**[INSERT AGENCY LETTERHEAD]**

**[AGENCY NAME] Housing Counseling Program Work Plan**

**[DATE]**

**OPTIONAL: History & Goals**

*Provide a brief history of the organization/housing counseling program and the overall goals of your counseling program – e.g., build assets for low and moderate income households; stabilize neighborhoods through promotion of affordable homeownership; etc.*

**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.*

**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 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, with a detailed description of each and Projections and Expected Counseling Outcomes/Impact. This 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.*

* ***If your organization provides Homeownership Counseling, specify how the agency is prepared to cover the entire process of Homeownership for clients that receive Homeownership Counseling, including: the decision to purchase a home, the selection and purchase of a home, issues arising during or affecting the period of ownership of a home (including financing, refinancing, default, and foreclosure, and other financial decisions), and the sale or other disposition of a home*.**
* ***If you provide pre purchase counseling or homebuyer education, describe how you incorporate information on home inspections. Also, confirm that you provide each client with a copy of HUD Form 92564 “For Your Protection Get a Home Inspection,” and “Ten Important Questions to Ask A Home Inspector.”***
* *If you provide Pre-Purchase/Home Buying or Rental Counseling, describe how you incorporate information on 1) the health risks associated with Lead-Based Paint for clients looking to reside in housing built prior 1978 that may have lead-based paints and 2) on clients’ rights and responsibilities under the HUD/EPA Lead Disclosure Rule (24 CFR part 35, subpart A), and the Lead Safe Housing Rule (24 CFR part 35, subparts B, K and R).*

*Please choose from the following types of HUD-approved counseling services:*

* *FBC - Financial Management/Budget Counseling*
* *HIC - Home Improvement and Rehabilitation Counseling*
* *DFC - Mortgage Delinquency and Default Resolution Counseling*
* *PPC - Pre-purchase Counseling*
* *RHC - Rental Housing Counseling*
* *RMC - Reverse Mortgage Counseling*
* *HMC - Services for Homeless Counseling*

**Example:**

{*Name of Agency*} is prepared to cover the entire process of Homeownership for clients that receive homeownership counseling, including the decision to purchase a home, the selection and purchase of a home, issues arising during or affecting the period of ownership of a home (including financing, refinancing, default, and foreclosure, and other financial decisions) and the sale or other disposition of a home. 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:

1) Goal including any issues that must be resolved

2) Steps for reaching goal and who will be responsible for each step

3) Estimated timeframe for steps

**Financial Analysis:**

1) Obtain and verify budget

2) Discuss ways to save money, cut expenses

3) 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.

**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 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.

**Example: 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

1) Referrals take about 30 minutes per client

2) See attached Referral List on page 4 for details

Steps Used to Analyze Client’s Housing Needs & Problems:

1) Initial screening interview to determine if client is eligible for service requested

2) One-on-one meeting with counselor to do intake application which gathers demographic, employment, income, debt, housing needs and any current issues

3) Housing Counselor will meet with the client one-on-one and review their needs to determine what type of assistance is needed.

4) A budget worksheet is given to the client to complete prior to the next meeting

5) 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.

6) Develop an action plan listing required steps, responsibility for completing and dates. Signed by the client and counselor or referral to other agency

7) Follow-up Activities (describe when and how often)

8) 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 including, e.g.: 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 anticipated. Please choose from the following types of HUD-approved education services:*

* *FHW - Fair Housing Pre-Purchase Education Workshops*
* *PLW - Predatory Lending Education Workshops*
* *FBW - Financial, Budgeting, and Credit Workshops*
* *NDW - Non-Delinquency Post Purchase Workshops*
* *DFW - Resolving/Preventing Mortgage Delinquency Workshops*
* *PPW - Pre-purchase Homebuyer Education Workshops*
* *RHW - Rental Housing Workshops*

**Example: Prepurchase Education**

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.

**RECORD KEEPING**

*Address the following: CMS used and online record keeping, hard copy file record keeping, list of documents in Counseling files, list of documents in Education files, how you ensure safekeeping of credit reports and confidentiality.*

**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 documents 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**

*Describe how the agency will avoid conflicts of interest and provide all clients with information that they are free to obtain housing counseling and related services from the agency of their choice.*

**Example:**

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. Per our housing counseling program guide, these should include regular file review, file checklist, workshop or counseling evaluations, employee evaluations, methods for ensuring timely response to initial inquiries and ensuring timely (at least every 3 months) follow-up with households and file closing when necessary. Include detail on Counselor Oversight, including: the process through which counselors are monitored, and performance evaluated. Also include a summary of the initial training you provide to newly hired counselors as well as the ongoing training that you support for all counseling staff. Include the number of hours of initial training you provide, the number of hours of ongoing training your counselors receive on an annual basis, and who provides the training for your staff. Describe how these procedures are documented.*

**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*](https://www.ftc.gov/tips-advice/business-center/guidance/financial-institutions-customer-information-complying) *for reference purposes.*

**LIMITED ENGLISH PROFICIENCY**

*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. Describe how the agency accommodates disabilities and the alternative settings/format available to clients.*

**Example:**

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 you are charging clients a fee for any services, identify what counseling activity will be charged. Describe the fee structure and explain how it’s determined (e.g. if it is market cost). Also describe how you ensure the fee does not create a hardship and how you make exceptions for clients that cannot afford to pay. If you do not charge fees, 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 FURTHER FAIR HOUSING**

*You must affirmatively further 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 Assessment of Fair Housing) to identify the primary fair housing issues for your area and address in your plan ways you can assist in overcoming the issues.*

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.

**MARKETING AND OUTREACH**

*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.

**OPTIONAL: Related Resources & Referrals**

*Summarize the related resources and/or services that you provide households either directly or through formal arrangements with other organizations or government entities. Please include one or two sample MOUs that formalize the arrangements you have with other organizations, for example credit counseling, job search assistance, or weatherization grants, etc.*

**SIGNATURE PAGE**

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**Executive Director or Housing Counseling Program Director Signature**

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**Name**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Title**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date**