

United States Senate
WASHINGTON, DC 20510

July 10, 2020

The Honorable Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, D.C. 20410

Dear Secretary Carson,

We write regarding the Department of Housing and Urban Development (HUD)'s Housing Counseling Assistance Program and the importance of ensuring that vital housing counseling services can continue in all communities during this unprecedented economic crisis. While counseling agencies have been working hard to get members of their organization certified, many agencies will be unable to complete this process before August 1 due to the COVID-19 pandemic, and therefore risk losing HUD funding. In light of logistical challenges caused by COVID-19 and the increased importance of housing counseling services, we urge you to delay the upcoming August 1, 2020 deadline for housing counselor certification by at least one year.

HUD provides vital support for housing counseling agencies across the country that benefits homeowners, prospective homebuyers, renters, people at risk of homelessness, and people experiencing homelessness. Housing counselors help these households meet their financial goals, evaluate their housing options, and find or stay in stable housing. Many agencies target their services to helping low- and moderate-income households, people with limited English proficiency, and communities of color reduce delinquencies and foreclosure rates. By helping these families navigate their housing options, housing counselors can play a crucial role in encouraging long-term homeownership.

In December, 2016, HUD published the Housing Counseling New Certification Requirements Final Rule. This rule required that all counselors providing housing counseling for a participating housing counseling agency have a HUD certification. We support HUD's effort to require a standardized base of knowledge among housing counselors and strengthen the quality of counseling services offered around the country. However, the upcoming August 1 deadline will disrupt the good work being done by many agencies around the country, and we ask that you provide flexibility for the industry during these unprecedented circumstances.

COVID-19 has created many logistical barriers to completing HUD's certification exam. According to HUD's own data, only fifty four percent of housing counseling agencies currently have a HUD-certified counselor on staff.¹ HUD's Office of Housing Counseling works with

¹ "HUD Certified Counselor Progress: Meeting Our Goal," HUD Exchange, accessed July 10, 2020, <https://www.hudexchange.info/programs/housing-counseling/certification/goal/>.

organizations to provide training courses for the certification exam, but restrictions on in-person gatherings due to COVID-19 have limited the ability of many counselors to attend. Some training providers in large cities have even cancelled the courses altogether.² According to a survey done by the National Housing Resource Center, fifty one percent of surveyed organizations reported concerns over exposure or transmission of the virus at these trainings.³

Administrations of the certification exam have also been disrupted by the COVID-19 pandemic. Many HUD-contracted testing centers have closed or reduced programming since the beginning of the public health emergency.⁴ In other circumstances, state and local restrictions have forced test centers to close in order to prevent virus transmission. The testing locations that remain open are not sufficient to accommodate the vast number of housing counselors who must complete the certification exam before August, and even if some reopen in the next few weeks, the shortage of available seats will prevent full compliance with the deadline.

The COVID-19 pandemic has laid bare existing disparities and economic inequities in our country. According to some estimates, 30 million jobs have been lost since early spring.⁵ This historic increase in unemployment disproportionately impacts communities of color and low-income households, who are more likely to work in low wage jobs in industries that have shuttered.⁶ Housing counseling services can play a vital role in preventing a wave of evictions and foreclosures within these communities, but only if housing counseling agencies are able to continue operations and receive HUD support through this economic crisis.

A confusing patchwork of state and federal eviction moratoria and protections for renters and homeowners have helped mitigate instability in the housing market. However, these protections can be difficult to understand and apply to individual circumstances. Counselors can help disseminate critical information about these assistance programs and services available for families trying to stay in their homes. Counselors are also especially important for borrowers with limited English proficiency, seniors, and those who may not have reliable broadband access who rely on their counselor to request assistance or maintain communication with their mortgage servicer. As this economic crisis continues, HUD should be working to expand, not reduce, the availability of counseling services and financial education.

² Dorpalen, Bruce, et al., “NHRC Letter to HUD,” March 13, 2020, www.hsgcenter.org/wp-content/uploads/2020/07/NHRC-3.2020-letter-to-OHC-HUD-on-cert-deadline-extension.pdf.

³ Dorpalen, Bruce, et al., “NHRC Letter to HUD.”

⁴ “Kryterion Testing Center Closures,” Kryterion Global Testing Solutions, accessed July 10, 2020, <https://www.kryteriononline.com/blog/update-kryterion-testing-center-closures>.

⁵ Eric Morath, “How Many U.S. Workers Have Lost Jobs During Coronavirus Pandemic? There are Several Ways to Count,” *The Wall Street Journal*, June 3, 2020, <https://www.wsj.com/articles/how-many-u-s-workers-have-lost-jobs-during-coronavirus-pandemic-there-are-several-ways-to-count-11591176601>.

⁶ Steven Brown, “How COVID-19 Is Affecting Black and Latino Families’ Employment and Financial Well-Being,” *Urban Institute*, May 6, 2020, <https://www.urban.org/urban-wire/how-covid-19-affecting-black-and-latino-families-employment-and-financial-well-being>.

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Maintaining the August 1, 2020 deadline will disrupt the delivery of housing counseling services in many communities across the country. The COVID-19 pandemic has made it more difficult for counselors to train for and complete the certification exam required by HUD under the Housing Counseling New Certification Requirements Final Rule. Housing counseling services will be in greater demand as temporary protections for homeowners and renters expire, and it is vital that community organizations around the country receive the resources necessary to help these households maintain stable housing. Due to these unique public health considerations and economic circumstances, we ask that you provide flexibility for counseling agencies and extend the August 1 housing counselor certification deadline for at least one year.

Sincerely,

Senator Tina Smith
Senator Chris Van Hollen
Senator Catherine Cortez Masto
Senator Ron Wyden
Senator Benjamin L. Cardin
Senator Amy Klobuchar
Senator Edward J. Markey
Senator Sherrod Brown
Senator Robert Menendez
Senator Kamala D. Harris
Senator Jacky Rosen
Senator Richard Blumenthal
Senator Robert P. Casey, Jr.
Senator Cory A. Booker