



HUD INTERMEDIARY TOOLKIT: QUALITY CONTROL

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 approximately 2,019 HUD-approved Housing Counseling Agencies (HCAs) located in urban, suburban, and rural communities in all 50 states and territories. HUD Intermediary organizations include: State Housing Finance Agencies (SHFAs), multi-state organizations (MSOs), regional and national intermediaries, operate at the national, regional, and state levels to oversee and support networks of HCAs.

Intermediaries are required by HUD to have a written quality control (QC) plan as specified in their grant agreement. This plan is the foundation for the Intermediary's network monitoring efforts as it outlines the standards that agencies must meet and the processes by which the standards will be monitored.

This toolkit includes a [template for a compliant QC plan](#), which covers the content to support a robust approach to QC. These include roles and responsibilities of all key stakeholders at HUD, the Intermediary, and its affiliate agencies, as well as policies and standards to maintain a compliant and high-quality program. The plan also outlines good practices for risk analysis, monitoring, measurement and analysis, and corrective actions.

To support the implementation of the QC plan, this toolkit includes three additional resources. Intermediaries can share the [sample optional client satisfaction survey](#) with affiliates as an example to encourage the consistent collection of data from their housing counseling clients. Client satisfaction data provide a means to measure the quality of the counseling services, compare impacts across the network, observe trends in the market, and ensure that the network is providing appropriate, responsive, high-quality services. The second resource, the [training inventory](#), is a quick list of learning opportunities available to Intermediaries and affiliate staff to address common challenges and maintain high-quality counseling services. As a third resource, this toolkit provides tools and tips to streamline the Intermediary's QC process.

This toolkit does not cover all of HUD's program requirements for network monitoring. For additional information, Intermediaries should refer to the regulations and guidance found in the resources section of this toolkit and the Intermediary's grant agreement.

Learning Objectives

Users of this toolkit will be able to:

- Execute a rigorous QC process, documented in a well-articulated plan.

Quality Control Toolkit

This toolkit provides useful information, tools, and strategies to help Intermediaries develop and implement an effective quality control plan. QC plans will periodically need to be updated and will play a vital role in sustaining quality control throughout an agency's housing counseling program.

- Create and implement a client satisfaction survey to ensure that clients receive quality services, and use the data to analyze and improve procedures.

Implement a staff training program ensuring that staff receive training necessary to uphold quality standards.

Toolkit Contents

- [Quality Control Plan Template](#)
- [Client Satisfaction Survey Template](#)
- [Inventory of Staff Training Opportunities](#)
- [Tips for Effective Quality Control](#)
- [Resource List](#)

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 frequently asked questions (FAQs) are available from the HUD Exchange at <https://www.hudexchange.info/programs/housing-counseling/>.



SECTION 2

QUALITY CONTROL PLAN CHECKLIST AND TEMPLATE

Quality Control Plan Checklist and Template

Intermediaries can use the QC plan checklist to assess the adequacy of their plan. If information is missing, they may consult the QC plan template for sample language. Intermediaries can use the template in its entirety to codify their QC policies, procedures, and standards, or they may copy specific language from this template into their own document. When using the template, Intermediaries must review the language closely to ensure that it is appropriate to their programs and insert Intermediary-specific information where necessary.

Please note, the template addresses only the requirements of HUD's Housing Counseling Program. If an Intermediary uses other HUD, federal, state, or local funding requirements to supplement their programs, the plan should be augmented to address the relevant laws and requirements.

Quality Control Plan Checklist

A standard QC plan covers the information listed below in terms of background, required elements, and best practices. These topics ensure that all key elements of QC are addressed.

Background	
1. <u>Plan Introduction and Purpose:</u> a. Describe the purpose of the plan. b. Outline the Office of Housing Counseling's (OHC's) goals for QC.	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. <u>Plan Development:</u> a. Provide a list of references and regulatory citations for the plan contents. b. Document dates of any edits to plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. <u>Definitions:</u> a. Include all key terms specific to HUD's Housing Counseling Program. b. Include terms for any actors referenced in the plan such as the Intermediary and affiliate. c. Include grant terminology such as the grant agreement and work plan. d. Include common Housing Counseling Program terms such as the Housing Counseling System (HCS).	<input type="checkbox"/> Yes <input type="checkbox"/> No
Required Elements	
4. <u>Roles, Responsibilities, and Authority:</u> a. Define roles and responsibilities for all stakeholders in the program. b. Include stakeholders from HUD, OHC, and affiliates.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. <u>Quality Control Standards:</u> a. Outline the standards by which performance will be measured and monitored. b. Include general standards such as grants management, fair housing, reporting, fees, conflict of interest, Real Estate Settlement Procedures Act, and financial audits. c. Include program standards such as approval criteria, facilities and accessibility, delivery of services, performance criteria, and recordkeeping. d. Include file standards for clients, group education, and financial records.	<input type="checkbox"/> Yes <input type="checkbox"/> No

6. Monitoring Procedures: a. Describe procedures for monitoring. b. Include risk assessments, monitoring methods and schedules, and documentation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Corrective Actions, Technical Support, and Consequences: a. Describe options available to address monitoring findings. b. Include corrective actions, technical support, and consequences.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Best Practices	
8. Quality Control Maintenance: a. Describe the Intermediary's strategies for maintaining high quality of counseling. b. Include measures for continuous improvement. c. Address succession planning and contingency planning.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Quality Control Plan for [ABC Intermediary]

Section 1.0: Plan Introduction and Purpose

[Tailor language below to reflect your Intermediary's name and purpose.]

This document is <insert Intermediary's name>'s QC plan. It describes the methods employed to ensure HUD's requirements (at Code of Federal Regulations [CFR] Title 24 Part 214 and Handbook 7610.1 REV-5) as well as the Intermediary's requirements, expectations, and best practices are achieved, including the quality of housing counseling service delivery. The intended audience for this document includes executive directors, program managers, housing counseling staff, and other senior leaders whose support is needed to carry out the plan. HUD requires funded Intermediaries to have a QC plan that specifically outlines how they will monitor the performance of their agencies.

This plan does *not* address Home Equity Conversion Mortgage (HECM) counseling and education, or the particular requirements for Intermediaries with sub-grantees performing this type of counseling. <HECM counseling assists seniors who seek to convert equity in their homes into income that can be used to pay for home improvements, medical costs, living expenses, or other expenses. As a condition of eligibility to provide reverse mortgage counseling, HECM counselors are also required to use HUD's standardized HECM Protocol as guidance when providing HECM counseling. The HECM Protocol provides guidance to counselors on all the information that they must cover during a counseling session. For Intermediaries who oversee affiliates that provide HECM counseling, additional QC procedures may need to be added to this plan from Chapter 4 and Appendix 4: HECM Protocol of Handbook 7610.1 REV-5.>

HUD's Housing Counseling Handbook 7610.1 REV-5 holds Intermediaries responsible, in partnership with HUD, for the quality and type of housing counseling services provided through its housing counseling affiliates (both funded and unfunded) and for compliance with the HUD Housing Counseling Program. The Fiscal Year <insert year> Grant Agreement for the Housing Counseling Program requires <insert Intermediary name> to exercise discretion in the use of grant funds through its sub-grantees, and it holds the Intermediary accountable for the

agency's performance. <insert Intermediary name> will monitor the performance of network agencies and take the appropriate action to resolve compliance and quality problems.

This QC plan outlines <insert Intermediary name>'s approach to QC and serves to:

1. Ensure all agencies comply with Housing Counseling Program regulations and handbook requirements.
2. Identify roles and responsibilities of the Intermediary, affiliates, and HUD staff.
3. Define standards, metrics, and methods by which affiliates will be evaluated.
4. Outline processes for monitoring, including risk assessments, reviews, and follow-up.
5. Create accountability for any program violations or deficiencies in the quality of network services.
6. Reduce the risk and incidence of actions and events that may negatively impact the network housing counseling programs.
7. Improve housing counseling client and program impacts.

Section 2.0: Plan Development

[Provide the list of documents that were used in developing this plan and keep an updated list of edits to the plan, using the table below.]

The following resources were consulted in the development of this plan:

1. HUD Housing Counseling Handbook 7610.1 REV-5
2. 24 CFR Part 214
3. HUD Comprehensive Counseling funding notices and grant agreements
4. HUD technical assistance and training resources
5. HUD 9910: Performance Review
6. <insert additional resources>

This plan should be reviewed annually, revised and updated as needed. Indicate changes made in the Version History Table that provides the plan version number, author, development and revision dates, approving authority, approval date, and the reason for any revisions. The HUD point of contact (POC) should periodically review revisions.

Table 1: Version History

Version #	Authored By	Revision Date	Approved By	Approval Date	Creation/Vision Reason
1	<insert name>	<insert date>	<insert name>	<insert date>	Plan originally developed
2	<insert name>	<insert date>	<insert name>	<insert date>	Plan revision based on HUD requirements
3	<insert name>	<insert date>	<insert name>	<insert date>	<insert reason>

Section 3.0: Definitions

[Choose from the definitions below and add additional definitions that are important to understand your QC plan.]

A HUD Intermediary is any one of the following: intermediary, multi-state organization, or state housing finance agency.

- An **Intermediary** is a HUD-approved organization that provides housing counseling services indirectly through its branches or affiliates, for whom it exercises control over the quality and type of housing counseling services rendered. HUD’s Housing Counseling Program recognizes two types of intermediaries:
 - **National Intermediary.** A national intermediary provides, in multiple regions of the United States, (a) housing counseling services, through its branches or affiliates or both, and (b) administrative and supportive services to its network of affiliates or branches, including but not limited to oversight, pass-through funding, training, and technical assistance.
 - **Regional Intermediary.** A regional intermediary provides, in a generally recognized region within the United States such as the Southwest, Mid-Atlantic, or New England, (a) housing counseling services, through its branches or affiliates or both, and (b) administrative and supportive services to its network of affiliates or branches, including but not limited to oversight, pass-through funding, training, and technical assistance.
- A **Multi-State Organization** directly provides housing counseling services through a main office and branches in two or more states.
- A **State Housing Finance Agency** is a public body, agency, or instrumentality created by a specific act of a state legislature, empowered to finance activities designed to provide housing and related services (e.g., land acquisition, construction, or rehabilitation) throughout an entire state. SHFAs may provide direct counseling services, sub-grant housing counseling funds, or both to affiliated HCAs within the SHFA’s state. “State” includes the several U.S. states, Puerto Rico, the District of Columbia, Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, and the U.S. Virgin Islands.

An **affiliate** is a nonprofit organization participating in the HUD-related Housing Counseling Program of a regional or national intermediary, or SHFA. The affiliate organization is incorporated separately from the regional or national intermediary or SHFA. An affiliate is (1) duly organized and existing as a tax-exempt nonprofit organization, (2) in good standing under the laws of the state of the organization, and (3) authorized to do business in the states where it provides or proposes to provide housing counseling services. Affiliates include all agencies in an Intermediary's network; the term "sub-grantee" is an affiliate of a HUD-approved intermediary or SHFA that receives a sub-award of housing counseling funds provided under a HUD housing counseling grant. Both affiliates and sub-grantee organizations are also referred to as an "agency" within this plan.

A **branch** or **branch office** is the same as an "affiliate" but not separately organized from the intermediary. HUD defines a branch office as an organizational and subordinate unit of a local HCA, MSO, regional or national intermediary, or SHFA, not separately incorporated or organized, that participates in HUD's Housing Counseling Program. A branch or branch office must be in good standing under the laws of the state where it provides or proposes to provide housing counseling services.

A **client management system** (CMS) is an online system that automates some of the counseling process, including intake, file creation, and the collection and reporting of client-level information, including but not limited to financial and demographic data, counseling services provided, and impacts. A CMS also provides counselors with sophisticated calculators and other tools (e.g., to analyze credit, evaluate readiness for homeownership, and compare loan products and features).

A **grant agreement** is the legal instrument outlining the terms and conditions an Intermediary must comply with when receiving a HUD grant award. The Intermediary and the HUD grant officer or authorized designee signs the agreement. Each grant will have its own grant agreement.

The **Housing Counseling System** is a web-based application that allows agencies to verify certain information and reports, such as client-level data, submitted from their CMS. Agencies maintain profile information such as changes in address, telephone number, and contact information. HUD uses the HCS to manage the Housing Counseling Program, including the scoring of grant applications and calculation of grant amounts. The system is accessed through the Housing Counseling web page on HUD's website at <https://www.hudexchange.info/programs/housing-counseling/hcs/>.

The **housing counseling work plan** is the agency plan for how counseling services will be applied to (1) meet the needs and problems of the target population; (2) explain how the agency will address one or more of these needs and problems with its available resources; (3) address the type of housing counseling services offered; (4) provide the fee structure, if applicable; (5) address the geographic service area to be served; and (6) provide the anticipated results (impacts) to be achieved within the period of approval. An agency's housing counseling work plan must also address, if appropriate, alternative settings and formats for the provision

of housing counseling services. Alternative formats can include telephonic counseling or remote counseling systems designed using Skype technology, video cameras, and the internet.

An Intermediary's, SHFA's, or MSO's work plan includes similar information for the network of affiliated agencies or branches. HUD must approve any amended plan prior to implementation.

<Insert other definitions that your affiliates need to know.>

Section 4.0: Roles, Responsibilities, and Authority

[Read the description of roles below to confirm your understanding and edit as necessary to describe the key parties and their roles within the Intermediary. Note that this covers the roles of HUD, the Intermediary, its affiliates, and designated staff.]

As an Intermediary, <insert Intermediary name> is responsible, in partnership with HUD, for the compliance and quality of services provided by its network affiliates. <insert Intermediary name> is also responsible, in partnership with HUD, for supporting its affiliates with training, technical support, and guidance. The roles and responsibilities of each of the parties are described below.

4.1: U.S. Department of Housing and Urban Development, Office of Housing Counseling

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act), amends Section 106 of the Housing and Urban Development Act of 1968 and authorizes the establishment of an Office of Housing Counseling in HUD. OHC provides overall program and grant management, policy direction, and strategy for homeownership and rental housing counseling. The office also provides direction and coordination of internal and external relationships, including HUD and other federal programs and requirements.

OHC has the authority to award grants, perform oversight, monitor requirements outlined in 24 CFR Part 214 and Handbook 7610.1 REV-5, conduct demonstration and outreach projects, and develop certification requirements. HUD's oversight of its grantees includes monitoring, guidance, and technical assistance. Table 2 identifies key staff positions within OHC related to grantee monitoring and oversight.

Table 2: Key HUD Staff

Title	Role	Quality Control Role/Responsibility
HUD POC, also called the government technical representative (GTR)	HUD Handbook 7610.1 REV-5 defines the GTR/POC as the HUD staff person that oversees and monitors <insert Intermediary name>'s housing counseling grant agreement	The POC is responsible for technical and financial oversight and evaluation of <insert Intermediary name>'s grant performance. The POC reviews and monitors <insert Intermediary name>'s work performance, payment requests, and reports. The POC is the first and primary point of contact for <insert Intermediary name> on all matters of program requirements.

Title	Role	Quality Control Role/Responsibility
Customer service feedback liaison	Access point to HUD management who ensures quality and accountability of the program.	The liaison is available to receive client, Intermediary, affiliate, or sub-grantee feedback on HUD's Housing Counseling Program. More information is covered in Section 8.1: Strategies for Continuous Improvement.

4.2: <insert Intermediary name> HUD Housing Counseling <Select Intermediary, Multistate Organization, State Housing Finance Agency>

The roles and responsibilities of <insert Intermediary name>'s are twofold: (1) ensuring that the network of agencies meet HUD program requirements and (2) providing our network of agencies with the skills and knowledge needed to deliver high quality of services.

Table 3 identifies key <insert Intermediary name> staff responsible for network QC. Job titles include <Intermediary may include program manager; monitoring manager; monitors; and grant administrator, finance manager, and compliance officer; etc.>

Table 3: Key <insert Intermediary name> Staff

Title	Role	Quality Control Tasks
Program manager	Responsible for the overall operation of affiliate and sub-grantee oversight. This person is also the primary POC with HUD.	Conducts the following QC activities: <ul style="list-style-type: none"> HUD primary POC Signs all documents for <insert Intermediary name> Oversees development and delivery of quarterly reports to HUD Provides detailed narrative reports (with data analysis) for submission to HUD Develops, designs, and implements administrative procedures and systems to monitor network agencies' performance on various funding programs
Monitoring manager	Responsible for the monitoring and QC function for the Intermediary. Responsible for reporting results to HUD.	<ul style="list-style-type: none"> Establishes an annual monitoring schedule Assigns work to monitors who perform the actual performance reviews Reports to program manager and HUD
Monitor	Responsible for conducting performance reviews.	<ul style="list-style-type: none"> Conducts monitoring of affiliates Maintains tools, templates, and procedures for monitoring
Financial manager	Responsible for overseeing invoice requests, managing budgets, and managing overall spending of the grant funds.	<ul style="list-style-type: none"> Reviews sub-grantee invoices and accompanying documentation Draws funds from the electronic Line of Credit Control System

4.3: Affiliates and Sub-grantees (Agencies)

<insert Intermediary name> maintains a housing counseling network, currently comprising <insert number> affiliates and sub-grantees (agencies), through which it provides housing counseling services (see Appendix 1: List of Affiliates and Grantees). To join the network, an organization must complete and submit the Intermediary’s membership application and, at a minimum, meet all of HUD’s eligibility criteria outlined in the HUD Housing Counseling Program Handbook 7610.1 REV-5. All affiliates of <Intermediary name> must comply with the requirements outlined in the Housing Counseling Program Regulations in 24 CFR Part 214. The agencies will also comply with all other applicable governing documents, including grant agreements and Office of Management and Budget (OMB) regulations governing federal grant recipients.

Table 4 identifies key staff that each affiliate and sub-grantee should, at a minimum, maintain to carry out immediate responsibilities related to oversight and monitoring activities.

Table 4: Key Affiliates and Sub-grantee Staff

Title	Role	Quality Control Tasks
Supervisor	Monitors the work of the housing counselors through activities such as reviewing client files to determine the adequacy and effectiveness of the housing counseling.	<ul style="list-style-type: none"> ▪ Submits reports to the Intermediary. ▪ Documents monitoring activities. ▪ Makes the documentation available to HUD or <insert Intermediary name> upon request. ▪ Ensures staff are compliant with HUD and <insert Intermediary name> requirements. ▪ Conducts internal audits of client and education files, systems, processes, etc., to ensure compliance. ▪ Addresses deficiencies identified by HUD or <insert Intermediary name>.
Counselor	Provides counseling services to clients. Must have six months of experience and proper training.	<ul style="list-style-type: none"> ▪ Provides direct housing counseling services to clients. ▪ Maintains and updates client files. ▪ <insert additional roles/responsibilities>
Finance director	Monitors and supervises the financial work required by the grant. Helps troubleshoot issues that may arise by either the program or finance staff as appropriate.	<ul style="list-style-type: none"> ▪ Oversees finance staff.
Finance staff	Completes financial tracking and reporting responsibilities required by the grant.	<ul style="list-style-type: none"> ▪ Oversees billing and invoicing. ▪ <insert additional roles/responsibilities>
<insert additional job titles as necessary>	<insert the role>	<ul style="list-style-type: none"> ▪ <list relevant tasks>

Section 5.0: Quality Control Standards

[Read and edit the subsections below to reflect your standards and expectations.]

<insert Intermediary name> requires its agencies to maintain high-quality, compliant programs. To meet that standard, <insert Intermediary name> defines three key focus areas for QC: general standards, program standards, and client and group education file documentation standards. The three categories described below are consistent with HUD Form 9910.

5.1 General Standards

General standards that agencies must meet include the following items listed in Form 9910: grant management, fair housing, reporting fees and lender-funded services, conflict of interest, TRID (defined below), and financial audits:

- **Conflict of interest:** Agencies must comply with the conflict of interest provisions in 24 CFR Part 214.303(f) and Chapter 6 Section 2 of the HUD Housing Counseling Program Handbook 7610.1 REV-5, including disclosure statements to all clients describing the various services provided and any exclusive, financial, or other relationship between the agency and other industry partners.
- **Civil rights and fair housing:** Agencies must comply with all fair housing and Title VI regulations of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1972, the Age Discrimination Act of 1975, and the Affirmatively Furthering Fair Housing requirements as described in Chapter 2 Section 2 and Chapter 3 of HUD Housing Counseling Program Handbook 7610.1 REV-5 (if the network includes faith-based organizations, are exempt from employment discrimination on the basis of religion as found at Section 702(a) of the Civil Rights Act of 1964.) and see Chapter 6 Section 1 of HUD Housing Counseling Program Handbook 7610.1 REV-5.
- **Fees (if applicable):** Agencies that charge fees must comply with the fee requirements in 24 CFR Part 214.313 and Chapter 7 Section 6 of HUD Housing Counseling Program Handbook 7610.1 REV-5.
- **Financial audits:** Agencies will comply with audit requirements in accordance with 24 CFR Part 200, 24 CFR Part 214.500, and Chapter 6 Section 1 of HUD Housing Counseling Program Handbook 7610.1 REV-5. Agencies spending more than \$750,000 in federal awards will have an independent single or program-specific audit conducted annually, while those spending less than \$750,000 will have such an audit every two years. HUD will be provided a copy of the audits within 30 days of completion.
- **Lender-funded services (if applicable):** Agencies that have lender-funded services must comply with requirements in 24 CFR Part 214.313(e) and Chapter 7 Section 5 of HUD Housing Counseling Program Handbook 7610.1 REV-5.
- **Reporting:** Agencies must submit complete accurate and timely reports to HUD as described in 24 CFR Part 214.317 and Chapter 6 Section 1/Chapter 5 of HUD Housing Counseling Program Handbook 7610.1 REV-5. This includes personnel activity, timely completion of Form 9902 data, and timely completion accompanying quarterly reporting elements.

- **TRID:** Agencies must be in full compliance with the Consumer Finance Protection Bureau’s “Know Before You Owe” mortgage initiative designed to help consumers understand their loan options, shop for the mortgage that is best for them, and avoid costly surprises at the closing table. This final rule is also known as the 2013 Integrated Mortgage Disclosure Rule Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z) (78 FR 79730, December 31, 2013). This rule extends the timing requirement for revised disclosures when consumers lock a rate or extend a rate lock after the loan estimate is provided, and it permits certain language related to construction loans for transactions involving new construction on the loan estimate.

5.2: Program Standards

Program standards that agencies must meet include the following items listed in Form 9910: approval criteria, facilities and accessibility, delivery of housing counseling services, performance criteria, and recordkeeping:

- **Approval criteria:** Agencies must maintain eligibility for program participation, as defined in 24 CFR Part 214.103 and Chapter 2 of HUD Housing Counseling Program Handbook 7610.1 REV-5 and as demonstrated in their application to the network.
- **Adherence to work plan:** Agencies must implement the activities outlined in their housing counseling work plans and demonstrate achievement of the work plan objectives as required in 24 CFR Part 214.103 and Chapter 3 Section 2 of HUD Housing Counseling Program Handbook 7610.1 REV-5.
- **Continuity of service:** Agencies must provide housing counseling to at least 30 clients each year and serve all clients referred by HUD as required 24 CFR Part 214.303 and Chapter 6 Section 1 of HUD Housing Counseling Program Handbook 7610.1 REV-5. Agencies must maintain a level of funds that enables them to provide housing counseling to at least the required workload of clients every year, whether or not the agency receives HUD funding.
- **Client impact statements:** Agencies will ensure that impacts are reported in their Form 9902 and are substantiated by client files. Similar impacts documented in files must be fully reported in Form 9902.
- **Customer service:** Agencies should maintain a high level of customer service, as documented through customer satisfaction surveys. While not required, surveys provide an indication of how well the agency performed.
- **Facilities:** Agencies must have facilities, including alternative formats for accessibility as required in 24 CFR Part 214.103 and Chapter 3 Section 1 of HUD Housing Counseling Program Handbook 7610.1 REV-5.
- **Qualified staff:** Agencies’ counseling staff must have sufficient training as evidenced in agency files to perform their jobs effectively. As required in 24 CFR Part 214.103 and Chapter 2 Section 2 of HUD Housing Counseling Program Handbook 7610.1 REV-5, at least half the counselors must have at least six months of experience. Supervisors will monitor the work of all counselors.

- **Recordkeeping:** Agencies will use a HUD- and Intermediary-approved CMS on client information and services. Agencies will ensure records are kept for a minimum of three years from the date of the final invoice paid by the Intermediary.

5.3: Client and Group Education File Standards

Agencies will keep a client file for each household served by the agency as outlined in Chapter 5 Section 7 of HUD Housing Counseling Program Handbook 7610.1 REV-5. The file, either paper or electronic, will be kept in a secured place, with access available only to the counselor and <insert relevant staff titles>.

At a minimum, all client files will include the following, as defined in the handbook:

- A unique identifying number to allow tracking.
- A summary of services provided and related documentation including:
 - Financial analysis of the client’s situation.
 - An action plan that outlines steps and goals for the counseling.
 - Activity log with dates, time spent with client, description of sessions and alternatives discussed, and records of follow-up communications.
 - Impacts achieved.
 - Termination notice that notes when and why services were terminated.
- Documents, such as correspondence, received from client or created for them, and referrals made to other agencies.
- Copy of disclosure statement provided to the client during the counseling session (or evidence that the disclosure was made verbally such as for phone counseling).
- Funding sources to which the counseling session is attributed, with any HUD grant activity highlighted.
- Fees charged to the client, if any.
- Client authorization for obtaining credit scores and/or sharing information, as relevant.
- For pre-purchase assistance: home inspection materials required by the grant agreement, information on contact with at least three lenders including the Federal Housing Administration (if the agency provided references), and credit reports (if credit reports are provided).
- <insert additional Intermediary, state, or local requirements or description, if applicable>

Group Education File Standards

Agencies will keep group education files conducted by the agency as outlined in Chapter 5 Section 8 of HUD Housing Counseling Program Handbook 7610.1 REV-5.

All group education files will include:

- A unique identifying number to allow tracking.
- A summary of services provided and related documentation including:
 - An indication of the activity and amount that was partially or fully funded by a HUD housing counseling grant or sub-grant, when applicable.

- Course title and description.
- Name of each housing counselor, instructor, or presenter participating in the session.
- Date, place, and duration of each session.
- List of participating households and the race, ethnicity, and income data for each household.
- The disclosure statement provided to each household that is relevant to the subject of the session.
- The amount paid through client fees and a copy of the receipt provided to the client.
- <insert additional Intermediary, state, or local requirements or description, if applicable>

Financial Records File Standards

Agencies will keep financial record files as outlined in Chapter 5 Section 9 of HUD Housing Counseling Program Handbook 7610.1 REV-5.

All financial record files will include:

- Program financial audit, by a qualified auditor
- Operating budget
- Evidence of leveraged funds
- Payroll, personal activity reports, etc.
- <insert additional Intermediary, State or Local requirements or description, if applicable>

Section 6.0: Monitoring Procedures

[Read and edit the sections below to reflect accurately the Intermediary's monitoring approach. While monitoring procedures are required, the approach the Intermediary takes in terms of the scope of the risk assessment is at their discretion.]

<insert Intermediary's name> will conduct monitoring reviews of its network agencies according to procedures described in this section and in compliance with 2 CFR Part 200. These include a risk assessment to determine the focus of monitoring, the use of a range of monitoring methods and activities, including both onsite and offsite reviews, the scheduling of reviews, and the documentation of review findings.

6.1: Risk Assessment

In setting priorities for and scheduling reviews, <insert Intermediary's name> will consider the risk profile for each affiliate. The following questions will be considered in determining the urgency of a review:

1. Has there been a change in personnel in the past 12 months?
2. Were there any unresolved or repeat prior financial audit findings by the Intermediary or HUD?

3. Were any required reports submitted late or found with errors or omissions?
4. Were there any spending issues, misuse of funds, etc.?
5. Were there any performance review findings by the Intermediary or HUD?
6. Is the affiliate new to the HUD housing counseling program or the Intermediary's network?
7. Is the amount of funding larger than in past years?
8. Were there any Fair Housing Act complaints?
9. Has the affiliate's reputation declined?
10. Is there any evidence of waste, fraud, or abuse?

Affiliates that demonstrate any of the above risks will be prioritized for reviews as well as for technical assistance.

6.2: Monitoring Methods and Activities

<insert Intermediary's name> will use the following methods to monitor its agencies:

- **Ongoing monitoring.** Ongoing monitoring, also known as desk monitoring, includes regular conversations by phone <fill in frequency> to discuss whether the affiliates' services, activities, and operations meet quality, compliance, production, and other performance requirements as outlined in HUD regulations and grant agreements as well as other federal guidelines. This monitoring consists of the Intermediary collecting and reviewing Form 9902s (in particular, Section 10 on impact statements) and quarterly reports, as well as a review and analysis of the affiliate's customer satisfaction surveys.
- **Onsite monitoring.** Onsite monitoring consists of an onsite visit with each affiliate at least once every <fill in> years. An onsite monitoring involves a review of the affiliate's facilities, file storage, a sampling of files, as well as discussions with program staff and <insert any other activities>. The Intermediary will formally observe and document affiliates' activities and operations to ensure that affiliates' services, activities, and operations meet quality, compliance, and other performance requirements as outlined in HUD regulations and grant agreements as well as other federal guidelines. Onsite monitoring may occur as frequently as once per year or as infrequently as once per three years depending on the affiliate's current performance, whether the Intermediary is receiving a sub-grant and the award amount, and the occurrence of third-party audits and HUD's formal performance reviews. Please note that in the instance of joint HUD and Intermediary performance reviews, the frequency could be different than what is noted <set protocol for joint or co-PRs as necessary and applicable to the Intermediary>

Onsite monitoring follows an established <set of protocols, checklists, and/or other templates to send to the affiliate> to test specific areas identified by the risk assessment, and important requirements, such as those requirements that can affect agency eligibility. The <protocol> has been shared with all affiliates so that they are aware of the tests to be performed during the onsite visit.

These monitoring methods all use a combination of activities and tools summarized in Table 5.

Table 5: Summary of Monitoring Activities

Monitoring Activity	Elements Reviewed	Recommended Frequency
Conference calls	Eligibility requirements, work plan objectives, Form 9910 requirements	<weekly, monthly>
In-person meetings	Eligibility requirements, work plan objectives, Form 9910 requirements	<monthly, quarterly, semiannually, annually>
Web-based meetings	Eligibility requirements, work plan objectives, Form 9910 requirements	<weekly, monthly, quarterly, semiannually, annually>
E-mail, listserv, bulletin board, etc., communication	New requirements, best practices, recurring issues	<weekly, monthly, quarterly, semiannually, annually>
Remote file review	File completeness, quality of Form 9902 data	<monthly>
Onsite file review	File completeness, quality of Form 9902 data	<monthly, quarterly, semiannually, annually>

6.3: Monitoring Schedule

<insert Intermediary's name> will establish a schedule for monitoring reviews based on the results of the risk assessment and share that schedule with monitoring staff and the agencies. The schedule may be updated on a <quarterly> basis to reflect changing priorities and risks.

The schedule will list agencies to be monitored, the monitor assigned, the type of review (e.g., ongoing, onsite) and date of the reviews.

For onsite reviews, the Intermediary will send a monitoring letter to the affiliate to inform them of the date and scope of the review. Typically <fill in number of days, weeks> notice is provided to schedule the visit. The Intermediary's protocols, as covered above, may be provided to the affiliate so they know what to expect during the onsite monitoring visit.

6.4: Documentation of Monitoring

If the review is ongoing monitoring, the monitor requests documentation to be reviewed including <insert list of documents>. The monitor reviews the documentation provided and identifies any noncompliant areas or any performance that does not meet the <insert Intermediary name> standard in a monitoring letter/e-mail <specify which one is used>.

If the review is onsite, the monitor requests affiliate documentation in advance of the onsite monitoring visit <insert list of documents>. Once onsite, the monitor conducts an entrance conference with the senior leadership of the agency. At the end of the site visit, the monitor conducts an exit interview with the senior leadership and verbally presents the preliminary results of the monitoring sessions. Within <fill in days> of the site visit, the monitor follows up with a written report of the results of the review.

The monitoring report is sent to the agency with the results of the review and any further corrective action required by the agency. If there are findings of a general nature, the monitor requires the agency to clear the finding in <fill in days> by providing evidence that the appropriate corrective action was taken. The monitor continues to follow up on outstanding findings until an acceptable resolution occurs.

<insert Intermediary's name> will make results of monitoring reports available to HUD upon request.

Section 7.0: Corrective Actions, Technical Support, and Consequences

[Tailor language below to reflect your Intermediary's corrective actions, technical support, and consequences.]

<insert Intermediary name> and agencies must take active steps to correct and improve upon unsatisfactory QC and monitoring results. The <insert Intermediary> communicates regularly with its HUD POC, particularly if there are financial penalties or more egregious issues.

When an issue is identified, the agency must be notified in writing. The Intermediary will first prescribe corrective actions. A corrective action is a task or next step to be completed by the Intermediary or the agency to address a finding identified during monitoring. If the agency does not show compliance with the corrective action or improvement in performance, the Intermediary may offer technical support. If noncompliance continues, the agency may be subject to penalties.

7.1: Corrective Actions

<insert Intermediary name> will identify corrective actions appropriate to the nature and scope of the finding. Table 6 summarizes common findings and responses.

Table 6: Common Monitoring Findings

Monitoring Finding	Corrective Action
Client files incomplete	Provide staff training on client files. Perform regular spot checks of client files by the agency and the Intermediary.
Staff expenses not documented through personal activity reports and/or payroll records	Provide staff training on reporting activity appropriately. Spot-check staff expenses for the following quarter.
Late or inaccurate reports	Provide staff training, set earlier deadlines, input data more frequently in CMS, etc.
More than half of the counselors lack the required housing counseling experience	Terminate agency or place on an inactive status until required staffing levels are met. If counselor is a sub-grantee, coordinate actions with HUD.
<other>	

7.2: Technical Support

<insert Intermediary name> conducts technical support activities to address individual or systemic monitoring findings as well as to present new information to its affiliates and support continuous improvement. Table 7 lists common technical support activities conducted by <insert Intermediary name>.

Table 7: Technical Support Activities

Activity	Offered for	Delivery Method
Training, peer-to-peer learning sessions	Broad number of affiliates have the same/similar issue	Webinars (live and/or prerecorded, such as HUD's free educational trainings), in-person intensive training
Written guidance	Broad number of affiliates have same/similar issue	FAQs, e-mail alerts, etc.
Tools and templates	Broad number of affiliates have same/similar issue	E-mail alerts
Technical assistance	Specific affiliate issue	Screen sharing/Skype, conference calls, and onsite visits
Lend-a-staff-person	Specific affiliate issue	In-person/remote work performed by Intermediary

7.3: Consequences

Specific consequences initiated by <insert Intermediary name> may vary based on results of the quality assessment of the agency's service, third-party auditor findings and/or HUD guidelines and feedback, and the severity of the issue. The <insert Intermediary> communicates regularly with its HUD POC, particularly on consequences delivered to its agencies. The following are examples of consequences that <insert Intermediary name> may implement:

Financial Consequences (only sub-grantees)

1. **Freeze funding.** A sub-grantee will not be allowed to submit invoices for housing counseling services provided until corrective action has been cleared.
2. **Funding recapture or reallocation.** With HUD approval and as indicated in the Intermediary agreement with its sub-grantee, a sub-grantee is required to return funds previously paid for activities that have been found to be noncompliant and not corrected or correctable.
3. <insert consequence>

Nonfinancial Consequences (any affiliate)

1. **Required technical support or training.** Mandate participation in the technical support areas provided by the Intermediary, HUD, or another partner. Certify that the agency has read a specific portion of the handbook and understands the requirements.

2. **Removal of HUD-approved housing agency from network.** With HUD approval, an agency's approval to provide HUD-approved housing counseling services may be terminated from the network based on serious findings from an auditor, [<insert Intermediary name>](#), or HUD for consistent and unaddressed noncompliance with the federal regulations and/or a lack of adequate financial resources to conduct the counseling services in a manner that complies with all of the requirements.
3. **Submission of additional documentation.** Require the agency to submit revised documentation including updated file checklist, missing documentation, and corrected files.
4. [<insert consequence>](#)
5. [<insert consequence>](#)

Section 8.0: Quality Control Maintenance

[Tailor language below to reflect your Intermediary's requirements for maintaining QC through standards for succession and contingency planning.]

Maintaining QC requires active monitoring of the quality of the counseling provided through customer satisfaction surveys and review of written and verbal feedback. It also requires planning for succession and contingencies to ensure ongoing, consistent quality in its network. The [<insert Intermediary>](#) communicates regularly with its HUD POC on maintaining QC areas, particularly on changes to the Intermediary and its agencies in terms of staffing and on maintaining eligibility for HUD's Housing Counseling Program.

8.1: Strategies for Continuous Improvement

[<insert Intermediary's name>](#) supports continuous improvement in its agencies by encouraging the collection and analysis of feedback on client satisfaction and compliance with program rules.

[<insert Intermediary's name>](#) will collect feedback through two means:

1. **Client satisfaction surveys.** Customer service satisfaction surveys will be provided to all agency clients to be completed at any time during their counseling. Agencies should compile the results of client satisfaction surveys on a quarterly basis and share those results with [<the Intermediary>](#). Agencies and the Intermediary will look for trends in client satisfaction and use the results to improve services.
2. **Written and verbal feedback.** The Intermediary also encourages staff and clients of HCAs to provide feedback about their experiences with and observations of the counseling provided. This feedback can be provided verbally or in writing to the Intermediary [<insert name and contact at Intermediary>](#), or directly to HUD at [customer service feedback](#).

The Intermediary will use this feedback to monitor trends, plan for the future, and change staff and protocols as necessary to ensure continued quality counseling. The Intermediary may also

make changes to this plan, the QC standards (Section 5.0: Quality Control Standards), or other documents used in its Housing Counseling Program based on feedback.

8.2: Succession Plan

The <insert Intermediary name> and its agencies will identify steps and responsibilities to ensure no disruption in operations when there are staffing or organizational leadership changes.

The <insert Intermediary name> and affiliates will develop individual succession plans that ensure continuity in the following roles and responsibilities:

1. Executive director:
 - a. Identify a current staff member with the potential to provide leadership.
2. Operations officer:
 - a. Identify a board member, if possible, with an operations background to fill in as necessary with staff gaps.
3. Finance and administration manager:
 - a. Identify a board member, if possible, with a finance background to fill in as necessary with staff gaps.

<insert Intermediary name>'s executive director obtains the support of its Board of Directors to commit the time and resources necessary to implement the plan.

8.3: Contingency Plan

A staff contingency plan outlines the steps <insert Intermediary name> and its agencies will take in the event of a situation that adversely impacts operations, including but not limited to a natural disaster or a sudden loss of funding.

The <insert Intermediary name> and affiliates will develop individual contingency plans that ensure continuity in the following circumstances:

1. Loss of a major funding source:
 - a. Establish relationship with the SHFA, including how clients may be transferred and other services provided to those seeking assistance.
 - b. Alert <local government agency> about situation.
 - c. As layoffs of staff may be necessary, plan to shift clients to <alternate local counseling agency>.
 - d. Maintain a list of potential funders.
 - e. <insert specific steps>
2. Disaster:
 - a. Develop a disaster recovery plan that includes a list of staff contact information, list of emergency phone numbers (police, fire and rescue, etc.), possible alternative location for staff or client meetings, and reference to local government emergency management plan.
 - b. <insert specific steps>

3. Employee termination:
 - a. For resignation, employee should provide two-week notice. All agency property in employee's possession must be returned to supervisor, including files, keys, and equipment, prior to processing of final paycheck.
 - b. For involuntary termination, collect keys during exit meeting and discontinue access to computer systems immediately.
 - c. Clients are to be notified in writing that counselor is no longer with <insert Intermediary name> and that a new counselor will be assigned to their case. New counselor assignment is based on caseload and client type.
 - d. <insert specific steps>

Appendix 1: List of Affiliates and Sub-grantees

Name of Organization	Affiliate or Sub-grantee
<insert>	<insert>



SECTION 3

CLIENT SATISFACTION SURVEY TEMPLATE

Client Satisfaction Survey Template

This client satisfaction survey template provides a list of questions that Intermediaries and counseling agencies should use to track client satisfaction with the agency's services, provide feedback on how the agency performed, and determine whether the agency meets certain compliance requirements from the client's perspective. In some instances when the administrative burden is high, client satisfaction data may not be a good use of resources (e.g., homeless, rental, HECM, etc.).

An approach to implementing this survey involves the following:

1. Distribute this template to all affiliates with instructions to adapt it for distribution. They will want to insert their agency name and may want to edit the list of services offered. They may also add customer service questions of their own, but they should keep the original 10 questions provided in the template.
2. Use an online evaluation tool such as [SurveyMonkey](#) or [SurveyGizmo](#). The survey link can also be added to the HUD conflict of interest disclosure to ensure the client receives this information.
3. Instruct affiliates to distribute this survey to every client. Feedback may be solicited throughout the process, but it should at least be gathered when the file is closed and/or the housing goals are met. For example, some agencies provide a survey link at application intake while other agencies use client exit surveys/questionnaires at the end of counseling and education sessions.
4. Follow-up may be necessary to ensure that the survey is completed within six months after the client file is closed. Surveys may be distributed on paper or electronically. Costs for postage and online survey fees are reimbursable expenses.
5. Affiliates should review surveys on a regular basis and use them to determine the level of satisfaction with their services. They may use these surveys to assess the adequacy of their counseling across service areas (e.g., pre-purchase counseling vs. post-purchase counseling) or to compare the efficacy of their individual counselors).
6. On a quarterly basis, affiliates should share the results of their surveys with the Intermediary. The Intermediary can choose to receive copies of surveys or request a summary of results in an Excel spreadsheet. The Intermediary may choose to create a spreadsheet for collecting the data. Online evaluation tools typically have a function for downloading results.
7. The Intermediary may evaluate the data from the surveys to determine an average satisfaction score for each affiliate and for each service.
8. Results from these surveys can be used to identify training needs among staff or identify trends in customer needs.

Housing Counseling Client Survey

We believe it is important to get *your* input on the quality of the services you received. Please tell us how we did so that we can serve you and others better in the future. Please answer all questions on the front and back of this survey.

Counseling agency:	
Counselor:	
Date of service:	
Date of survey:	

Counseling Services Received Please indicate the counseling or education service you received.	Yes	No	Unsure
Financial education or assistance with money management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Credit counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pre-purchase counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Post-purchase counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help with refinancing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reverse mortgage counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mortgage default/delinquency counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeless counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please describe)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you want further counseling, will you go back to the same agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please rate the **quality of the services** provided from 1 (very poor), to 5 (excellent). If a question is not applicable or you do not wish to respond to that question, check the box NA.

Quality of Services Received	1	2	3	4	5	NA
1. Did we provide clear instructions?	<input type="checkbox"/>					
2. How well did the counselor explain the counseling process, the available programs, and potential impacts at the outset?	<input type="checkbox"/>					
3. How well did the counselor communicate the analysis of your financial situation?	<input type="checkbox"/>					

Quality of Services Received	1	2	3	4	5	NA
4. How would you rate the knowledge and expertise of the counselor?	<input type="checkbox"/>					
5. How well did the counselor listen to your needs and seek to understand your situation?	<input type="checkbox"/>					
6. How would you rate the counselor's professionalism, courtesy, and responsiveness?	<input type="checkbox"/>					
7. How would you rate the information on available housing resources provided to you during the session?	<input type="checkbox"/>					
8. How well did the counseling meet the specific needs that you came in with?	<input type="checkbox"/>					
9. How would you rate the budget or other action plan that was developed during the session? (Please rate as "1" if no budget or plan was developed.)	<input type="checkbox"/>					
10. How would you rate the overall quality of the housing counseling process and services received?	<input type="checkbox"/>					



SECTION 4

INVENTORY OF STAFF TRAINING OPPORTUNITIES

Inventory of Staff Training Opportunities

This training inventory lists the training that Intermediaries may choose to provide to their affiliates. Some training courses are available from HUD and its training partners. See the [resources](#) section for sources of training.

Training Category	Description	Audience
New Member Training		
HUD Network Membership Interest	HUD's approval requirements for the housing counseling network includes eligibility and application requirements along with the processes.	New/potential affiliates
Network Orientation	The orientation overviews the structure of Intermediary's network; expectations; and standards for conduct, roles, and responsibilities. Identified are the QC plan, implementation procedures, funding opportunities, available technical assistance and training, and other resources.	New and existing affiliates
Program Training		
Client Management System Training	The training reviews the CMS and how to use it to interface with HUD's HCS; track and analyze client data and impacts; report to HUD; manage client physical files; and ensure accessibility for Intermediary, HUD, and auditors.	All affiliates
HUD Counseling and Education File Management	File management includes requirements for client counseling and education files, proper documentation, file maintenance and internal QC activities.	All affiliates
HCA Marketing	Training includes marketing an HCA, outreach to potential clients, fundraising, and potential grant opportunities.	All affiliates
Renewing HUD Network Membership	Training includes requirements for periodic renewal of affiliate membership in Intermediary's network. Included are how affiliates are assessed, including HUD eligibility requirements, HUD compliance requirements, and network membership requirements.	Existing affiliates
Compliance Training		
HUD Compliance	HUD compliance training describes HUD rules and regulations for the administration of housing counseling services, including a discussion of HUD Handbook 7610.1 REV-5, current HUD directives, and reporting process for potential issues and concerns.	All affiliates
HUD Grant Agreement Training	Training includes grant and sub-grant agreement, including all requirements of the grant, and topics such as performance reporting, financial reporting and monitoring, and specific reporting tools such as the HUD-9902, SF-425, and HUD-424-CB.	Funded affiliates

Training Category	Description	Audience
Compliance with State and Federal Regulations	This training describes laws and regulations governing the provision of housing counseling services beyond HUD Handbook 7610.1 REV-5, current HUD directives, and effectively researching, understanding, and applying state laws and regulations.	All affiliates
National Industry Standards (NIS)	This training overviews NIS for counseling agencies, similarities and differences between the NIS and HUD, best practices in implementation, information about NIS training and certification, and benefits of NIS certification.	All affiliates
Audits and Performance Reviews	This training describes performance reviews conducted by the Intermediary, HUD, and third-party audits, as well as differences and similarities in processes, expectations, preparation, implementation, and potential impacts and consequences along with best practices for internal monitoring and ongoing preparedness.	All affiliates
Client File—Privacy and Security Requirements	This training covers HUD and NIS requirements for privacy and securing confidential data, including information about privacy in the counseling setting, file storage, e-security, and confidentiality requirements.	All affiliates
Counselor Training		
HUD Housing Counselor Certification	This training covers information on the HUD housing counselor certification process, the courses and training necessary to become certified and to maintain compliance, and continuing education.	All affiliates
Industry News and Updates	This training presents current events and issues in the housing market and housing counseling industry that have a direct impact on the provision of housing counseling services or the administration of housing counseling programs.	All affiliates



SECTION 5

TIPS FOR EFFECTIVE QUALITY CONTROL

Tips for Effective Quality Control

This section provides tips and suggestions for best practices that Intermediaries can use to support high-quality counseling services in their networks. These are suggestions for consideration.

Tip #1: Make Information Available in a Central Location



Description

Some Intermediaries have found that online one-stop-shop websites speed up communication and ensure strong knowledge management across its affiliates. These Intermediaries make everything about their Housing Counseling Program available online, in one central location. Google Docs, Basecamp, Dropbox, and SharePoint are examples of platforms Intermediaries can use to provide easy access to monitoring; grant administration; and other tools, guidelines, and templates.

Why

Affiliates need clear guidance on the requirements, expectations, and practices of the Housing Counseling Program. Easy access to information helps them focus on program tasks without having to search through extensive e-mails or their own files. A central site also allows the Intermediary to make timely updates to materials. Intermediaries can also use these platforms to collect grant reports and other required compliance documents.

Example

Since 2010, the HUD-approved intermediary known as the Housing Partnership Network (HPN) has leveraged online collaboration platforms to connect with affiliates and provide opportunities for ongoing training, technical assistance, and peer exchange. Currently, HPN uses Jive software to support our online community, MemberExchange, where affiliates can access grant materials and resources to support their programs 24/7. HPN staff post copies of sub-grant agreements, reporting templates, webinars, links, and other resources, and they share important announcements with affiliates on the site. Affiliates also use the site to post questions to HPN staff and their peers, engaging in ongoing discussions that often generate best practices or ideas for new counseling initiatives for the network.

Tip #2: Create Tools and Templates for Your Network



Description

Many effective Intermediaries have developed tools such as client file checklists and templates such as sample client action plans that their affiliates can modify and adopt for their own programs. These tools and templates are provided with clear instructions for editing and adapting them for the affiliate's use.

Why

Tools and templates provide clear, actionable guidance to affiliates and help ensure consistent processes across the network. They also save affiliates' time, as they do not have to create their own documents or processes from scratch.

Tip #3: Establish a Quality Control Budget**Description**

A QC budget designates resources specifically to QC activities, including staff time to review affiliate documentation and funds for site visits.

Why

A QC budget ensures that sufficient resources are dedicated to support Intermediary's commitment to QC. By setting aside these resources for QC, the Intermediary can ensure that critical activities occur and also can assess the effective use of these resources. Questions to consider:

1. Are sufficient Intermediary staff assigned to oversee affiliate activities?
2. Can existing staff absorb additional QC tasks?
3. Do low-performing agencies need more support? If so, is the current staff able to meet these needs?

Tip #4: Conduct Concurrent Monitoring with HUD**Description**

The Intermediary should consider being present for third-party audits and HUD performance reviews. When possible, the Intermediary should coordinate their own monitoring of sub-grantees to coincide with these activities.

Why

Being present at third-party audits and formal HUD performance reviews increases the knowledge base of the Intermediary staff and allows staff members to see HUD's audit process firsthand. It also allows for a coordinated approach to resolution and correction of any issues identified and reduces the burden experienced by sub-grantees as they spend time preparing for and attending just one monitoring visit instead of two.

Example

The Minnesota Homeownership Center, a HUD-approved intermediary, frequently has performed joint monitoring visits with the OHC Minnesota HUD Office for jointly funded sub-grantees. They work together to coordinate a date that works for all parties; share the tools, templates, and sub-grantee documents that will be used during the monitoring visit; and issue separate but concurrent reports to the sub-grantee.

Tip #5: Make Network Aware of Common Errors Undermining Quality Counseling**Description**

Across an Intermediary network, HCAs may have similar compliance issues and challenges. For example, many HCAs lack adequate conflict of interest practices. Intermediary staff should meet regularly to discuss HCA performance and identify common problems. Staff can use information from these meetings to select topics for webinars and other technical assistance efforts.

Why

Using real-world challenges to inform training, technical assistance, and monitoring will build interest in and commitment to Intermediary trainings and technical assistance efforts and will support a stronger affiliate community.

Example

At the beginning of each fiscal year, HUD-approved intermediary HPN holds a webinar on HUD compliance for all affiliates. During the webinar, HPN shares lessons learned from HUD’s performance reviews, including common findings and applying best practices to avoid them. HPN staff stay in regular contact with the HUD POC and member affiliates during performance reviews so that they can provide targeted technical assistance on areas that have proven challenging for affiliates. For example, HPN has shared timesheet templates and fair housing disclosures created by affiliates that have been reviewed by HUD and that meet all compliance requirements. All materials are posted on HPN’s online peer-exchange community MemberExchange, where affiliates can access resources and engage with their peers 24/7.

Tip #6: Create a Comprehensive Quality Control System**Description**

A comprehensive system for QC uses tools, templates, job aids, and regular quality reviews to help housing counselors focus on productive client interactions and high-quality housing counseling.

Why

Tools and templates support consistency in the counselor’s approach, and regular monitoring and feedback helps them continue to improve their performance.

Example

Money Management International (MMI), a HUD-approved national intermediary, has a multifaceted approach to ensure the consistency and quality of the counseling required for its HECM program. MMI aims to achieve compliance with HUD regulations and required counseling protocol while remaining focused on the quality of the customer’s experience during each counseling session.

As part of the intake procedure, the certified intake counselor discusses required pre-session information with the client, provides the required documentation to the client for review, and schedules the first session with an HECM-certified counselor. The client has an opportunity to review the information, become familiar with it, and identify questions to ask in the first counseling session. This intake process meets HUD requirements and permits the HECM-certified counselors to focus on counseling rather than paperwork.

To ensure that counselors have up-to-date information, MMI has created a SharePoint site—accessible by all HECM counselors—that serves as a central repository for all program tools, forms, and job aids. These materials include a reference guide and a comprehensive HECM counseling PowerPoint deck that counselors are required to use during every counseling session. Counselors can program the site to send individualized alert messages about updates or changes to resources on the site.

To facilitate communication and on-the-job learning, the SharePoint site has a discussion board to exchange ideas, troubleshoot challenges, or simply share messages with the team of counselors. Counselors also have access to instant messaging to communicate in real time with their peers or leaders when they have a question, need clarification, or need support while conducting a session.

MMI leaders perform quality assurance reviews at least monthly. These reviews cover procedures and client interactions and include a discussion of what occurred in the session as well as a review of the file documentation. Results of the reviews are always shared with the counselors. If any issues or gaps are identified, leaders work collaboratively with the counselor to develop action steps to address the problem.



SECTION 6

RESOURCE LIST

Resource List

The following is a list of useful resources to help new or potential Intermediaries get familiar with network monitoring requirements and best practices.

Resource Name and Link	Description
HUD Housing Counseling Regulations	These are the federal regulations for the HUD Housing Counseling Program (approved in 2007).
HUD Housing Counseling Handbook 7610.1 REV-5	This link connects to HUD’s Housing Counseling Handbook, which details HUD’s standards and required procedures for providing housing counseling services to consumers. This handbook is also available in Spanish.
Form HUD 9910	This form is the OMB-approved checklist tool that reviewers and agencies use to ensure HUD Housing Counseling Program compliance.
Housing Counseling Frequently Asked Questions (FAQs)	There are a number of FAQs on performance reviews and monitoring, including the most updated copy of Form 9910, HUD’s performance review form, and recordkeeping.
Housing Counseling Webinar Archive	This page contains links to the archived versions of previously recorded webinars presented by OHC. In particular, “Oversight of Networks Series: Network Monitoring Webinar” provides an overview of the requirements and best practices for Intermediaries in terms of monitoring their network.
Housing Counseling Training and Events Calendar	This page, filtered for the Housing Counseling Program, provides upcoming training and events available either by HUD or by partners.
Housing Counseling Certification	This page offers free online training covering a broad range of topics including responsibilities of homeownership and tenancy; avoiding foreclosure and eviction; financial management; and fair housing. The training is designed to help prepare housing counselors for the upcoming mandatory HUD-certified counselor examination.
Housing Counseling Training Partners	OHC works with national organizations to provide training to housing counselors. Funds are awarded to national organizations through the Housing Counseling Notice of Funding Availability. This page includes links for the current organizations that have been awarded housing counseling training grant funds as well as other training available.
Capacity-Building Toolkit—Compliance Monitoring Procedures	This toolkit provides guidance on ensuring financial monitoring requirements are met under the OMB Circular.

Resource Name and Link	Description
Capacity-Building Toolkit—Developing a Housing Counseling Work Plan for HUD Approval	This toolkit provides a template for creating a work plan for HUD approval.
Useful Resources for Counseling Agencies Housing Counseling HUD-Approved Intermediaries, SHFAs, and MSOs This page provides a list of agencies participating in HUD’s Housing Counseling program as intermediaries, SHFAs and MSOs as well links to other useful resources.	These two pages on the HUD Exchange website provide links to other useful resources for HUD HCAs.
HUD Integrity Bulletins	This page provides integrity bulletins developed by the HUD Office of the Inspector General covering topics related to oversight and monitoring.