

**Performance Review  
of a HUD-Approved Housing Counseling Agency or  
Participating Agency**

U.S. Department of Housing  
and Urban Development  
Office of Housing  
Federal Housing Commissioner

OMB Approval No. 2502-XXXX  
(Exp.xx/xx/xxxx)

Agency Name and HCSID  
Number: \_\_\_\_\_  
Address: \_\_\_\_\_

Name of Parent Agency, if  
applicable: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Review Date: \_\_\_\_\_

**INSTRUCTIONS TO REVIEWER.** Use this form to record the results of the Performance Review. Circle “Yes”, “No” or N/A for each applicable question. **Provide detailed comments.**

**A. Basic Program Requirements**

1. Is the agency still a nonprofit entity or unit of local, county, or state government authorized to provide housing counseling services?	Yes	No	N/A
2. Does HCS reflect the agency’s current profile information including but not limited to name, address, telephone number, and e-mail address?	Yes	No	N/A
3. Can the agency demonstrate that it can access the Housing Counseling System (HCS)?	Yes	No	N/A
4. Does the agency validate its agency profile in HCS at least quarterly?	Yes	No	N/A
5. Is the agency using a client management system (CMS) that interfaces with HUD databases?	Yes	No	N/A
6. Did the agency transmit housing counseling activity data on a timely basis?	Yes	No	N/A
7. Was the housing counseling activity data completed correctly?	Yes	No	N/A
8. Does the agency conform to the assurances it signed as part of its application for approval?	Yes	No	N/A
9. Is the agency still in compliance with local and state requirements, if any, that relate to its counseling program?	Yes	No	N/A
10. Does the agency conform with programmatic requirement prohibiting subcontracting ?	Yes	No	N/A
11. During the past fiscal year, if the agency provided more services than just reverse mortgage counseling, did the agency counsel at least 30 clients?	Yes	No	N/A

**Reviewers Comments:**

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**B. Skills and Experience**

1. Does the housing counseling experience of staff comply with all programmatic requirements ?	Yes	No	N/A
a. Do 50% or more of the housing counseling staff have at least 2 years relevant experience ?	Yes	No	N/A
2. Did the agency experience no changes to personnel responsible for the counseling program?	Yes	No	N/A

a. Did the agency report any changes to HUD in a timely manner?	Yes	No	N/A
3. Does the Housing Counseling Program Manager have at 2 years experience managing a housing counseling program?	Yes	No	N/A
4. Does the agency counsel clients whose native language is not English, or who are hearing impaired using interpreters, or multi-lingual counselors?	Yes	No	N/A
If "Yes, explain:			
If "No" does the agency make a reasonable effort to refer clients to other local housing counseling agencies or other organizations that can meet the client's needs?			
5. Does staff possess a working knowledge of HUD housing programs including Federal Housing Administration (FHA) programs?	Yes	No	N/A
6. Does staff possess a working knowledge of non-HUD housing programs available and applicable to the target population?	Yes	No	N/A
7. Have 50% or more of the agency's housing counselors received any housing counseling training or education in the last two years?	Yes	No	N/A
8. Does the agency have any urgent training needs?	Yes	No	N/A
If so, list:			

**Reviewers Comments:**

**C. Financial Capacity**

1. Does the agency have sufficient funds to carry out its counseling work plan for the next year?	Yes	No	N/A
2. Did the agency receive \$500,000 or more in federal funds during the past year?	Yes	No	N/A
If "Yes," has the agency had an independent audit of its financial records completed?			
Does the audit indicate that it is in compliance with OMB Circular A- 133?	Yes	No	N/A
Was the latest audit free of any irregularities or problems?	Yes	No	N/A
3. If the agency received less than \$500,000 is the agency in compliance with the independent audit requirements outline in the Handbook 7610 Rev.?	Yes	No	N/A
Was the latest audit free of any irregularities or problems ?			
4. Does the agency charge fees for its counseling services?	Yes	No	N/A
If "Yes," answer the following:			
a. Does the agency waive fees for clients who cannot afford the fees?	Yes	No	N/A
b. Are the fees commensurate with the level of services provided, and reasonable and customary for the area?	Yes	No	N/A
c. Are the fee schedules prominently displayed?	Yes	No	N/A
d. Are clients informed of the fees prior to the provision of services?	Yes	No	N/A
e. Is the initial client intake performed without charge?	Yes	No	N/A
f. Does the agency have a system in place so that it only bills HUD under a grant agreement for the cost of services in excess of the fee charged the client?	Yes	No	N/A
g. Does the agency charge the client for credit reports?	Yes	No	N/A

If "Yes," does the agency charge only the actual cost of the report?	Yes	No	N/A
h. Do budget and financial statements reflect the receipt of housing counseling fees, if charged?	Yes	No	N/A
i. Is there evidence that the total housing counseling budget reported is accurate and consistent with leveraged funds and program income documented in the grant application, if applicable?	Yes	No	N/A

**Reviewers Comments:**

### **D. Grant Management**

1. Did the agency receive HUD Housing Counseling grants or subgrants during the past 2 years?	Yes	No	N/A
If "No," skip to Administrative Capacity/Program Practices section.			
If "Yes", answer the following:			
a. Does the agency have source documentation on file to support all expenditures of HUD Housing Counseling Grant funding and does this documentation reflect that these funds were used solely for authorized purposes?	Yes	No	N/A
b. Does the amount of housing counseling hours attributed to HUD Housing Counseling funding seem consistent with the grant application?	Yes	No	N/A
c. Are indirect costs assessed to the grant(s)?	Yes	No	N/A
(1) If "Yes," was the indirect cost rate determined by an independent accountant?	Yes	No	N/A
(2) If the response to (1) is "No", can the agency demonstrate how the indirect cost rate was calculated?	Yes	No	N/A
(3) If indirect costs are included in the voucher request, are they the same or less than what was proposed?	Yes	No	N/A
d. Does the agency receive no other sources of HUD funding in support of its housing counseling program?	Yes	No	N/A
e. Can the agency demonstrate how it ensures that activities billed under the HUD Housing Counseling Grant aren't billed under any other funding sources?	Yes	No	N/A

**Reviewers Comments:**

### **E. Administrative Capacity / Program Practices**

1. Does the agency's housing counseling activities conform to the agency's counseling work plan and does work plan on file reflect the geographic scope actually served by the agency?	Yes	No	N/A
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2. Does the agency use credit reports as a tool for counseling?	Yes	No	N/A
If "Yes," does the agency maintain the confidentiality of the reports and document authorization for the client to obtain the credit report?	Yes	No	N/A
3. Does the agency safeguard and maintain the confidentiality of all client files, including credit reports, etc?	Yes	No	N/A
4. Is the agency complying with all programmatic requirements regarding recordkeeping?	Yes	No	N/A
5. Did counselors design an action plan with each non-reverse mortgage counseling client that addresses the unique needs of each client?	Yes	No	N/A
6. Did the counselor monitor the client's progress in meeting the housing need or correcting the housing problem and is there evidence of follow up to ascertain outcomes?	Yes	No	N/A
7. For each counseling client, is there evidence in the client file that the activity met programmatic requirement for counseling?	Yes	No	N/A
8. Do supervisors of housing counselors monitor the work of their counselors and are these activities documented?	Yes	No	N/A

**Reviewers Comments:**

## F. Reverse Mortgage Counseling

**IF APPLICABLE:**

1. Is the agency using the most current OMB-approved Counseling certificate, HUD-92902, unaltered?	Yes	No	N/A
2. Is there a signed copy of the counseling certificate in the client file?	Yes	No	N/A
If "Yes," is the certificate signed by the counselor and all homeowners shown on the deed?	Yes	No	N/A
3. Is there a list of all those who attended the counseling and their relationship to the client documented in the client file?	Yes	No	N/A
4. Is the handling of clients lacking legal competency in compliance with HECM handbook requirements?	Yes	No	N/A
5. Does the agency maintain complete client files that meet all programmatic requirements regarding reverse mortgage counseling record keeping?	Yes	No	N/A
6. Do the counselors providing reverse mortgage counseling meet programmatic requirements regarding eligibility to provide reserve mortgage counseling?	Yes	No	N/A
7. Are counselors providing reverse mortgage counseling in compliance with the geographic restrictions imposed by HUD?	Yes	No	N/A
8. Does the agency provide information to the client on the reverse mortgage lending process, procedures, and timelines?	Yes	No	N/A
9. Does the agency provide information on alternatives to a HECM, which may be a detailed explanation of, or written materials on the following?	Yes	No	N/A
A Proprietary Reverse Mortgage Programs	Yes	No	N/A
B Deferred Payment Loans	Yes	No	N/A

C Sale/Lease buyback alternatives	Yes	No	N/A
D Annuities	Yes	No	N/A
E. List of local and State social service agencies	Yes	No	N/A
F. Local and/or State proprietary programs or other private reverse mortgage programs	Yes	No	N/A
G Property Tax Deferral	Yes	No	N/A
H Other (explain)	Yes	No	N/A
1 Does the agency perform and provide to the client a Total Annual Loan Cost 0. using HUD HECM or compatible software?	Yes	No	N/A
1 Does agency provide loan amortization schedules for all HECM loan 1. payment methods, using HUD HECM or compatible software for HECM loan payment options?	Yes	No	N/A
1 If requested by the client, does the agency refer them to the list of 2. HECM agencies provided on HUD's website?	Yes	No	N/A
<b>Reviewers Comments:</b>			
<b>G. Facilities</b>			
1. Is the agency easily identified by permanent signage on the building/or office door?	Yes	No	N/A
2. Is the agency open during hours that are conducive to working clients?	Yes	No	N/A
What are the agency's normal business hours?			
Does the agency offer extended hours when necessary?	Yes	No	N/A
3. Is the agency accessible to individuals with disabilities and/or limited mobility or does the agency make home visits or arrange meetings in alternative space suitable to serve these individuals?	Yes	No	N/A
4. Do the facilities provide privacy for one-to-one counseling?	Yes	No	N/A
<b>Reviewers Comments:</b>			
<b>H. Conflict of Interest</b>			
1. Are the agency and all applicable individuals in compliance with programmatic requirements that prohibit them from taking any action that might result in, or create the appearance of, administering the housing counseling operation for personal or private gain?	Yes	No	N/A

2. Are the agency and all applicable individuals in compliance with programmatic requirements that (1) prohibit giving preferential treatment to any organization or person, or (2) undertaking any action that might compromise the agency's ability to serve the best interest of its clients?	Yes	No	N/A
3. Does the agency provide any services besides housing counseling? If "Yes," list those services and activities?	Yes	No	N/A
4. Do any of the housing counseling staff (counselors or management) perform any other roles within the agency ? If "Yes," please describe.	Yes	No	N/A
5. Do any of the housing counseling staff (counselors or management) perform any other related roles outside of the agency? If "Yes," please describe and list any licenses.	Yes	No	N/A
6. Is the agency in compliance with programmatic requirements prohibiting applicable individuals from receiving anything of value, (including compensation on a commission basis) for services the client is being counseled about? If "No" identify the applicable individual, the services being provided and type of compensation?	Yes	No	N/A
7. Did any applicable individual refer client(s) to an entity in which they or any another applicable individual have a financial interest?			
8. Are the agency and all applicable individuals in compliance with programmatic requirements that prohibit the acceptance of a fee or other consideration for referring clients to a specific mortgage lender, broker, builder, real estate sale agent or broker, attorney or landlord?			
9. Are the agency and all applicable individuals in compliance with programmatic requirements that prohibit the acquisition of a client's property from the trustee in bankruptcy?			
10. Does the agency's Quality Control Plan or Employee Handbook address conflict of interest provisions?			
11. Does the agency's disclosure to HUD meet all programmatic requirements and does it reflect its current business or partners?			
12. Does the agency provide to each client and each education participant a disclosure statement that includes the following:			
a. Identifies the agency and explicitly describes the various services provided by the agency, as well as any financial arrangements between the agency and any other industry partners, that are relevant to the client ; and			
b. Clearly indicate that the client is not obligated to receive any other services offered by the organization or its partners.			
13. If counselors provide information on a specific program or product, do they provide information regarding at least 3 alternative programs or products?			

**Reviewers Comments:**

**Review Results**

There are no findings or concerns that need to be addressed.

There are findings or concerns that need to be addressed.

\_\_\_\_\_  
Signature of Reviewer

\_\_\_\_\_  
Date

**Public Reporting Burden.** This information is collected in connection with HUD Housing Counseling Program and will be used by HUD to evaluate clients compliance with programmatic requirements. The reporting burden for this collection of information is estimated to average 2.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number. This information is required to obtain or retain benefits. There are no questions of a sensitive nature. HUD uses the information to monitor and provide oversight in the HCP. Information is needed to ensure the agencies are in compliance with the program.