’ll say here, for our part, the Office of Housing Counseling, we look for opportunities to streamline and to see if we can whittle down requirements that seem onerous, provided we can do it within the confines of our regs.

I would say one example with respect to recordkeeping and reporting, let's talk about the NOFA. We no longer require that you send us a lot of documents in support of your application, and instead we say that the information can just be maintained in your office for when we come to conduct a performance review. We saw little value, as I'm sure you did, with just receiving binders and reams of documentation when it could very well be left in your office and we would consult with that during a performance review or on an as needed basis if we needed it to be forwarded to us.

In a climate where funding resources are limited and sometimes counseling staff is limited, our goal is to have you focus on the counseling of the clients primarily and not do reporting that appears burdensome. Of course your recordkeeping needs to be thorough enough so that we see that you're operating within the parameters of the Housing Counseling Program requirements, and for those of you who are grant fund recipients, to support your reimbursement request. So, obviously we do need some solid recordkeeping and reporting, but if there adjustments that you see that could be made we'd love to hear from you about those.

Moderator [Operator instructions.] And we'll go to Line 672. Please go ahead.

Line 672 Can you hear me?

Stephanie Yes.

Line 672 Yes, on the follow ups I agree that it's a bit much, as far as if you look at the procedure right now my counselors on average see five appointments a day, and so what you're asking them to do is when it's time for their first follow up there's five people we've got to call. And let's say we don't reach those people, and so then when we do the second follow up there's five more people we have to call the second time, along with the people that are now ready for their first follow up. And then three months later now you've got to go back and check the ones that you've already called twice to see if they've returned your call or not, and if not send the HUD termination letter.

And so it's like you're going through about 15 to 20 calls for each day that you counseled somebody on that day in the past. That is way too much. And so what you're forcing my counselors to do is to counsel less for the people in need so we can make phone calls to people who are not there,

leave messages, do the data entry, and then go back and call the next person on the list. That's our concern.

Stephanie Thank you for expressing your concern. That does appear to be something that we can work on, or that we will make every effort to work on. I think the priority from your side as a housing counselor and as an agency, and also from our standpoint as HUD and the administrators of this program, getting counseling to clients "in need," as you put it, those who have not been counseled, rather than spending a significant amount of time, or maybe we need to shift the balance a bit on follow up versus counseling. So, thank you very much for your comments and letting us know what your agency's experience has been.

Moderator [Operator instructions.] And we'll go to the line of 625. Please go ahead.

Line 625 Hi. This is [indiscernible] with the Minnesota Home Ownership Center.

Stephanie Yes. Hello.

Line 625 Hi. Just a couple of comments on the follow up, because I certainly understand the importance of not letting clients just fall away. We want to maintain contact with them to be sure that they have ongoing services, if that's what they're interested in. But a little bit to echo what someone had said before, I think it would be helpful to focus a little bit more on the closeout and how this really only comes into play if contact is lost after a certain amount of time. I think sometimes we have folks wrapped up in needing to follow up with everyone even if the case can be closed.

And then a thought on, I like the idea of specifying a time frame, because I think that helps in ensuring that cases get closed out, but I would suggest maybe opening up the methods for contact. So, for example, maybe just suggesting that the contact be in whatever the preferred format is for the client, because there may have been primarily email contact with the client. And I don't know how many organizations may or may not be using text now, because I know that that's something that has been brought up in terms of surveying millennials and others, so maybe opening up the ways in which the contact can occur. And then maybe fewer contacts required, so maybe two instead of three, something like that.

Stephanie Well, thank you very much for that. I think the example that you just gave just really is in line with how we began the call and just talking about changes in technology, i.e. texting, right?

And you also raised the point about millennials, which is something that comes up frequently during discussions, and it came up during last week's conference with the intermediaries, and I think comes up regularly otherwise, that it's a different sort of group and generation of consumers who are looking for conveniences and just different ways of doing business. And we need to do our best to be responsive to that, so thanks so much for giving us your thoughts.

Line 625 Thank you.

Moderator And then we can move on to the line of 627. Please go ahead.

Karen This is Karen again. I was thinking while everybody was talking about sometimes alternatives we have when we get reviewed, sometimes I feel like we've also left cases open and there's a real reason for that, where the customer really wants to stay connected with us in that. So, we're looked at like, oh, you should really close these cases. They haven't been coming in timely enough.

I think it has to do with interpretation of the handbook. So, I wanted to give just that other side of it too, because I think coaches often do want to help, so you also have that issue. And then you have somebody tell you, "Go ahead and close it," well, then what my counselors look at, then I have to reopen the whole darn thing again when they come back in a month, you know?

Stephanie Right. Yes, yes. That's a good point too. I think, once again, striking that balance, and sometimes there is an explanation for why something is done. I'm sure that's probably more the exception than the rule for cases that you have that sit within that particular scenario, where you're leaving the file open longer than maybe according to the handbook requirement that you should.

Karen Right, right.

Stephanie Yes, that's something—

Karen Because we—

Stephanie Go ahead. I'm sorry.

- Karen I'm sorry. It's hard for me to hear. Sometimes it's like, I'll give an example again, IDA homeowner, and we may have them for three years, you know?
- Stephanie Right.
- Karen And they're not required to come in every month some of the time. So, then the counselors look at me for guidance for that, but I can see keeping it open. Yes.
- Stephanie Okay. Yes, that's something that we'll look at as well and see if there is any room for us to take a circumstance like that under consideration.
- Karen I just want to be sure that this is recordkeeping and reporting just with the case management, or is this more inclusive? Are we going to get more into that later, like HUD-9902?
- Stephanie Yes, this is more so your client files, not so much HUD-9902 reporting specifically.
- Karen Okay.
- Stephanie Okay. Well, I think that, operator, unless there is anyone else in the queue, I was going to move ahead.
- Moderator Nobody in queue at this time.
- Stephanie Excellent. Good. We're all on the same wavelength then. So, the next file, again, this still falls within recordkeeping and reporting, and client files, this is an observation that we've made in reviewing files, that the client files do not always reflect the costs charged to the HUD grant, or sub-grant, as well as other sources. So, we'll look at the client files and we'll see that this documenting of the costs charged to the HUD grant or the sub-grant do not appear in the file. And I would say from HUD's standpoint, generally this seems like a requirement that is clear, and straightforward, and has been communicated. But we're gathering that there may be some challenges with documenting these costs, and so we're opening this to find out if more guidance is needed.
- I think in the interest of time I'm going to tee up a few of the other recordkeeping and reporting discussion topics, and then after that open the

lines so that anyone can weigh in on any of these recordkeeping and reporting sub-issues.

So, the first is documenting costs charged to the HUD grant, and the client files not in some instances satisfactorily reflecting that. If we move to the next slide, this is a different topic area, but we'll make sure that we can get discussion on a number of different fronts, and I think we'll be able to follow along.

So, part of recordkeeping and reporting is, I think we're all keenly aware of the critical importance of security measures that are needed to protect PII, Personally Identifiable Information. And from our end we are looking to include a new section on Personally Identifiable Information in the handbook. It's not currently in the handbook. Again, when the handbook was revised in 2010, that version of the handbook had, as you might expect, information about making sure that client files are secure, and locked, and things that we've all come to understand as givens in the program.

But over the years we've had instances where databases anywhere within business and industry have been compromised, or we just have people with internet and hacking prowess able to get at information that does not belong to them and causes a lot of damage. And so we want to make sure to include in the handbook language about protecting information and avoiding security breaches.

And so what we're asking now, to make sure that we are providing the guidance that you need, is are there certain types of information that would be helpful to you to include on protecting Personally Identifiable Information. And are there particular points that you think would be helpful to have addressed, is there certain guidance that you need, or any instances or scenarios that you've come across that you want to mention in your efforts to protect client information that you think might be useful to the discussion.

And then finally, when we close out our discussion on recordkeeping and reporting this next slide is asking you generally, what is your most significant challenge, if you can narrow it down to one, but we've put an "s" on the end of challenge in case you have more than one, but what is your most significant challenge regarding recordkeeping and reporting? If had your druthers and wanted to let us know about one area of

recordkeeping and reporting that really is problematic or burdensome for your agency, this would be a great time to tell us about that.

So, just to quickly recap, any feedback that you have on documenting costs charged to the HUD grant, on protecting Personally Identifiable Information, and any significant challenges that you have regarding recordkeeping and reporting generally. And you can chime in on one, or two, or all of those topic areas if you wish.

So, operator, once again I'm going to ask you to open up the lines so that our participants can provide any feedback.

Moderator [Operator instructions.] And I'll go over to the line of 572.

Sharon Hi. This is Sharon. And one of the things I'm wondering is as far as the client file for recordkeeping and as far as HUD grant funds used for that particular file, is there a way that HUD could design some type of document to where each file could encapsulate the information that HUD is looking for on that?

Stephanie Okay. That's something that we can look into.

Sharon I think that that would help with consistencies across the board when you're looking at a statewide program, so that it would ensure that everybody is doing it the same way and providing the same consistent information.

Stephanie Okay. Very good.

Moderator And we can move to the line of 581. Please go ahead.

Heather Hi. Heather Huber, [indiscernible] Chicago. I just wanted to comment on the documenting costs of HUD grants and counseling files. This can be a technical challenge, because often we'll receive the grant award maybe Q3 and then we're going backwards assessing our files. So, we may be looking at several hundred client files that we're attributing to that grant all at one time, so that can be a challenge. Often, we'll keep that information separate, outside of our CMS, and work backwards to update.

Stephanie Okay. Can you elaborate on that just a little bit more?

Heather Sure. Which piece?

- Stephanie So, you're saying that documenting the grant, is it the number of grants that's posing the challenge? What particular area is challenging?
- Heather Sure. So, often we'll receive information knowing our dollar amount of our grant award, and it will be three-quarters of the way through the year that we receive that information.
- Stephanie Yes. Okay.
- Heather So, we're having to look at a lot of client files all at once to see which ones would be applicable to apply.
- Stephanie So, you're really talking of having to work and apply, and go back to your files retroactively, after you've already completed your counseling and your grant funds have been awarded, after the counseling has been done?
- Heather Right.
- Stephanie Yes. Okay. Yes, that's a point well taken and we recognize is a challenge by the time the grant funds hit, that you're having to go back in time. So, yes, we appreciate that and recognize that. Thanks so much for giving that comment.
- Moderator And we'll go to the line of 596. Please go ahead.
- Dana Okay. Thank you. My name is Dana Hodge. I'm from Mon Valley Initiative. And I basically agree with the last caller's comments that it is, I think, a bit of a hardship if you expect a counselor or someone at an agency to have to go back, if we're getting the HUD awards, let's say, in July, August, and now they have to go all the way back to clients from October 1st to input what amount is being charged to the HUD grant.
- And a housing counselor may not know that because that may be something determined by, perhaps, the agency's finance department. So, if HUD could perhaps consider, if it's not maintained in the actual client file but if it's maintained by the agency, where they can break down that we spent ten hours with client Joe Smith, and of those ten hours that we spent with him four hours were charged to HUD and six hours were charged to whoever else. Then that way the agency as a whole is maintaining those records, even though it may not particularly be in the client file.

- Stephanie Very good point. Thank you.
- Dana And in regards to the security breach, HUD's requirement each agency be held accountable to ensure that the CMS' are secure, we do that to the best of our ability. Most of us I think are probably using either CounselorMax or HCO, HCO being a Fannie Mae database, we're at their mercy and we don't have so much authority or power to make those entities control whatever that they do. But as you mentioned, no matter how secure a system is the hackers and people with bad intentions are usually one step ahead and they're able to hack into it. So, I think HUD's toolkit for protecting Personally Identifiable Information, that has some really good wordage, or words that we're trying to use.
- And then lastly in regards to recordkeeping and reporting, reporting is especially difficult for intermediaries, I'm sure it's difficult for locals as well, but for intermediaries we're trying to gather, review, make sure that everything is correct, and then submit it to HUD. That's difficult because some agencies obviously do better than others, and we need to do a little bit of hand holding with those that aren't as good. So, if HUD could consider giving just a little bit more time in submitting the reporting, especially for intermediaries, that would be appreciated. And that's all I've got. Thank you very much.
- Stephanie Very good. Thank you so much. Operator, am I able to move on, or are there any other callers in the queue?
- Moderator One more in queue. Would you like to go to that?
- Stephanie Yes. Thank you.
- Moderator Okay. Next, Line 627. Please go ahead.
- Karen It's Karen. I want to support what Sharon said, except I want to go a step farther. I do agree with everybody else. I don't want to have to go back, when I still haven't even gotten this year's grant approved, to actually input that data into each of those customer files, because I would have to have somebody else do it. My grant over the years has just dwindled, just because of the way we're supposed to cone and what we have to do, and the recordkeeping.
- The other thing I think you really need to keep in mind is that the processes are very burdensome on your HUD employees. It's very

difficult for them to even report back to us when we do biannual reviews. I think the whole Keep It Simple Simon may be something that I know it's tough for federal interpretation of different things, but it's gotten harder and harder.

HUD used to be a foundation that you could depend on to help prop up your programs, and instead between the PARs and everything that's being mandated just down through we spend more time recordkeeping and keeping track of our customers than we do meeting people face-to-face. And my coaches want to help people and eradicate their housing situation, and we've even gone as far as hiring an intake person and a billing specialist that now we can't afford because we just don't get the funding to be able to do that.

Stephanie

Yes. Well, Karen, thank you. It sounds like definitely a consistent theme for those of you who have voiced your comments by phone here. Hopefully we'll get some more feedback, either from the people mailing the housing counseling mailbox, and there may be some questions that are being typed in at the same time. But my suspicion is that we will see a number of other comments that are in line with and supporting what you, and Sharon, and Dana, and others have shared with us. So, thanks very much for that.

This to me is a case of time flies when you are having fun. I'm going to say I'm ecstatic about the feedback that we're getting, and I thank you all for it very much. We still have a lot of good ground to cover, and so I'm going to move the discussion along to our next point. I also have a colleague who is going to be speaking with you too, and I want to give her some time to talk about a few other policy issues. So, I'm going to plow ahead with the next slide. We're going to move away from recordkeeping and reporting and now move to the delivery of housing counseling services.

Now, I'll set the stage by saying upfront that this next topic, the brick-and-mortar requirement, as we refer to it internally, you won't find brick-and-mortar in the handbook or in the reg as a term. But it is a big issue that we are thinking through, and also need to see what rule making implications there may be. And we've not moved the issue along the departmental chain enough to get to our Office of General Counsel and such. Right now we're getting some thoughts and comments, and just trying to figure out where we need to move on this requirement. So, I'm going to begin to talk about this. I will probably need to limit discussion to about seven

minutes or so, so that we can continue with the presentation, recognizing that we may revisit this at another time.

So, generally the brick-and-mortar requirement is that agencies are required to have a physical office in each state where they are approved to provide housing counseling. And if you look at the next slide, this is a quick background snapshot to ground the issue and let you know, again, this is one of the issues that we talked about last week with our intermediary counseling agencies, and they provided some good feedback. So, we're looking forward to hearing from them again, but also the local housing counseling agencies, and SHFAs, and MSOs.

The background, quickly, this is the cliff notes version, is that the Housing Counseling Program currently allows agencies to perform comprehensive housing counseling only in states where they have a physical brick-and-mortar office. And cited there we have the HUD reg and a little text from the Housing Counseling Handbook which says: "All agencies participating in HUD's Housing Counseling Program that provide services directly to clients must provide in-person counseling to clients that prefer this format."

The next slide, by way of just a little bit more background, addresses the HECM counseling, where there is a recognition and an acknowledgment that seniors may prefer telephone counseling for various reasons if they have limited mobility and health conditions.

Currently, our HUD approval Form 9900, which is the form you all completed in order to get approval to participate in the Housing Counseling Program, for each type of agency that you are, an intermediary or a local, there's language that talks about geographic presence, where you are, number of states, or just that you have an office someplace, meaning a physical office. There are reasons for exceptions to the brick-and-mortar requirement. One of the things that we saw in recent years was the foreclosure counseling hot line, where there was a crisis situation where homeowners needed to be helped immediately. And by phone was one of the ways that that was done.

We are going to begin with a polling question that asks: What percentage of your agency's clients prefer phone counseling to in-person? Just to get a sense. So, Jane, if you would please open the polls. And we invite everyone to pick the response that best reflects your agency's clients preferences, and if that percentage is: Under 25%; 26% to 50%; 51% to

75%; and 76% to 100%. Take a moment, if you would, and let us know what percentage of your agency's clients prefer phone counseling to in-person.

Okay. Oh, interesting. So, 47% of you said that Under 25% of your clients prefer in-person counseling—I personally did not expect the number, oh, yes, I didn't expect that number to be so high, yes, I'm reading my stats right—26% to 50%, 17% fall within that category; 21% for the 51% to 75% category; and 15% have most of their clients that prefer in-person counseling. Okay. Interesting. Very interesting. Thank you. You can close the polls, Jane.

So, that we can begin to have a little bit of discussion on this, and please be ready to chime in and let the operator take your call, so our question is, do you feel that the market has changed so that clients are no longer favoring in-person counseling? And if so, what has led you to this conclusion?

And then one of the bigger questions, the overarching question that we're really trying to get at with this brick-and-mortar requirement issue is, can an agency that is not physically located in a state overcome obstacles to providing quality counseling in that area? So, in other words, if an agency is not physically located in a state, how do you become aware of local resources, and services, and referrals, and just information to best serve that client? And then the offshoot from that question is, how can an agency demonstrate to HUD familiarity with these rules, programs, and services outside of your normal service area where you have a physical presence?

Again, this is the brick-and-mortar requirement that we are examining. We know that telephone counseling is an alternative format that's readily available now, that many of you use. But this question is getting at the requirement for having a physical presence in the state in which you're counseling, and also making sure that quality counseling is provided. If you're not physically located, how do you show and/or gain familiarity with the rules, programs, and services in that area to best assist those clients?

So, operator, I'm going to invite you to please open up the line.

Moderator

[Operator instructions.] We'll go back to the line of 572. Please go ahead.

Sharon Hi. This is Sharon calling in again, or have a comment. I'd be interested in the poll that you just took, if you had broken that down by the entity that you represent being state, or local, or intermediary already. We had some issues, when we went into the foreclosure crisis, with outside entities trying to counsel Michigan citizens, and with different rules and legislation that dictates foreclosure process here in Michigan it created havoc in our state.

I truly believe that even if you provide phone counseling you need that local presence within the community to be able to assist a client with the resources that are available and provide them that community background that they need as far as the services that are available to them. I would be really disappointed with HUD allowing an entity that does not have brick-and-mortar within a state to provide counseling within that state.

Stephanie Well, Sharon, thank you for your comment. Yes, we're looking to hear feedback that runs the gamut, and I think your first point is very, very well taken, that the poll responses would have been even more valuable if the responses were broken out by entity type. So, that's information that we will attempt to get again at some point after this call. But—

Sharon Yes. One of the other things too that we saw was how do we avoid duplicate billing for that client when somebody at an intermediary level provides services, and then they weren't happy with those services and then they come back to a local community for the same service.

Stephanie Good issue to raise as well. Thank you. Okay. Why don't we take maybe one more question on this topic, and then if we have time at the end, which I'm hoping we will, we can open it up to questions that people may still have.

Operator, is there another person in the queue?

Moderator Not at this time.

Stephanie Not at this time. Okay. Alright. Well, if this is a topic area that you would like to come back to and we have time at the end of the presentation, please feel free to provide your feedback then, as well as via email, as we've said throughout the presentation.

I thank you for your participation in this part of the session, and now I'm going to turn the presentation over to my colleague, Connie Barton. Thank you.

Connie

Thank you, Stephanie. Good morning, or good afternoon, everyone, depending on where you're calling in from. Thank you for participating in today's meeting. We've had a lot of great discussion so far, and we may run past our scheduled time of 2:30, but I'm hoping you'll be able to stay with us for a bit longer as we have a couple more important topics to cover.

Many of you may have applied for a housing counseling grant a couple months ago, and if you did you would have read the instructions in the NOFA as well as in grants.gov. And within the past few weeks you may have also submitted your grant agreement, your 1044, and other grant documents to your POC. The beginning of Chapter 7 of the handbook provides general guidance on the NOFA, as well as eligibility information on who may apply for a HUD housing counseling grant, and the requirement to submit applications through grants.gov. So, we're interested in hearing your suggestions or comments, if you have any, for improving this section of the handbook.

So, with that said, we'd like you to answer our next polling question, Jane, if you could please open the polls, and let us know: How often did you refer to the handbook when completing your NOFA application? So, please choose from the following: Very frequently; Frequently; Infrequently; or Not at all. So, let's give everyone a few moments to respond.

Okay, so the polls have closed. So, we had 6% respond Very frequently; 42% Frequently; 34% Infrequently; and 19% Not at all. Well, there's no right or wrong answer to the question, but we are interested in why you may or may not have referred to the handbook, and how frequently when filling out the NOFA application.

Would someone like to share their thoughts on how they responded, if the operator can please open the lines, or if you have any written comments to submit?

Moderator

[Operator instructions.]

Connie

Operator, are there any questions or comments in the queue?

- Moderator Not at this point. No.
- Connie Okay. Well, we can move ahead to the next slide. The handbook and the NOFA go hand-in-hand when you apply for your HUD housing counseling grants. Please remember that the handbook provides general guidance on applying for HUD housing counseling grants, and that you should always read the NOFA for application and submission information, because the requirements may change from year to year. At this time, does anyone have any suggestions or comments for improving this section of the handbook?
- Moderator [Operator instructions.]
- Connie Or, if you think this section of the handbook is fine as is, we would like to know that as well.
- Moderator I can open the line of 572.
- Sharon Hi. This is Sharon. One of the suggestions that I would have is, well, first of all, I think every time you go in there to look something up you learn something new, or interpret it maybe a little bit different based on what issue you're having, or what you're seeing at that point in time. So, I would like an opportunity to be able to provide feedback, and I will send that information in.
- But one of the things I might suggest is that irrelevant of when the funding actually gets approved, is that there's an application period prior to October 1st where then beginning October 1st you would know whether or not your application had been accepted, and then once the funding gets approved then you would be awarded the funding. So that we wouldn't have to continue to go back to that October 1st date to go back to get information, you could just move forward then based on knowing that you were going to get some type of an award if the budget was approved. That's just a suggestion.
- Connie Okay. Thank you, Sharon, for your suggestion. And we are glad that you do refer to the handbook periodically and that you do learn something from it every time you go in to check for something. We like to hear that. And we'll look forward to your email comments and suggestions as well.
- Operator, are there any other questions in the queue?

Moderator There are currently no questions in queue.

Connie Okay. Great. Thank you. Well, if anything else comes to mind after today's meeting, please let us know by sending an email to housing.counseling@hud.gov. Let's move on to the next slide.

And we have another polling question for you: True or False, the handbook is my agency's primary source of information for grant compliance?

Okay. The polls are closed. We have 77% that have answered True, and 22% have answered False. Let's move ahead to the next slide, please.

Section 7-2 of Chapter 7 provides general guidance on grant administration and compliance, and also makes reference to the grant agreement. So, please remember that you should always review your grant agreement for specific requirements because the requirements may change for each grant award year. Again, the handbook is an additional resource and it goes hand-in-hand with the grant agreement, but please remember that you also have a POC and that he or she is always available to help. And if you can't find the answer to your question in the handbook, please check with your POC for assistance.

Does anyone have any issues or concerns about Chapter 7's section on grant administration?

Moderator [Operator instructions.] And there's nobody in queue at this time.

Connie Okay. Great. Thank you. Well, in Section 7-2 you'll see that it says that GTR is responsible for grant administration, and the GTR is usually also your POC. In this section you'll also find information on how to submit a voucher to HUD for payment of your grant award, how to request payment or reimbursement for your HUD grant, and how to check on the status of your voucher. So, you would do all these things by contacting your POC.

Does anyone feel that we need to include additional guidance on grant administration? If you do, you can submit your question through the queue, or dial star zero to submit your question by phone.

And other things that we have covered in this section, in Section 7-2, is how to document grant expenses, and you do this by keeping invoices,

salary reports, utility bills, if you're billing to the HUD grant. And please remember that documentation must be kept for three years from the date the final grant invoice was paid by HUD.

Do we have any additional questions in the queue?

Moderator We'll go to the line of 627. Please go ahead.

Connie Hello.

Moderator And 627, your line is open. I'm not getting any feedback from the line here. It is open.

Connie Okay. Well, maybe they'll dial back in. Well, if no one else can think of anything else that we can add to this section for grant administration, we can move forward to the next slide.

The next slide covers Section 7-3 of the handbook, and it provides a few examples of HUD grants that may be sources of funds for housing counseling activities. For example, CDBG funds, Fair Housing funds, and FSS, or Family Self-Sufficiency program funds. So, we're interested in hearing whether you know where to find other sources of HUD funding, or if it would be helpful to you if we provided more information or guidance on other funding sources. So, if you'd like to ask a question, you can hit star zero.

Moderator And currently there's nobody queuing up.

Connie Thank you. We can continue on. Chapter 5, which Stephanie covered earlier, as well as Chapter 7, specifically Section 7-6 of the handbook, provides guidance on funding and fees for housing counseling and related services. Some of the guidance on fees includes information on assessing, reducing, and waiving fees. For example, your agency may have a procedure or a policy in place for when you're able to reduce or waive fees, depending on a client's income, whether or not they can afford to pay the fees, or other circumstances.

And also with regard to documenting funding sources and fees charged, client files must include documentation of the funding source and the amount that was charged to the grant or other funding source, as well as documentation and a copy of the receipt provided to the client, as well as other documentation that shows the amount and source of fees paid by

other parties, such as lenders. What we're wondering is, do you feel you need additional guidance on fees, or would it be helpful for us to provide additional examples in the handbook?

If the operator could please open the lines to see if there are any questions.

Moderator [Operator instructions.] And we'll go to the line of 466. Please go ahead. And I've got Line 466 open. If you queued up for a question, go ahead and try to speak and see if your line comes through here.

Connie Maybe they're having technical difficulties.

Moderator Yes. I'm not sure. We'll go on to the line of 596. Please go ahead.

Dana Hello. Can you hear me?

Connie We can. Thank you.

Dana Awesome. Thank you. My name is Dana Hodge. I'm from the Mon Valley Initiative. I think we're breezing through, because I think that the handbook, I think that the rules, regulations that it contains in this regard are pretty straightforward. But I think what's even more helpful is in conjunction to the handbook having the additional toolkits and trainings. I think having those, where we can really get some detailed guidance, that's what's most helpful. But the handbook right now gives, I think, enough basic guidance and instruction on these topics and I'd hate for it to be too detailed, because then it becomes a whole huge process to have to revise the handbook again. So, I think it's good the way it is.

Connie Okay. Great. Thank you so much. We appreciate your feedback.

Dana Thank you.

Connie And we're continually working to see if our agencies need additional information or even more detailed toolkits to help you do your jobs in counseling your clients, so thank you for that feedback.

Are there any other questions in the queue?

Moderator We do have that will come from the line of 572. Please go ahead.

- Sharon This is Sharon again. And any kind of examples included in a toolkit are always helpful. Thank you.
- Connie Okay. Thank you, Sharon. We appreciate your feedback, and we will definitely keep that in mind and work on more examples.
- Moderator We have one more in queue, if you'd like to take that.
- Connie Sure.
- Moderator It's Line 466. Please go ahead.
- Karen Hi. It's Karen Emerson. I think some of the stuff, and I agree with what everybody's mentioned right now with funding and the fees, but I think, like you said, a toolbox, some additional training, what accepted practices or best practices in creating budgets, and maybe layering with the HUD would be good here, just in addition to waiving fees and that. Because I think sometimes it is up to interpretation, which I think is great, but I think sometimes just refresher courses every year about some of these things would be helpful for the team.
- Connie Great. Thank you so much for your feedback, and we'll definitely take all of your suggestions into consideration.
- Karen Thank you.
- Connie Operator, are there any other questions in queue?
- Moderator Not at this time.
- Connie Great. Thank you. So, while we're on this topic of funding and fees, we'd like to hear about any thoughts or challenges that you may have. We realize that federal funding has been decreasing over the years, and we at HUD have been working to come up with sustainable funding models to support your housing counseling. So, while we're in the process of revising the handbook, we're also thinking about policies regarding fees and funding.
- While the issue of funding and collecting fees is something that many agencies have brought to our attention, and many of you have challenges with funding, the fees that housing counseling agencies collect usually account for a small percentage of funding for operating expenses and all of

the counseling services that you provide, and we also know that many agencies waive or reduce fees for clients who cannot afford to pay them. And some of you may also be thinking about increasing fees and aren't sure if it's a good idea, or you may not be sure if the fees that you're thinking about may be reasonable. And also most housing counseling agencies have modest budgets for counseling and education, and you rely on a limited number of sources for funding.

So, we're wondering for those of you on the call today if you're having any of these challenges. If you are, can you share with us some of your thoughts and what some of those challenges might be. If the operator could please open the lines again.

Moderator [Operator instructions.] And we do not have anyone queuing up at this time.

Connie Okay. Thanks.

Moderator We do have one that just queued up here. It comes from Line 572. Sharon, please go ahead.

Sharon Hi. Sorry to come in late. I was hoping that other people would comment on this, because I think that this is a big issue and we've talked about it throughout some of the conversations. Karen mentioned that she's hired an intake and then a reporting person as far as reporting into the systems and stuff like that, and she doesn't have the funding for that. And I think over the last five years we've seen a significant reduction, even at the state level, of funding being allocated to these programs, and we're asking the agencies to do more with less.

So, I'm always looking at ways of streamlining the process, and it seems like more and more we're adding to it rather than reducing the processes. So, I think that this is a huge issue, and I wouldn't mind seeing some type of a team brought together to discuss how we can look at maybe obtaining more funding, and reducing the requirements that go along with this that are impacting these local communities that are actually providing the services.

But also, I always look at a specific fee for the service that they're providing, and it seems like it would be a little more streamlined if it was a specific dollar amount allocated and then the grant application was based on actual clients that they've served and then an actual dollar amount tied

to that, similar to what the FSS, the Family Self-Sufficiency application process is like.

Connie Thank you for your comments, Sharon. We definitely hear what you're saying, and many of our agencies echo what you said as well.

Moderator We do have a couple more that have queued up. The next comes from Line 632. Please go ahead.

Connie Hello.

Moderator Line 632, your line is open. We'll go to the next line, and that comes from the Line 635. Please go ahead.

Line 635 Yes. Can you hear me?

Connie Yes, I can. Thank you for calling.

Line 635 I guess I would echo all of the concerns that Sharon brought up in terms of funding, that it is a significant issue. And one thing that I would draw back to as well is in terms of service delivery, that we talked about earlier, and what our clients are preferring, whether it's in-person or over the phone. One of the issues that we see isn't necessarily what the clients are preferring, but what are we able to provide.

And, again, as it relates to funding, we in the past had had up to eight regional offices in our state, and now we're down to three based on the ability to support those number of offices. It costs more to staff a regional person and staff a regional office than it does have an additional counselor at our main office.

And so one of the things that we wrestle with is how much availability can we have for in-person counseling in some of those more remote areas. And again if we're sending a staff person out there once a week, once a month, they're able to maybe serve five clients, where if they were to stay home at the main office and counsel, they'd be able to serve ten clients. So, is there a desire for in-person counseling in some of those locations? There certainly is. But we often find it difficult to provide a counselor to be there and do in-person counseling based on the funding.

Connie Okay. Thank you very much for your comments.

Moderator [Operator instructions.] Our next question comes from the line of 592. Please go ahead.

Sophie Hi. This is Sophie from New Jersey.

Connie Hi, Sophie.

Sophie In New Jersey we've been cut back, the same as the last caller, a lot in funding. The reporting requirement with the PARs is very time consuming. I'm not sure if there's a way to eliminate that. I question myself every time we have an audit, our audit passes our fiscal department, it passes the counseling portion, so why are we also required to create the PARs to count every minute that we do, whether we do it for closure, first-time home buyer, or financial capability. The money that we are given through our sub-grantee is not enough for the time that it takes for that billing.

Connie Thank you, Sophie, for your comments. Yes, those are a lot of concerns. Those are the same concerns that many agencies have. And they are the current requirements, so we're listening to all of you, and that's something that we'll continue to work on and continue to have discussions with all our agencies.

Sophie And then the client management system gives you a detailed breakdown of how many hours and minutes we're spending with the clients that we're billing to HUD, then why are there other forms and other things necessary to receive the funding?

Connie Thank you for your questions. Those are things that we're hearing from many agencies like yours, and we'll continue to try to work with everyone on fulfilling their reporting requirements. And we'll work on how to better meet everyone's needs as we—

M Hello?

Connie Hello. I'm sorry. I think I got cut off for a few seconds.

M Okay.

Connie Are there any other questions, or is Sophie still on the line?

M I think I got cut off with you. I didn't hear anything else.

- Connie Okay.
- Moderator Right now we don't have anyone else in queue, but I think Sophie's line did disconnect here accidentally. I'll let you know when they rejoin. But right now we do not have any other questions or comments in queue.
- Connie Okay. Hearing none, we can move on to the next slide, please. Okay. Let's talk briefly about the appeals process. This is in Chapter 8 of the handbook. The appeals process doesn't come up very often, but this is an important process that housing counseling agencies should be aware of. Chapter 8 is a brief chapter, and most agencies probably will not have questions on the appeals process until the need comes up. Well, one of those situations where the appeals process would come up would be if HUD sends a housing counseling agency a termination letter. Well, you might wonder what can the agency do if they get a termination letter? They might want to appeal that termination. And to appeal the agency must submit a written appeal which must be received within 30 days of HUD's decision.
- There are other situations where the appeals process might come up. So, with that said, we'd like to know if you have any questions or concerns about the appeals process that we should include in the handbook? If the operator could open the lines, please.
- Moderator Okay. [Operator instructions.] And allowing a few moments here, I do not have anyone queuing up.
- Connie Thank you.
- Moderator Oh, we do have one that's queued up here. One moment. [Operator instructions.] So far we haven't had anyone queue up. [Operator instructions.] And we have no questions in queue.
- Connie Okay. Thank you. So, we can move ahead. We've covered quite a bit of information today, and we appreciate you taking the time to participate in today's stakeholder feedback meeting. Do you have any additional suggestions or comments that could further improve the handbook, or are there any other topics that you would like to see addressed on another call?
- So, just in case you don't have a handbook in front of you, here are some of the topics. Chapter 1 is General Program Information. Chapter 2

covers Obtaining HUD Approval. Chapter 3 is Delivery of Housing Counseling Services, followed by Reverse Mortgage Housing Counseling. Chapter 5, which Stephanie covered earlier, is Recordkeeping and Reporting. Chapter 6 is Performance Criteria and Monitoring. And again, Chapter 7 is Funding, and Chapter 8 is Appeals.

So, if you have any additional suggestions or comments, please let us know. And you can call in, or you can send your comments through the written queue. Or, if you think of something later you can always send us an email to housing.counseling@hud.gov. Does the operator have anyone in the queue right now?

Moderator

Currently we have no one in queue for a question or a comment.

Connie

Okay. Thank you. So, with that, I can hand it back to Stephanie for closing.

Stephanie

Thank you, Connie, very much, for covering all that material. It's a lot of good information. And I'd like to extend my thanks to all of you who are on the call. We appreciate all of your feedback and telling us like it is, and telling us what your experiences are, many of which we have heard. But hearing them again just increases the priority level to try to address them, and you've given us some food for thought that we had not considered or anticipated.

So, we have gone over our allotted time, and appreciate those of you who were able to stay on for an additional ten minutes or so. We have, at the end of the presentation, our last slide, which gives you the housing counseling mailbox again, housing.counseling@hud.gov, to which you can email questions or comments. If we were not able to address your questions or comments during this call, or didn't address your questions or comments that you sent to the feedback mailbox, we'll try to get to those at another time.

If you think of anything else that you would like for us to cover on a stakeholder call, let us know. This will not be the last one that we'll convene. And also at some point we will invite written comment. A lot of times you are able to put your thoughts and expressions into words on paper a little bit better and just have the handbook available to you as a reference as you're forming your feedback.

So, thank you again. Enjoy the rest of your afternoon. And we appreciate all the work that you do for the Housing Counseling Program and clients. Goodbye.

Moderator

Ladies and gentlemen, that does conclude today's conference. I want to thank you for your participation and for using AT&T Executive TeleConference. You may now disconnect.