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Executive Director
NHRC

Friday, March 13, 2020

Danberry Carmon
Office of Housing Counseling
U.S. Department of Housing and Urban Development
Washington, DC 20410

Advisory Board

Jennifer Murphy
HomeSmartNY

Dear Danberry,

Teresa Bardwell
Rural Community
Assistance
Corporation

The National Housing Resource Center (NHRC) recommends that HUD extend the August 1, 2020 deadline for housing counselor certification by at least one year to August 1, 2021, in light of the serious challenges created by the coronavirus.

Certification Trainings

Lot Diaz
UnidosUS

The Centers for Disease Control and Prevention (CDC) recommends avoiding all non-essential travel including plane trips and avoiding crowds. Training agencies are in the difficult position of providing group training sessions which often require travel and are delivered in a group setting. While virtual, on-line training is available, trainers have all told us that face-to-face trainings are much more effective than on-line trainings. Participant engagement is higher, there are fewer distractions, and the personal connection between trainer and trainees improves learning with in-person training.

Simone Griffin
HomeFree USA

We are aware of two training cancellations (trainings in New York City and Chicago), all training providers are monitoring the situation closely, some contracted trainers have expressed concern about travelling to and conducting training workshops, and some providers have told us no new in-person trainings have been scheduled until the situation is clearer.

Ibijoke Akinbowale
National Community
Reinvestment
Coalition

The inability to provide in person trainings because of health risks will remove the most effective certification training methodology during the critical time period from now to the August 1, 2020 deadline.

Karen Woods
Neighborhood
Housing Services of
Chicago

NHRC conducted a short survey of counseling agencies to assess the situation in the field. Of 106 respondents, seventy one percent said that at least one person in their organization is scheduled to attend a training. Fifty one percent report concerns over exposure to and transmission of the coronavirus. Seventeen percent report they are waiting to hear about cancellation of the training. Seven percent say they have already cancelled planned training due to coronavirus. Four percent say they want to cancel but fear loss of money spent on travel and lodging. Twenty one percent are not concerned and plan to attend.

David Young
Housing Action
Illinois

Testing Sites

Educational institutions are common certification testing sites and as more of these institutions close their campuses or limit their programming, the number of available testing sites will shrink. Not having enough available testing seats was a problem before coronavirus and the problem will get worse. Remote testing is available as an alternative to on-site proctored testing. However, agencies have found the remote testing to be very difficult to implement, intimidating for some test-takers, and in practice 90% of the certification tests are in-person tests.

Examples of educational institutions that have closed or reduced programming and are testing sites are:

Illinois State University, Normal, Illinois

Bellevue College, Washington State

North Seattle College, Washington State

Western Washington College, Washington State

San Diego University, San Diego, California

Impact on Agencies and Communities

Currently, less than half of housing counselors have passed the certification test. Without the availability of the most effective training tools and with a potential shortage of testing sites, the housing counseling agencies are likely to have serious shortages of certified counselors after August 1, 2020. Some agencies will likely have no certified counselors and not be able to conduct housing counseling services. Furthermore, without a postponement, HUD is putting counselors and managers in the difficult position of having to choose between health risks and the viability of their housing counseling program. Some agencies are in localities where local governments have asked people to work from home and avoid travel and social contact in order to limit community spread of the coronavirus. Some agencies are reporting an increase in requests for assistance in foreclosure counseling and eviction counseling. These requests are likely to increase as more of the public experiences reduced work hours or reduced small business income due to the coronavirus. This can mean an increased demand for counseling services in the upcoming months.

Length of Postponement

We recommend a one year postponement at least, because there is no predictable timeline currently. A shorter time period could mean that multiple extensions may be required. Once things return to normal, there is also the start-up time required to reinstitute the training schedule. Training providers report that trainings require two months to six months lead time, depending on the provider

and training facilities used. Adequate time should be provided to schedule and conduct a robust training program, once the situation improves.

Summary

We remain fully committed to the certification process and believe it is an important step forward for the housing counseling work. However under these exceptional times, we recommend that HUD postpone the housing counselor certification at least one year to August 1, 2021.

We also recommend that after August 1, 2020, HUD require each HUD approved housing counseling agency have an FHA Connection Application Coordinator in place. If the agency does not have one in place, the agency should be suspended until one is assigned and approved. This step will help move agencies forward in the certification process.

Additionally, we recommend that HUD look favorably on any contract extension requests by training providers, if training programs are delayed by the coronavirus challenge.

Arizona Housing Coalition
HomeFree-USA
Housing Action Illinois
Housing Options Provided for the Elderly
Minnesota Homeownership Center
National Coalition for Asian Pacific American Community
Development
National Community Reinvestment Coalition
National Housing Resource Center
National Urban League
New Jersey Citizen Action
Northwest Side Housing center
Rural Community Assistance Corporation
The Housing Partnership
The Housing Partnership Network
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