



DEVELOPING AN AGENCY WORK PLAN FOR HUD APPROVAL

OFFICE OF
HOUSING COUNSELING

Introduction

The U.S. Department of Housing and Urban Development's (HUD's) Housing Counseling Program operates through a nationwide network of over 1,750 HUD-approved housing counseling agencies (HCAs) located in urban, suburban, and rural communities in all 50 states and territories.

One of the most important elements of an application for HUD approval is an Agency Work Plan. As outlined in HUD's Housing Counseling Program Handbook 7610.1, REV-5 (HCP Handbook), HCAs must have an Agency Work Plan. It is a roadmap to help agencies of an Agency Work Plan better understand how HCAs offer housing counseling services. Further, Chapter 3 of the HCP Handbook addresses the Agency Work Plan and its required content.

This toolkit includes a sample work plan. The sample uses a fictional HCA called "ABC Counseling Inc." located in a fictional community called the "City of Springfield." Example text is provided in [blue](#). The following Agency Work Plan sections are included:

- [Target Community](#)
- [Housing Needs and Problems](#)
- [Affirmatively Furthering Fair Housing](#)
- [Description of Services](#) for each service checked within the "Type of Housing Counseling Services" section, including a list of ZIP codes where the agency, branches, subgrantees/subrecipients, or affiliates provide these services
- [Homeownership Counseling and Home Inspection](#)
- [Impact and Scope of One-on-One Counseling Services](#)
- [Formats for Delivery of Services](#)
- [Client Follow-Up](#)
- [Fee Structure](#)
- [Limited English Proficiency](#)
- [Marketing and Outreach](#)
- [Supervisory Monitoring/Quality Control Plan](#)
- [Emergency Response and Continuity of Operations Plans](#)

Agency Work Plan Toolkit

This toolkit is designed to provide useful information, tools, and strategies for currently participating HCAs and prospective agencies with guidance on developing or modifying their Agency Work Plan.

Target Community

Essential elements include a complete and concise description of the target population (including statistics and references), why the agency selected this area as its target population, and why the agency's services are needed if other HCAs also offer services in the area.

Opportunity Zones

HUD in coordination with local governments have established opportunity zones around the nation to encourage revitalization and investment. Housing counseling agencies (HCAs) have a vital role to play in the success of opportunity zones in their communities. HCAs are encouraged to participate in opportunity zone activities and include them in their workplan. To determine if an HCAs service area is in an opportunity zone please visit: <https://opportunityzones.hud.gov/>.

In this section, you should list demographic information including age of housing stock, median income, poverty level, education, etc., in order to show who will be your targeted audience.

Information can be obtained from the HUD Community Consolidated Plan, U.S. Census Bureau, community history, socioeconomic makeup, demographics, and employment trends. Be sure to identify in this section if you are serving rural areas, as defined by U.S. Department of Agriculture and Opportunity Zones.

Example:

The target audience is drawn from a variety of partnerships in the community, as well as referrals from previous program participants. Community partnerships are organizations that you have a working relationship with to accomplish your program goals.

You may wish to do an attachment with a list of your community partners and contact information or add a link to your website for additional information.

If you operate in a smaller region that only operates in a single state, for each county/city include the following type of information, citing the source and date of your data:

_____ County in 2019 had a population of _____ with _____ % of the population ages 18–64. The population of the area is ___% white, with ___% having at least a high school education. The median household income for the area in 2013 was \$_____ yielding ___% of the population at or below poverty level.

According to the _____ County's Comprehensive Plan, _____ County in 2019 had housing units with ___% single-family detached and the balance of is multi-unit structures. The median age for housing stock are those built in 20____, yielding potential for increasing need for counseling related to rehabilitation, refinance, and post-purchase maintenance. The homeownership rate is ___%, yielding some new homeownership education needs as well as post-purchase counseling. The bankruptcy rate for the county has increased by ___% in the past 2 years, indicating a need for financial management and possibly credit repair counseling.

The Consolidated Plan for _____ County indicated a need for ___ units of new single-family housing and ___ rental units in the next ___ years. This would point to a potential target audience for new homebuyer education as well as rental assistance and potential fair housing needs.

Example:

Our target population is the 5,000 residents of the City of Springfield. According to 2019 estimated Census data, tracks 201.11 through 220.12, this area’s characteristics include an average median income of \$22,000 with a population comprising 25% Hispanic (including populations of Guatemalan and Cuban descent with English as a second language), 23% Caucasian (including 500 resettled refugees from Bosnia), and 10% Native American. Approximately 60% of the population are renters. According to the City of Springfield’s 5-year Consolidated Plan, approximately 45% of the housing in this area is substandard and the area has been targeted by the city for redevelopment.

Our agency was chartered in 2000 specifically for improving the housing conditions of low-income families in the City of Springfield. Our target client group is the residents of the City of Springfield because of their income levels. Also, the city’s redevelopment efforts in the area include several affordable housing projects, providing a way for our clients to meet their housing needs without having to leave the City of Springfield.

XYZ Springfield Nonprofit Legal Services Inc. also offers housing counseling services to residents in the City of Springfield. However, this agency’s emphasis is to provide legal services relating to landlord/tenant disputes or fair housing issues. They do not offer the level of pre-purchase and rental housing counseling services we will offer.

Attached is a list of all ZIP code areas of the target population and a map indicating the location of our facility and the associated ZIP codes. Another purpose of the map is to depict the target area and show the location of the applying agency in relationship to other HUD-approved agencies in the area.

Housing Needs and Problems

You should be able to answer the following questions about housing needs and problems when you develop this section of your work plan:

- What are the specific housing problems of the target population?
- What barriers do they face?
- What problems are unique to this population base?

TIP

Be sure to add anything that is unique to the target audience of the area.

For example: Over 50% of the population rents, compared to the national average, is due to the mean cost of \$500,000 for single-family dwellings.

Cite specific sources for your information.

Example:

As stated previously, 45% of the target population are renters living in substandard housing.

Last year, our agency helped organize several community events including the City of Anytime Founder's Day, Thanksgiving Parade, and Independence Day celebrations. A majority of the attendees at these events were polled about their housing needs. Over 70% responded they needed larger living quarters, and 50% described their present residences as over 40 years old. Problems cited included disrepair of properties and unreliable utility services. More than half (60%) of the population described the desire to own their own home. An overwhelming 75% of the respondents indicated they would like to find better housing in the City of Springfield.

This information is also corroborated by a poll reported in the *Springfield Daily Sun*, published May 10, 2019. The article was entitled "Where to Live in Springfield," and it cited a study by Springfield Community College that reported over 80% of the residents polled in the City of Springfield felt "like they lived in substandard housing."

According to the 2019 estimated Census data, 30% of the population does not speak English as a first language. Our polls also revealed that 35% of the population did not know how to use the internet and only 25% owned their own computers or had access to the internet at their place of residence or workplace. Over 65% of attendees at our homebuyer education classes during the past year did not have access to credit or traditional banking services.

All of this information results in the identification of three major housing problems: (1) need for rental assistance to help clients relocate to federally subsidized programs such as Section 8 vouchers or project-based subsidy complexes, (2) need for both short- and long-term pre-purchase counseling, and (3) post-purchase counseling with an emphasis on property rehabilitation.

Two of our counselors are fluent in Spanish and Bosnian, and we have a contractual agreement with Springfield Community College to provide interpreters for other languages spoken by residents in the City of Springfield. A copy of the contract is attached to this application.

Affirmatively Furthering Fair Housing

In [7610.1 Handbook Rev. 5](#), HUD requires that funding recipients have a duty to Affirmatively Further Fair Housing (AFFH) in all its activities. You must affirmatively further fair housing for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. HCAs are expected to help remedy discrimination in housing and promote fair housing rights and fair housing choice.

Agencies must take reasonable steps to identify impediments to Fair Housing Choice and specify activities to affirmatively further fair housing. You will want to review the Consolidated Plan and Analysis of Impediments to identify the primary fair housing issues for your area and address in your plan ways you can assist in overcoming the issues. Although HUD does not

require AFFH to be part of the Agency Work Plan, it is a recommended best practice, especially as part of an agency’s marketing and outreach activities.

Example:

The Consolidated Plan for the City of Springfield lists lack of access to community assets and distribution of affordable housing units. They will be building 100 affordable scattered site units for sale within our geographic region. Our agency will contact clients eligible for the units and offer housing counseling services. We will work with the City of Springfield to provide education opportunities on how to access community assets for the area.

Description of Services

The portion of the work plan on housing counseling services is critical as it ties together the needs of the target population with your agency’s services. The work plan should describe in detail anticipated workload, staff resources, and specific information on how clients will be counseled in accordance with [7610.1 Handbook Rev. 5](#). Please review Chapter 3 and ensure your counseling activities comply with HUD’s requirements and reference all services (counseling, education, setting/format, geographic scope, civil rights and fair housing, accessibility and facilities, religious discrimination and influence, limited English proficiency, and referrals).

In the Description of Services:

1. Write out the process for the counseling offered.
2. Outline the specific services that support the counseling.

See the One-on-One Counseling example below.

Type of Service	Example
<p>One-on-One Counseling</p>	<p>Our agency offers three different types of programs: (1) Safe Harbor in Springfield, (2) the ABC Step Up to Homeownership Program, and (3) No Place Like a Springfield Home.</p> <p>Process for One-on-One Counseling:</p> <ul style="list-style-type: none"> • Intake: Application form is completed by client, reviewed by receptionist before scheduling meeting with counselor. • Financial Analysis: <ul style="list-style-type: none"> ○ Obtain and verify budget ○ Discuss ways to save money, cut expenses ○ Develop budget that client can afford • Action Plan: At the first meeting, an action plan is developed including the following: <ul style="list-style-type: none"> ○ Goal including any issues that must be resolved ○ Steps for reaching goal and who will be responsible for each step ○ Estimated timeframe for steps • Follow-Up:

	<ul style="list-style-type: none"> ○ Follow-up is conducted in accordance with 7610.1 Handbook Rev. 5. ● Termination: <ul style="list-style-type: none"> ○ Client file will be terminated based on HUD’s seven outcomes when the client’s issue is resolved, goal is met, or the following follow-up yields the need to terminate. <p>Below are a few examples of outlining one-on-one services offered by XXX agency.</p>
<p>One-on-One Counseling: Rental Counseling</p>	<p>The Safe Harbor in Springfield Program offers rental counseling to those clients seeking housing counseling rental assistance. It is designed to match client housing needs with locally available housing projects. Clients usually receive 1 to 2 hours of housing counseling. Before the appointment, clients are given contact information for obtaining a free credit report and are advised to bring copies of pay stubs or other income sources to the screening interview. At the screening interview, the housing counselor explains the agency’s role in helping the client locate affordable, safe housing. The client signs a disclosure form (copy attached) acknowledging that the agency does not endorse any specific housing program or complex and does not have a financial interest in any project or complex the client may be referred to.</p> <p>The counselor then determines family size, income, and housing need or problem. The counselor will also review the credit report if available and discuss any issues that may cause a potential landlord to reject the client’s application. The counselor will first ascertain whether the family is in a crisis (eviction, homelessness, or unsafe housing situation). Those needing immediate placement will be referred to both Springfield Shelter Services, Inc. and the City of Springfield’s Transitional Housing Program or the City of Springfield’s Faith-Based Charity Begins at Home Project.</p> <p>Clients not in crisis will be evaluated to determine what programs or affordable housing projects best meet their housing needs. This evaluation will include a budget analysis, review of credit issues, and discussion of the client’s housing needs and desires (such as number of bedrooms, area of town they wish to live in, amenities). The counselor will outline all options available to the client and then refer the client to the appropriate agency (e.g., the City of Springfield Housing Authority for those clients seeking portable Section 8 vouchers or public housing units) or affordable housing complexes with available units. The counselor will also tell a client when a housing need is unobtainable. Clients needing legal advice as a result of landlord disputes will be referred to XYZ Springfield Nonprofit Legal Services Inc. Clients with discrimination complaints will be referred to the local fair housing point of contact at the nearest HUD office. All clients will receive a copy of the Counseling Plan outlining the steps they will need to take to resolve their housing problem at the end of the session. The client will sign the Counseling Plan and receive a copy. During the initial session, the client will also be provided a copy of “Your Rights and Responsibilities as a Tenant.”</p> <p>Follow-up is conducted in accordance with 7610.1 Handbook Rev. 5. See below for detailed follow-up procedure.</p> <p>Our agency has one full-time counselor, Ms. Smith, assigned to work with rental clients. In the 12 months preceding this application, our agency counseled 125</p>

	<p>clients in this category. In addition to her counseling responsibilities, Ms. Smith is also required to maintain monthly contact with all agencies and apartment complexes the agency refers clients to for maintaining the most up-to-date information. She also conducts internet searches of www.hud.gov to locate the most up-to-date pertinent information about HUD programs. All total, Ms. Smith dedicates 75% of her time to rental counseling-related activities. She has no further duties assigned, as an increase in her workload is anticipated if this application is approved.</p>
<p>One-on-One Counseling: Mortgage Delinquency/Foreclosure Prevention</p>	<p>ABC Counseling Inc. is a partner with the City of Springfield’s “No Place Like a Springfield Home.” As part of the program, we have committed that all of our counselors shall have strong practical as well as theoretical knowledge in the area of mortgage default and/or foreclosure intervention counseling as it relates to the current rapid changing industry practices concerning loss mitigation, including repayment, partial claim, forbearance, modification, refinance, deed-in-lieu, etc.</p>
<p>One-on-One Counseling: Housing Needs and Problems</p>	<p>Steps Used to Analyze Client’s Housing Needs and Problems:</p> <ul style="list-style-type: none"> • Initial screening interview to determine if client is eligible for service requested. • One-on-one meeting with counselor to do intake application, which gathers demographic, employment, income, debt, housing needs, and any current issues. • Housing counselor will meet with the client one-on-one and review their needs to determine what type of assistance is needed. • A budget worksheet is given to the client to complete before the next meeting. • Client asked to sign “Client Authorization for Counseling Services,” which includes agreement to participate in the Housing Counseling Program, release of information, and release of liability for services rendered. <p>Development of an action plan listing required steps, responsibility for completing, and dates. Signed by the client and counselor or referral to another agency.</p> <ul style="list-style-type: none"> • Referrals to other agencies and community resources: <ul style="list-style-type: none"> ○ Referrals take about 30 minutes per client. ○ See Referral List for details. • Follow-up activities involve: <ul style="list-style-type: none"> ○ Reasonable effort by a qualified housing counselor to follow up with the client to ensure they are progressing toward their goals. ○ Reasonable efforts to conduct a verbal (in-person or via phone) follow-up session within the first 60 days of no client contact. ○ If unsuccessful after two attempts to conduct a verbal follow-up session, the counselor must write a letter or send an email to the client stating that such efforts have been made and inform the client that there is a need for follow-up communication. The letter must request that the client contact the housing counseling agency no later than 30 days from the date of the letter to help the agency assess if additional client services are necessary to assist them in achieving their housing goals or if services should be terminated.

	<ul style="list-style-type: none"> ○ Note: Issuing surveys to assess housing outcomes does not fully meet the requirement for client follow-up. Hiring a third-party agency to conduct follow-up services is prohibited. ● Clients are terminated if: <ul style="list-style-type: none"> ○ Needs are resolved. ○ Agency determines that further counseling will not meet the client’s need or problem. ○ Client terminates counseling. ○ Client does not follow housing counseling plan. ○ Contact is lost with the client.
One-on-One Counseling: Preparedness Assistance Counseling and Education	Preparedness education and counseling occurs before a disaster. It can be group education or one-on-one counseling. Education and counseling provide the clients with the tools and information necessary to prepare and implement a home and family emergency preparedness plan. A plan could include family information, communication plan, important papers, financial information, and an emergency kit.
One-on-One Counseling: Recovery Assistance Counseling	Recovery assistance counseling and education occur post-disaster. While this is usually one-on-one counseling, there could also be group education. Recovery assistance counseling will focus on relocation, re-housing, and rebuilding of clients impacted by a disaster. Depending on the needs of the client, the traditional types of education and housing counseling services will be offered. Often multiple services will be needed during the recovery period. In addition to traditional counseling services, the agencies and their counselors may provide community support activities.
Group Education Workshops	<p>Identify all types of education and the workshop preparation process:</p> <ul style="list-style-type: none"> ● List the general process for workshops, including agenda rollout ● Intake sign-up information ● Assign to class ● Attend workshop ● Gather demographics and information for data points ● Include necessary <u>Client Disclosure forms</u> ● Teach course: <ul style="list-style-type: none"> ○ Follow-up for one-on-one counseling ○ Preparation of file for workshop <p>List workshops that you offer including the duration, delivery method, major topics covered, and outcomes anticipated. Below are examples of group education workshop services.</p>
Group Education Workshops: Pre-purchase Education	<p>Step Up to Homeownership Programs:</p> <ul style="list-style-type: none"> ● Offer an 8-hour pre-purchase workshop once a month in English and once a month in Spanish every Saturday at the City of Springfield Community Center from 8:00 a.m. to 4:00 p.m. ● Preregister participants (explain the process....). ● Education workshop curriculum includes information covering the following topics: <ul style="list-style-type: none"> ○ Name the topics and continue to list the steps pertaining to pre-purchase activities. ● Individual counseling may cover any of the topics described above plus any additional topics as needed by potential homebuyers...etc.

	<ul style="list-style-type: none"> • Follow-up (describe how often). • Anticipate that client will be able to understand contract and closing documents and process to purchase a home.
<p>Referrals to Other Agencies and Community Resources</p>	<ul style="list-style-type: none"> • Referrals take about 30 minutes per client. • Must include actual counseling. • See Referral List for details.
<p>Recordkeeping</p>	<p>Online</p> <ul style="list-style-type: none"> • Client Management System (CMS) (<u>Insert name of system</u>) software is used to track the client and store information. • The online program is password protected, and only authorized users have access to the program. <p>Hardcopy Files (if applicable):</p> <ul style="list-style-type: none"> • A central file for each client will be used to store hardcopies. Files are stored in a secure filing cabinet, and the counselor’s office is locked in the evenings. • All meetings and phone calls with the client are logged. • Any letters, correspondence, or copies of client documents (e.g., loan docs) to or on behalf of the client are kept in their confidential file. <p>Individual File Documentation:</p> <ul style="list-style-type: none"> • File number • Date activity occurred • Start and end time of session • Name of housing counselor • Client’s name, address, and phone number • Federal Housing Administration (FHA) case number if applicable • HUD project number or name for clients renting HUD-assisted housing • HUD client number for cases receiving HUD funding for housing counseling • Client action plan • Screening interview information • Financial analysis • Disclosure/conflict of interest statements given to client • Alternatives discussed • Log of activities performed on behalf of the client (stored online) • Required data elements are kept in the online system • Copies of pertinent records and correspondence • Statement about how the person qualifies as a client • Follow-up activities • Termination date (date client file closed and reason for termination) <p>Group Files Documentation Includes:</p> <ul style="list-style-type: none"> • File number • Attendee name (first and last) • Attendee address (city, state, and ZIP code) • Attendee phone number • Attendee race • Attendee ethnicity

	<ul style="list-style-type: none"> • Attendee income level (area median income -AMI) • Attendee referred by • Attendee first-time home buyer (yes/no) • Signature of each client • Amount of fee charged, if applicable • Date, duration, and location of workshop • Counselor and/or instructors • Workshop subject • Conflict of interest statement <p>Credit Reports and Confidentiality:</p> <ul style="list-style-type: none"> • All credit files should be kept in a locked filing cabinet along with other supporting documentation such as tax returns, paystubs, and any forms with Social Security numbers. The application and demographic information completed on the client and the client housing counseling plan should be documented in the CMS. • Both computer copies and hardcopies of logs (optional for hardcopies) are kept and include the required information. • Each counselor has their own passcode to enter their client files on the computer. • All printed information is kept in client files in a locked office. • All one-on-one credit counseling is done in a private area.
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Homeownership Counseling and Home Inspection

Any agency that provides one or more types of homeownership counseling (including pre-purchase, post-purchase non-default, mortgage delinquency/default, or reverse mortgage counseling) must address the entire process of homeownership in the Agency Work Plan.

The Final Rule for Housing Counseling Certification requires that any agency providing homeownership counseling (pre-purchase, post-purchase non-delinquency, mortgage delinquency/default, or Home Equity Conversion Mortgage [HECM] counseling) must cover the following topics:

- Decision to purchase a home
- Selection and purchase of the home
- Issues that may arise during homeownership, including refinancing and mortgage default
- Final disposition of the home, including sale

The work plan must address how these components of homeownership will be provided to the agency’s clients. Additionally, the work plan must describe how home inspection material dissemination will take place.

Example:

ABC Counseling Inc. offers two types of homeownership counseling: (1) pre-purchase and (2) mortgage default counseling. The agency will cover the following topics relevant to each client:

- Decision to purchase a home
- Selection and purchase of the home
- Issues that may arise during homeownership, including refinancing and mortgage default
- Final disposition of the home, including sale

ABC Counseling Inc. will cover all these topics during homebuyer education classes. The counselor will provide additional information during the one-on-one session for those clients that have additional questions or did not attend homebuyer education. ABC Counseling Inc. will cover topics relevant to mortgage default clients during one-on-one counseling sessions. The clients may also be provided links to relevant websites (such as HUD.gov) for more information on loss mitigation tools and foreclosure process.

All clients will be provided the home inspection materials as part of the agency's intake package, and clients must acknowledge receipt of these documents. The counselor will review these documents during homebuyer education classes and during counseling sessions with the client.

Impact and Scope of One-on-One Counseling

Identify results for the types of counseling activities identified in the housing counseling services section of the work plan. Your Form HUD-9902 will contain projections in Sections 8 and 9 and should match the types of counseling outlined in your work plan. Additionally, you should identify the types of impacts you expect from your program's activities as identified in Section 10 of Form HUD-9902.

Formats for Delivery of Services

The counseling should take place in a location convenient for the client and in a format that best meets their needs. Face-to-face, phone, and secure internet (Skype, virtual, and video) counseling are all appropriate alternatives, and the counselor should use the setting and format that works best for the client.

Example: Accommodation of Disabilities

All disabilities are managed as needed. ABC Counseling Inc. has specific accommodations for the following needs and meets additional ones as the situation requires:

- Sight and hearing impaired
- Accessibility needs (e.g., phone, meet at their house, go and pick them up for meeting)

Client Follow-Up

Client files must not remain open indefinitely. The HCA must document in the client's file when housing counseling services are terminated.

Approximately 30 days after the initial counseling session, the counselor must make reasonable efforts to conduct a verbal (in-person or via phone) follow-up session. After several unsuccessful attempts to conduct a verbal follow-up session, the counselor should write a letter or send an email to the client stating that such efforts have been made and inform the client that there is a need for follow-up communication.

- If no contact is made within a 90-day period, the agency must not bill or count that client as an active file against any future billing periods unless client contact is reinitiated. The follow-up activities are documented in the file, and counseling for the client is terminated.
- If contact is made, the counselor will notate the progress of the client in resolving their housing problems and whether further counseling is needed or desired. The counselor will then either schedule a follow-up appointment or terminate counseling and document the file accordingly.

Example:

ABC Counseling Inc. makes reasonable efforts to have follow-up communication with the client, to ensure that clients are progressing toward their housing goal, to modify or terminate housing counseling, and to learn and report outcomes. The client follow-up is conducted by a qualified housing counselor who makes reasonable efforts to conduct a verbal (in-person or via phone) follow-up session within the first 60 days of no client contact. If unsuccessful, after two attempts to conduct a verbal follow-up session, the counselor writes a letter or sends an email to the client stating that such efforts have been made and informs the client that there is a need for follow-up communication. The letter requests that the client contact the housing counseling agency no later than 30 days from the date of the letter, to help the agency assess if additional client services are necessary to assist them in achieving their housing goals or if services should be terminated.

Fee Structure

Participating agencies may charge reasonable and customary fees for housing education and counseling services, for HUD housing counseling clients only, if this has been approved and the cost does not create a financial hardship for the client. If the agency is charging fees, identify what counseling activity will be charged and how the fees do not create a burden on clients. If the agency charges a fee for credit reports, the agency can only charge the client what the agency pays for the credit report. The work plan should explain how fees were determined or state that the agency does not charge fees. *(Note: A HUD participating counseling agency is prohibited from charging any fee for default/foreclosure prevention counseling or for homeless counseling per [7610.1 Handbook Rev. 5](#)).*

Example:

ABC Counseling Inc. charges fees for some services to those who can afford to pay. If a participant is required to pay a fee and feels that paying the fee will create a financial hardship, they may request a hardship waiver. To request a hardship waiver, the participant is asked to write a letter explaining how payment of the fee will create a financial hardship and provide the housing counselor a signed copy. The housing counselor will consult with management, who will in turn approve or decline the waiver. The agency's charges for services are below:

- Default Counseling: Free of charge
- Pre-purchase Counseling: Free of charge
- Homebuyer Education Seminar: \$250

Limited English Proficiency

The Agency Work Plan must describe how the agency serves non-English-speaking clients or clients with limited English proficiency. Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP), seeks to improve access to federally assisted services, programs, and benefits for individuals with LEP.

Agencies participating in the Housing Counseling Program must seek to provide access to program benefits and information to LEP individuals through language assistance services, in accordance with Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, published on the *Federal Register* on January 22, 2007 (72 FR 2732). For assistance and information regarding LEP obligations, go to www.lep.gov.

Example:

ABC Counseling Inc.'s plan serves non-English-speaking clients or clients with limited English proficiency. We provide access to program benefits and information to LEP individuals through language assistance services at no cost to the client. The firm has counselors that speak Spanish and Bosnian. Translators will be hired to accommodate other languages, which might be needed. All documents are printed in Spanish and Bosnian, and a translation of other languages can be provided as needed.

Marketing and Outreach

The section should outline the major ways in which you will reach out to your target audience. The plan should also incorporate how you will reach those least likely to come to you, especially large minority audiences.

Example:

ABC Counseling Inc. will use public service announcements on local radio, send articles monthly to the *Springfield Sentinel* for name recognition, and take out ads in newspapers with large minority readerships to reach our minority community. We will contact major employers in the area including schools, government, the hospital, and major retailers to determine if there is a way to partner through educational opportunities.

Supervisory Monitoring/Quality Control Plan

Write out step by step the quality control procedures the agency will follow:

1. These reports and monitoring procedure will ensure records of quality control findings and actions taken are maintained.
2. All deficiencies are provided to senior management.
3. Prompt effective corrective measures are taken by senior management and documented when deficiencies are identified.
4. Senior management will review X percent of counselor client files monthly.
5. Additional information as needed. View the [Housing Counseling Intermediary Toolkit: Quality Control](#) for additional guidance.

Example:

ABC Counseling Inc.'s housing counseling program manager will review five client files quarterly for each housing counselor for compliance with HUD requirements and quality of housing counseling. The program manager will document her review using a checklist and discuss with the counselor any deficiencies identified in each file. The program manager will produce quarterly reports that identify for their senior executive management and board of directors areas of deficiency, including violations of HUD regulations and ABC's own policies and procedures.

Supervisory Monitoring and Documentation for Information Security Plan Compliance:

The plan should include oversight to incorporate the basic requirements of the Gramm Leach Bliley (GLB) Act of 1999. Information includes all hardcopy and digital storage of client information. The plan should include ways to monitor and document the main areas outlined in the GLB Act. The Federal Trade Commission has posted online a [summary of the act](#) for reference purposes.


Emergency Response Plan and Continuity of Operations Plans

Both Emergency Response Plans and Continuity of Operations Plans (COOPs) are an optional but important component of the work plans.

It is important to note:

- Both plans assist agencies to effectively prepare for, respond to, and recover from a disaster in their organization.
- Emergency Response Plans guide the agency until the activities identified in the COOP are triggered.

View the [Housing Counseling Disaster Recovery Toolkit](#) for more information.



**Signed by Executive or Program Director for
Their Housing Counseling Program**

Date the plan