

Frequently Asked Questions (FAQs) on Reportable HUD Housing Counseling Activities

This document clarifies the reporting standards outlined in the [HUD Housing Counseling Handbook 7610.1 Rev. 6.1 \(April 2024\)](#). The following questions and answers are designed to help HUD-certified housing counselors identify and report the broad range of activities that qualify as housing counseling as well as the flexibility available when counseling clients.¹

Reportable Housing Counseling Services

There is a broad range of housing counseling activity that you should report to HUD on the 9902 form. This activity includes connecting clients with housing and non-housing community resources that help address their housing barriers and achieve their housing goals.² All housing counseling must include four steps: **Intake**, a **Financial and Housing Affordability Analysis (FHAA)**, an **Action Plan**, and **Follow-up**.³ These steps are designed to be flexible and adaptable and should be customized to the needs of the client.

1. **My client needs help accessing non-housing resources, such as social security benefits, disability benefits, Medicaid, employment training and placement, etc. to address their housing barriers or achieve their housing goals. Is this activity reportable to HUD as housing counseling?**
 - You should report this activity to HUD as housing counseling **if** it helps the client address their housing barriers and achieve their housing goals **and** it includes the four required elements of housing counseling (Intake, FHAA, Action Plan, and Follow-up). For example, if the additional income from social security benefits or disability benefits or new employment will assist the client with making housing payments or achieve a sustainable budget, you should record the connection between the non-housing resources(s) and the client's housing barriers or goals in the client file.
 - However, you should not report the session to HUD as housing counseling if the non-housing resources have no relationship to the client's housing situation.
2. **Should I report clients counseled using non-HUD funds?**
 - Yes. It doesn't matter who funded the counseling session. You should report to HUD **all** housing counseling activity that meets HUD's standards.

¹ This Q&A provides examples of how to comply with HUD's policies, but it does not cover every situation you may face as a housing counselor. If you have additional questions, reach out to your HUD Office of Housing Counseling Point of Contact.

² See 12 U.S.C. 1701x (a)(1)(iii) and 12 U.S.C. 1701x (c)(2)(C), which are excerpted in the Appendix.

³ See 24 C.F.R. 5.100, which is excerpted in the Appendix.

Intake

3. Can someone other than a HUD-certified housing counselor perform intake?

- Yes. Intake can be performed by any staff member at your agency who is trained in the requirements of the Privacy Act of 1974. The intake process involves gathering basic information (such as the client's contact details and their housing barriers and/or goals), determining if your agency is able to provide assistance, and documenting this information in the client file.
- If a client doesn't proceed with housing counseling after intake, then you should not report that activity to HUD as housing counseling.

Financial and Housing Affordability Analysis

The Financial and Housing Affordability Analysis (FHAA) should evaluate how a client's financial situation is related to their housing barriers and housing goals.

4. When should I create a client budget as part of the FHAA?

- You should create a client budget if it would help the client address their housing barriers or achieve their housing goals. For most agencies, this will be the case for most clients.
- You do not need to create a client budget if you determine it would not help the client address their housing barriers or achieve their housing goals. Some examples may include, but are not limited to:
 - Individuals experiencing homelessness who have no income.
 - Rental clients seeking advice about a non-financial landlord issue (e.g. repairs).
 - Disaster clients, depending on the extent and type of emergency.
- If you do not create a budget, the FHAA should instead include a more general evaluation of the client's finances. This evaluation could include, but is not limited to:
 - Income stability: Whether the client has or will soon have a reliable source of income to sustain housing.
 - Affordability challenges: Whether financial constraints, such as rent burden or lack of savings, are a barrier to their housing goals.

Be sure to document the reason why a budget was not created in the client file.

5. My client needs help with a non-financial landlord/tenant problem such as a maintenance issue, fair housing issue, etc. How should I perform the FHAA for this client?

- The FHAA should evaluate how a client's financial situation impacts their housing barriers and housing goals including resolving issues with their landlord. Determine whether or not there are any financial components to their housing concern and note those facts in the client file. If you determine that the FHAA does not require a budget, document the reason why in the client file.

6. My client cannot access any of their financial documents. How should I perform the FHAA for this client?

- In this situation, ask the client to recall details of their finances to the best of their ability. Use that information to evaluate the client's financial situation and how it impacts their housing barriers and housing goals. Determine whether to create a budget or perform a more general evaluation of their finances, whichever is more appropriate for their situation.⁴ If you determine that the FHAA does not require a budget, document the reason why in the client file.

7. My client needs help applying for an emergency rental assistance program. How should I perform the FHAA for this client?

- The FHAA should evaluate the client's financial situation and how it impacts their housing barriers and housing goals including their need for rental assistance. If you determine that the FHAA does not require a budget, document the reason why in the client file.

Action Plan

The Action Plan outlines the next steps you and your client will take to address their housing barriers and achieve their housing goals. Action plans can range from simple to detailed as long as they're customized to the client's needs and circumstances.

8. My client needs help accessing non-housing resources such as social security benefits, disability benefits, Medicaid, employment training and placement, etc. to address their housing barriers and achieve their housing goals. What might an action plan for this client include?

- The counselor will:
 - Provide referrals to appropriate services, such as benefits counseling to enroll in social security or Medicaid, job training and placement services, etc.
- The client will:
 - Contact and apply for the appropriate services referred by the counselor.

9. My client is experiencing homelessness and currently has no income. What might an action plan for this client include?

- The counselor will:
 - Assist the client in applying for public assistance by guiding them through the application process or helping them gather necessary information.
 - Provide referrals to local emergency shelters or transitional housing programs.
- The client will:
 - Contact the emergency shelter or transitional housing program referred by the counselor and apply for public assistance, such as housing vouchers or emergency assistance.

⁴ While this approach meets OHC requirements, note that other funders or assistance programs may require additional verification or supporting documents.

10. My client is facing eviction and needs help understanding their options. What might an action plan for this client include?

- The counselor will:
 - Guide the client in identifying and preparing the necessary documentation for rental assistance.
 - Provide referrals to legal aid or tenant advocacy organizations.
- The client will:
 - Contact legal aid or tenant advocacy organizations and apply for rental assistance programs.

11. My client is interested in homeownership but has little savings and no credit history. What might an action plan for this client include?

- The counselor will:
 - Identify pre-purchase education workshops.
 - Work with the client to develop a savings plan for a future down payment and review options to start building credit.
- The client will:
 - Attend pre-purchase education workshops, begin a savings plan for their future down payment, and select an option to start building credit.

12. My client's home was damaged in a natural disaster. What might an action plan for this client include?

- The counselor will:
 - Refer the client to FEMA or other disaster recovery programs, if available.
 - Assist with identifying contractors or repair programs.
- The client will:
 - Apply for disaster recovery programs and/or FEMA assistance, if available.
 - Work with contractors or repair programs referred by the counselor to address immediate housing needs.

13. My client is 62+ and wants to explore using a Home Equity Conversion Mortgage (HECM) reverse mortgage to age in place. Do I need to create an Action Plan for this client?

- No. For HECM clients, an action plan is not required. However, the remaining housing counseling processes—Intake, FHAA, and Follow-up—are still necessary.

Follow-Up

14. How do I comply with HUD's Follow-up requirements?

- You must make at least two attempts to contact the client within 60-days of no communication. This contact can happen via any method (e.g. phone calls, emails, letters, live video calls, or in-person conversations).
- If these two attempts are unsuccessful, you must make a final follow-up attempt via letter or email requesting a response. This final follow-up attempt must be made within 30 days of the second contact attempt.

15. What Follow-up information should I include in the client file?

- The dates and methods of follow-up attempts.
- The outcome of each attempt (e.g., successful contact or no response).
- A copy of the final follow-up letter or email to the client, if applicable.
- Notes on any progress reported by the client including any 9902 outcomes achieved, as well as any adjustments to their action plan or their reasons for terminating services.

16. Can I use a survey to satisfy HUD's Follow-up requirements?

- No. You cannot use a survey *alone* to satisfy follow-up requirements. You must use a direct communication method (e.g. phone calls, emails, letters, live video calls, or in-person conversations). Surveys can be used as a supplementary tool to gather additional client insights but cannot serve as the main method of follow-up.

Appendix

The statute authorizing the Office of Housing Counseling allows a wide range of activities to be reported to HUD as housing counseling. Specifically, 12 U.S.C. 1701x (a)(1)(iii) states that:

Counseling and advice to tenants and homeowners with respect to property maintenance, financial management, and such other matters as may be appropriate to assist them in improving their housing conditions and in meeting the responsibilities of tenancy or homeownership.

And 12 U.S.C. 1701x (c)(2)(C) states that:

The homeownership counseling provided by homeownership counseling organizations receiving assistance under this subsection shall include counseling with respect to — (i) financial management; (ii) available community resources, including public assistance programs, mortgage assistance programs, home repair assistance programs, utility assistance programs, food programs, and social services; and (iii) employment training and placement.

HUD's Housing Counseling regulatory definition describes housing counseling and the specific steps each housing counseling session must include. Specifically, 24 C.F.R. 5.100 states that:

Housing counseling is independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must include the following processes: Intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible.