



After the Final Compliance Date: Common Questions about the Housing Counselor Certification

Following the final compliance date, August 1, 2021, housing counseling required under or provided in connection with all HUD programs must be provided by HUD certified housing counselors. This document provides answers to some common questions that agencies have about the final compliance date and its implications. More detail on these questions and how to manage counselor certification after the final compliance date is available in the referenced [frequently asked questions \(FAQs\)](#) and on the [Managing Certification After the Final Compliance Date page](#).

HUD will contact HCA leadership after August 1, 2021, to inactivate HCAs who do not have any HUD certified housing counselors. HUD may change an HCA's status to inactive, in lieu of termination, for up to 90 days.

Question	Answer
What happens if a HUD Certified Housing Counselor leaves my agency?	When a HUD certified housing counselor is no longer employed by a participating HCA, the HCA must notify their HUD POC within 15 days of the change in staffing. If this is the sole counselor for the HCA, the HCA will be made inactive. The HCA's application coordinator must also validate the end of the counselor's employment in FHA Connection (FHAC).
I am no longer employed at the same agency I was when I got certified. How can I update my employer on my housing counselor certificate?	If a counselor becomes employed at a new agency, they must apply for certification using their new employer's HCS ID in FHAC . The coordinator at the new agency must validate their employment. The former employer's FHAC application coordinator must validate the end of the counselor's employment in FHAC once the counselor leaves the agency .
I have at least one housing counselor on staff that is not yet HUD certified. What activities can they perform?	Non-certified staff can perform routine administrative duties until they are HUD certified. Administrative duties include intake, answering phones, scheduling counseling appointments, gathering documentation from clients, etc. Non-certified staff may shadow certified staff as a training opportunity.
How does the final compliance date affect 9902 reporting?	Starting August 1, 2021, HUD participating HCAs may only report one-on-one counseling activities conducted by a HUD certified housing counselor.
We are a new agency seeking HUD approval for the first time. When do we need to have a housing counselor on staff?	Agencies applying for approval to HUD's Comprehensive Housing Counseling Program must have a housing counselor that has passed the HUD Housing Counselor Certification Exam prior to application submission. For more information on HUD approval, visit How to Become a HUD-Approved Housing Counseling Agency .
Is my agency able to employ certified counselors as contract employees?	No, each Participating Agency must have a sufficient number of their own HUD certified housing counselors working for ¹ the agency to carry out their Housing Counseling Work Plan. An agency cannot rely on an agreement with another agency to use its housing counselors to satisfy the staffing requirements necessary to participate in HUD's Housing Counseling Program.
Does my certification expire, or do I need to recertify in the future?	Counselors do not need to retake the exam once they have passed. However, certification will expire when a counselor no longer works for a HUD-approved housing counseling agency. There are currently no continuing education requirements, though housing counseling staff must maintain their housing counseling knowledge .
Will the certification exam still be available after the final compliance date?	Yes, the exam will remain available for new housing counselors or housing counselors still working toward the certification requirement.

¹ The term "works for" includes both paid employees and volunteers of a Participating Agency, on a full- or part-time basis. If an agency validates the employment of a HUD certified housing counselor, the agency will be responsible for any housing counseling activity conducted by the housing counselor pursuant to that certification. The agency will also be responsible for ensuring that the counselor's activities comply with all regulations and requirements of HUD's Housing Counseling program, including requirements pertaining to conflicts of interest and subcontracting.