

## Proposals to the Office of Housing Counseling

### On Improving the HUD Housing Counselor Certification Exam

**August 27, 2020**

**National Housing Resource Center**

HUD has made clear progress in moving the housing counselor certification and testing forward. As housing counselors, we share the goal of developing a highly skilled, professional, and certified housing counseling workforce.

However, we are also seeing that there are problems with the certification testing. Experienced housing counselors with good track records have failed the exam several times. English as a second language counselors are having a hard time with the exam. We hear that people new to the housing counseling work have an easier time passing than seasoned counselors. The testing venues and protocols are not always conducive for people with different learning styles or with learning disabilities.

A broad range of housing counselors, trainers, and administrators have come together to make proposals to the Office of Housing Counseling on improving the certification testing process.

#### Test Content

**Fair Housing Questions:** Counselors identified the Fair Housing section as the most problematic. Questions should rely on essential information that each counselor needs to know when working with consumers, such as protected classes, how to file complaints, and what complaints should be referred. Instead, there is an over-emphasis on dates, complaint filing content (which should be handled by FHIP and FHAP organizations), and legal interpretation (even though counselors should not be providing legal advice). We suggest that a Fair Housing legal program, such as HERA (Housing and Economic Rights Advocates), review the questions to improve the content.

**Delinquency and Foreclosure Counseling:** HAMP/HARP loss mitigation programs are no longer active and Hope Loan Port is no longer widely used. Critical issue areas like how to handle property taxes and property insurance in forbearance, loan modification, and deferral are not included.

**Over Emphasis on Less Common Programs:** For example, FHA Title 1 Property Improvement Loans are not widely used and should have less emphasis in the test.

**Ratios:** Housing counselors work with front end and back end ratios, which are provided by the lenders and loan programs. The study materials and test require calculation based on memorized ratios. Math problems should align with how lenders and counselors calculate real world cases.

**Question Format:** Questions should be simple and clear with only one clear answer. Unnecessary wording or information should be eliminated. On negative questions like “what item is not included,” the word “not” should be underlined or highlighted.

## Language Issues

For some people for whom English is a second language, the test has been confusing and difficult. Language capacity is a critical component in reaching underserved markets and HUD needs to affirmatively support English as a second language counselors.

1. Additional time should be available upon request to any counselor for whom English is a second language.
2. Study guides should be available in multiple languages.
3. The test directions should be available in multiple languages.
4. A vocabulary guide should be available for housing industry and housing counseling terms in multiple languages.

As a start, study guides, test directions, and vocabulary guides should be available in Chinese, French, Haitian Créole, Tagalog, Korean, and Vietnamese, which after English and Spanish are the most common languages spoken in the United States. The CFPB provides materials in these languages. HUD should work with housing counseling agencies on what other language translations are needed for their communities. In our discussions, Burmese, Nepalese, Hindi, Hmong, and Somali have been mentioned.

The Spanish translation has presented challenges for some counselors. Part of this is the diversity of Spanish dialects. This can be addressed by using Neutral Spanish, commonly referred to as Standard Spanish, Global Spanish or Universal Spanish, which is a variation of the Spanish language used to allow the greatest number of Spanish speakers to understand the message without the use of local terminology. Since there have been questions about the quality and accuracy of the translation, the test should be reviewed by a professional translator who is familiar with mortgage and housing counseling vocabulary.

## Test Logistics

More test sites are needed during and after the COVID-19 crisis.

Counselors in rural areas may not have enough internet speed to take the test online. HUD should reach out to libraries, hotel chains, business centers or other institutions with wide reach and internet access to better serve rural and unrepresented areas. These could be for group or individual testing.

Better instructions are needed for signing in for online testing and there should be fewer clicks to get to the test registration through the HUD website.

While the online proctored test is more affordable and is a good option where there may not be a location to take the test in-person, there are technical issues that can be difficult to overcome. Non-profits do not always have IT staff to help with these technical issues. Test takers need

better customer contact availability. The chat function does not always connect, so phone support needs to be an option. Kryterion online and telephone support need to be active and available to people applying to take the test and to test takers.

Unexpected biometric issues like wearing glasses, keystroke verification and hairstyle have caused test starts to be delayed, sometimes by an hour and more, while counselors try to confirm their identity, adding unnecessary stress. These qualifications are less problematic with the HECM test.

Clear instructions are needed around restrictions on verbalizing during testing. Counselors taking tests are sometimes unnerved by proctors who interrupt the test to stop any verbalization, even when the counselor is the only person in the room. Some people say things out loud to better understand the question. We would prefer an accommodation to allow people to verbalize if there is no one else there to be disturbed.

For some, the online test calculator and note pad are awkward to use during testing. Ideally, HUD will permit test takers to use a hand calculator and have a sheet of paper and pencil, to facilitate test takers who are not familiar with on-screen computation. If not, at least put a sample calculator and note pad on the practice test, so that test takers could become familiar with using them before taking the test.

On FHA Connections, better instructions are needed. The HUD Point of Contact should connect with their agencies about assigning FHA coordinators. HUD should offer a video that walks through the process.

HUD should allow testing and passing by subject area. Anyone who does not pass can be tested on the sections they failed and they can concentrate their studies on the relevant subject areas. At the very least, the test taker should be able to learn in detail which areas they failed in order to focus their studies accordingly.

## Training

HUD should solicit feedback from trainers on problem areas with the test.

The email sent to people who fail the exam should be easier to understand. Rather than just listing the section (ie.2.1), the email should also provide a link to the specific section in the study guide that corresponds to incorrect answers.

HUD should provide an audio version of training materials on the HUD website to assist auditory learners.

The practice exam is not specific enough on what the counselor is getting wrong.

New funding for training is needed, without taking away from housing counseling assistance funds.

## Learning Differences

HUD should recognize that some people have different learning styles and some people have undiagnosed learning disabilities. Many counselors do not realize they have a learning disability that would allow them to access reasonable accommodations. HUD should provide a listing of those learning disabilities that allow for reasonable accommodations. So much of the exam success hinges upon ability to memorize specific facts in accordance with Study Guide Materials, as opposed to real-life knowledge. Some learners may be competent in their role or position but are unable to pass because of the requirement to memorize many facts.

If the counselor is taking the test online by themselves, permit counselors to listen to music, speak during the test (some people analyze best when verbalizing), or have extended time.

Funding for one-on-one coaching and mentoring is needed, especially for counselors who have failed more than once.

For test takers who have reading disabilities, are vision impaired, or have other challenges, HUD should provide an oral exam alternative.

## Staffing Issues

HUD should clarify if housing counseling agencies can contract out its certified counselors to other HUD approved housing counseling agencies and provide guidance on best practices.

1. What is the status of a HUD approved housing counseling agency if they have no certified housing counselors? What do they do with their clients who need ongoing attention? Can the agency without certified counselors do intake and refer clients to agencies with certified counselors? If the agency contracts for services from an agency with certified counselors, are they reinstated?
2. The Office of Housing Counseling should provide detailed guidance on what are the appropriate roles for housing counseling agency staff who are not certified, such as can they do intake, pull credit reports, and present at educational workshops?
3. What is the process for new agencies hoping to receive HUD approval as a housing counseling agency and at what point are they required to have certified counselors in place?

For agencies with a small housing counseling staff, HUD should provide guidance on how to manage staff transitions, when certified counselors leave and new counselors need to be recruited.

With the requirement that half of an agency's housing counselors have at least six months experience, what is the HUD guidance for new agencies and agencies with small counseling staffs in markets where there are not very many certified counselors, especially in rural areas? Agencies which are applying for HUD approved agency status should have access to HUD training scholarships, so that their staff can take and pass the certification test when they become approved.