The Housing Counseling Federal Advisory Committee ("HCFAC") of the U.S. Department of Housing and Urban Development convened a public meeting from 1:00 pm. to 4:00 pm EDT on Tuesday, December 13, 2022. The HCFAC met virtually via Zoom. Public attendees included 293 registered webcast attendees, and 173 attended the webcast.

**HCFAC Members Present:**

* Angie Liou
* Carol Ann Dujanovich
* Richard Verrillo
* Gabe Del Rio
* Ibijoke Akinbowale
* Lawrence Batiste
* Marcia Lewis
* Bill Sevilla
* Anthony Walters
* Paul Yorkis

**HUD Presenters:**

* David Berenbaum - Deputy Assistant Secretary, Office of Housing Counseling
* Virginia Holman - Designated Federal Official, Lead for DART, Office of Housing Counseling
* Julia Gordon – Assistant Secretary for Housing and the Federal Housing Commissioner
* Terry Carr – Office of the Deputy Assistant Secretary, Office of Housing Counseling
* Ruth Roman- Senior Policy Analyst, Office of Deputy Assistant Secretary, Office of Housing Counseling
* Jerrold H. Mayer – Director of Outreach and Capacity Building, Office of Housing Counseling

**Subject Matter Expert Presenters:**

* Terry Carr – Senior Program Advisor, Office of Housing Counseling- Past Marketing: Awareness and Visibility Initiative
* Whitney Kenerly –Director, Red Carrot- 2023 HUD OHC Awareness, Communication, Education and Counseling
* Jerrold H. Mayer – Director of Outreach and Capacity Building, Office of Housing Counseling- Modernization of the National Industry Standards for Homeownership Education and Counseling
* Ruth Roman- Senior Program Advisor, Office of Housing Counseling- Briefing on Tribal Counselor Certification Rule

**Opening of the HCFAC Meeting**

**Summary:**  Mr. Berenbaum welcomed everyone, stated a quorum was met and called meeting to order. Before beginning, on behalf of the HUD leadership and the professional staff of the Office of Housing Counseling, Mr. Berenbaum took a moment to express appreciation to Patty Arvielo for her public service as a member of the Housing Counseling Advisory Committee; for her personal and professional commitment to the housing counseling community, and for the support and guidance that she's provided to him in his role as Deputy Assistant Secretary. On November 29, 2022, Patty submitted her resignation and offered her continued support for, quoting her, "the work we love". The Office of Housing Counseling's mission is to help families obtain, sustain, and retain their homes. HUD accomplished this mission through a strong network of HUD-approved housing counseling agencies and their HUD-certified housing counselors, who provide professional services to over 1 million consumers annually. The Housing Counseling Federal Advisory Committee is mandated by Congress to advise the United States Department of Housing and Urban Development about its Housing Counseling program. The committee provides a forum for those involved in housing counseling and related industries to offer advice directly to the Deputy Assistant Secretary for housing counseling on ways to accomplish the objective of HUD's Office of Housing Counseling. The committee's 12 seats are equally split between representatives of the real estate industry, the mortgage industry, housing counseling agencies, and consumer advocates. Committee meetings are open to the public.

Mr. Berenbaum gave a brief rundown of the agenda as follows: committee members will be focusing in on discussions that solicit their expertise and recommendations on two exciting new initiatives, our forthcoming National Housing Counseling Awareness Campaign, and our discussions with our industry partners on how to approach and facilitate an update or modernization of our industry best practices. An update on the status of tribal rulemaking will also be discussed, as well as highlighting some recent accomplishments of the Office of Housing Counseling.

**Introduction of Assistant Secretary of Housing, FHA Commissioner- David Berenbaum**

**Summary:** Mr. Berenbaum then introduced Julia Gordon, the Assistant Secretary for Housing and Federal Housing Commissioner.

**Comments by Julia Gordon, Assistant Secretary for Housing and the Federal Housing Commissioner**

**Summary:** Ms. Gordon started by thanking Mr. Berenbaum for the invitation and that she was present voluntarily and believes that the work of the Office of Housing Counseling within HUD and the work of housing counselors throughout the nation are foundational to HUD’s mission of supporting affordable housing throughout the country and addressing the systemic and pervasive barriers to housing that exists today. Right now, we are at a time of inflection when it comes to housing, we're at a new point in that economic and business cycle that goes up and comes down. This is a time where new approaches and innovations are more important than effort than ever.

Many people are still out there struggling as a result of the pandemic and though the hardships that were faced during the worst of the pandemic may be less, COVID is still out there, and it is still having impact. These impacts now go well beyond just the public health concerns that we had at the beginning, there are some fundamental economic challenges that we will need to. We want to continue to focus on helping those families and communities that have been disproportionately impacted while at the same time assessing the lessons we’ve learned from this experience and put some of them into place for better and more effective delivery of services going forward, continuing our focus on fairness and equity. We want to ensure that everyone has access to safe, decent, and affordable housing, we want to make sure families are not shut out of opportunities.

When looking at the work we do here in the Office of Housing, whether it's on the homeownership side, through the FHA program, on the rental side, through the FHA multifamily portfolio, and our assisted rental portfolio, or even in the work we do to make sure that all communities have access to adequate health care and residential care facilities, where we also ensure mortgages the nexus of all these is the housing counseling program. This is why today's Housing Counseling Federal Advisory Committee Meeting is so important, this is why more than 250 attendees have registered for this event. We all understand the importance of housing counseling to address the barriers that should not exist but do exist for so many individuals and families seeking affordable and sustainable housing.

Ms. Gordon is extremely proud of the Office of Housing Counseling’s hard work over the past couple of years. The new online and telephone search tools are terrific, the grant funding for the launch of an innovative partnership program between housing counseling agencies and minority serving institutions will enable us to reach deeper and more directly into so many communities. More will be heard today from David and his team about other work underway, whether it's new outreach methodology, doing work that is more sensitive to cultural and racial differences, or work that expands HUDs framework for working within tribal communities. These are all critical initiatives, not just for the housing counseling agency network, but for HUDs mission, and for the people and communities that we serve. Ms. Gordon bid farewell and thanks to Patty, who is a longtime partner, not just on the housing counseling side, but on the FHA lending side as well.

**David Berenbaum** – Requested if Julia Gordon could speak on the importance of manufactured housing as a source of affordable housing.

**Julia Gordon-** The manufactured housing audience knows better than any other out of reach home prices can be for families today. Manufactured housing is a sector that has been around for a long time, but it is one that suffers from some of the same things that FHA lending sometimes suffers from, which is that people have a picture that they created in their mind decades ago, and that picture hasn't been updated to reflect the modernization of the program. More than ever, manufactured housing is poised to be an important option for individuals and families seeking affordable housing and HUD plays several different and complementary roles in this sector. Many people may know that the Office of Manufactured Housing Programs has responsibility for the Building and Construction Code of all manufactured housing, we affectionately refer to this as the HUD code. That code was decades out of date; through that building code and changes that this administration has been making over the past couple of years we have now brought that code up to date. Or as soon as we finalize our proposed rulemaking on the code, we will have brought that code up to date. People who are seeking manufactured housing will have access to the modern features that they're looking for ranging from multi-unit manufactured housing to all kinds of advances in terms of finishes and decor, to what the roofline looks like, et cetera. We're very excited about that work and think that it can really underpin having manufactured housing be an option, not just for sort of the more traditional Manufactured Housing Communities that you might find in a rural or, or suburban area, but really, for using manufactured housing, in more urban settings in infill projects. FHA also has financing tools that relate to manufactured housing, both for housing titled as Real Property and housing titled as Personal Property. In both of those areas, HUD has not updated its programs in a long time, leaving us to have not been a player, particularly in the Personal Property area for a long time because of outdated loan limits and programmatic features. What we are doing now is really working to change that. To say we think we can provide safe and sustainable lending in this space that will dovetail nicely with the updated manufacturing standards for the sector really presents a wonderful opportunity for so many seeking affordability.

**David Berenbaum**- Thanked Julia, introduced Gabe Del Rio to ask his question.

**Gabe Del Rio** – Some follow up to that question, on the update for the manufactured guidelines are you also including or thinking about what other secondary market projects can be utilized? Will those standards meet the need of standard GSE products and programs? Several rural organizations don't like today's manufactured housing and cite its quality, that and accessing standard products for financing outside of FHA programs in the marketplace has always been seen as a challenge, which is important for the full market to be served.

**Julia Gordon**- First let me say the HUD code is a federal building code. In fact, it's the only federal building code that we have anywhere in the world of building goods. That is something that applies regardless of where you're getting your financing from. Something that is true is that there are still plenty of very aged, manufactured housing out there that need renovations, one of the things we're looking for are products that we have that enable owners to get the financing to help them upgrade, as well as purchase units. We are very mindful of and always keeping track of the work that Fannie and Freddie do in the manufactured housing space, in fact, we're very inspired by some of the work that's been done by them through the duty to serve initiative. The pad lease protections that have been put in place for communities are inspiring. For people who live in manufactured housing, but don't own the land under their unit, the nature of their tenancy is incredibly important, it determines whether this is a safe and sustainable form of affordable housing, or something that is neither. This is an issue we're very mindful of and trying to figure out what our authorities are here to help do the same kind of good work that Fannie and Freddie have been doing in this area. All of this goes without saying that our work is best implemented and amplified when the housing counseling community is up to speed on what is being done. David has worked hard to create trainings for housing counselors, and to make sure that manufactured housing is out there as a viable option, and that counselors have a good understanding of what's happening in the field.

**David Berenbaum**- Thanked Julia for her time and Gabe for his question.

**Office of Housing Counseling Updates – By David Berenbaum**

**Summary:** HUD hosted it’s first house party event on November 1st, which was hosted by HUD Secretary Fudge. It was an amazing program very different for HUD, using virtual mediums such as YouTube and other streaming video sources to speak about the opportunities of homeownership, but from the vantage point of new homeowners or the next generation of homeowners. It presented information in a fun way, most significantly, it highlighted and repeatedly emphasized the importance of the resource of HUD approved housing counseling organizations, and our counselors to be trusted advisors. Over 6000 people registered for the airing or the viewing on November 1st; 4000 viewed it, and thousands have viewed it now that it's posted on YouTube. One of the highlights was Julia Joseph at Single Family Housing who spoke about the myths of homeownership, breaking down some of those mythologies of 20% down or perfect credit, as well as focusing on alternative and emerging credit products, such as special purpose credit programs. This is an invaluable new tool that is getting quite a bit of attention across the country from the lenders who have opted to implement that program. We are doing some deep thinking internally at HUD about how to continue this path of reaching the next generation of homeowners, so there may be some more house parties in our future.

Many of you are familiar with what has been from the founding of the Office of Housing Counseling, our quarterly newsletter, The Bridge. The Bridge was called that as originally the goal was to bridge and to share information with the housing counseling community. It's a rather traditional format, and I want to commend my team for the years of publishing the document with our colleagues at ICF. But the time has emerged for change and I'm happy to share with you that at the beginning of January we are going to have an online blog format. Using the best of electronic and social media to deliver information more properly and efficiently using other forms of delivery such as video. The new format is going to be called ‘Housing Counseling Today’ and we will share more information in early January. Using this we will reach beyond the thousands we had before to tens of thousands of our stakeholders and the public. We are excited for this and look forward to your feedback and input as we move forward with our partner ICF to use this new tool.

There have been quite a few requests, particularly because of some turnover in the housing counseling community, for additional training for what’s called the One on ones of Housing Counseling. In January, we have scheduled three webinars which have been wonderfully received. We're approaching 1,000 registrations for the three programs, which cover the basics of being a HUD approved housing counseling organization, reporting and financial requirements, and our mutual goals to reach communities. Whether it's to bridge the homeownership gap or serve underserved communities across the nation, thank you to the entire housing counseling community for the terrific response to this new initiative.

We're getting very close for the announcement of second year and supplemental grant opportunities, stay tuned right after the New Year for that. This is a great interest to many of our colleagues in the housing counseling community. We did not want to issue a NOFO opportunity before the holidays, but things are right around the corner, please stay tuned.

Introduction of Terry Carr, Office of the Deputy Assistant Secretary, who's playing a lead role in launching our awareness campaign and will brief on what has been done in the past and where the future is headed.

**Past marketing: Awareness and Visibility Initiative by Terry Carr – Senior Program Advisor Office of Housing Counseling**

**Summary:** Three or four years ago we were looking to increase the awareness and visibility of the Office of Housing Counseling and of housing counseling services. That initial effort had a couple of goals. We wanted to increase stakeholder awareness of housing counseling and we wanted to positively change the perception of housing counseling services. So essentially to encourage more consumers to use them. We wanted to motivate behaviors that led to acquiring housing counseling and we wanted to partner with stakeholders in the industry so that we could more effectively disseminate information about housing counseling.

Some research was done to look at what the current perceptions of housing counseling were among consumers and stakeholders as well as among a vast variety of audiences. The office developed some messaging and collateral and distributing of that messaging and collateral. Some of the techniques used were 25 focus groups, we talked to licensed real estate agents, we talked to lenders, we talked to GSEs, we talked to FHFA, we talked to CFPB; so we talked to all the regulators in the industry. We did surveys and mystery shopping of HUD agencies, we did a communications audit, we looked at how housing counseling was perceived. We looked at impressions of HUD and housing counseling, in social media and in newspapers.

What was found was that there's a negative perception of the term counselor. We found that people really do value impartial advice and that housing counseling could be perceived that way. We found that people think of HUD as a good housekeeping seal of approval. People tended to trust the service if they thought in some way HUD certified or approved it. We also found that stakeholders, and by that meaning lenders, regulators, and realtors all had distinct value proposition.

To engage them and help raise the visibility of housing counseling, we would need to be very specific and focused on what the value proposition for that particular stakeholder group was. We then found that there was in general a lack of awareness of the fact that these services were available, a lot of people didn’t realize it’s availability or the thought that were only available to certain people. Some key comments heard were that housing counseling is a best kept secret, and when people found out about it the reaction was, why didn't I know about this, I would have used it. People did not know that these programs assisted all homeowners most thought that they were limited to low-income people or section eight, particularly since it was associated with HUD. The advice given was that we should really get out in front of consumers and try to get them to think about using housing counseling at the very beginning of the home buying process.

With the information that we collected, we came up with some ideas around messaging, we thought that one of our key messages would be that HUD approved housing counseling provides trusted resources to empower consumers to make informed housing decisions. The key word is that these are resources you can trust, and that they are resources that gives consumers more power and ability to make good housing decisions. We had a tagline, 'Let's Make Home Happen', we had a visual identity guide, a library of photos, a color palette, and typography that we wanted to use for various templates for brochures and PowerPoints, lots of collateral development. We developed brochures in 10 languages and sent them out to the housing counseling agencies and to the HUD regional offices as well as HUD field offices. We created posters that helped highlight the value of housing counseling and how important it is to use those services. We had flyers and did several videos. We also celebrated our anniversary with a three-minute video positioning housing counseling as a first step in the home buying process. We also did a video saying happy birthday to the Office of Housing Counseling, for the 50-year anniversary.

After developing the materials and doing the research that led to the material development we started, we found that agencies would probably be one of the best ways we could start to disseminate the messaging. Trainings were then offered on social media to agencies, we also had a social media toolkit as well as a media relations toolkit in preparation for the next phase of the campaign. We partnered with HUD Public Affairs during homeownership month and we had a national homeownership toolkit in 2016. In 2018 we had webinar trainings, which had good participation and we disseminated the brochures to all the agencies. To list what was done specifically for the 50th anniversary, we had a conference and a symposium called ‘Building Tomorrow Together’, a logo, a video, and an anniversary page. We were successful in that we were able to identify some of the things that were uniquely important to our stakeholders, and we developed a lot of material and collateral.

We didn't get very far into the message dissemination portion of this, we're looking for the next phase of the campaign to really try to make more headway in getting the word out. We were not able to maintain the resources and weren't able to renew the contract and go right into that next phase. There were challenges in leveraging to get the word out, the contract gave us plenty of resources for developing content, but it's another level of resources to push forward ads, radio and TV, which is what is needed to do a substantial visibility campaign. HUD, as an agency, is not always willing to co- brand which is a challenge along with working with counseling agencies as the primary way to distribute the message. Since those resources went away, we have been relying on our HUD public affairs and FHA communications efforts. We have continued some social media efforts and efforts designed to bring attention to housing counseling. Weekly emails go out to subscribers, we do webinars, and have announcements in The Bridge using a Gov delivery as well as tweet about things. This is not a cohesive strategic campaign. What we hope to do is to begin the efforts to do something a bit more strategic and comprehensive. We are convinced that consumers would benefit from being more aware of housing counseling, and that there's a wide range of consumers, not just low and moderate income who would benefit from having more knowledge about the homeownership process. We want to increase awareness and availability of the value of housing counseling services, we want to launch a nationwide campaign that's targeted at diverse markets. The campaign theme will be Celebrate HUD priorities, to include Housing, Equity, Asset Development and Bridging the Homeownership Gap. We think a successful campaign will position to HUD approved housing counseling providers, and certified counselors as a go to resource for homebuyers prior to the housing research now that we have HUD approved counseling agencies, and we have HUD certified counselors. This builds on the idea of a trusted resource. The campaign will target cities that are aligned with HUDs diversity and equity goals, as well as focus on financial literacy and education permission from pilot projects that we are working on. That kind of summarizes what we've done in the past and our vision for another effort designed to increase visibility and raise awareness about housing counseling.

Introduction of Red Carrot and Whitney Kenerly, who is the public relations vendor brought on board to help with this next effort.

**2023 HUD Office of Housing Counseling Awareness, Communication, Education and Visibility Campaign - Red Carrot by Whitney Kenerly**

**Summary:** Red Carrot and their Director, Whitney Kenerly, are managing the visibility project with OHC. A brief agenda of the presentation is as follows: a review of the team's capabilities and the initial framework for this campaign. As part of this framework the goals of the campaign, the market research plan, the current marketing brief, and potential communications approaches will be discussed.

Currently market research is being conducted with this campaign that will determine the exact communication approaches that will be proposed in 2023. Red Carrot is a woman owned small business that values innovation, creativity, and optimization. Our goal is to continuously evaluate our performance to ensure that we are providing the best possible solutions for our clients. For this contract with OHC, we will be conducting market research, developing a comprehensive marketing campaign using insights to implement innovative marketing strategies, creating campaign materials, and planning events. Some of our core capabilities that are relevant to this campaign include our market research capabilities, integrated marketing, strategic communications, our graphic design and video production capabilities and stakeholder outreach.

The outline for this campaign with OHC is as follows: we will be using our integrated marketing workflow- this uses a holistic approach to develop comprehensive campaigns. Our strategies are based on insights, and then we create all components of the campaign based on the strategies. Once the campaign launches, we continuously evaluate our performance to determine if we're meeting the campaign goals, what's working, what can be improved, and these evaluations allow us to constantly monitor and improve our campaign performance. We're launching a campaign; the goal of this campaign is to advance racial equity through the promotion of housing counseling and homeownership. This campaign will be based on research, and it will be designed to increase the use of housing counseling in minority communities.

Every campaign is designed around goals, these goals serve as our North Star and our guide for the campaign strategies. The goals for the HUD OHC campaign are to generate awareness for pre-purchase counseling and promote home ownership, to generate awareness of and promote HUD certified housing counselors as trusted professionals and to generate awareness for national homeownership month in June. Our campaign strategies will be based on market research and as part of our research we are evaluating and analyzing the product which is primarily housing counseling.

Our target areas to focus on are our audience for the campaign, insights from previous OHC campaigns, the landscape, which is the current discourse about housing counseling, and in the entities competing with our message to promote housing counseling, and, of course, the key stakeholders for the campaign. This is a very high-level view of the type of things that will be expanded on in our marketing plan for the campaign. We know that it will be essential for us to leverage partnerships, if possible, we would also like to engage and activate new stakeholders, we want to reach target audiences using strategies based on our research. We want to create eye catching materials, so think about how many ads, commercials, emails, promotional mail you see a day we want to create something that pops. We want to develop materials that stand out so that our message has the opportunity to reach our audience. We also want to be sure to use metrics, metrics to measure our success, and to also help establish benchmarks for the future. These are all some of the potential communications approaches we might use in this campaign.

Our goal is to use multiple channels that are best suited to both our message and our audiences so these approaches would build on each other towards our goal. They can include social media campaigns, coordinated with stakeholders, sharing content in the bridge, creating, and sharing toolkits for stakeholders and outreach events.

We will be asking the committee for feedback on different outreach approaches and look forward to the opportunity to hear insights and recommendations. Thank you for the opportunity to share this initial framework we are absolutely thrilled to be working on this campaign with HUD OHC.

Re-introduction of David Berenbaum to begin member discussion and Q and A.

**Member Discussion and Q&A - by David Berenbaum**

**Summary:** David Berenbaum opened the floor to the members of the advisory committee to share their thoughts and questions.

The questions presented were as follows:

1. How would you describe your preferred target audiences for an office of housing counseling campaign?
2. In your experience, what types of communications have been most effective for these target audiences? What hasn't worked? Remember our discussion about our racial equity survey that we did with the counseling community, grassroots initiatives were quite distinct as far as how we look at marketing and how we look at outreach. We're interested to hear your feedback on that.
3. What are some ways you'd like to recommend this effort highlight the value of HUD certified housing counselors?
4. How can we use these efforts to elevate the profession and our industry as a whole?
5. What would you say are the biggest challenges for HUD certified housing counselors, and what are their biggest needs?
6. What types of materials have been most useful to HUD certified housing counselors? What materials have not been useful?
7. What would you say are the biggest challenges for diverse and underserved audiences to obtaining homeownership? What are their biggest concerns?
8. What are the biggest obstacles they face when they are going through the process?
9. And finally, when it comes to buying a home are there hidden challenges that diverse underserved or emergency impacted populations face?

To be completely transparent with you, the Office of Housing Counseling has decided in the first year of the campaign to focus on bridging the homeownership gap and this is because we have limited resources. We hope to leverage more matching resources to this initiative, but as we look out further into future years of the campaign we can see moving into other areas of focus.

**Panel Discussion Comments were:**

* What I would say for preferred target audiences is targeting areas that we know have high minority populations, perhaps overlaying that with affordability. We can also look at the homeownership gap in every market and look at that from a racial and ethnic perspective. We ranked every state by race and ethnicity you can target in that way. As far as prioritizing the audiences, on the experience of what communications have been effective or hasn't worked. The issue or the concern that I have, even in seeing this with Red Carrot is that a lot of material has been made in the past - a lot of iterations and materials. And it's then relied on, back to Terry's challenges in her presentation, the housing counseling agencies to get that out there. These organizations don't have the budget for it. When they are posting, they're only doing or they're only getting organic traffic, which means people who already know them. When you talk to your audience to only people who know you, and The Bridge newsletter and even in the tweets and all the other sort of mechanisms that are happening right now, we are talking to ourselves. That's industry loop talking inside and that's the big concern. I think that whatever resource we have, shouldn't be in reinventing the wheel and shouldn't be in redescribing the problem statement because, Terry, the findings that you presented there, I've heard that stuff for 20 years in this space, not one thing has changed about the findings of what the public think about housing counseling in the last 20 years. But what we have not done in that time either is to put materials out there in an advertising space. What hasn't worked is making a bunch of materials and relying on the industry to let people know who already know them about these programs, that has not worked. What I would recommend to value housing counselors or to highlight that is to tell some success stories. And I love this, the ‘Let’s Make Home Happen’, Terry, that was awesome, I love that, that's the best slogan I've heard yet. Because really housing counseling, as we explain it to folks, helps you to purchase a home or become mortgage ready, but helps you for all instances and all circumstances of housing. I think telling some success stories, through the lens of consumers, who were able to achieve their home, in a more stable and better way would be a great way to tell that story; that can elevate the counselors that are there. And the biggest challenges that these folks are facing or what the need is, is marketing and when it comes to this particular issue, the housing counseling agencies, nonprofits, don't have marketing dollars, they don't have advertising plans. You can give them material, but they won't actually get pushed out there. They don't have the people capacity or the budget capacity to push those ads out there. I think that the audience's face, and I just do want to end on that because my work is in racial equity. And I think that, Terry's findings, already described that HUD has a seal of trust. And that seal of trust can help bridge the trust gap. That trust gap exists between communities of color, and institutions at large. Specifically, financial institutions as well and government institutions because there's distrust because of history. And because that history is the truth and its real life, it's what's happened, and we must build that trust again. What we see in specific racial equity findings is that you have a big trust gap. And that's the first barrier to even getting information out. But to even get to that point where information is being taken in by the consumer, you’ve got to overcome trust. And there's a lack of that.
* First, I think it’s great for HUD to be trying to reduce the racial homeownership gap. As we know, in this country, homeownership is probably the number one biggest factor towards building family and generational wealth. What some people may be surprised by and may not know is that the Asian American population has the greatest income and wealth disparity as a racial group in this country currently, and because of my area of expertise and who I've worked with over the years, the target audience that I'm particularly concerned about is the Asian American and Native Hawaiian Pacific Islander population. I think David did mention earlier about trying to pay more attention to language access in this outreach campaign, I certainly applaud that. I just do want to caution that what we have found especially over the last two years where so much of the pandemic related communications have really produced more lessons learned about what language access means. At the very basic and means having written materials translated by translators who have not only the language but the cultural understanding and competency to make sure that the cultural contexts are appropriate. But number two, let’s say somebody sees a flyer or social media post in Chinese or Korean or Vietnamese; how are they going to be connected to a housing counseling agency or local housing counselor that's going to be able to provide those services in that particular language? I think that's something that deserves some looking into so that we're not doing the outreach but then there is a gap at the other end should the outreach work and people do want to be connected with a HUD certified counselor. Gabe touched on this in terms of the outreach, I do think there are different approaches, in terms of outreach, one is kind of top down centralized. And because HUD’s scope is national, the other one is more sort of decentralized, where you're relying more on your local partners and agencies and it's a coalition effort. I do think you will probably get limited success with the generic national centralized outreach, we're not sure who that's getting to. It could result in an echo chamber of only hitting the people who are already in our camp or already in the industry. Interestingly, I do want to share a local experience, much like probably many of the other housing counseling agencies, for the longest time, we have our own sort of little list of clients and people will refer their family and friends. So that's kind of the sort of concentric circle of clients that we have. However, during the pandemic, we expanded our services to have language hotline in Chinese to do intake for emergency housing assistance for rental and mortgage emergency assistance. All of a sudden, we were getting an influx of people who never knew about us before and were not interested in home buying but are now connected to us because they're applying through us for emergency assistance. So now they have become part of our network. And now as the pandemic has, sort of ramped down some, some of these folks are starting to think about the future, and they are able to kind of think about next steps and maybe buying a home. One other thing I just want to highlight for some communities of color especially for immigrant communities is that we find that oftentimes they do need more work. Meaning on average our HUD housing counselors have to spend more time and more hours working with them because they need more time for us to catch them up on basic concepts like credit, which are new to them. If they did not grow up in this country, then having non-cash-based transactions and building up a credit profile and basic things like filing their taxes just because a disproportionate of our population do work cash-based industries like food service and restaurants. So that is something that is a challenge that I will identify for our housing counselors, they tend to have to spend more hours and more time working with our clients.
* I've got several suggestions and I hope Whitney can take some notes or watch this later. I think one of the absolute incredible resources is the 800-phone number. I don't think enough people know about it, and I'm not talking about first time homebuyers. I'm talking about everybody. I happen to be a realtor and a fair portion of my clientele are seniors. I don't know if you have reached out or are planning to reach out to AARP to let them know about housing counseling and how housing counseling can help their members take advantage of the resources that are available to them through housing counseling agencies. I also would suggest that a communication be targeted to the 50 states, to the members of the 50 state legislator housing committees, because those folks need to know how important housing counseling is in their states. I don't mean this disrespectfully to my friends who served in the legislature, but they're asked to look, in Massachusetts, at 7000 pieces of legislation, they cannot be an expert on everything, but they can, and their staff can, if they have communication when somebody has an issue. If there's some way to reach out to them, I would really encourage that opportunity. They’re in Massachusetts, and I know David is aware of this the mandatory agency disclosure form has been translated into seven different languages, the seven most commonly spoken languages in Massachusetts, I don't know what is available in other states. I think, to the earlier point that was made first time homebuyers are not always white Caucasians, they are people of very different backgrounds, from very differences. They need that language assistance and anything that we can do to encourage that. My last suggestion is to reach out to the Mortgage Bankers Association and let the Mortgage Bankers Association know that housing counselors want to work with prospective homebuyers. That helps that industry a great deal; in Massachusetts there is a close working relationship with the Massachusetts Mortgage Bankers Association. I have a hunch, the same can be true in the other 50 states and territories. Thanks for the opportunity to share those thoughts.
* I wanted to just start by saying I'm really excited to see that we are focusing again on visibility and branding awareness overall. I know it had been a longtime priority of the office and so I'm excited to see the restart and the strong resurgence of this effort. In terms of the target audiences, current homeowners are top of mind for me as they're very important to maintaining homeownership is important to growing the net number of homeowners that we have in the country, especially as we look to focus on bridging the gap for minorities in homeownership. I think that will be incredibly important in terms of our marketing efforts. Seniors as my colleagues have mentioned, and minority populations desperately impacted by the homeownership gap, as well. I think it would also be very nice to see some additional myth busting come out of this campaign and so whether that is, what is the difference between a certified housing counselor versus paid programs that require you to repair your credit. I think some of that consumer targeted information would be really helpful in terms of attracting consumers to the services overall, as we look to increase the awareness of the profession, but also, since we've gone through this certification, we've professionalized the standards. And we do differ from a number of services that consumers may be more directly familiar with. I think from that angle, since we're focusing on home buying and homeownership, it could also be very nice to include some of those common myths for prospective homebuyers as they look to engage in the home buying process. Just as a target method on attracting them to connect with our services further. I also neglected to mention that public housing, as well as an area of targeting consumers and prospective homebuyers, something based upon the target audiences that I've mentioned, mailers do continue to be popular, text, radio, and commercials. But I know that Terry's presentation did include some of the challenges, and one of which, again, happened to be co-branding. As some of my colleagues have mentioned earlier, a lot of local housing counseling agencies do struggle with the resources to engage in significant marketing and outreach strategies and so I'm not certain if we figured out the solution to help them better collaborate with some kind co-branding efforts. But I think that's something that will be critically important in helping them increase the overall awareness of their local agencies and of the collective field.
  + **David Berenbaum-** I want to highlight your remark about reaching residents in various apartment complexes subsidized as well as market value. I think our committee is very aware of recent Freddie Mac data that shows the percentage, particularly in the Black or African American communities, of folks who are mortgage ready today, based on data analysis that Freddie has done, but are simply unaware of it is really an amazing opportunity across all groups for us to reach that audience.
* I can't agree more with what many of the other members already mentioned. What has always worked for us and where the majority of our referrals and clients coming to us are from partners and word of mouth from family or friends who already completed and went through counseling with us or took advantage of our service. The biggest challenge for us is when we do not have grant funding, or we don't have partner funding or another way to fund a client that's coming for homebuyer education or pre purchase, and they come to us and find out there is a fee attached to it, right there without a partner talking about us or explaining what we do, or a family or friend that has explained our service and the value of what we offer when they're coming to us from outside and they hear there's a fee and that is a killer for many people for us. That's one of the struggles we always have once the grant funding is gone. How do we cover the costs for the homebuyer education program when the people are coming to us for this; that's the biggest hurdle and when I think of the marketing and the campaign around this, some agencies don't charge a fee, others do charge a fee and there's so much confusion around that and it is an obstacle that we'll have to try to face. It's a lot easier when we can offer it for free to get people signed up and to get people into the program.
  + **David Berenbaum-** That really falls in line with our goal of elevating the profession and ensuring that the public recognize the value in the information and knowledge they're receiving. Not only when they apply for mortgage, but over the life of their residency in their home and beyond.
* I'm pretty new to the housing counseling specific side of this and kind of facilitating this information flow out to the target audiences. But I know it's very similar to pretty much what we’ve heard for anything involving Native communities and homeownership or housing services and assistance generally. It's always difficult to reach the folks who probably need this information the most and I think that's why we're all here trying to find ways to improve that process. I think it's a call to remind everyone that Native Americans, for the arguments that I'm probably most interested in, are all across the United States. When you're working in your existing communities, whether it's urban, suburban, or even rural, you're probably going to have Native Americans in them. Try to remember that and find ways to connect with partners within those areas, and they don't have to be formal tribes or whatnot, they could just be a community of groups that you're probably already familiar with for getting more information out to the target audience. I heard the comment earlier about kind of being in a bubble, it's very hard to try to facilitate people to reach out to housing counselors if the information is coming from housing counselor organizations. They will already have to be in the know about them to learn about that from the audience from this kind of platform that we're using. For tribal communities to include a more general type of financial literacy training and education a lot of tribes that I'm aware of in the housing programs that we work with are conducting more general financial literacy, homebuyer education without this kind of formal counseling tag tied to it. So as a good mechanism to highlight the next step is moving on to more formal or certified HUD counseling. And I know we're still very much in the beginning process of getting more of our tribal housing professionals engaged in that formal certification process as well, but I think just a reminder that it probably does take a lot more outreach with other groups that are doing similar, but not quite as formal levels of counseling, just to make sure that when they're doing their general financial literacy, or trainings that they're pointing their audience into the next step or the right step for that process. That's some of the pushback that I've seen from tribes slowing down the formal certification process for their programs is that they are having this bring a broader audience that they can reach that they may not be able to keep connecting with if they're having to move back to this more formal certification process. I know that a lot of that will come up and further discussions down the road but that’s where I am and it’s probably true for rural communities to have to work with whatever groups are out there doing this type of more general training as well.
* What I have heard thus far has been tremendous and at the same time, what I've noticed is that we have now come to a point where we have elevated the office of not only how it's done, but by certifying counselors, we have really elevated the individual offices and agencies in regard to this. My upward concern now is as we continue to move forward, and we are bringing in the marketing and the excitement that's coming behind it and having all of these available, is to make sure that the counseling agencies can maintain and be able to handle the workload that is also coming because there are a number of areas that are going to be added to it now we're in a phase with heavy render systems. We are in a phase of heavy mortgage assistance that's needed, educational assistance, but we're having to grasp and reach out to the future and when I say the future, the people that are ready to purchase now to be more aware. And as we make all of these individuals more and more aware, wanting to make sure that our certified counselors are ready, do we have the numbers that we need in place to be able to handle this? With the new program that you were speaking of in regard to coming for the new year, the new blog, that this would lay out, hopefully a lot of additional information that people could go to. And if we had links, of course, to be able to go to that, and send individuals to it so that they can get additional information that would be quite helpful. That was just basically one of my concerns there were just so many obviously good suggestions that have made, which surely going to have some more talks to go over, but I also am looking at the factor that with the marketing campaign, is that going to be a national complete campaign that we're looking at that will include the local agencies where they can utilize templates, or will that only be product that can be utilized by the Office of Housing Counseling?
  + It is our hope to develop templates that we'll be able to use by all of our partners. But this will be an area of further development and focus for us. And we're really at the first station stop now on this ride. We're going to really rely on our partners at Red Carrot and all of our stakeholders and partners across the country to guide us on that front. We want meaningful templates and campaigns here.
* I mirror everyone else's comments. I'm representing the reverse angle of this. I'm concerned about what has been our outreach to our senior community. We need to also promote that we can do reverse mortgages for purchase. If there are first time homebuyers in the senior community, we can provide financing repurchase standpoint. Our trade association, NRMLA, which is the National Reverse Mortgage Lenders Association, needs to be a little bit more active. I would welcome any assistance in that to become a bit more proactive with the counseling. We have had many speakers at our conferences. However, I don’t really think our organization is aware of what this organization in this community can offer. Also, I think what I was thinking about as everyone was speaking, we have another Association, the National Aging in Place Council, we need to really make them aware of what is available for their senior borrowers. I haven't heard very much of anything as it relates to our senior community, which I think is underserved as well. I'd like to be very proactive in partnering with anyone to discuss other options for our senior community.
  + Thank you, and I look forward to continuing that discussion. I’ll note too that many black and Latinx homebuyers buy their homes in their more mature years.
* I think we have some good ideas it's safe to say we hear you and that agencies are probably not the best equipped to distribute the message. We'll be looking for some strategies to deal with that. I think we've gotten some good ideas today of groups to partner with, some were already on our list, but some are not and so the idea that we might be able to reach out to the housing committees in the 50, state legislators are things worth exploring. I'm excited about what I'm hearing, and I think we look forward to taking these back and factoring it into the rest of our discussions.
* I have a quick question for Terry, in some of the slides that you shared, one of the findings I found interesting was that there was a negative connotation or negative association with the term 'housing counselor'. I was pretty struck by that. I'm wondering if there's any context or additional details you could share around that?
  + The idea is that people think of counseling is something you do when you have a problem. They think of it like marriage counseling, or maybe counseling for rehabilitation of some kind of problem and that is the connotation, and we had lengthy discussion within OHC and within the industry when this first finding came out, and some of the agencies have already taken to using the term coach or advisor to try to avoid that connotation. With respect to the Office of Housing Counseling, the term counselor is statutory. It would be extraordinarily difficult for us to change it. Some of this research happened before certification was final. So now counselor is part of the language that we use around certification, which would be another obstacle to changing it. We don't see it as a high priority, at least from the perspective of the Office of Housing Counseling to change that nomenclature. If agencies choose to do it, it's fine. We do understand that it is a little bit off putting and I do think there are probably strategies we can engage around raising visibility and helping people understand what counselors do, that might help mediate some of the initial challenges that come with the use of that that term.
    - Thank you, and I'll add that we have moved to using HUD Certified Housing Counseling, analogous to a licensing requirement used throughout our industry for other forms of professions. We believe that has elevated the word counselor through recognition of HUDs role of being that seal of approval.
* So, for that to be meaningful, we've got to brand it within the public. I agree with you that the certification is really meaningful, but if the public doesn't know what it means to be HUD certified, then the branding elevation doesn't happen. And this exact issue, and I’m surprised you haven’t heard of it, because I've literally seen, market study aftermarket study for 20 years always come back with this finding that folks don't like that term. One thing that certainly I have seen work in the grant space as it relates to marketing among nonprofits, and that is if there is a reimbursable grant or if there is a grant that it specifically must be spent on advertising, which I've seen grants like that over time, then that specific resource - a small amount can be carved out, even $1,000 per organization goes a really long way on social media. So, if they were spending $90 a month then that would be $90 a month more than 99% of them are spending today. And would leverage their existing social accounts. So, where they have their social account, and they have content and they have an audience, that's great, because it gives them validity. Advertising would push those actual posts in front of new people who have never known or met that organization, which is so critical, and that's the piece we're missing. So, if there is any way you could sub grant or make that, you know, part of a NOFO, or part of HUD, housing counseling grant funds that would be required to be spent in that way that would really do the trick.
  + I'll share with you that we're looking at that very issue right now, as part of the modernization of our NOFO and grant programs. So, stay tuned. The way we've been talking about disaster response and other issues, or a focus on a fixed price for fee for service, that's part of what we're looking at right now as well.
* Thank you all so much, you hit on the exact things I was hoping to hear and that are really going to help us, it was really helpful for me to get a better idea of the depth of diversity of our audience, geographically, demographically, from all different backgrounds. Thank you for sharing your insights on the bandwidth of our partners, this is good to know as we develop materials as we don't want to develop something that never gets used, because the people, who end up with them, don't have the bandwidth to share them. And thank you for sharing ideas for stakeholders to contact. Something you know, David, Terry, and I have talked about is a strong coalition will be the key to success for this campaign. I'm hearing the concerns about reinventing the wheel, I get it, I just want you all to know that our goal is to launch a campaign that is feasible to stakeholders, that has a brand identity that does resonate with our target audience, and that it's accessible to everyone. Thank you, again, for your input. This is really helpful. And I'm so excited to just dig into this and put together a plan.
  + We will be doing targeted outreach and listening sessions focus groups with Red Carrot to other audiences and stakeholders.
* Introduction of Jerry Mayer, the Director of our Outreach and Capacity Building, to highlight partnering with all of you as our industry partners and to update industry best practices, which has not happened in a while.

**Modernization of the National Industry Standards for Homeownership Education and Counseling – by Jerrold Mayer**

**Summary:** Ontoday's agenda, we'll go over what the standards are, we'll talk about the HUD Housing Counseling handbook and how it references the standards, a little bit about the process for how industry has adopted the standards over the years. We'll make the case for modernizing the standards today and go over HUDs role in the modernization effort.

The national industry standards for homeownership education and counseling also known colloquially as the standards, are a set of guidelines that are published to promote quality homeownership and counseling services. Industry professionals adopt the standards, and they are trusted to provide consistent and high-quality advice. NeighborWorks America convened and supported the Standards Advisory Council around 2004. The standards were first published around 2007 but during 2022 this past year NeighborWorks has asked HUD to help support the maintenance and the modernization of the standards.

In HUDs housing counseling handbook, which was published on May of 2010, there is in chapter three, a passage about the industry standards that HUD may require, promote or incentivize the adoption of an implementation of housing, counseling and education standards by our participating agencies. These standards can include minimum acceptable counseling and education, content and activity training and testing and these industry standards may be developed or implemented by HUD or by other entities and endorsed by HUD. HUD operates on an industry forward basis and nonprofit organizations that provide direct housing counseling and homebuyer education services can adopt the standards. Adoption demonstrates an organization's commitment to implementing the standards. There have been many partnerships that have been formed around the standard since they have been published in 2007, including government and lending and real estate education and the nonprofit housing community. The Neighborhood Center for Homeownership Education and Counseling is central to the adoption of the standards.

A HUD housing counseling agency has to achieve certification in one of at least one of the nine areas that are on the slide today and most of those are around homeownership or post purchase, foreclosure intervention for example, and post purchase homeownership education and especially those in native communities, financial capability, rental counseling and so on. The case for modernizing the standards - the standards have been around for about 18 years since the committee was first convened back in 2004. Since then, there have been a lot of changes to the housing counseling industry and the way that housing counseling has been carried out. For example, in 2010, there was the creation of the Consumer Financial Protection Bureau, and all of the great information that they have brought to the home buying process is something that needs to be considered in new standards.

There was no HUD Office of Housing Counseling back in 2004, so that's been a big change as well. Housing counselor certification is something that has been created since the standards were first published in 2007. And we're also looking at extending future housing counselor certification to tribal lands through rulemaking. So that is another component that needs to be considered. There's been a new form of housing counseling that has been created since the standards were published, and that is disaster preparation and mitigation housing counseling, a very important area of counseling, where our agencies are engaged nationwide in the wake of disasters. There's also been new technology that is facilitated remote counseling and virtual education. Also, there's an entire online homebuyer education industry that did not even exist in 2004 that thrives today. Additionally, there have been fair housing discrimination protections for persons identifying as LGBTQ plus, that should be considered as well in modernization. Additionally, there are new racial equity initiatives that include working with HBCUs those historically black colleges and universities, our tribally based institutions, and minority serving institutions. Also, around appraisal equity the Property Appraisal and Valuation Equity or PAVE interagency task force is making great strides in bringing equity to the valuation process and this is something that homebuyers should know about so that they can be certain that they are receiving a fair valuation of the property that they're planning on purchasing.

There's also been a range of studies but the one I want to call out here is from HUDs Office of Policy Development and Research, they did a long-term impact report on first time homebuyer education and counseling, a demonstration project where they identified strengths and weaknesses to homebuyer education. These are certainly good things to consider in this report in modernizing the standards. There have been an increase use of homebuyer education across a wide range of HUD programs, multiple federal agencies, government sponsored enterprises, or housing finance agencies, local government agencies and the nonprofit community. Since the creation of the standards and their publishing in 2007, a whole industry has grown up around the standards, and there've been so many changes, that it is a good time for us now to consider modernizing these standards. HUD's role in modernization - we seek to support the modernization of the standards in collaboration with NeighborWorks and the housing industry. What we're seeking is an industry forward HUD supporting approach that will benefit consumers with a modernized set of standards that are responsive to current and future housing market conditions. We've secured funding for FY 23 and 24 to provide technical assistance to modernize standards through HUD's community compass grant, and HUDs community compass grantee will support convening and scheduling and modernization and build and support a new standards website. Our ask is that we seek advice from the Committee on modernizing the standards.

**Member Discussion and Q&A - by David Berenbaum**

**Summary:** David Berenbaum opened the floor to the members of the advisory committee to share their thoughts and questions.

**Panel Discussion Comments were:**

* Thank you very much for that wonderful overview of our hopes, our goals to update standards. These standards for those of you who are familiar with them, have really played a formative role in credentialing the housing counseling community, you know, many, if not all of our organizations are signatories to these standards. But one of our challenges, of course, as Jerry noted is that the practice and the profession of housing counseling has really grown and matured over the past decade. Our thought is that it's time to take a fresh look. And we're delighted that the Office of Housing Counseling has identified the resources to facilitate this discussion among our stakeholders. I'd like to invite any of you would like to share your thoughts about this initiative or next steps. Again, we want to be inclusive, holistic with industry, we want to play to our industry's strength, but really develop the best practice standards so that they complement the reality of what's certification of where the industry is today. And frankly, what our partners are hoping to see in the profession of housing counseling, whether they be public or private sector.
* I have not looked at the standards document, my question is, will they be shared with us as they're being edited? We can provide feedback to whoever’s looking for the comments, I just don't know what the mechanism will be for us to provide either individually or collectively to provide feedback.
* Sure. Jerry, let me invite you to jump in there because we do view this as industry lead, meaning all the stakeholders who came together originally, and others in a more diverse marketplace, coming together to take a fresh look and develop this. But Jerry, would you like to respond to that?
  + - Thank you for the question, this process we're looking to support we want to see it be very transparent, open to public participation and comment. The industry will be taking a leadership role in this HUD supporting of course, and we do look forward to regularly updating the Federal Advisory Committee on progress as we go, but we are really seeking to foster a transparent process here.
* I guess just following up with Paul's comment there, hearing progress versus having input on draft is very different. So, I hear you saying that you'll engage the intermediaries that have had this table or this roundtable to govern this in the past, and I think that's great and a wonderful opportunity for HUD to convene that group. Being that we have this group in place and it's over housing counseling, it probably behooves the process to include some sort of formalized input from the committee, which it sounds like Paul's welcoming, and I would certainly welcome as well.
* David or Jerry, can you talk a little bit more about the timeframe.
* We hope that we will convene groups early next year for what will be a formative planning discussion and how to wrap our hands around what will be a collaborative approach. I view it as taking at least a year to create some of the first products, because this will be a consensus driven process as it was originally. I think it's going to be very interesting to see the areas of focus of the industry as a whole. Jerry, do you agree with that?
  + - Yes, absolutely. The original standards took about three years from original convening to publication. We hope it doesn't take three years to do this. We hope it takes less time, we're going to do everything we can to support the process and move it along. Hopefully, we'll get a great set of modernized standards that will help our industry move forward.
* I just saw that in the prior slides, you're doing all the right outreach. We're trying to make sure you're getting the right groups involved. I know that can be tricky for a lot of groups and tribes are no different. If there's not a more formal integration between this advisory committee on helping provide input to that at least let this group know and me know, particularly as you're not hearing any stakeholders from the tribal side you guys aren't getting engaged by the right people, in our respective circles. I’m happy to offer that try to connect those dots as you guys move forward in this process, but it looks like you're trying to be as comprehensive as you can and getting all the right folks in on updating the standards.
  + Thank you, Tony. I'll share with you that some of us, including myself, were around the table when these standards were originally developed. I really enjoyed the diversity of industry participation, whether it was originators, or the GSE's. It was also the real estate industry, as well as the housing counseling community. And we wonder, again, our hope, working with industry as a whole will make this even more inclusive, as Jerry noted, appraisal and valuation are a very important issue today. Ensuring diverse market segments are actively part of the conversation, and so on. I think everyone understands the point being made. Again, this is the first step forward. We look forward to sharing more early next year as our conversations with NeighborWorks and other groups continue.
* Thank you, David, and thank you to the committee. We do appreciate your advice on this. We will be seeking more consultation with you in the future. The standards meetings will be open and committee members will certainly be able to participate there as well should they want to; this is an industry-based approach. It's an inclusive approach, so we want to make sure that we're moving forward together with HUD in the supporting role to really make sure that modernization is useful to the entire housing counseling community and especially to homeowners and homebuyers as they go forward.
* Right. Thank you, Jerry. And thank you, everyone for your additional thoughts. We will certainly keep the committee apprised of developments and I suspect through your own trade associations, you'll be learning about this effort as well as we move forward.

**David Berenbaum-** I'd like to move forward now invite Ruth Roman, who is a senior policy analyst who has been playing a lead role on our efforts for tribal rulemaking. Over the in the past, we briefed the Committee on our tribal consultations, as well as our outreach and listening sessions to tribal constituencies. Ruth will cover a little bit of the history of why we're doing this. It is a requirement of the Dodd Frank statute that stood up the Office of Housing Counseling, and I'm very happy about where we are in this process and our next steps.

**Briefing on Tribal Counselor Certification Rule – by Ruth Roman**

**Summary:** I amvery happy to be with you all to provide this update on tribal housing counselor certification. This afternoon, I'll give a brief background on the certification requirements. I'll review what OHC has done to solicit feedback from tribal leaders. I'll highlight some of the major themes that we heard, and I will wrap up with next steps for rulemaking.

The requirement for HUD to certify individual counselors is statutory. The Dodd Frank Act mandated that all housing counseling required under or provided in connection with housing programs across the department be provided by a HUD certified counselor. To implement this mandate, HUD published a final rule back in 2016 that requires housing counselors to take a HUD issued exam and work for a HUD participating agency. The deadline for compliance uh for the rule was with the rule of August 2021. When we issued the rule back in 2016, we indicated that OHC would be conducting tribal consultation before implementing the new certification requirements in the Indian Housing Block Grant and the Indian Community Development Block Grant programs. For the past few years, OHC has very closely, with the Office of Native American Programs and our General Counsel's Office worked on moving consultation and the rulemaking process forward. We started in December 2020 by publishing a letter to tribal leaders informing them that the department would be engaging in consultation. We announced that the consultations would take place virtually on January 26, 2021 and February 4, 2021. At the same time, we also launched a HUD Exchange website, which included back background materials.

Once the consultation sessions had occurred, we posted on the website, the recordings of the sessions, materials from the sessions, as well as links to all the written comments that we received. OHC and ONAP worked very hard in outreach to encourage as much participation as possible. There were 119 tribal leaders and housing practitioners that joined HUD for the consultation sessions. The participants represented 85 organizations, including 57 tribes and 9 native CDFI's. During each session OHC gave an overview of the housing counseling program and the certification requirements and we posed several questions as a framework to start the conversation. We wanted to know would the requirements be practical and effective in their communities. What impact would certification requirements have on providing culturally relevant housing counseling in Indian country and what changes they would recommend to the current requirements.

After the two consultation sessions, OHC decided to schedule additional listening sessions to continue to learn more. The sessions took place over five months from April to August 2020. We reached out to Indian Regional Housing associations across the country and met with representatives from five of these organizations. We often met with members from the Native community development finance. We very much appreciated all the time the tribal leaders spent with us and the time they took to submit written comments. During these sessions, the participants shared with us the work they're doing to expand housing opportunities in their communities, and the important role that culturally relevant counseling plays in the services they provide.

There were many comments and ideas shared and I want to just take a few minutes to highlight the major themes that emerged. Tribal sovereignty and self-determination were a major point of discussion during our meetings. Participants in the meetings and through written comments told HUD that the, NAHASDA, the Native American Housing Assistance and Self Determination Act was enacted in 1996 to promote tribal sovereignty and self-determination, and that this legislation allows their tribes to create their own Indian Housing plans and receive federal funding to address their local needs. They believe that the current requirements will add additional barriers to their tribe’s ability to provide housing counseling services. So, for example, tribes shared with us that meeting the threshold eligibility criteria for HUD approval and other program requirements will be very challenging. One of the eligibility requirements is that organizations have formed a tax-exempt nonprofit organization or be recognized as a unit of local county or state government. They told us that many tribal housing programs are administered within departments of tribal governments or through TDHE's, Tribally Designated Housing Entities, and that they do not have nonprofit status and they do not seek designation as units of local county or state governments. They told us that it will be difficult for smaller tribes or TDHE's to serve the 30-client minimum over a 12-month period that is currently required. They also share that it's not practical for tribes with large geographic footprints and that serve communities and rural and remote places to maintain certified staff or required that they have at least six months experience as a housing counselor.

They told us that many of the facility and electronic client management system and reporting requirements are not consistent with how tribal programs operate today and would be administratively burdensome. In terms of the exam requirements, we were told that the current exam lacks important content that is relevant to native housing practitioners and potential homebuyers on tribal lands. They said the current exam does not include content about the unique status of trust land, the role of the Bureau of Indian Affairs and mortgage transactions or the role played by tribes to grant leases on trust land. They also expressed concern about the requirement that counselors demonstrate competency on fair housing, they shared with us that the civil rights laws do not apply to tribes in the same way in which they do for other HUD program participants.

There were also a number of suggestions and recommendations shared during the consultation and listening sessions. One recommendation was that HUD recognize the training and counselor certification that is already available and provided by native housing organizations like Pathways Home Training, which is offered by the Native American Indian Housing Council. They told us that many native practitioners have participated in these trainings and they have this certification, and they will like the certification to be accepted by HUD. Participants also suggested HUD deliver an alternative exam that include content relevant to counseling and tribal communities.

OHC has reviewed and discussed all the comments provided, we've worked with our program partners and NONAP and general counsel's office, we've drafted a proposed rule taking into consideration the substantial feedback that we received while still also complying with the certification requirements in the legislation, Dodd Frank. At this time, in terms of next steps, we the plan is for the proposed rule to be published soon in the new year. OHC welcomes, of course, all written comments and feedback during the 60-day comment period. We look forward to taking those comments into consideration as we draft a final rule. And we're also in discussions with the Office of Native American Programs on holding another tribal consultation to gather additional feedback once the proposed rule is published.

**David Berenbaum -** Ruth, thank you for that excellent overview. Tony, I want to express my appreciation to you for your guidance and counsel with regard to conducting a consultation during the rulemaking process. And as you heard, that's something that we are planning on moving forward with. Unfortunately, we cannot give any more detail about the content of the rule pending publication. But what I will say as Ruth emphasized, we listened very carefully to all the comments, both written and verbal, that was shared with us during the consultations, as well as the listening sessions. And we are very optimistic that in the end, we are going to have a very healthy update, and that the thoughts and ideas shared with us by stakeholders are going to be addressed. But that's why we have a comment period, and of course, we can build upon the rule once we receive additional comment in process. This really is part of our focus of building capacity among our various market segments and that's how we had been approaching this rulemaking.

**Anthony Walters -** We're all waiting to see what the rule looks like, I think that's kind of the big response point. Glad to hear the themes that that Ruth just went through I think that's what we hear as well, from our perspective. And I think we were part of some of those consultations, and probably expressing some of that. Looking forward to seeing kind of where that balance is and we all know is a statutory requirement but trying to find ways to streamline that as much as we can for the tribal community. So happy to look at it when it comes out, probably willing to offer our organization as a facilitator for any of those types of meetings moving forward as well and I know we're going to have an event in DC in the spring, we don't have dates finalized yet, but a possible chance to at least to provide updates regarding that process there. Appreciate all the work that you guys have put together and all those listening sessions you did, really helpful to get that direct feedback, right from the folks who are going to be impacted.

**David Berenbaum -** I'd like to recognize Virginia Holman who is our designated federal official for the Office of Housing Counseling and we're going to move to our public comment period.

**Public Comment – David Berenbaum & Virginia Holman**

**Summary**: Ms. Holman started the Public Comment Portion of the meeting by explaining the rules and procedures.

**David Berenbaum Opened the floor for public comment**:

For those who are not familiar with the rules of a Federal Advisory Committee or board, we are permitted to invite comments, but we cannot respond to comments during the meeting.

* **Sandy Deters**

My question is that we're a very rural housing counseling agency and we're finding it increasingly difficult to hire staff at all and then you know, the HUD exam the questions are kind of worded a little difficult and sometimes there appears to be like trick questions. These counselors are just trying to help people. So is there any way that that exam can be reexamined so it's less tricky and they don't have to try six or seven times to pass it. Thank you very much.

* **Deborah Estrada**

Well, thank you for this presentation. As a housing counselor, I do appreciate all the information, but also wanted to discuss a little bit of the challenges like as a housing counselor, like creating a budget when, when the census you know, it's providing and it's the experience that I've had with my clients when we are overburdened with the housing um expenses, right. So, the housing ratio It's right now for more than 2,000,000.2 people are over the 30% based on our income guidelines, and HUD, that's overburden. And it's very difficult to help people to look at options for saving options for buying or even renting. I've been using the HUD Exchange website, that it's awesome tool, but also when sometimes when I want to provide some tool for my clients, like housing affordability that, basically that's the major issue right now, it's very difficult to find options these days. So I was thinking, you know, at the very beginning of this presentation, talking about different options, like prefabricated houses and manufactured houses, like different ways of community building community, that that could help our community find something that it's more affordable, at least for the beginning, right, and how we can do that when sometimes the banking products are not to buy though in those manufacturing houses, it's kind of difficult. It’s not like an FHA loan that you could buy a pre manufacture and it's sometimes it's very difficult to find places that you could go and have products for that. So, I've been trying to see other resources, other ways for helping the community. And sometimes it's kind of very difficult to find them, even though I know that we're in the market right now it's so difficult but even though we are thinking ahead of the of what could happen and changing some rules to find other options right now

* **Odette Wilkins**

Yes, hello, thank you very much for having me. I just wanted to quickly point out that it's a great goal, to make sure that underserved people have home ownership. The problem is that there are people who are underserved who have a particular disability who are not being recognized sufficiently and that prevents them from having home ownership, and many of them are disadvantaged. And that is people who have been injured, and who are now disabled because of electromagnetic radiation, particularly with respect to cell towers outside of their homes and this has already occurred. I understand that HUD, I believe, sees cell towers as a nuisance, particularly with respect to any kind of federal funding. It's important that the counselors know that this is a real problem and if their disabilities are not being accommodated for, they do have to basically evacuate the premises. And so that is a detriment to homeownership, particularly, if cell towers are placed right outside their windows or 5g small cells are placed right outside their windows without accommodation. So that is something that I'd like HUD to really take a look at with respect to homeownership. Thank you.

* **Ellie Pepper**

Hi, everybody. I'm hoping everybody is going to have happy holidays. I wanted to really start off by talking about the biggest some of the biggest needs. So, this question was asked about what are the biggest needs in the housing counseling industry? Angie mentioned, language access, and I think that that's a good point. And that goes along with the biggest need that I think in is in the industry is for a decent salary for our housing counselors. And then particularly if we're looking at language access, and we want housing counselors who can speak other languages we need to really be thinking about how we can pay housing counselors more now that they're certified. And they're being expected to provide services in other languages, I realized that, you know, HUD's hands are tied and in some ways around this, but maybe there's some assistance around helping organizations figure out where to find um alternative funding and additional funding. Speaking of money, Gabe's point about marketing and the organization's marketing on their social media platforms, to the people who are who already know about them is a good point, and one that requires funds again, because National Housing Resource Center did a series of events, we were lucky enough to have a pretty significant grant from a large bank. And we saw how much of a difference it made, being able to use money to do advertising on social media, it made a huge difference, we were really able to reach to get a significant reach into the black community, through social media, 97% of the people who registered for these events, had not heard about housing counseling before this was the first time they'd heard about it. And 70% of the folks who registered who said that they hadn't heard about housing counseling before had heard about it on a social media platform. So, I think it's important to really be thinking about how to put some money behind helping agencies advertise themselves on social media. The other points I Gabe made about telling stories, I will relate that one of the events that we did, in Florida, the organization had a homeowner who did a video about how much housing counseling helped them become a homeowner. And in the video, they talked about how the day that they closed on the house, they weren't ready to move in. But they were also the whole family was so excited about it that they slept in the house without any furniture, but they just were so excited. And so, then every year, on their closing day, they would sleep on the floor in the living room in celebration of having this home. That video that with that homeowner, talking about that was one of the most engaging videos that we saw in any of our events, a lot of people listened to it, a lot of people watched it. And so just want to kind of double down on Gabe's point about telling stories and about money for marketing. That was really what I wanted to say thank you

* **Colleen Dushkin**

Good afternoon. My name is Colleen Dushkin. And I have the pleasure of serving as the executive director for the Association of Alaska Housing Authorities. I wanted to thank David and Ruth and the entire team at the Office of Housing Counseling for engaging with the AHA members who are traveling designated housing entities for 196 tribes here in Alaska, and I really appreciated Ruth's overview of the of what was heard during those sessions and the engagement with tribal communities and the overview was great. I know that you took and you heard what we were saying, and I really look forward to seeing that feedback that you had gotten in the proposed rule and look forward to helping the Office of Housing Counseling reach out to the tribes and tribally designated housing entities here in Alaska, to do further consultation once that proposed rule is published. So, thank you for having me today. And thank you for um engaging with our members and the Tribes in Alaska and we look forward to our continued partnership.

**Next Steps and Adjournment- David Berenbaum**

**Summary**: Mr. Berenbaum reminded the public that the committee cannot comment at this time on the comments made but assured the committee is listening. Mr. Berenbaum thanked the committee members, supports and behind the scenes’ contractor and staff on a wonderful meeting. Mr. Berenbaum wished everyone Happy Holidays and adjourned the meeting.

**End of Webinar**