

**Supporting Statement for PRA Submission**  
HUD Certified Housing Counselor Registration - Office of Housing Counseling  
U.S. Department of Housing and Urban Development  
OMB Control Number 2502 – New

1. HUD will establish a Housing Counselor Certification Exam, as mandated by Subtitle D of title XIV of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203, 124 Stat. 1376 (July 21, 2010)) (Dodd-Frank Act). The Dodd-Frank Act requires individual housing counselors providing homeownership counseling or rental counseling under HUD programs to successfully pass a certification examination demonstrating competency in six (6) areas identified in the statute.
2. The information will be collected on the Office of Housing Counselor Certification Examination website [www.HUDHousingCounselors.com](http://www.HUDHousingCounselors.com) (to be changed to a .gov site).
3. Interested parties will be able to register for the Housing Counselor Certification Examination at [www.HUDHousingCounselors.com](http://www.HUDHousingCounselors.com) (to be changed to a .gov site). This will be the only location available examination registration.
4. As this Housing Counseling Examination is new, there is no similar information for the same group of individuals available. The application for the HECM Roster requests similar information but only for those counselors who have passed the HECM Exam and want to be placed on the HECM Roster. This information is not collected elsewhere. HUD makes every effort to assure no duplication of information is required.

The Office of Housing Counseling (OHC) initially planned stakeholders meetings to help develop the certification examination. However OGC told our office this would be in violation of the rule making process. We could not discuss any aspect of the testing prior to publication of the final rule.

HUD staff and subject matter experts working for the contractor developed learning objectives based on the six Dodd-Frank criteria. The training and test questions were developed based on these learning objectives.

OHC has taken steps to ensure that there will be no questions that would discriminate or put a counselor at a disadvantage regardless of the state where the housing counselor is located. OHC staff presented a webinar on the newly launched “HUD Housing Counseling Training and Testing for Certification” website (<http://www.hudhousingcounselors.com/>) on June 16, 2015. There are 6 training modules that covered the 6 areas that Dodd-Frank requires that counselors are required to pass in order to qualify for certification. At the end of the webinar, OHC had a participants’ survey and also could provide questions or comments to [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov)

To become HUD certified under section 106(e), individuals, working with a participating agency, must demonstrate competency by passing a standardized written examination covering six major areas of housing counseling. These areas include: (1) Financial management; (2) property maintenance; (3) responsibilities of homeownership and tenancy; (4) fair housing laws and requirements; (5) housing affordability; and (6) avoidance of, and responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default.

The training and examination will not focus on specific state and local law and regulations but the training will address ways for counselors to access local and state information. (Not for public review/internal only)

In the proposed rule for the Housing Counseling Program: Certification Requirements (<https://www.federalregister.gov/articles/2013/09/13/2013-22229/housing-counseling-program-new-certification-requirements>) for an organization to become HUD certified under section 106(e), all

individuals through which the organization provides counseling must be certified as competent to provide such counseling.

*HUD-certified housing counselor.* A counselor, employed by a participating agency, who has passed the requisite examination and is certified by HUD as competent to provide housing counseling services pursuant to this part.

For an organization to become HUD certified under section 106(e), all individuals through which the organization provides counseling must be certified as competent to provide such counseling.

*HUD-approved counseling agency.* The term “HUD-approved counseling agency” means a private or public nonprofit organization that is—

- (1) Exempt from taxation under section 501(c) of the Internal Revenue Code of 1986; and
- (2) Certified by the Secretary to provide housing counseling services.

The Housing Counseling Program PRA approved in OMB 2502-0261 covers the requirements to be a HUD-approved Housing Counseling Agency. HUD Staff conduct performance reviews on HUD-approved agencies to ensure program compliance so that the office will receive certification. Housing Counselors who will take the test and receive counseling certification are required to work for an HUD-approved Housing Counseling Agency. The only way they would not be working for an HUD-approved Housing Counseling Agency would be if they were transferring to another HUD-approved agency, seeking a career change, or between jobs.

5. This information does not impact small business or other small entities as the potential respondents are individuals.
6. If this information is not collected, housing counselors will not be able to take the Certification Exam necessary to become certified as required by Dodd-Frank.
7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
  - requiring respondents to report information to the agency more than quarterly: None Applicable
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it: None Applicable
  - requiring respondents to submit more than an original and two copies of any document: None Applicable
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years: None Applicable
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study: None Applicable
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB: None Applicable
  - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use: None Applicable
  - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law: None Applicable

8. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on Friday, October 9, 2015 (Volume 80, Number 196, Page 61224). No comments were received.
9. There are no payments or gifts provided to the respondents with respect to this collection.
10. The [www.HUDHousingCounselor.com](http://www.HUDHousingCounselor.com) site advises housing counselors that information they have provided will be kept confidential. The Privacy Policy is posted on the website. Since social security numbers are required, HUD has provided the required privacy act state on form HUD-92904.

To handle the collection and management of personally identifiable information (PII), the HUD Housing Counselor website will use a Secure Sockets Layer (SSL), a standard security technology that establishes an encrypted link between a web server and a browser. When a user enters PII into a web form, the SSL encrypts the data and allows for the secure transmission of information from the online web form to the server.

11. The individuals will be required to provide personally identifiable information (PII). Demographic information is optional.

Below is the information that will be requested for the examination registration. To comply with Dodd-Frank, collection of PII is required.

- Name;
- Email;
- Phone number;
- Mailing address;
- Occupation;
- Employer;
- Whether or not employer is a HUD-approved housing counseling agency; and
- Whether or not the user provides direct housing counseling services, and the language in which services are provided.

Further data collected is optional and users will not be required to provide this information:

- Ethnicity (Hispanic/Latino or Non-Hispanic/Latino);
- Race (American Indian/Alaska Native, Asian, Black/African American, Native Hawaiian/Other, Pacific Islander, White, or Other);
- Gender (male, female, transgender);
- Whether or not the user completed pre-exam training (HUD training or another entity); and
- Whether the user needs special accommodations to take the exam.

The HUD Housing Counselor website will not collect or store any financial data from users. The third-party payment processor will collect all credit card data using advanced web-based payment gateway integration.

## 12. Burden Matrix

Information Collection	# of Respondents	Annual Responds	Burden Hour per	Total Burde	Hourly Cost**	Total Annual
------------------------	------------------	-----------------	-----------------	-------------	---------------	--------------

			<b>Respondent</b>	<b>n Hours</b>		<b>Cost</b>
<b>Registration for HC Examination</b>	<b>10,700</b>	<b>3,567</b>	<b>.25</b>	<b>891.75</b>	<b>\$17.42</b>	<b>\$15,534.29</b>

\*\* Median hourly wage of \$17.42 for housing counselors

13. There is no cost to the registrants to complete the registration process.
14. The annual cost to the Federal Government is the cost of the BIXAL contractor for site administration is \$170,784. The GTR cost (based on .25 FTE of a GS 15-1 at \$60.69 per hour) is \$35,200
15. This is new collection so no changes were made.
16. No results will be published.
17. HUD is not requesting approval to avoid displaying the expiration date.
18. There are no exceptions to the certificate statement identified in Item 19 of the OMB Form 83-1.

---

**B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.