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Client Counseling and Group Education Files

The *client counseling file* is the individual file for each client counseled and maintained by the housing counseling agency. The *group education file* is a separate confidential file for each course provided. The client counseling file and the group education file can be electronic or paper.

The Individual Client File

The housing counseling agency must maintain a separate confidential file documenting each distinct provision of counseling services provided to a client, as described in federal and handbook regulations.

The client file should include:

- A *file number* for the counseling interaction with client
- Evidence of *budget and financial analysis* and *credit circumstances*, relative to the client's housing needs
- A *log of activities* that records date, time, duration, and description of each interaction performed on behalf of, and by, the client
- An *action plan*, except in the case of reverse mortgage counseling. The plan must clearly identify the client need or problem and outline what the agency and the client will do in order to meet the client's housing goals. A copy of the action plan must also be given to the client.
- *Follow-up communication* with the client, along with an account of all written and verbal attempts to contact client(s) to conduct follow-up sessions
- *Pertinent documents of record* and/or correspondence received from the client or created on behalf of the client
- A copy of the *disclosure statement* provided to each client in a face-to-face setting, or an annotation of the date the disclosure statement was verbally communicated to the client during telephone counseling
- The date, cause and explanation for *termination of counseling*, if applicable
- Documentation of the *outcomes of counseling* provided
- Documentation of any *fees paid* by the client for housing counseling services and a copy of the receipt provided to the client, if applicable. Additionally, include documentation about the amount and source of *fees paid by other parties*, for example, lenders.
- Indication that the *activity* was partially or fully funded by a HUD housing counseling grant or sub-grant, if applicable
- Annotation of *discussion of alternatives*, service providers, product vendors, products, features, services, or properties discussed with the client
- Documentation that the agency received the *client's authorization* to order a credit report and/or to share information. For example, with HUD or third parties, if applicable
- *Other pertinent documents* obtained during the intake and subsequent housing counseling sessions

The Group Education File

The housing counseling agency must maintain a separate confidential file for each course provided. An individual file does not need to be established for each education attendee. However, if a client has an existing individual file and attends a group workshop, the client's participation in the workshop session must be documented in his or her individual file.

The group file should include:

- A *file number* for the education and workshop session
- Indication that the *activity* was partially or fully funded by a HUD housing counseling grant or sub-grant, if applicable
- Course title, course outline, or established curriculum and instructional goals
- Name of each housing counselor, instructor, or presenter participating in the session
- *Course logistics*, date, place, and duration of each session
- List of participating households, race, ethnicity, and income data for each household
- A *disclosure statement* provided to each household that is relevant to the subject of the session
- The *amount paid* by clients for services and a copy of the receipt provided to the clients, if applicable

The client counseling and group education files must be maintained in accordance with the following references:

- **24 CFR Parts, 214.300 and 214.315** Housing Counseling Program Final Rule.
- **HUD Handbook 7610.1, Rev. 5, Chapters 3 and 5, Paragraphs 3-5, 5-7 and 5-8.**

Note: For reverse mortgage counseling client file content, see [Handbook 7610.1](#) and reference Chapter 4-12.

Learn More

Do you have questions about files? We have answers!

Visit the “[FAQs: Client Files and Recordkeeping](#)” article for more information.