

Proposals to NeighborWorks America
For the COVID 19 Housing Counseling Funding
National Housing Resource Center

Reporting and Data Collection

While we understand the importance of data collection, housing counseling groups felt the NFMC data requirements for projections and reporting were high and costly to agencies. The legislation does not require any geographic targeting and we recommend that there should be no projected geotargeting requirements, except to ensure that there is adequate delivery to rural areas.

The HUD 9902 data points should be the baseline reporting. To the extent possible, we encourage that the reporting data fields should be data that housing counselors already collect.

Reporting should flow through Client Management Systems and avoid double entry.

Program start date should be 1/1/21.

Capacity Building

Capacity building should include technology upgrades, internet capacity, security, training including training on technology, and equipment.

Allow time for agencies to hire up and train.

Smaller organizations may have higher capacity building needs.

Administrative

There should be adequate support for administrative costs for both subgrantees and for Intermediaries.

The former NFMC grant program definitions related to program support and operational oversight are broad enough to meet the varying degrees of needs.

The prior percentage funding allocations for program support and operational oversight were reasonable considering there were other funding sources which were providing awareness of the availability of counseling services on a national level, i.e. Hope Hotline,

MHA, Mortgage Servicers. Given that this is not the case now, there should be additional consideration to increase the program support funding for marketing and outreach activities.

Funding

Prioritize funding to agencies over research and training for first \$100 million. We strongly support analytic reviews of the work and training, but encourage that funding for this comes from later tranches of COVID 19 funding. Agencies need funding now to expand capacity and deliver services.

Smaller agencies will get lower funding allocations but their capacity building may be proportionately larger. We did not have a consensus view of how to solve this. But we recognized that smaller agencies may be providing valuable services in underserved communities and may have specialized services in language or for targeted populations. One possibility would be a participation grant for capacity building for each organization, rather than as a percentage of projected volume.

Provide funding:

- a) Initial 70 % prefunding allocation for program support/operational oversight with additional draw requests available quarterly
- b) Initial 25% prefunding allocation for tier 1 sessions with quarterly submissions for sessions completed, with 30 day turn times for payments.
- Tier 1 session: Initial intake session, Base fee \$300.00
- Tier 2 session: \$600 first session. Expansive services focused on addressing more extensive, complex, and often unique services to connect clients to other services such as legal aid, servicer's, housing and rental assistance programs, document collection, property management/ landlord coordination, housing relocation and/or emergency health, food and shelter services.
- Tier 3 sessions: Follow up, \$150 per session

Tier 1 and Tier 3 sessions can be conducted by administrative staff and may not require work by a HUD certified housing counselor.

Agencies should be able to bill for services delivered in the NeighborWorks contract but also bill for other services or more extensive services delivered for the same client to other funding sources, including HUD. This should not be considered double dipping if there is extra staff time devoted to these services.

Agencies should be able to bill for the services delivered to a client, even if another agency might have also provided services to that client.

Marketing and Outreach

NeighborWorks should work with housing counseling agencies and industry stakeholders to develop ways of connecting people in need to housing counseling agencies that can deliver services.

NeighborWorks should encourage state housing finance agencies and state and local governments to permit housing counseling agencies to provide the initial intake for renter and homeowner relief.

There is a need for a national public awareness campaign to inform renters and homeowners about the value and opportunity available with housing counseling agencies. This campaign should direct people to contact housing counseling agencies. Given the scale of the campaign, the housing counseling funds should not be used for this campaign, but instead sponsorship by government, industry, or philanthropic sources.

Subgrantees should be able to choose if some of their funds should be devoted to outreach.

NeighborWorks should consider developing some recognizable branding for the initiative and potentially something that might still be useful for agencies after the crisis is over.