



DEVELOPING A HOUSING COUNSELING WORK PLAN
FOR HUD APPROVAL

One of the most important elements of an application for HUD approval is a housing counseling work plan. It is a roadmap for reviewers to better understand how your agency offers housing counseling services.

This sample work plan utilizes a fictional housing counseling agency called "ABC Housing Counseling Inc." located in a fictional community called the "City of Anytown". Additional fictitious entities mentioned in this sample include "XYZ Anytown Legal Services Inc.", "Anytown Shelter Services, Inc." and "123 Housing Counseling Intermediary Inc." as well as Departments and Agencies of the fictitious City of Anytown.

Sample ABC Housing Counseling Inc. Work plan:

TARGET COMMUNITY:

Essential elements include a complete and concise description of the target population (include statistics and references), why the agency selected this area as its target population, and why the agency's services are needed if other housing counseling agencies also offer services in the area.

In this section you should list demographic information including age of housing, median income, poverty, education, etc. in order to show who will be your targeted audience. Information can be obtained from the HUD Community Consolidated Plan, Census Bureau, community history, social-economic makeup, demographics and employment trends. Be sure to identify in this section if you are serving rural areas.

See below sample of information describing your community:

- The target audience is drawn from a variety of partnerships in the community, as well as referrals from previous program participants. Community partnerships include the

Three horizontal lines for text entry.

You may wish to do an attachment with a list of your community partners and contact information or the link to the list on your website.

For each county/city if smaller area includes the following type of info:

County in 2014 had a population of with % of the population ages 18-64. The population of the area is % white with % having at least a high school education. The median household income for the area in 2013 was \$ yielding % of the population at or below poverty level.

According to the \_\_\_\_\_ County’s Comprehensive Plan approved \_\_\_\_\_  
\_\_\_\_\_ County in 2014 had \_\_\_\_\_ housing units with \_\_\_\_\_% single  
family detached and the balance multi-unit structures. The median age for housing stock  
are those built in 20\_\_\_ yielding potential for increasing need for counseling related to  
rehabilitation, refinance, and post purchase maintenance. The homeownership rate is  
\_\_\_\_\_% yielding some new homeownership education needs as well as post purchase  
counseling. The bankruptcy rate for the county has increased by \_\_\_\_\_% in the past 2  
years, indicating a need for financial management and possibly credit repair counseling.

The Consolidated Plan for \_\_\_\_\_ County indicated a need for \_\_\_\_\_ units of new  
single family housing and \_\_\_\_\_ rental units in the next \_\_\_\_ years. This would point  
to a potential target audience for new homebuyer education as well as rental assistance  
and potential fair housing needs.

**Be sure to add anything that is unique to the target audience of the area.**

(Example If you have a high % of disabled, explain why that might be (large number of  
facilities, higher disability pay in state, hot springs, etc.)

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**Example:**

Our target population are the 5,000 residents of the City of Anytown. According to 2010 Census  
data, tracks 201.11 through 220.12, this area’s characteristics include an average median income  
of \$22,000 with a population of comprised of 25% Hispanic (including populations of  
Guatemalan and Cuban descent with English as a second language), 23% Caucasian (including  
500 resettled refugees from Bosnia) 10% Native American...; approximately 60% of the  
population are renters. According to the City of Anytown’s 5 year consolidated plan,  
approximately 45% of the housing in this area is sub-standard and the area has been targeted by  
the city for redevelopment.

Our agency was chartered in 2000 specifically for the purpose of improving the housing  
conditions of low-income families in the City of Anytown. We targeted the residents of the City  
of Anytown population because of their income levels. Also, the City’s redevelopment efforts in  
the area include several affordable housing projects providing a way for our clients to meet their  
housing needs without having to leave the City of Anytown.

XYZ Anytown Legal Services Inc. also offers housing counseling services to residents in City of  
Anytown. However, this agency’s emphasis is to provide legal services relating to  
landlord/tenant disputes or fair housing issues. They do not offer the level of pre-purchase and  
rental services we will offer.

Attached is a list of all zip code area of the target population and a map indicating the location of our facility and the zip codes.

**Housing Needs and Problems:**

What are the specific housing problems of the target population? What barriers do they face? What are problems are unique to this population base? Cite specific sources for your information.

**Example:**

As stated previously, 45% of the target population are renters living in substandard housing. Last year, our agency helped organize several community events including the City of Anytime Founder’s Day, Thanksgiving Parade, and Independence Day celebrations. A majority of the attendees were polled about their housing needs. Over 70% responded they needed larger living quarters. 50% described their present residences as over 40 years old. Problems cited included lack of working plumbing, electric, and/or heating and cooling systems. 60% of the population described the desire to own their own home. An overwhelming 75% of the respondents indicated they would like find better housing in the City of Anytown.

This information is also collaborated by a poll reported in the Anytown Daily Sun, published May 10, 2009. The article was entitled, “Where to Live in Anytown” and cited a study by Anytown Community College that reported over 80% of the residents polled in the City of Anytown felt “like they lived in substandard housing”.

According to the 2010 census data, 30% of the population does not speak English as a first language. Our polls also revealed that 35% of the population did not know how to use the Internet and only 25% owned their own computers or had access to the Internet at their place of residence or workplace. Over 65% of attendees to our homebuyer education classes during the past year did not have access to credit or traditional banking services.

All of this information results in the identification of three major housing problems – need for rental assistance to help clients relocate to federally-subsided programs such as Section 8 vouchers or project based subsidy complexes; need for both short term and long term pre-purchase counseling, and post purchase counseling with an emphasis on property rehabilitation.

Two of our counselors are fluent in Spanish and Bosnian we have a contractual agreement with Anytown Community College to provide interpreters for other languages spoken by residents in City of Anytown. A copy of the contract is attached to this application.

**HOUSING COUNSELING SERVICES:**

**List the process for your one-on-one and then outline the specific services that you offer.**

A portion of the application is critical as it ties together the needs of the target population with your agency’s services. It should describe in detail anticipated workload, staff resources, and specific information on how clients with be counseled in accordance with HUD Handbook 7610.1 Rev-5. Please review Chapter 3 and ensure your counseling activities comply with

HUD's requirements. Plan should include steps used to counsel; discussion of alternatives (including FHA); Action plan; financial analysis; referrals; Follow-up process; Client Files; and Termination of counseling.

Our agency offers three different types of programs – “Safe Harbor in Anytown”, the “ABC Step Up to Homeownership Program”, and “No Place Like an Anytown Home”.

**Process for One-on-one Counseling:**

- Intake: Application form is completed by client, reviewed by receptionist prior to scheduling meeting with counselor.
- Action Plan: At the first meeting an action plan is developed including the following:
  - Goal including any issues that must be resolved
  - Steps for reaching goal and who will be responsible for each step
  - Estimated timeframe for steps
- Financial Analysis:
  - Obtain and verify budget
  - Discuss ways to save money, cut expenses
  - Develop budget that client can afford
- Follow-Up:
  - ABC Counseling Inc. makes reasonable efforts to have follow-up communication with the client, to assure that the client is progressing toward his or her housing goal, to modify or terminate housing counseling, and to learn and report outcomes. The client follow-up is conducted by a qualified housing counselor who makes reasonable efforts to conduct a verbal (in person or via phone) follow-up session within the first 60 days of no client contact. If unsuccessful, after two attempts to conduct a verbal follow-up session, the counselor writes a letter or sends an e-mail to the client stating that such efforts have been made and informs the client that there is a need for follow-up communication. The letter requests that the client contact the housing counseling agency no later than 30 days from the date of the letter, to help the agency assess if additional client services are necessary to assist them in achieving their housing goals or if services should be terminated.
- Termination:
  - Client file will be terminated based on HUD's seven outcomes when the client's issue is resolved, goal is met, or the following follow-up yields the need to terminate.

**The following are Examples of outlining one-on-one services offered by agency:**

**RENTAL COUNSELING:**

The “Safe Harbor in Anytown Program” offers rental assistance counseling to those clients seeking housing counseling rental assistance. It is designed to match client housing needs with

locally available housing projects. Clients usually receive one to two hours of housing counseling. Prior to the appointment, clients are given contact information on where to obtain a free credit report and advised to bring copies of pay stubs or other income sources to the screening interview. At the screening interview, the housing counselor explains the agency's role in helping the client locate affordable, safe housing. The client signs a disclosure form (copy attached) acknowledging that the agency does not endorse any specific housing program or complex, and does not have a financial interest in any project or complex the client may be referred to.

The counselor then determines family size, income, and housing need or problem. The counselor will also review the credit report if available and discuss any issues that may cause a potential landlord to reject the client's application. The counselor will first ascertain whether the family is in a crisis situation (eviction, homelessness, or unsafe housing situation). Those needing immediate placement will be referred to both Anytown Shelter Services, Inc. and "the City of Anytown's Transitional Housing Program" or the "City of Anytown's Faith-based "Charity Begins at Home Project".

Clients not in crisis will be evaluated to determine what programs or affordable housing projects best meet their housing needs. This evaluation will include a budget analysis, review of credit issues, and discussion of the client's housing needs and desires (such as number of bedrooms, area of town they wish to live in, amenities, etc.) The counselor will outline all options available to the client then refer the client to the appropriate agency (For example the City of Anytown Housing Authority for those clients seeking portable Section 8 vouchers or public housing units.) or affordable housing complexes with available units. The counselor will also tell a client when a housing need is unobtainable. Clients needing legal advice as a result of landlord disputes will be referred to XYZ Anytown Legal Services Inc. Clients with discrimination complaints will be referred to the local Fair Housing Point of Contact at the nearest HUD Office. All clients will receive a copy of the Counseling Plan outlining the steps they will need to take to resolve their housing problem at the end of the session. The client will sign the Counseling Plan and receives a copy. During the initial session, the client will also be provided a copy of "Your Rights and Responsibilities as a Tenant".

Approximately 30 days after the initial counseling session, the counselor will attempt to contact the client for follow-up either through a telephone call or letter. If no contact is made, the file is documented and counseling is terminated. If contact is made, the counselor will notate the progress of the client in resolving his/her housing problems and whether further counseling is needed or desired. The counselor will then either schedule a follow-up appointment or terminate counseling and document the file accordingly.

Our agency has one full time counselor, Ms. Smith, assigned to work with rental clients. In the twelve months preceding this application, our agency counseled 125 clients in this category. In addition to her counseling responsibilities, Ms. Smith is also required to maintain monthly contact with all agencies and apartment complexes the agency refers clients to in an effort to maintain the most up to date information. She also conducts Internet searches of [www.hud.gov](http://www.hud.gov) to locate the most up to date pertinent information about HUD programs. All total, Ms. Smith dedicates 75% of her time to rental counseling related activities. She has no further duties

assigned, as an increase in her workload is anticipated if this application is approved.

## **MORTGAGE DELINQUENCY/FORECLOSURE PREVENTION SERVICES:**

No Place Like an Anytown Home:

ABC Counseling Agency Inc. is a partner with the City of Anytown's "No Place Like an Anytown Home". As a part of the program, we have committed that all of our counselors shall have strong practical as well as theoretical knowledge in the area of mortgage default and/or foreclosure intervention counseling as it relates to the current rapid changing industry practices concerning loss migration including: Repayment, partial claim, forbearance, modification, refinance, deed-in-lieu, etc.

### **Referrals to other agencies and community resources**

- Referrals take about 30 minutes per client
- See attached Referral List on page 4 for details

### **Steps Used to Analyze Client's Housing Needs & Problems:**

- Initial screening interview to determine if client is eligible for service requested
- One-on-one meeting with counselor to do intake application which gathers demographic, employment, income, debt, housing needs and any current issues
- Housing Counselor will meet with the client one-on-one and review their needs to determine what type of assistance is needed.
- A budget worksheet is given to the client to complete prior to the next meeting
- Client asked to sign "Client Authorization for Counseling Services" which includes agreement to participate in the housing counseling program, release of information and release of liability for services rendered.
- Develop an action plan listing required steps, responsibility for completing and dates. Signed by the client and counselor or referral to other agency
- Follow-up Activities (describe when and how often)
- Clients are terminated if:
  - Needs are resolved
  - Agency determines that further counseling will not meet the client's need or problem
  - Client terminates counseling
  - Client does not follow housing counseling plan
  - Contact is lost with the client

### **Projections and Expected Counseling Outcomes/Impacts:**

*(Identify for the types of counseling activities identify above).* Your 9902 will contain projections in sections 8 and 9 and should match the types of counseling outlined in your work plan. Additionally, you should identify the types of impacts you expect as identified in section 10 of Form HUD-9902.

**EDUCATION WORKSHOPS:** *(Identify all types of education and identify setup of session)*

- List here the general process for workshops
- Intake sign-up information
- Assign to class
- Attend workshop
- Gather demographics and information for data points
- Teach course
- Follow-up for one-on-one counseling
- Preparation of file for workshop

List workshops that you offer with duration, how workshop is delivered and major topics covered, and outcomes anticipate.

**Example:**

**PREPURCHASE EDUCATION:**

Step Up to Homeownership Programs:

- Offer 8-hr pre-purchase workshop once a month in English and once a month in Spanish every Saturday at the City of Anytown Community Center from 8:00 am – 4:00 pm
- Pre-register participants – (explain the process....)
- Education workshop curriculum includes information covering the following topics: name the topics and continue to list the steps pertaining to pre-purchase activities.
- Individual counseling may cover any of the topics described above plus any additional topics as needed by potential homebuyers...etc.
- Follow-up (describe how often)
- Anticipate that client will be able to understand contract and closing documents and process to purchase a home

**Referrals to other agencies and community resources:**

- Referrals take about 30 minutes per client
- Must include actual counseling
- See attached Referral List on page 3 for details

**Record Keeping:**

**On-Line**

- Client Management System (CMS) (Insert name of system) software is used to track the client and store information
- The online program is password protected and only authorized users have access to the program.

**Hard Copy Files, if applicable:**

- A central file for each client will be used to store hard copies. Files are stored in a secure filing cabinet and the counselor's office is locked in the evenings.
- All meetings and phone calls with the client are logged.

- Any letters, correspondence, or copies of client documents (loan docs, etc.) to or on behalf of the client are kept in their confidential file.

**Individual File documentation includes:**

- File Number
- Date activity occurred
- Start and end time of session
- Name of housing counselor
- Client's name, address and phone number
- FHA case number if applicable
- HUD project number or name for clients renting HUD-assisted housing
- HUD client number for cases receiving HUD funding for housing counseling
- Client Action Plan
- Screening interview information
- Financial Analysis
- Disclosure/Conflict of Interest statements given to client
- Alternatives discussed
- Log of activities performed on behalf of the client (stored online)
- Required data elements are kept in the on-line system
- Copies of pertinent records and correspondence
- Statement about how the person qualifies as a client
- Follow Up Activities
- Termination Date (date client file closed and reason for termination)

**Group Files Documentation Includes:**

- File Number
- Attendees Name (First and Last)
- Attendees Address (City, state and zip code)
- Attendees Phone number
- Attendee Race
- Attendee Ethnicity
- Attendee Income Level (AMI)
- Attendee Referred by
- Attendee First Time Home Buyer (yes or no)
- Signature of each client
- Amount of fee charged, if applicable
- Date, duration and location of workshop
- Counselor and/or Instructors
- Workshop Subject
- Conflict of Interest Statement

**Credit Reports and Confidentiality:**

- All credit files should be kept in a locked filing cabinet along with other supporting documentation such as tax returns, paystubs and any forms with social security numbers. The application and demographic information completed on the client and the client housing counseling plan should be documented in the CMS system.



- Both computer and hard copies of logs (optional for hard copies) are kept and include the required information
- Each Counselor has their own pass code to enter their client files on the computer
- All printed information is kept in client files in a locked office
- All one-on-one credit counseling is done in a private area

**Conflict of Interest:** (Insert Name of Agency) will provide all clients with information that they are free to obtain housing counseling from the agency of their choice. The information is printed on our brochure so all potential clients receive it. We also include a statement as part of their authorization materials.

“The counseling services, lending products, weatherization, rehabilitation, affordable housing and other forms of assistance that may be offered by (Insert Name of Agency), its subsidiaries, affiliates or directors, officers employees, agents or partners may also be offered by other providers and you are under no obligation to utilize services from (Insert Name of Agency), regardless of the recommendations made by counselors. Our financial industry partners include 123 Housing Counseling Intermediary Inc., Housing and Urban Development, and The City of Anytown.”

**Supervisory Monitoring and Documentation for Quality Control Plan Compliance:**

(Write out step by step the quality control procedures the agency will follow).

1. These reports and monitoring procedure will assure records of Quality control findings and actions taken are maintained.
2. All deficiencies are provided to senior management.
3. Prompt effective corrective measures are taken by senior management and documented when deficiencies are identified.
4. Senior management will review monthly x percent of counselor(s) client files.
5. Additional information as needed.

**Example:**

ABC Housing Counseling Inc.’s Director will produce quarterly reports that identify for their senior executive management and Board of Directors areas of deficiency, including violations of HUD regulations and ABC’s own policies and procedures.

**Supervisory Monitoring and Documentation for Information Security Plan Compliance:**

The plan should include oversight to incorporate the basic requirements of the Gramm Leach Bliley (GLB) Act of 1999. Information includes all hard copy and digital storage of client information. The plan should include ways to monitor and document the main areas outlined in the GLB Act. The Federal Trade Commission (FTC) has posted on-line a [summary of the act](#) for reference purposes.

**LIMITED ENGLISH PROFICIENCY:**

The housing counseling work plan must describe how the agency serves non-English speaking or clients with limited English proficiency. Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP), seeks to improve access to Federally assisted services, programs and benefits for individuals with limited English proficiency.

Agencies participating in the Housing Counseling Program must seek to provide access to program benefits and information to LEP individuals through language assistance services, in accordance with Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons published on the Federal Register on January 22, 2007 (72 FR 2732). For assistance and information regarding LEP obligations, go to [www.lep.gov](http://www.lep.gov).

**Example:**

ABC Housing Counseling Inc.'s plan serves non-English speaking or clients with limited English proficiency. We provide access to program benefits and information to LEP individuals through language assistance services at no cost to the client. The firm has counselors that speak Spanish and Bosnian. Translators will be hired to accommodate other languages which might be needed. All documents are printed in Spanish and Bosnian, and a translation of other languages can be provided as needed.

**ALTERNATIVE SETTINGS/FORMAT:**

The counseling should take place in a location convenient for the client and in a format that best meets their needs. Face-to-face, phone and secure internet, skype, virtual and video counseling are all appropriate alternatives and the counselor should use the setting and format that works best for the client.

**Accommodation of Disabilities:**

All disabilities are managed on an as needed basis. ABC Housing Counseling Inc. has specific accommodations for the following needs, and meets additional ones as the situation requires:

- Sight and hearing impaired
- Elderly (phone, meet at their house, go and pick them up for meeting)
- Accessibility needs

**FEE STRUCTURE:**

(If charging, identify what counseling activity will be charged) The fees are either a charge structure and explain how its determined if it is market cost or that state that the agency does not charge fees. *(Note – a HUD participating counseling agency is prohibited to charge any fee for default/foreclosure prevention counseling or for homeless counseling per HUD policies).*

**AFFIRMATIVELY FURHER FAIR HOUSING:**

In the 7610.1 Handbook Rev. 5, HUD requires that funding recipients have a duty to Affirmatively Further Fair Housing (AFFH) in all its activities. You must affirmatively furthering fair housing for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability and familiar status. Housing counseling agencies are expected to help remedy discrimination in housing and promote fair housing rights and fair housing choice.

You will want to review the Consolidated Plan and Analysis of Impediments (Changing to AFFH Assessment) to identify the primary fair housing issues for your area and address in your plan ways you can assist in overcoming the issues.

**Example:**

The Consolidated Plan for the City of Anytown lists lack of access to community assets and segregation of affordable housing as concerns. They will be building 100 affordable scattered site units for sale within our geographic region. Our agency will contact clients eligible for the units and offer housing counseling services. We will work with the City of Anytown to provide education opportunities on how to access community assets for the area.

**MARKETING AND OUTREACH:**

The section should outline the major ways in which you will reach out to your target audience. The plan should also incorporate how you will reach those least like to come to you, especially large minority audiences.

**Example:**

ABC Counseling Agency Inc. will utilize public service announcements on local radio, send articles monthly to the Anytown Sentinel for name recognition, and take out ads in newspapers with large minority readerships to reach our minority community. We will contact major employers in the area including schools, government, the hospital and major retailers to determine if there is a way to partner through educational opportunities.

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**Signed by Executive or Program Director for  
Their Housing Counseling Program**

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**Date the plan**