



HUD INTERMEDIARY TOOLKIT: HUD ELIGIBILITY CRITERIA

OFFICE OF
HOUSING COUNSELING
LET'S MAKE HOME HAPPEN



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SECTION 1

TOOLKIT INTRODUCTION

Toolkit Introduction

The U.S. Department of Housing and Urban Development's (HUD's) Housing Counseling Program currently operates through a nationwide network of over 2,200 HUD-approved Housing Counseling Agencies (HCAs) located in urban, suburban, and rural communities in all 50 states and territories. Intermediary organizations include: State Housing Finance Agencies, Multi-state Organizations, and Regional and National Intermediaries operate at the national, regional, and state levels to oversee and support networks of HCAs.

Intermediaries are encouraged to develop networks with qualified HCAs to meet local housing counseling needs. In that capacity, Intermediaries must review and approve HCAs for participation in their networks. This approval process is similar to the process used by HUD to approve HCAs in that Intermediaries must apply HUD's eligibility criteria as well as their own criteria to determine suitability for their networks. When an Intermediary approves an HCA for its network, the HCA becomes part of HUD's national network of participating HCAs.

This toolkit describes the process that an Intermediary should follow to determine HCA eligibility for its network, and it provides a [Network Eligibility Assessment Tool](#), as well as additional information and tips for implementing an effective process.

Learning Objectives

Users of this toolkit will be able to:

- Follow standard processes for bringing new HCAs into their network and assessing current affiliates.
- Identify the criteria Intermediaries will use, in addition to HUD's criteria, to approve HCAs for their network.
- Assess the capacity, appropriateness, and need for a potential HCA in the network.
- Identify the critical resources related to the network approval process.

Toolkit Contents

- [Adding an Agency to Your Housing Counseling Network](#)
- [Network Eligibility Assessment Tool](#)
- [Summary of HUD's Eligibility Criteria for HCAs](#)
- [Intermediary Criteria](#)
- [Intermediary Tips for Effectively Vetting Housing Counseling Agencies](#)
- [Resource List](#)

Network Eligibility Toolkit

This toolkit is designed to provide useful information, tools, and strategies for Intermediaries seeking to implement an effective eligibility assessment process for potential and current affiliates.

Other Resources for Intermediaries

Other toolkits in this series provide valuable information for Intermediaries. These toolkits, and other resources such as the regulations, handbooks, and FAQs, are available from the HUD Exchange at <https://www.hudexchange.info/programs/housing-counseling/>. The [Housing Counseling Agency Eligibility Tool](#) was launched in 2017. The tool allows a potential HCA to self-assess if they meet the basic requirements to apply to become a HUD-approved Housing Counseling Agency either through HUD or through an Intermediary. This tool may also be helpful for existing Intermediaries who are currently participating in HUD's Housing Counseling program, or new Intermediaries who want to review the HUD eligibility criteria. The link to the tool is also provided in the resource section of this toolkit.

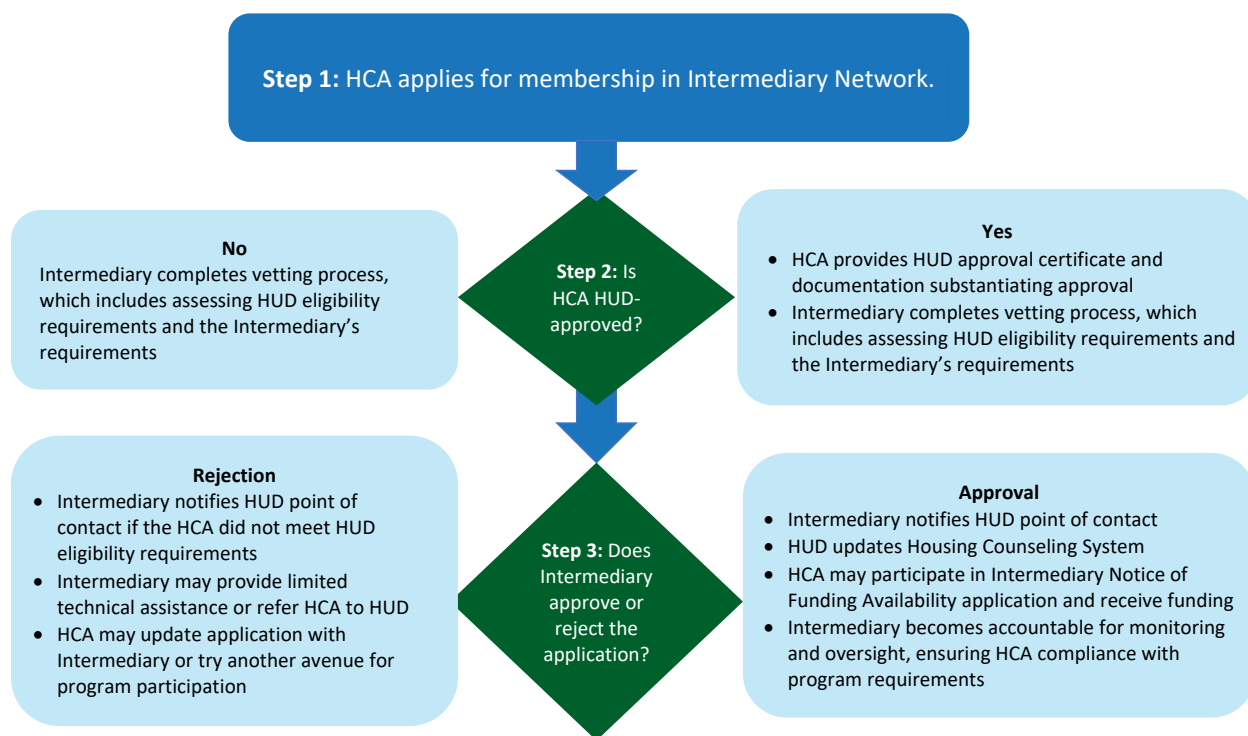


SECTION 2

ADDING AN AGENCY TO YOUR HUD HOUSING COUNSELING NETWORK

Adding an Agency to Your HUD Housing Counseling Network

Intermediaries should regularly assess their networks to ensure they are meeting the housing counseling needs in their areas. As they expand their networks to achieve objectives, such as better geographic coverage and a full range of counseling services, they will need to vet HCAs that they wish to add to their networks. Some agencies will already be HUD-approved, while others will not. The Intermediary must vet all these agencies to confirm their conformance with HUD's approval criteria as well as their own Intermediary-specific criteria and priorities. After acceptance in the network, Intermediaries must monitor network affiliates to ensure that they meet HUD criteria and the Intermediary's goals. The flowchart illustrates the process for approving agencies for your HUD Housing Counseling Network. Each step is described in more detail below on the requirements and recommendations (i.e., best practices).



Step 1: HCA Applies for Membership in the Intermediary's Network

Required: Intermediaries must have a written process for accepting documentation from HCAs to be added to HUD Housing Counseling Network. This could be a formal application or another mechanism for collecting information. The process must reflect HUD's and the Intermediary's eligibility criteria and identify any required documentation and additional steps required to complete the application process. The application must require HUD-approved HCAs to provide evidence of their HUD approval and the documentation substantiating approval.

Recommended: The Intermediary may consider using the HUD 9900 form as the basis for its application and supplement it with any additional network criteria. The Intermediary's network criteria, and the standards of proof for establishing compliance with these criteria, should be documented in the Intermediary's quality control plan.

Step 2: Intermediary Reviews the Application

Required: The Intermediary must review the application and accompanying documentation for compliance with HUD and network eligibility criteria. If the HCA is not HUD-approved, the Intermediary must confirm the HCA can demonstrate compliance with HUD criteria. If the HCA is already HUD approved, the Intermediary should reconfirm that the HCA can still document its compliance with HUD criteria.

Recommended: In addition to the review of documents, the Intermediary may include the following steps in its vetting process:

- **Research and Verify Information.** Check the information included in the HCA application. For example, if the applicant agency states that there are no other counseling agencies in the area, verify this by looking online at HUD's website and other sources.
- **Conduct a Site Visit.** A site visit allows the Intermediary to observe agency operations, observe counseling sessions, and interview staff. If a site visit is not possible, plan to collect pictures of the facility to ensure that requirements, such as site accessibility, are properly satisfied. Intermediaries should include funds in their annual budgets to allow for such visits.
- **Conduct Phone Interviews with Staff.** If a site visit is not feasible, interview agency staff by phone. Interview questions should probe staff experience, knowledge of HUD's counseling program requirements, and familiarity with the local area and its service needs.

Step 3: Intermediary Approves or Rejects the Application

Required: The Intermediary must notify its HUD point of contact of its decision to accept new HCAs in its network. This allows HUD to update the Housing Counseling System (HCS) with the names of any newly participating HCAs. The Intermediary *should* also notify HUD of any HCAs that do not meet HUD criteria so that HUD can be aware of any HUD-approved HCAs or new HCAs that do not meet HUD eligibility criteria.

At this point, the newly approved HCA becomes eligible to participate in the Intermediary's Notice of Funding Availability (NOFA) application, and the Intermediary becomes responsible for ongoing monitoring and oversight of the HCA.

Recommended: We advise using a formal letter to the new agency communicating the decisions:

- If the agency is approved, the letter should indicate which services the agency is eligible to provide.

- If the agency is not approved, the letter should describe application deficiencies and corrective action needed to become eligible. The Intermediary may choose to provide limited technical assistance (TA) to an unapproved HCA.
- The Intermediary may also reject the HCA without opportunity for corrective action. The letter should include the reasons for rejection, and it can refer the agency to HUD or, if appropriate, to another Intermediary (e.g., an Intermediary they are aware of who is accepting additional agencies and/or needs an agency with a particular counseling niche). Rejection without the opportunity for corrective action may be appropriate if the applicant agency's issues are too significant to correct in a reasonable timeframe.

Intermediaries are also encouraged to conduct an orientation with the new agency to ensure that the agency is aware of the network's requirements, policies, procedures, and expectations.



SECTION 3

NETWORK ELIGIBILITY ASSESSMENT TOOL

Network Eligibility Assessment Tool

Intermediaries are encouraged to use this tool to evaluate HCA applications. It includes HUD eligibility criteria and can be tailored to add the Intermediary's criteria. More information is available in this toolkit on [HUD eligibility criteria and documentation](#) as well as considerations for [Intermediary criteria](#).

| | |
|--|--|
| Applicant Name | |
| Application Submission Date | |
| HUD-Approved HCA | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown |
| Sub-grantee in a HUD-Approved Network | <input type="checkbox"/> Yes (<i>list network name:</i>) <input type="checkbox"/> No <input type="checkbox"/> Unknown |
| Review Type | <input type="checkbox"/> First review <input type="checkbox"/> Corrective action (<i>list date of previous review:</i>) <input type="checkbox"/> Annual review (for existing affiliates) |
| Reviewer Name | |
| Review Signature | |
| Review Date | |
| Application Approved or Denied? | |
| Follow-Up Actions Needed | <i>List any deficiencies and describe necessary corrective actions.</i> |

| Criterion 1: Nonprofit and Tax-Exempt Status | |
|---|--|
| Can the agency show proof of eligible nonprofit and/or tax-exempt status? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Nonprofit: 501(c) letter and tax ID #, OR <input type="checkbox"/> Government: Authorization to provide housing counseling services <u>and</u> operate as unit of general local government and tribe/tribal designated housing entity <input type="checkbox"/> For instrumentalities of government: statute or court opinion <input type="checkbox"/> Articles of incorporation, bylaws, etc. <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |

| Criterion 2: Experience | |
|---|---|
| Can agency document that they administered a housing counseling program in accordance with HUD requirements for at least 1 year? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Disclosure forms <input type="checkbox"/> Agency work plan <input type="checkbox"/> Case file documentation <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 3: Fair Housing and Civil Rights Laws | |
| Does the agency have any unresolved fair housing or civil rights violations? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Self-certification <input type="checkbox"/> Internet research <input type="checkbox"/> Other: _____ |
| Is the agency engaged in at least one affirmatively furthering fair housing (AFFH) activity? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were provided. | <input type="checkbox"/> AFFH education (brochures, fairs, etc.) <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 4: Ineligible Participants | |
| Are HUD-approved counselling staff working in the housing counseling program, all current agency directors, partners, officers, principals, or employees: <ul style="list-style-type: none"> ▪ Suspended or disbarred from participating in federal programs? ▪ Indicted or convicted for a criminal offense that reflects on the responsibility, integrity, or ability of the agency to participate in housing counseling activities? ▪ Subject to any unresolved findings in a federal investigation or any government audit or investigation? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, agency does not meet HUD approval requirements. If you are unsure if the offense is relevant, discuss with HUD.</i> |

| | |
|--|--|
| Indicate which documents were reviewed. | <input type="checkbox"/> List of housing counseling staff and board <input type="checkbox"/> Public records, Internet (e.g., Google searches), System for Award Management, or Limited Denials of Participation search results conducted <input type="checkbox"/> Agency's hiring procedures <input type="checkbox"/> Self-certification <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 5: Community Base | |
| Has the agency operated a housing counseling program for at least 1 year in the same geographic area proposed in the application? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> HUD-9902 that quantifies the households the agency provide counseling and education services to during the past 12-month period <input type="checkbox"/> Other: _____ |
| <u>Existing affiliates</u> : Has the agency provided counseling to a caseload of at least 30 participants? (Note: the 30-caseload requirement does not apply to agencies that perform only Home Equity Conversion Mortgage (HECM) program counseling.) | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A, HECM counseling only <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Case files <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 6: Recordkeeping and Reporting | |
| Does the agency have written processes and procedures for reporting and recordkeeping? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Written procedures <input type="checkbox"/> Other: _____ |
| Indicate which documents were reviewed. | <input type="checkbox"/> Photographs <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |

| Criterion 7: Client Management System (CMS) | |
|---|--|
| Does the agency have a client management system (CMS)? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Verification of data in CMS <input type="checkbox"/> A signed statement indicating the CMS an agency uses or intends to use upon acceptance to the network <input type="checkbox"/> CMS bill or registration <input type="checkbox"/> Other: _____ |
| Does the CMS interface with HUD's Housing Counseling System (HCS)? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Verification of data in HCS <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 8: Housing Counseling Resources | |
| Does the agency have evidence of sufficient funding to cover the costs of operations for the next 12 months? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Operating budget <input type="checkbox"/> Letters of financial commitment/written agreements with funders <input type="checkbox"/> Independent audited financial statement <input type="checkbox"/> Other: _____ |
| Does the agency at least have one half of its staff with at least 6 months of experience in the housing counseling job they will perform? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Resumes <input type="checkbox"/> Position descriptions <input type="checkbox"/> Staff training <input type="checkbox"/> Other: _____ |
| Does the agency have staff with the appropriate language skills for their housing counseling clients or have an adequate referral process for persons with limited English proficiency (LEP)? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |

| | |
|---|---|
| Indicate which documents were reviewed. | <input type="checkbox"/> Resumes <input type="checkbox"/> A statement concerning client/counselor languages spoken <input type="checkbox"/> LEP referral agreements or memorandums of understanding for translation services <input type="checkbox"/> Other: _____ |
| Does the agency have alternative formats and reasonable accommodations for those with disabilities? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Accessible format (e.g., large print, braille, interpretation services, etc.) <input type="checkbox"/> Agency work plan should specify alternative formats <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 9: Knowledge of HUD Programs and Local Housing Market | |
| Does the agency have staff knowledgeable about HUD programs? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Staff training certificates <input type="checkbox"/> Resumes <input type="checkbox"/> Other: _____ |
| Does the agency have staff knowledgeable about the local housing market? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Resumes <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 10: Contracts or Agreements to Provide Eligible Housing Counseling Services | |
| Does the agency contract out any of its housing counseling services? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, the contracts must be consistent with HUD-approved reasons for contracting. See Criteria Summary for an explanation.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Work plan must state if there are any contracts in place and provide rationale for any existing <input type="checkbox"/> Other: _____ |

Review notes (expirations, issues, concerns/issues, etc.):

Criterion 11: Community Resources

Does the agency have relationships with other service providers that provide services they do not offer?

- ☐ Yes
☐ No

If no, agency does not meet HUD approval requirements.

Indicate which documents were reviewed.

- ☐ A description of the relationships
☐ Letters, agreements, or referral lists
☐ Other: _____

Review notes (expirations, issues, concerns/issues, etc.):

Criterion 12: State and Local Requirements

Is the agency in compliance with state and local requirements to do business in the communities served?

- ☐ Yes
☐ No

If no, agency does not meet HUD approval requirements.

Indicate which documents were reviewed.

- ☐ Business registration
☐ Authorization to do business
☐ A certificate of good standing
☐ Secretary of state records
☐ Other: _____

Review notes (expirations, issues, concerns/issues, etc.):

Criterion 13: Facilities

Does the agency have permanent, accessible space dedicated to housing counseling services during normal business hours?

- ☐ Yes
☐ No

If no, agency does not meet HUD approval requirements (see [Criteria Summary](#) for exception).

Indicate which documents were reviewed.

- ☐ Physical inspection and/or site visit
Date: _____
☐ Signage
☐ Photographs
☐ Other: _____

Does the agency provide privacy for in-person housing counseling?

- ☐ Yes
☐ No


If no, agency cannot be approved.

Indicate which documents were reviewed.

- ☐ Written procedures
☐ Self-certifications
☐ Other: _____

| | |
|--|---|
| Does the agency provide security for electronic and paper client records? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency cannot be approved.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Written procedures <input type="checkbox"/> Self-certifications <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 14: Housing Counseling Work Plan | |
| Is the agency able to submit a compliant (based upon the regulations and handbook) housing counseling work plan? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, agency does not meet HUD approval requirements.</i> |
| Indicate which documents were reviewed. | <input type="checkbox"/> Work plan |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 15: Conflicts of Interest and Disclosure Requirements | |
| Can the agency provide conflict of interest procedures and explain any conflicts of interest? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Indicate which documents were reviewed. | <input type="checkbox"/> Conflict of interest policies and procedures <input type="checkbox"/> Disclosures to HUD and results <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Criterion 16: Election Law Violations | |
| Are any of the following election law violations occurred: <ul style="list-style-type: none"> ▪ An agency, its branches, and/or affiliates has been convicted of a violation under Federal law relating to an election for Federal office, or ▪ One or more individuals employed by an agency in a permanent or temporary capacity; contracted or retained by your agency; or acting on behalf of, or with the express or apparent authority of, your agency been convicted of a violation under Federal law relating to an election for Federal office? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

| | |
|--|---|
| Indicate which documents were reviewed. | <input type="checkbox"/> List of housing counseling staff and board <input type="checkbox"/> Public records, Internet (e.g., Federal Election Commission) <input type="checkbox"/> Agency's hiring procedures <input type="checkbox"/> Self-certification <input type="checkbox"/> Other: _____ |
| Review notes (expirations, issues, concerns/issues, etc.): | |
| Intermediary Criteria | |
| <i>The Intermediary should add questions and documentation requirements to reflect additional standards that the Intermediary wishes to enforce in addition to the HUD standards. The Intermediary can add additional boxes below as needed.</i> | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Indicate which documents were reviewed. | |
| Review notes (expirations, issues, concerns/issues, etc.): | |



SECTION 4

SUMMARY OF HUD'S ELIGIBILITY CRITERIA FOR HCAS

Summary of HUD's Eligibility Criteria for HCAs

There are 16 criteria for HCA approval. These are used to assess new affiliates and continued eligibility of existing affiliates. For a definition of each criterion, click on the title (below). Additional information on these criteria can be found in Network Agency Eligibility and Evaluation for Intermediary Organizations, State Housing Finance Agencies, and Multi-state Organizations: <https://www.hudexchange.info/programs/housing-counseling/intermediaries-shfa/>.

| | | | |
|---|---|---|---|
| 1: Nonprofit and Tax-Exempt Status | 5: Community Base | 9: Knowledge of HUD Programs and Local Housing Market | 13: Facilities |
| 2: Experience | 6: Recordkeeping and Reporting | 10: Contracts or Agreements to Provide Eligible Housing Counseling Services | 14: Housing Counseling Work Plan |
| 3: Fair Housing and Civil Rights Laws | 7: Client Management System | 11: Community Resources | 15: Conflicts of Interest and Disclosure Requirements |
| 4: Ineligible Participants | 8: Housing Counseling Resources | 12: State and Local Requirements | 16: Election Law Violation Requirements |

Criterion 1: Nonprofit and Tax-Exempt Status

Guidance on New Affiliates: Only private or public nonprofit organizations or a units of local, county, or state government are eligible. For nonprofits, documentation includes a copy of the IRS 501(c)(3) letter and the agency's taxpayer identification number. The letter must include the organization's official name, address, and telephone number of the legal authority that granted the nonprofit status. For nonprofit instrumentalities of government, the organization must have been established by a governmental body or with governmental approval or under special law to serve a particular public purpose or designated as an instrumentality by law (statute or court opinion) and board or principals have operational, organizational, or financial control of their activities. Finally, articles of incorporation, bylaws, and certificates of good standing may also be helpful to review and document the files.

For government entities, HUD requires relevant statutory documents issued by the local, state, or federal authority that authorize the agency to operate. For governmental instrumentalities of government, the organization must have been established by a governmental body or with governmental approval or under special law to serve a particular public purpose or designated as an instrumentality by law (statute or court opinion) and board or principals have operational, organizational or financial control. Finally, the HUD 9900 form must be completed and submitted electronically. The documents must be signed and notarized by the authorizing officials.

Guidance on Existing Affiliates: Proof of eligible corporate status must be maintained and must be current at all times after the agency is initially approved. Proof must be made available upon request to HUD or the Intermediary.

Criterion 2: Experience

Guidance on New Affiliates: An agency must have provided the specific housing counseling services proposed for 1 year in a way that meets HUD requirements and standards (e.g., meets the HUD Housing Counseling Program regulations in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#)). An organization may be working with a HUD-approved intermediary or a state housing finance agency offering housing counseling to the public using the same standards as HUD would require.

Documentation includes case files that show the provision of housing counseling services dating back at least 1 year; disclosure forms; client personal information forms; client data release forms; client-counselor agreements; proof of registration with a HUD-compatible CMS; and proof of signage, file cabinets, and private counseling rooms.

Guidance on Existing Affiliates: Agencies must maintain program activities in accordance with HUD requirements. Documentation includes program case files, the agency's work plan, and, if applicable, an updated work plan when expanding services.

Criterion 3: Fair Housing and Civil Rights Laws

Guidance on New and Existing Affiliates: An agency cannot have unresolved [fair housing or civil rights violations](#) with HUD's Office of Fair Housing and Equal Opportunity as described in the HUD Housing Counseling Program regulations in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#) at the time of application for approval. Documentation includes an agency self-certification concerning the absence of any fair housing violations. If there has been a prior violation, the Intermediary should review the HUD letter that confirms that previous violations are addressed. The Intermediary could also conduct an Internet search to verify that there are no red flags or concerns that are cause for further investigation, such as HUD's website for [fair housing complaints](#). Documentation includes a written description of Internet research conducted and its results.

HUD-approved HCAs must [affirmatively further fair housing \(AFFH\)](#) for classes protected under the Fair Housing Act (e.g., Fair Housing newsletters, marketing and outreach to underserved populations, and counseling and education). Further information is available in the [April 2015 Bridge Newsletter: Housing Counseling Promotes Fair Housing & Financial Literacy](#) and as described in the HUD Housing Counseling Program regulations in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). Documentation includes AFFH marketing materials, counseling and education files, letters from HUD, and agency self-certification.

Criterion 4: Ineligible Participants

Guidance on New and Existing Affiliates: HUD-approved counseling staff working in the Housing Counseling Program, including all of the agency's current directors, partners, officers,

principals, or employees must not be (1) suspended or disbarred from participating in Federal programs; (2) indicted or convicted of a criminal offense that reflects upon the responsibility, integrity, or ability of the agency to participate in housing counseling activities; or (3) subject to unresolved findings in a federal investigation, or any government audit or investigation. HUD-Approved counseling staff working in the housing counseling program, including all current agency directors, partners, officers, principals, or employees will need to provide assurance that the above instances are not currently occurring for each person, the housing counseling agency, or in the case of board members, their employer as described in the HUD Housing Counseling Program regulations in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). For each individual listed, provide the agency office name, the agency physical address, their position title, length of employment including a start date, the name of board member's employer, title and term on board, staff duties, full-time or part-time status, paid or volunteer status, their physical home addresses, and contact numbers.

All current agency directors, partners, officers, principals, or employees will need to provide assurance to the Intermediary that the above instances are not currently occurring for each person, the HCA, or, in the case of board members, their employer. These entities should also not have outstanding federal or state tax liens or defaulted federal loans. In addition, directors, staff, and volunteers cannot be subject to any unsatisfied judgments or foreclosure of a Federal Housing Administration (FHA)-insured mortgage unless currently under a repayment plan. Agency hiring practices can include these types of background checks as part of the employment process and board membership. Documentation includes external public records searches such as the local taxing agency (e.g., County Auditor), the [System for Award Management](#) for excluded/debarred parties from working with the Federal government, and the [Limited Denials of Participation](#), a list of people and organizations that are not allowed to participate in HUD programs.

Criterion 5: Community Base

Guidance on New Affiliates: An agency must have operated for 1 year in the geographic area where it plans to provide the services as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). Documentation also includes a HUD 9902 form that quantifies the households the agency provided counseling and education services to during the past 12-month period.

Guidance on Existing Affiliates: An agency must have operated for 1 year in the area it plans to provide the services as outlined in its work plan. An agency must also have maintained a caseload of 30 clients in a year (except for HECM) as demonstrated through HUD 9902 form data. Authorization to do business or a certificate of good standing are sufficient when combined with review of the CMS or a client list substantiating the number of clients served.

Criterion 6: Recordkeeping and Reporting

Guidance on New and Existing Affiliates: HUD-Approved housing counseling agencies must have an established system of recordkeeping adequate to meet HUD reporting requirements that includes written procedures on how files are managed, stored, and/or archived. HCAs must

also have an established system and a set of written procedures on how electronic and paper records are secured to protect sensitive personal information (e.g., social security numbers, credit reports, etc.). The agency must ensure the confidentiality of all client level and agency profile information. HUD-Approved housing counseling agencies must also ensure client files, electronic and paper, are accessible only to authorized personnel. Hard copies must be kept in locked file cabinets and electronic files must be kept secure, which should be codified in the agency's written policies and procedures. Failure to maintain confidentiality of credit reports may be subject to penalties under the Fair Credit Reporting Act. Housing counseling agencies must also use a client management system (CMS) which has taken all the standard and required security protections, including assurances that this data will not be shared with any entities other than HUD and the housing counseling agency, unless explicitly instructed to do so by the client themselves, and in the case of agency information, the housing counseling agency. Documentation includes the written recordkeeping procedures and photographs of locked file cabinets. Further information is available in the [Frequently Asked Questions on Recordkeeping, 24 CFR 214](#), Chapters 2 and 5 of [Handbook 7610.1 Rev 5](#), and the [Housing Counseling Capacity Building Toolkits](#).

Criterion 7: Client Management System

Guidance on New and Existing Affiliates: HCAs must use an automated, housing counseling client management system (CMS) for the collection and reporting of client-level information. The system must interface with HUD's Housing Counseling System (HCS) to ensure proper reporting to HUD. For more information, please see the [CMS page](#), [HCS page](#), and multiple chapters of [Handbook 7610.1 Rev 5](#). During the application process, the agency will be required to submit a [Form HUD 9902](#) for past activities of the last year. Documentation includes onsite or remote verification of data in the CMS, verification of data in HCS, a signed statement indicating the CMS an agency uses, or a bill or registration associated with CMS. For new agencies, documentation can include a bill or signed statement that their system meets HUD requirements or will meet upon acceptance to the network, and Intermediaries can remotely review that documentation.

Criterion 8: Housing Counseling Resources

Guidance on New and Existing Affiliates: The agency must have resources to provide services. This includes:

1. **Sufficient Funds.** The agency must demonstrate financial commitments to ensure counseling can be provided over a 12 month period as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). National organizations provide training and resources on topics such as fundraising, sustainability, and succession planning. See the [Housing Counseling Training Partners page](#) and the [Housing Counseling Capacity Building Toolkits](#), such as the HCA 101 for more guidance. A number of Federal grant opportunities for agencies are available on [Grants.gov](#). Documentation includes evidence that funds are immediately available or that there is a written commitment (an operating budget for the housing counseling programs, recent financial audit, letters of

commitment/contracts/agreements) and a copy of the agency's independent audited financial statement completed within the last 2 years.

2. **Adequate Staff.** The agency must employ one half of their counselors with at least 6 months of experience providing a similar housing counseling service (e.g., a pre-purchase counselor must have experience in providing housing counseling in pre-purchase for at least a 6-month period) as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). Documentation includes resumes, position descriptions, and certificates of staff training.
3. **Language Skills.** The agency must meet have staff with language skills and referral procedures in place to accommodate clients within their housing counseling service area as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). The Department of Justice defines Limited English Proficiency as follows: If these individuals have a limited ability to read, write, speak, or understand English, they are limited English proficient, or "LEP." For further information, see the [Limited English Proficiency \(LEP\) page](#).
4. **Alternative Formats.** The agency must be prepared to provide vital documents and services to persons with disabilities. This includes accommodations for people who are sight or hearing impaired and people with mobility issues. Accommodations can include alternative formats (such as documents in Braille) as well as physical accommodations (accessible location, counseling by phone). Documentation includes a written description of all accommodations that are made available by the agency. Further information is also available in the [Capacity Building Toolkit: Developing a Housing Counseling Work Plan for HUD Approval](#) and as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#).

Criterion 9: Knowledge of HUD Programs and Local Housing Market

Guidance on New and Existing Affiliates: Counselors or staff must be knowledgeable about HUD's programs and resources (e.g., FHA mortgage products and requirements). HUD-approved HCAs must be knowledgeable about the various HUD programs related to the services being provided as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#) (e.g., local housing partner programs such as the public housing authority, continuum of care, and community development and affordable housing (e.g., the [Consolidated Plan](#), where applicable, includes program information) and about FHA mortgage products and requirements. The [FHA Resource Center](#) has extensive resources available. HUD will want to see staff knowledge on specific housing counseling or education services that will be provided, as well as documentation of staff training.

Documentation includes staff training certificates and resumes and, for existing affiliates, housing counseling work plan and quarterly reports.

Counselors or staff must also be knowledgeable about their clients' housing options, and HCA staff must be familiar with state and local housing programs and other resources as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). They should also be familiar with the local [Consolidated Plan](#) and the Assessment of Fair Housing (AFH) Tool. Depending on

the type of counseling being delivered, they should be familiar with local lenders, housing partners (e.g., housing authorities, local and state housing departments, etc.), their programs, and products.

Criterion 10: Contracts or Agreements to Provide Eligible Housing Counseling Services

Guidance on New and Existing Affiliates: Unless an agency falls under an exception, HUD-Approved housing counseling agencies must deliver all housing counseling services set forth in their housing counseling work plan as described in [24 CFR 214](#) and in Chapter 2 of [Handbook 7610.1 Rev 5](#). [Frequently Asked Questions on Housing Counseling Delivery](#) provide more specific guidance. HUD allows HUD-Approved housing counseling agencies to contract out for their housing counseling services only if one of three conditions are met:

1. In geographic areas where there is a need for a specific housing counseling service that the agency or its subgrantees cannot provide or is not covered by another HUD-Approved housing counseling agency.
2. State housing finance agencies (SHFAs) and intermediaries may enter into agreements with affiliates to provide housing counseling services (Note: this is not applicable for HCAs).
3. Intermediary agencies may operate a program with a network of affiliated counselors, instead of affiliated agencies, if the arrangement meets a special need identified by HUD (Note: this is not applicable for HCAs).

Chapter 2 of [Handbook 7610.1 Rev 5](#) provides more guidance.

Documentation includes a self-certification form from the agency or a review by the Intermediary to confirm there is no evidence of subcontracting, such as tax documents, or a memorandum of understanding, contract, or payments to another agency.

Criterion 11: Community Resources

Guidance on New and Existing Affiliates: The HCA must demonstrate that it has established working relationships with private and public community organizations as described in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). These organizations can refer clients who need help the agency cannot offer (e.g., family services, food services, childcare, legal help, credit counseling, healthcare). Documentation includes a description of these working relationships and partnerships, or a signed partnership agreement must be documented in the agency's application.

Criterion 12: State and Local Requirements

Guidance on New or Existing Affiliates: An agency and its branches and affiliates must be in compliance with state and local requirements to do business in the communities served (e.g., a certificate of good standing from a Secretary of State office). They must meet all state and local requirements for their operations as described in the HUD Housing Counseling Program regulations in [24 CFR 214](#) and in Chapter 2, 2-2 of [Handbook 7610.1 Rev 5](#). Documentation can

include the most recently renewed business registration or authorization to do business, a certificate of good standing, and an agency certification that it meets all state and local requirements.

Criterion 13: Facilities

Guidance on New and Existing Affiliates: Counseling agency facilities must meet the needs of all potential clients and must have a clearly identified office, accessibility for persons with disabilities including appropriate signage, and operate during normal business hours with extended hours when necessary. Signage can be ordered through the [HUD Fair Housing and Equal Opportunity \(FHEO\) Office Outreach Tools page](#). HCAs must also have an established, private place to perform housing counseling. Offsite facilities may also be used. For further information, see [24 CFR 214](#), Chapter 2 of [Handbook 7610.1 Rev 5](#), and for offsite facilities, see the [Frequently Asked Question on offsite accommodations](#).

Criterion 14: Housing Counseling Work Plan

Guidance on New and Existing Affiliates: The agency must submit a detailed housing counseling plan consistent with the requirements in [24 CFR 214](#) and in Chapter 3, 3-2 of [Handbook 7610.1 Rev 5](#). These include but are not limited to targeted geographic areas and population, issues and needs of target area/population, services, projected outcomes, fair housing, service fees, and accommodations for those with special needs. Further information is also available in the [Capacity Building Toolkit: Developing a Housing Counseling Work Plan for HUD Approval](#).

Criterion 15: Conflicts of Interest and Disclosure Requirements

Guidance on New and Existing Affiliates: The agency must disclose any real or apparent conflicts of interest involving a Position of Trust and describe how these conflicts will be mitigated including any disclosures that will be provided to clients. A person in a Position of Trust includes a director, employee, officer, contractor, volunteer, agent of a participating agency, or the spouse, child, or business partner of any individual holding these positions. These individuals must avoid any action that might result in, or create the appearance of, administering the housing counseling operation for personal or private gain. It is a conflict of interest for any persons in a Position of Trust to provide preferential treatment to any organization or person, or to undertake any action that might compromise the agency's ability to ensure compliance with the conflict of interest requirements and to serve the best interests of the agency's clients. Where conflicts of interest are apparent or questionable, agencies are required to disclose these issues to HUD and in a disclosure for the client.

Documentation includes (1) disclosures to HUD and HUD response or an agency self-certification that no conflicts of interest exist and (2) conflict of interest policy and documents to support the policy. Further information is available in the [Frequently Asked Questions Conflict of Interest](#) and as described in the HUD Housing Counseling Program regulations in [24 CFR 214](#), Chapter 2, 2-2 and Chapter 6, 6-1 and 6-2 of [Handbook 7610.1 Rev 5](#), and [Capacity Building Toolkit: Agency Disclosure Forms](#).

Criterion 16: Election Law Violation Requirements

Guidance on New and Existing Affiliates: HUD-Approved housing counseling agencies must not have been convicted of a violation under Federal law relating to an election for Federal office, or that employs “applicable individuals” who have been convicted of a violation under Federal law relating to an election for Federal office. Applicable individuals means an individual who is employed by the organization in a permanent or temporary capacity; contracted or retained by the organization; or acting on behalf of, or with the express or apparent authority of, the organization; and has been convicted of a violation under Federal law relating to an election for Federal office. Election law violation includes, but is not limited to, a violation of one or more of the following statutory provisions related to Federal election fraud, voter intimidation, and voter suppression. Agency hiring practices can include a check on possible election law violations within background checks as part of the employment process and board membership. Documentation includes external public records searches of the Federal Election Commission, or a self-certification.



SECTION 5

INTERMEDIARY CRITERIA

Intermediary Criteria

When Intermediaries assess the eligibility of HCAs for their networks, they must consider their own criteria in addition to the 16 criteria required by HUD. These criteria should reflect the needs and priorities of the Intermediary's service area. The Intermediary's application form and its quality control plan should reflect these criteria.

Examples of appropriate Intermediary criteria include:

- **Geographical Coverage.** The Intermediary may seek to fill gaps in geographic coverage by adding agencies that serve specific geographic areas defined by neighborhood, ZIP code, or jurisdictional boundaries. To document compliance, the HCA should be able to show a geographic area in its charter or mission statement, an office or presence in the target areas, or case files for services provided in the target areas.
- **Services.** The Intermediary may also seek HCAs that can provide specific services that respond to local needs. For example, an Intermediary may seek to expand its services by adding HECM counseling or rental counseling or may respond to an increase in demand for pre-purchase. The HCA should demonstrate compliance by sharing a written summary of its services, staff qualifications, and case files to document experience in those areas.
- **Curricula.** The Intermediary may choose to require a specific curriculum or learning standards, such as those that meet the National Industry Standards for Homeownership Education and Counseling. The HCA can document compliance with such standards through its written procedures or by sharing its training materials.



SECTION 6

INTERMEDIARY TIPS FOR EFFECTIVELY VETTING HOUSING COUNSELING AGENCIES

Intermediary Tips for Effectively Vetting Housing Counseling Agencies

For an Intermediary to approve a new agency or renew an agency's participation in its HUD Housing Counseling Network, HUD requires that standards are met. This next section provides a few high-level tips or best practices that successful Intermediaries use to manage vetting agencies for new or ongoing participation in their HUD Housing Counseling Network.

Tip #1: Treat the HUD eligibility process like a performance review, and make the processes consistent.



Description

Sometimes, Intermediaries and HCAs approach the HUD eligibility vetting process with less formality than audits and performance reviews. This may be because the latter are conducted in person more often than the former. In other cases, the vetting is rushed to accommodate the NOFA schedule as HCAs apply close to the NOFA deadline.

Approving an HCA should be taken as seriously as a performance review. Intermediaries should plan to collect documentation (including pictures of the HCA's facilities), conduct a site visit (if possible), consider past audits or performance review findings and remedies, and conduct other activities that decrease the likelihood of missing a significant issue.

Why?

Treating the vetting process like a performance review and making the processes consistent underscores the importance of the vetting process and ensures that the Intermediary and the applicant HCA will approach it with proper planning and thoroughness. This also ensures that the Intermediary and the applicant HCA will carefully consider whether HUD's standards have been adequately met, especially if a site visit is conducted, and reduce the chance of an issue negatively affecting the Intermediary, the HCA, and the network later in a subsequent performance review or audit.

Example

Virginia Housing Development Authority (VHDA) uses their performance review protocols to add new agencies to their network. Their performance review includes use of the HUD 9910 form during an onsite visit. If any agency does not meet the 9910 requirements, VHDA will provide TA, referrals to other funding opportunities such as VHDA Capacity Building program, and professional development opportunities such as the Virginia Association of Housing Counselor and will suggest they reapply in the future.

Housing Partnership Network (HPN) conducts a full compliance review of all agencies that apply to receive HUD Housing Counseling grant funding as a sub-grantee of HPN. The vetting process mirrors the HUD performance review, using the 9910 form as the basis for collecting documentation and reviewing the agency's compliance with HUD handbook requirements. In addition to ensuring HUD compliance, HPN has minimum threshold requirements that each agency must meet.

The review is conducted onsite and provides an opportunity for intensive TA and training on managing the HUD Housing Counseling grant, including review of the HUD handbook and toolkits, as well as training on quality assurance and reporting. If the prospective sub-grantee meets eligibility requirements for funding, HPN will bring them through the onboarding process, which includes an overview of HPN's program guide and our online community where they can access resources and engage with their peers 24/7. The onboarding training can be conducted onsite during the review or via webinar. If the

prospective sub-grantee does not meet HPN and HUD requirements, they will not be awarded funding, but HPN staff will work with the agency and attempt to resolve any concerns identified during the review. HPN also connects staff at prospective sub-grantee organizations with other sub-grantee staff to facilitate peer exchange on best practices in managing housing counseling programs.

Tip #2: Focus on those areas that HUD has determined are especially challenging for agencies.



Description

HUD has noted specific areas where HCAs have trouble during performance reviews including the adequacy of conflict of interest policies, practices, and related documents, as well as adequacy of work plans.

When approving network agencies, Intermediaries should have processes that address special circumstances such as these. This may include reviewing conflict of interest policies and related documents and interviewing the program manager to understand how conflicts of interest are handled. The process may also include engaging the Intermediary's HUD point of contact for special circumstances.

Why?

Newly approved agencies should be ready to succeed programmatically. Having a robust vetting process with focused attention on special circumstances ensures that network agencies are well prepared and do not jeopardize their own sustainability or the sustainability of the network on issues that will most certainly be reviewed during an audit and that can be properly managed from the outset.

Tip #3: Assess an agency's capacity to maintain HUD eligibility criteria.



Description

Maintaining ongoing eligibility is just as important as gaining initial eligibility approval. HCAs often let certain criteria slip after approval has been achieved, not realizing that these criteria are subject to assessment during performance reviews and audits. Moreover, eligibility criteria and requirements must be maintained by all participating agencies in the program.

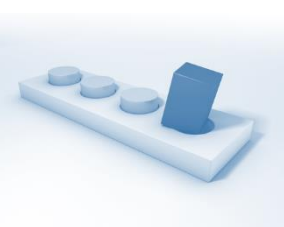
Intermediaries should assess operational capacity as well as the human resources and internal policy support for maintaining ongoing eligibility criteria when approving the membership application of a network agency. Further, the Intermediary should have an onboarding process that describes how HCAs are required to maintain eligibility criteria and the ways in which maintenance of criteria and assessment in performance reviews are different from initial network membership application review. For example, what should an agency do if it loses staff? How should an organization maintain its 501(c)(3) status?

Why?

HUD places equal importance on initially satisfying eligibility criteria and maintenance of the criteria. Intermediaries' membership approval processes and criteria should, therefore, ensure that agencies are aware of and be able to fulfill the requirement to take on this ongoing responsibility.

Example

National Council of La Raza (NCLR) has a robust pre-application process when looking to add agencies to their network to ensure that HUD criteria will be met and that the agencies' mission and goals align with NCLR. NCLR may initiate the interest in an agency, but for the most part, agencies reach out to NCLR. When agencies approach them, NCLR researches the agency's website, Guidestar, and collaborating agencies they have in common. This allows NCLR to make an initial assessment of the status and level of service of the agency. Assuming interest after initial research, NCLR will contact the agency for a phone interview where they discuss the agency's and NCLR's interests in partnering. After the application is collected and they are accepted, the agency is offered conditional acceptance into the network. Finally, NCLR uses a robust sustainability tool during vetting to ensure the agency will be able to succeed within their network. This tool, ONWARD, reviews the financial and operational health via the agencies supporting documents (e.g., audited financials, housing program budget and funding sources, marketing materials, disclosures, intake forms, work plans, policies and procedures manual, HUD 9902 forms).

Tip #4: Accept that you will turn an agency down that is not a good fit.**Description**

Although the Dodd-Frank Wall Street Reform and Consumer Protection Act requires all counselors to be certified in housing counseling topics, and HUD is implementing this policy soon, this does not mean that all counselors or agencies should focus on all service areas. Intermediaries and network agencies should focus on service areas that fit their missions, areas where they are needed, and areas in which they have sufficient experience. An Intermediary that does not include a specific service area in its network portfolio because it is outside the mission or business model for the Intermediary should avoid approving agencies in those areas.

In addition, as part of the membership approval process, an Intermediary should provide TA to struggling applicant agencies only if the Intermediary determines that TA for membership approval is appropriate. Intermediaries should have a clear policy on what constitutes adequate TA and feedback and when it can be determined that an HCA is not ready to join the network/be approved.

Why?

Agencies that are not yet ready to obtain and maintain HUD eligibility or that are not a good fit for an Intermediary's network due to size, capacity, focus areas, or quality of services may pose a risk to themselves, their clients, the Intermediary, and the Intermediary's entire network. The Intermediary should assess whether it has the funds and capacity to train agencies and/or help support them to meet the HUD criteria. It is better to recommend to the agency to wait another year before reapplying, recommend that the agency work directly with HUD, or recommend an agency partner with a different Intermediary that is a better match.

Example

An Intermediary receives an application from an agency that provides a housing service that is being unmet within its service area. However, after reviewing their application, the Intermediary determines that the agency does not have staff with necessary knowledge or skills to deliver the proposed service. Given concerns about the quality of service and likely need for extensive staff development, the Intermediary declines the application. In the rejection letter, the Intermediary provides feedback about the steps the agency must take before reapplying to the network.



SECTION 7

RESOURCE LIST

Resource List

Besides the links provided above, the following is an additional list of useful resources to help Intermediaries and HCAs become more familiar with HUD's eligibility criteria, standards, and review process.

Resources for Intermediaries

| Resource Name and link | Description |
|--|---|
| HUD Housing Counseling Program Handbook 7610.1 Rev. 5, Chapter 2 | This handbook documents the programmatic requirements for program eligibility and approval. |
| How to Become a HUD-Approved Housing Counseling Agency | This web page provides basic information and additional links such as the HUD 9900 form. This web page also provides a link to the Housing Counseling Agency Eligibility Tool indicated below under Resources for HCAs. |
| HUD-Approved Housing Counseling Agencies Map | This is a resource list of HUD-approved HCAs and intermediaries, which is helpful for identifying potential agencies to market to the Intermediary network as well as for collaboration among Intermediaries. <i>Please note:</i> This list is updated periodically, so not all approved organizations may be listed. The list provides the locations of other HUD-approved HCAs required for the map in the work plan used in HUD approvals. |

Resources for HCAs

| | |
|---|---|
| Housing Counseling Agency Eligibility Tool | This tool is available to prospective housing counseling agencies to determine if they are ready to apply to become a HUD-Approved Housing Counseling Agency either through HUD or through an Intermediary. |
| Capacity Building Toolkit—Establishing a Nonprofit Entity: A Step-by-Step Guide for Organizations Launching a Local Housing Counseling Agency | This guide details how to become a HUD-approved nonprofit local HCA. |
| Capacity Building Toolkit—HUD 101 Orientation Guide for New HCAs | This guide is designed to help HCAs understand HUD's organizational structure, resources, and program guidelines related to the Housing Counseling Program. While HUD's website publications and grant agreements remain the primary sources of information guiding new HCAs in the counseling program, this guide is a supplemental reference designed to help agencies quickly learn about being a successful HUD-approved counseling agency. |
| Capacity Building Toolkit—Developing a Housing Counseling Agency Work Plan | One of the most important elements of an application to participate in HUD's Housing Counseling Program is a housing counseling work plan. It is a roadmap for reviewers to better understand how your agency offers housing counseling services. |