



# Partnership and Programming: HUD's Role in Refugee Housing

THE BENEFITS AND CHALLENGES  
OF BECOMING A HUD HOUSING  
COUNSELING AGENCY

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# KEY TERMS

Throughout this document, several key terms and/or acronyms will be used. The following table defines the frequently used acronyms in this resource. For further information on these key terms and definitions, an appendix section is included for resources, references, and supplemental information.

<b>HUD:</b> Department of Housing and Urban Development	<b>LHCA:</b> Local Housing Counseling Agency
<b>HCA:</b> Housing Counseling Agency	<b>MSO:</b> Multi-State Organization
<b>ORR:</b> Office of Refugee Resettlement	<b>SHFA:</b> State Housing Finance Agency
<b>PHA:</b> Public Housing Agency	<b>NOFO:</b> Notice of Funding Opportunity
<b>FHA:</b> Federal Housing Administration	<b>eLOCCS:</b> Electronic Line of Credit Control Systems
<b>FEMA:</b> Federal Emergency Management Agency	<b>SAM.gov:</b> System for Award Management
<b>GMO:</b> Office of Grants Management and Oversight	<b>OBM:</b> Office of Management and Budget

## Introduction

Attaining and maintaining affordable housing in the United States continues to be challenging on the road to self-sufficiency for both new and longstanding residents alike. Thus, although a daunting challenge, there is opportunity for success through creative partnerships and multi-faceted approaches in attaining and sustaining affordable housing. This resource explores the critical nature of partnerships and their positive contributions towards housing success for ORR-eligible populations. It will provide educational and actionable ways in which partners can work creatively to attain housing. A unique approach to this is for organizations serving ORR-eligible populations to consider becoming a HUD Housing Counseling Agency (HCA). However, to best understand the key components and the benefits of becoming a HUD Housing Counseling Agency, it is critical to have a clear understanding and framework of HUD and the HUD Housing Counseling Program as it relates to the housing situation of ORR-eligible populations.

### The Department of Housing and Urban Development (HUD) Overview

The Department of Housing and Urban Development (HUD) is a U.S. federal agency that works to create strong, sustainable communities and quality affordable homes for all Americans. HUD does this by administering housing and community development programs, enforcing fair housing laws, and promoting homeownership.

The Department has several different programs that provide funding to a myriad of projects and efforts and offer support to local Public Housing Agencies (PHAs) that manage public housing for low-income families, the elderly, and people with disabilities, including Section 8 programs. HUD supports homeownership through programs like the Federal Housing Administration (FHA), which provides mortgage insurance to help people qualify for loans. They provide enforcement and investigations of the Fair Housing Act and, finally, they provide community development grants to state and local agencies.

Additionally, many ORR-eligible populations may qualify for HUD programs. Each program has specific eligibility requirements, so it is important to always research eligibility requirements for each program as they are subject to change. This list of HUD programs is not exhaustive, and the programs HUD offers are wide and vast. To learn more about HUD and the various programs it administers, please visit the [official HUD website](#).

### HUD Housing Counseling Overview

One program ORR-eligible populations may find valuable is the HUD Housing Counseling program. This program provides guidance and support to individuals and families on various housing-related matters. These services are offered by HUD-approved housing counseling agencies (HCA), which are staffed by certified housing counselors. Counselors help with issues such as, but not limited to, first-time homebuying, foreclosure prevention, rental issues and education, and financial literacy. Organizations assisting ORR-eligible populations with housing-related needs may find value in maintaining a working partnership with a local HUD Housing Counseling Agency and/or may decide to become a HCA themselves.

Throughout this resource, key components of HUD Housing Counseling Agency status are considered, such as:

1. the benefits of HUD Housing Counseling Agency Status,
2. HUD Certified Housing Counselors,
3. becoming a HUD Housing Counseling Agency, and
4. the process and value of applying for Notice of Funding Opportunities.

By understanding the potential benefits of becoming a HUD Housing Counseling Agency, organizations and housing stakeholders alike will be able to consider additions to their housing portfolio which may impact housing success for the future and how, once they become an HCA, they may be better positioned and equipped to expand housing opportunities to not only ORR-eligible populations but also other community members.

## Benefits of HUD Housing Counseling for ORR-Eligible Populations

Most ORR-eligible populations may be eligible to receive HUD Housing Counseling.

A few highlights of the HUD Housing Counseling Program, its offerings, and the value it brings to organizations and individuals are as follows:

- **One-on-One Counseling Services:** Housing Counseling Agencies can provide each client with personal one-on-one counseling or group classes covering the same topics. This may cover anything from budgeting to finding housing, first-time homebuying, and more. Clients can meet with a counselor as many times as they wish, free of charge.
- **Credit Counseling:** HUD Housing Counselors can help clients obtain and maintain credit. The program offers education to clients about how credit works, how to establish credit, and how to maintain that credit. Clients also learn the importance of good credit and how to check their credit reports and scores to prevent identity theft.
- **Pre-Purchase Counseling:** If clients want to purchase a home — no matter where along the process they find themselves in — a HUD Housing Counselor will work to get the client homebuying-ready. They will educate clients about mortgage payments, taxes, interest, homeowners associations, homeowners' insurance, and loan products (both private and governmental), all while taking them through the homebuying process and team and working within their budget, credit, and savings in preparation for a first-time home purchase.
- **Post-Purchase Counseling:** After a client buys a home, counselors can work with the client to ensure successful homeownership: everything from paying PITIA (Principle, Interest, Taxes, Insurance, and Association) fees to a scheduled maintenance and replacement plan for large appliances and systems. Counselors can make sure that clients avoid foreclosure and help guide them through the process if it does become an issue.
- **Debt Management Services:** Anyone can easily fall into debt, especially if they are not familiar with how financial systems and interest work in the U.S. Housing counselors can work with clients to consolidate debt or come up with strategies to effectively pay it off. Counselors work with clients to meet their debt and savings goals and educate them on how to stay out of bad debt.
- **Homelessness and Housing Search Counseling:** HUD gives funding to local partner organizations to provide homelessness services. These partners are very often also HCAs. Organizations that provide these services can assist clients in finding new and affordable housing by helping with housing searches and completing application information. They can also assist with budgeting education for new costs such as rent, utilities, and moving expenses.
- **Disaster Preparedness and Response:** Immediately after a disaster, FEMA (the Federal Emergency Management Agency), the U.S. Small Business Administration, and other government agencies provide initial assistance. HUD then provides additional support for ongoing recovery through programs and partnerships. Housing Counselors can assist clients with registering with FEMA and helping with their specific housing needs. They can also assist clients with developing an emergency plan prior to any kind of disaster, researching what kind of disasters are likely to happen in their geographical area and assisting with decisions like insurance add-ons or disaster plans for the household.

## HUD Certified Housing Counselors

HUD Certified Housing Counseling Agencies are staffed by HUD Certified Housing Counselors. Only HUD Certified Housing Counselors are able to provide these specific and tailored housing counseling services in an official capacity, and agencies can only bill HUD for services rendered by a HUD Certified Housing Counselor. For an organization to become a HCA, there is a specific process; in order to become a HUD Housing Counseling Agency, the agency first needs to have HUD Certified Housing Counselors on staff.

To do this, a staff person must pass the HUD Certified Housing Counselor Exam. Or, the agency should seek to hire staff who already have their HUD Housing Counselor certification.

While certification is not a huge financial commitment for an organization (see below), it is a large time commitment for staff to study for and pass the exam. The HUD Certified Housing Counselor exam often requires extensive preparation and study. However, HUD does provide course material on their website to aid those in their attempts. Additional details and resources to prepare for the exam can be found on the HUD Exam Hub.

The interactive models and PDF lessons cover all the material the exam will test. These include:

- **Financial Management**
- **Housing Affordability**
- **Fair Housing**
- **Homeownership**
- **Avoiding Foreclosure**
- **Tenancy**

Altogether, HUD estimates that these modules will take 13 hours to complete. Setting aside time for staff to study and complete the modules is recommended. The exam can be taken as many times as needed to pass it and can be scheduled any time. Additional information on HUD Certified Housing Counseling can be found on the HUD Exchange.

There is a cost for the exam: \$60 USD to take it virtually, or \$100 USD in person. Both are proctored, and the participant must allow the examiner to take control of their computer to ensure no programs are open besides the exam. It is not an open note exam and must be completed from memory. The only calculator that can be used is the one on the participant's computer. Participants are given 90 minutes to complete 100 questions.

This insight is not to discourage organizations or staff from taking the exam but to ensure agencies are prepared to support staff attempting to take the exam. Once staff have passed the exam, they will receive an email approval which will be an important document to include as an attachment should an agency want to pursue HCA status. It is critical for agencies/organizations to keep a record of these email approvals.

It is also important to note that the certificate obtained by an individual who passes the exam belongs to the individual who passed the exam. Once someone is a Certified Housing Counselor, they are always a Certified Housing Counselor. There is no continuing education requirement, and the certificate follows the individual throughout their professional career. This makes the investment in preparation for the exam and passing the exam an excellent career development opportunity for staff.

Lastly, [Refugee Housing Solutions](#) offers an eight-week virtual prep course designed to prepare learners to take the HUD Housing Counseling Certification exam and gain additional housing expertise to serve their clients.

This course draws from the HUD Office of Housing Counseling's Certified Housing Counseling course. It is designed to not only provide the knowledge needed to better serve clients but also prepare learners for the HUD Certified Housing Counselor exam. This course is open to all agencies, organizations, staff, ethnic community-based organizations (ECBOs), and/or community-based organizations (CBOs) that serve ORR-eligible populations, and it is free of charge.

By the end of the course, participants will be equipped with the following anticipated skills and expertise:

- Learners will be equipped with the tools and expertise to effectively manage all aspects of either renting or purchasing a home, including finances, as it relates to budgeting and credit. Throughout the course, learners will understand first-time homebuying requirements, including but not limited to loans, income, maintaining homeownership, mortgages, financial assistance programs and community support opportunities.
- Learners will gain knowledge on federal fair housing laws, regulations, and tenancy best practices and how they are applied.
- Learners will be equipped with knowledge and expertise to prepare for the HUD Certified Housing Counselor exam, which could open opportunities both for clients' housing support as well as for the organization to pursue HUD Housing Counseling Agency status.

## Becoming an HUD Housing Counseling Agency

Once the agency/organization either hires a HUD Certified Housing Counselor or a current staff becomes a HUD Certified Housing Counselor, the necessary requirements are met to apply to become a Housing Counseling Agency.

There are two ways to participate in HUD's Housing Counseling Program:

Organizations may apply directly to HUD as one of the following:

- a Local Housing Counseling Agency (LHCA),
- an Intermediary (regional or national),
- a multi-state organization (MSO),
- or a state housing finance agency (SHFA).

OR

LHCAs can also apply through a HUD-participating Intermediary or SHFA.

- Intermediaries and SHFAs provide LHCAs with critical supportive services, including training, tools and templates, pass-through funding, and technical assistance. They also monitor their networks to ensure services meet program standards and effectively meet the needs of their clients.

It is up to the organization to determine which type of HCA works best for them and their organizational structure.

There are also additional requirements for applying beyond having a Certified Housing Counselor on staff. All requirements can be found [here](#), but they are also listed below:

1. **Nonprofit Status:** The applicant must function as a private or public nonprofit organization. The agency must submit evidence of nonprofit status as demonstrated by Section 501 (c) of the Internal Revenue Code.
2. **Experience:** The applicant must have successfully administered a housing counseling program for at least one year. The applying organization needs to determine what they consider to be housing counseling experience and discuss it with their HUD point-of-contact (POC).
3. **Community Base:** The applicant must have functioned for at least one year in the geographical area that the applicant proposes to serve.
4. **Counseling Resources:** The applicant must have sufficient resources to implement its proposed counseling plan no later than the date of HUD approval.



Once an organization meets all critical requirements and is ready to submit an application, in order to successfully apply an organization must include the following:

1. **Form HUD-9900 Application** (expires 7/31/2027) | Complete both the application and Attachment A:
  - *HUD Form 9900: Application for Approval as a Housing Counseling Agency (PDF)*
  - *HUD-9900 Attachment A – Screening for Ineligible Participants (XLSX)*
2. **Documentation of 501(c)**
3. **Eligibility documents for government entities** (if applicable)
4. **Charter/By-Laws**
5. **Conflict of Interest Policy and Procedures and HUD Disclosure to Clients**
6. **Other HUD Programs** | If applicable, list the other HUD program(s) in which you are currently participating, the name of the point-of-contact (POC), and contact information.
7. **List of housing counselor(s) and evidence of passing the HUD Housing Counselor Certification Exam**
8. **Housing Counseling Work Plan**
9. **HUD-9902** | Complete sections 8 and 9 to quantify the households who received counseling and education services from your agency during the past 12-month period.
10. **Written Agreements** | If applicable, agencies with branches, sub-grantees/sub-recipients, and/or affiliates must provide written agreements which delineate the responsibilities.
11. **Budget and Funding Sources**
12. **Most Recent Audited Financial Statement**
13. **Facility Information/Photos**

Before the organization collects all the necessary documents, it is imperative they reach out to HUD to schedule an appointment with an application advisor who will assist further. Guidance on how to do this can found [here](#).

This advisor will help explain the program requirements and assist with the application and documentation requirements. HUD's goal is to review the application once it is submitted within 90 days. If documents are incomplete or missing, then the HUD POC will reach out to the applying agency. This prolongs the process.

Once the organization or agency has been approved, they may begin looking up and applying for HUD Housing Counseling NOFOs at [Grants.gov](#).

## Applying for Notice of Funding Opportunities (NOFOs)

In 2024, there was a total of \$48 million available for HCAs through HUD grants. HUD announces these funding opportunities through NOFOs. Each NOFO contains all the information needed to apply for the grant.

To apply for grant funding through HUD, you must go to the [Grants.gov website](#). There, you will make an account, verify that you are eligible for the grant you are applying for, and then apply. All grant applications are tracked through this portal, and your organization will need to review it regularly to check when relevant NOFOs are released. To be eligible to apply through Grants.gov, the organization must have a Unique Entity Identifier number, or UEI number. This number is requested for and assigned to the organization through the System for Award Management at [SAM.gov](#).



An additional tracking system utilized by HUD grant recipients is eLOCCS, or Electronic Line of Credit Control Systems. This system handles grant disbursements after initial, quarterly, and final reports are submitted and approved. All users and approving officials must first obtain a secure systems ID and password from HUD in order to log in to eLOCCS. This person is usually not a housing counselor but a supervisor or financial staff position. Work with your HUD POC or grant manager to navigate this process.

The Office of Grants Management and Oversight (GMO) is responsible for guidance and policies related to competitive grants programs. This includes:

- Notices of Funding Opportunities (NOFOs),
- ensuring compliance with pertinent statutes and regulations, and
- ensuring consistency with HUD's strategic goals and policies.

GMO is responsible for issuing guidance concerning all federal grants and works in conjunction with the other 26 federal grant-making agencies. They operate within the office of the Chief Financial Officer for Systems and work closely with the Office of Management and Budget (OMB).

## Conclusion

HUD Housing Counseling and HUD Housing Counseling agencies can provide an incredible array of services to clients. Many organizations, including those working with ORR-eligible populations, are already providing supportive housing services to clients. By completing the [HUD Certified Housing Counseling training course](#) and Housing Counseling Agency application process, agencies may be able to serve their communities in a greater capacity through additional funding mechanisms only available once they are a Housing Counseling Agency. While the process may seem daunting, by understanding the potential benefits of becoming a HUD Housing Counseling Agency, organizations and housing stakeholders will be able to consider expanding their housing portfolio and how it may impact housing success for the future. Once becoming an HCA, they may be better positioned and equipped to expand housing opportunities to not only ORR-eligible populations but also the wider community.

## Resources and Citations

### General

- [ORR-Eligible Populations](#)
- [HUD Housing Counseling Agencies](#)
- [HUD Services](#)

### Housing Counseling Agency Application Process

- [How to Become an HCA](#)
- HUD Application Advisor Contact: [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov)
- [HUD Approval Process Overview](#)

### Housing Counseling Exam and Process

- [FAQs](#)
- [HUD Exam Resources](#)

### Applying for Federal Funding

- [HUD Funding Information](#)
- [How to Apply for Grants](#)
- [eLOCCS](#)
- [SAM.gov](#)
- [Notice of Funding Opportunities](#)
- [Grants Management and Oversight](#)

## FEEDBACK

Refugee Housing Solutions wants to hear from you about the quality, relevancy, and helpfulness of our resources and tools.

Help us improve our offerings by completing this [short form](#).  
You may also scan the QR code to access the form on another device.





**[www.refugeehousing.org](http://www.refugeehousing.org)**

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