



HUD Office of Housing Counseling

Housing Counseling 9902 Reporting

Thursday, March 14, 2024

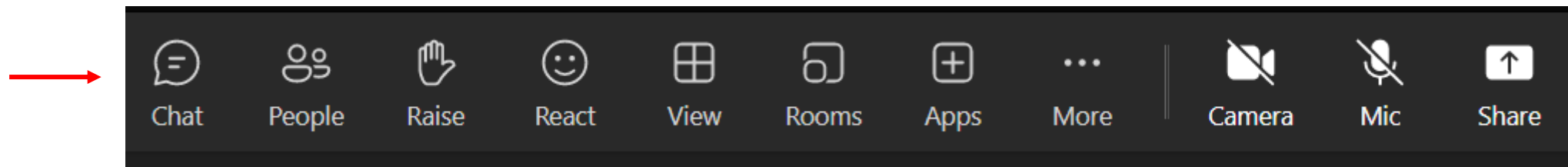


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Terry Carr

Associate Deputy Assistant Secretary
HUD Office of Housing Counseling

HUD Welcome

- Welcome to today's training session on HUD 9902 reporting.
- Today's agenda will cover reporting systems, the 9902 Form, and tips for avoiding errors.
- Reporting is a priority for HUD
- Data from the 9902 report is widely used by industry and policy makers



Today's Presenters

Office of Policy of Grant Administration

- Tracie Oaks-Ross, Housing Program Specialist
- Gabriela Roman, Housing Program Specialist

Agenda

- HUD Welcome
- 9902 Reporting Systems
- The Form HUD-9902
- Overview of 9902 reporting
- Common Reporting Errors and Reporting Tips
- Data Quality Checks
- Data Displays
- Resources
- Frequently Asked Questions





9902 Reporting Systems

CMS Overview

- Each Housing Counseling Agency (HCA) must have a CMS that is approved by HUD
- All participating HCAs are required to use a CMS that interfaces with HUD's databases for the collection and reporting of agency and client-level data
- Approved CMSs must integrate with HUD's Housing Counseling System (HCS)
- All 9902 data must be entered into the CMS, which gets transmitted to HCS

What is a CMS?

A Client Management System (CMS) is an online housing counseling application that automates much of the counseling process, including:

- client intake
- file maintenance
- financial and credit analysis
- outreach
- client notification, and
- reporting

CMS Overview

Client Management System Guidance

This page contains information on the Housing Counseling Client Management System (CMS). Select a topic to find relevant guidance and resources.

All CMS issues regarding performance and reporting data to HCS should be directed to the [CMS Help Desk](#).

Housing Counseling Technology

Learn more about how HCAs can [leverage technology in their counseling delivery](#).

Find by Topic

[Overview](#)

[CMS Benefits](#)

[Reporting Requirements](#)

[Choosing a CMS](#)

[Making a CMS HUD-Compliant](#)

[Agency Reporting Module \(ARM\) Requirements](#)

[Developer Meeting Notes and Announcements](#)

[Technical Support and Help Desk](#)

Overview

All Housing Counseling Agencies (HCAs) participating in HUD's Housing Counseling Program are required to use a Client Management System (CMS) that interfaces with HUD's Housing Counseling System (HCS). A CMS is a commercial or self-developed online housing counseling application that automates much of the housing counseling process, including client intake, file maintenance, financial and credit analysis, outreach, client notification, and reporting. Automated data transfer from each agency's CMS to HUD's HCS, replacing the manual input process.

HCAs have the option to either acquire an existing commercial CMS listed on HUD's website that is already compliant and connected to HCS, or to develop their own CMS. A CMS must be compliant—meeting the requirement that data transfers to HCS—before an agency is allowed to participate in HUD's Housing Counseling program. It is the HCAs' responsibility to utilize an accepted CMS that is in compliance with HUD's standard. HUD recognizes that many HCAs have multiple CMS applications for various sponsors. To minimize these multiple redundant applications, HUD recommends HCAs acquire a single CMS that can provide multiple reporting requirements instead of having multiple CMSs.

It is important that HCAs access HCS to check and validate their inputted data at least every 90 days. In addition, there are some unique data elements that HCAs have to input in HCS manually that are not currently available in any CMS.

[View CMS FAQs](#)

HCS Overview

- The Housing Counseling System (HCS) is a real-time web application that manages the HUD Housing Counseling program's data
- HCAs are required to transmit their data into HCS using a HUD authorized CMS of their choice from the approved list of CMSs
- HCS maintains the list of agencies, collects client data, processes grant applications, and provides performance reports

HCS Overview

- Every HCA has a single HCS user ID (not individual staff users)
- The HUD Exchange has information about HCS, including password reset and technical assistance
- HCAs are required to validate their profile at least once every 90 days



The screenshot shows the HUD Exchange website interface. At the top, there is a dark blue header with the HUD Exchange logo and name. Below the header, a breadcrumb trail reads: Home > Programs > Housing Counseling > Housing Counseling System. The main heading is "Housing Counseling System". Below this, there is a paragraph of text: "This page contains information on the Housing Counseling System (HCS). Select a topic to find relevant guidance and resources." There are two links: "Email to Obtain an ID and Password for Log in and Assistance." and "Learn more about how Housing Counseling Agencies can leverage technology in their counseling delivery." On the right side, there is a "Log In" section with a note: "Note: HCS is a separate website from the HUD Exchange. If you have trouble accessing HCS, follow the instructions on the **Technical Support** section of this page." Below the note is a green button labeled "Log In to HCS".



The Form HUD-9902

The Form HUD-9902

- The HUD Form 9902, known as the Housing Counseling Activity Report, is a tool HUD uses to track the Housing Counseling Program
- Form 9902 HCA Activity Reports are cumulative fiscal year-to-date for each quarterly report period
- Designed to capture all an HCA's education and counseling activities within HUD's fiscal year.
- Allows analysis of demographic characteristics, income level, counseling type, and counseling outcomes

The Form HUD-9902

HCA Activity Report:

- Section 3: Ethnicity
- Section 4: Race
- Section 5: Income Levels
- Section 6: Rural Area Status
- Section 7: Limited English Proficiency
- Section 8: Households Receiving Education Services (Including Online Education), by Purpose
- Section 9: Households Receiving One-on-One Counseling, by Purpose
- Section 10: Outcome of One-on-One Counseling Services



Overview of 9902 reporting

Overview of 9902 Reporting

- Required for all participating agencies regardless of whether or not a HUD Housing Counseling Grant was received.
- HUD-approved Local Housing Counseling Agency's (LHCA) are required to transmit an electronic HUD-9902 quarterly, reflecting main-office and branch location activities. Branch offices of LHCAs do not file an independent HUD-9902.
- For all participating intermediaries, Multi-State Organizations (MSO) and State Housing Finance Agencies (SHFA), an individual electronic HUD-9902 must be submitted quarterly on behalf of each HUD Housing Counseling Program affiliate and/or branch office, if applicable.

Overview of 9902 Reporting

- HUD recommends that HCAs transmit the 9902 data through their CMS early in order to review and correct errors prior to the due date.
- Discrepancies discovered should be corrected in the CMS and retransmitted.
- After submitting 9902 data through the CMS, log into HCS to verify that the data was transmitted and is correct.

Overview of 9902 Reporting

- The HUD-9902 should be submitted, even when no clients have been served.
- **Reporting must be cumulative. The current quarter reporting must include client data from previous quarter(s) of the current fiscal year.**
- HCAs that do not submit their HUD-9902 reports may jeopardize their agency's status as a HUD-Approved HCA. If your HCA is a HUD housing counseling grantee, failure to report will affect timely processing of grant vouchers and may negatively affect your agency's scores in HUD housing counseling grant competitions

Overview of 9902 reporting

| HUD Fiscal Year | Period Covered | Due Date |
|-----------------|------------------------------|---|
| 1st Quarter | October 1st - December 31st | Due no later than January 31. |
| 2nd Quarter | October 1st - March 31st | Due no later than April 30. Include clients reported in the Quarter 1 report plus new clients served in Quarter 2. |
| 3rd Quarter | October 1st - June 30th | Due no later than July 31. Include clients reported in the Quarter 2 report plus new clients served in Quarter 3. |
| 4th Quarter | October 1st - September 30th | Due no later than December 31. Include clients reported in the Quarter 3 report plus new clients served in Quarter 4. |

Overview of 9902 reporting

Cumulative Reporting

- Reporting must be cumulative. The current quarter reporting must include client data from previous quarter(s) of the current fiscal year.

| HUD Fiscal Year | Period Covered | Total Clients Served | Period Covered For 9902 Reporting | Total Clients Reported on 9902 |
|-----------------|---|----------------------|--|--------------------------------|
| 1st Quarter | October 1st - December 31 st | 30 | October 1st - December 31 st <i>Due no later than January 31</i> | 30 |
| 2nd Quarter | January 1st - March 31 st | 42 | October 1st - March 31 st <i>Due no later than April 30</i> | 72 |
| 3rd Quarter | April 1st - June 30 th | 25 | October 1st - June 30 th <i>Due no later than July 31</i> | 97 |
| 4th Quarter | July 1st - September 30 th | 0 | October 1st - September 30 th <i>Due no later than December 31</i> | 97 |



Gabriela Roman

Housing Program Specialist
Office of Policy of Grant Administration



Overview of 9902 reporting Case Study

Case Study: Pre-purchase Counseling

**Period Covered
For 9902 Reporting**




October 1st - December 31st
Due no later than January 31

A client visits your agency for one-on-one pre-purchase counseling. Before attending one-on-one counseling, the client has already completed a homebuyer education workshop. During the counseling session, the certified counselor:



- works with the client to establish a household budget
- encourage the client to start saving part of each paycheck to establish an emergency fund
- provides information about down payment assistance programs that may help them achieve their homeownership goal

How do you report the household on the HUD Form 9902?



Case Study: Pre-purchase Counseling

| Outcome | Yes, report | No, do not report | Reasoning |
|--|--|--|---|
| a. Households that received one-on-one counseling that also received education services. |  | | You know the client received one-on-one counseling and also attended a group education workshop, so you can report this outcome immediately after the counseling session. Make sure the counseling file supports the outcome, e.g. in the client notes. |
| b. Households that received information on fair housing, fair lending and/or accessibility rights. | |  | You did not discuss any fair housing information with this client, so it would not be appropriate to report this outcome. |
| c. Households for whom counselor developed a budget customized to a client's current situation. |  | | You developed a budget during the counseling session, so you can report this outcome immediately. Make sure the counseling file supports this outcome, e.g. in the client notes, or with a copy of the budget developed. |


Case Study: Pre-purchase Counseling

| Outcome | Yes, report | No, do not report | Reasoning |
|--|-------------|---|--|
| d. Households that improved their financial capacity (e.g. increased discretionary income, decreased debt load, increased savings, increased credit score, etc.) after receiving Housing Counseling Services. | |  | You encouraged the client to start saving for emergencies, but you will not know whether the client actually started saving until you have followed up with the client. When you follow up with the client, you will need to ask the client whether or not they started saving. |
| e. Households that gained access to resources to help improve their housing situation (e.g. down payment assistance, rental assistance, utility assistance, etc.) after receiving Housing Counseling Services. | |  | You gave the client information about down payment assistance programs that may be helpful, but you will not know whether the client applied for that resource until you have followed up with the client. When you follow up with the client, you will need to ask the client whether they applied for the down payment assistance program. |

Case Study: Pre-purchase Counseling

| Outcome | Yes, report | No, do not report | Reasoning |
|--|----------------|---|--|
| f. Households that gained access to non-housing resources (e.g. social service programs, legal services, public benefits such as Social Security or Medicaid, etc.) after receiving Housing Counseling Services. | |  | You did not discuss any non-housing resources with this client, so it would not be appropriate to report this outcome. |
| k. Household that received rental counseling and avoided eviction after receiving Housing Counseling Services. | |  | This is not a rental counseling client reported in Section 9b, so it would not be appropriate to report this outcome. |

Case Study: Pre-purchase Counseling

| Outcome | Yes, report | No, do not report | Reasoning |
|---|-------------|---|---|
| m. Households that received pre-purchase/homebuying counseling and purchased housing after receiving Housing Counseling Services. | |  | You discussed steps the client can take toward achieving their homeownership goal, but you will not know whether the client purchased housing until you have followed up with the client. When you follow up with the client, you will need to ask the client whether they purchased housing. |

Case Study: Pre-purchase Counseling

| Period Covered For 9902 Reporting | October 1st - December 31st <i>Due no later than January 31</i> |
|---|--|
| <ul style="list-style-type: none">✓ 8f. Completed pre-purchase homebuyer education workshop✓ 9c. Prepurchase/Homebuying✓ 10a. Households that received one-on-one counseling that also received education services.✓ 10c. Households for whom counselor developed a budget customized to a client's current situation. | |

Case Study: Pre-purchase Counseling

Part II

**Period Covered
For 9902 Reporting**

October 1st - March 31st
Due no later than April 30



The certified counselor performs follows-up with the pre-purchase client. During the follow-up call, the certified counselor:

- confirmed that the client is saving part of each paycheck and;
- received approval for downpayment assistance

How do you report the household on the HUD Form 9902?

Case Study: Pre-purchase Counseling

Part II

| Outcome | Yes, report | No, do not report | Reasoning |
|--|--|-------------------------|--|
| d. Households that improved their financial capacity (e.g. increased discretionary income, decreased debt load, increased savings, increased credit score, etc.) after receiving Housing Counseling Services. |  | | You encouraged the client to start saving for emergencies. During the follow-up session with the client, you were informed that the client increased their saving. Make sure the counseling file supports this outcome, e.g. in the client notes. |
| e. Households that gained access to resources to help improve their housing situation (e.g. down payment assistance, rental assistance, utility assistance, etc.) after receiving Housing Counseling Services. |  | | You previously provided the client information about down payment assistance programs that may be helpful. During the follow-up session, the client confirmed they received preapproval for downpayment assistance. Make sure the counseling file supports this outcome, e.g. in the client notes. |

Case Study: Pre-purchase Counseling

Part II

| 9902 Reporting October 1st – December 31st <i>Due no later than January 31</i> | 9902 Reporting October 1st - March 31st <i>Due no later than April 30</i> |
|---|--|
| <ul style="list-style-type: none">✓ 8f. Completed pre-purchase homebuyer education workshop✓ 9c. Prepurchase/Homebuying✓ 10a. Households that received one-on-one counseling that also received education services.✓ 10c. Households for whom counselor developed a budget customized to a client's current situation. | <ul style="list-style-type: none">✓ 8f. Completed pre-purchase homebuyer education workshop✓ 9c. Prepurchase/Homebuying✓ 10a. Households that received one-on-one counseling that also received education services.✓ 10c. Households for whom counselor developed a budget customized to a client's current situation.✓ 10d. Households that improved their financial capacity (e.g. increased discretionary income, decreased debt load, increased savings, increased credit score, etc.) after receiving Housing Counseling Services.✓ 10e. Households that gained access to resources to help improve their housing situation (e.g. down payment assistance, rental assistance, utility assistance, etc.) after receiving Housing Counseling Services. |



Common Reporting Errors and Reporting Tips

Common Reporting Errors and Reporting Tips

- Under-reporting outcomes in Section 10
 - Counseling activities can have multiple outcomes. Report as many as apply.
- Reporting outcomes in Section 10 that do not align with counseling activities reported in Section 9
 - For example, reporting outcomes for workshops or an unrelated category.
- Reporting high percentages of clients as “Chose Not to Respond” in the demographic categories
 - “Chose Not to Respond” should be used minimally.

Common Reporting Errors and Reporting Tips

- Submitting data under the incorrect HUD Fiscal Year or quarter.
- Late reporting.
- Not including cumulative fiscal year data when manually submitting the form into the HCS
 - Your CMS should also be configured to report cumulatively
- Incorrectly counting one client twice if an education/group workshop is divided into two sessions.

Common Reporting Errors and Reporting Tips

- Inaccurate/out-of-date HCA information.
 - HCA information should be validated quarterly.
- Reporting services not approved under the HCA's workplan.
 - Please contact your POC if your workplan needs to be updated.
- Reporting marketing and outreach activities.
- Online education administered by HCA's may be recorded in group education. Demographics must be collected, and the HCA must keep a workshop file.

Common Reporting Errors and Reporting Tips

- It is a best practice to assign a person or team to conduct 9902 quality control before submission
- Download 9902 client level data in excel format
- Data can be sorted by date, activity, and counselor
- Check for missing fields and duplicates
- Share results with the team, especially common errors and acknowledge great work.
- Utilize data analysis to improve the quality of your work

Data Quality Checks

- HCS Improvement Release in June 2019 added Data Quality Checks to the 9902 reports.
- If data quality alerts have been identified, the **Data Quality Alerts** will display a box below the “Validation Section”.
- Click the “Review Data Quality Alerts” button to display alerts.



| Housing Counseling Agency Activity Report | | U.S. Department of Housing and Urban Development Office of Housing Counseling Federal Housing Commissioner | | OMB Approval No: 2502-0261 Exp. 07/31/2019 | | | | | | | | | | |
|---|---------------------------|--|--|---|-------|-------|--|--|----------------|---------------------------|--|--|--|--|
| 1. Counseling Agency Name | | | 2. Reporting Period and Budget | | | | | | | | | | | |
| Agency Name XYZ AGENCY Agency ID: Agency Type: LHCA 4000 Legato Rd Suite 600 FAIRFAX, VA 22033-2892 Parent Agency Name (if applicable) XYZ PARENT AGENCY Agency ID: ----- Agency Type: SHFA | | | Reporting Period: <input type="text" value="Quarter 2"/> Fiscal Year: 2019 From: 10/01/2018 To: 03/31/2019 Submission Date: 04/30/2019 Update Date: 06/11/2019 Total budget, all sources: \$88,305.08 Total HUD Funding, all grants: \$26,461.00 | | | | | | | | | | | |
| Validated: Validated Last Validated: 06/11/2019 Validated by: System | | | Only reports completed by 04/30/2019 will be credited for on time submission. | | | | | | | | | | | |
| Data Quality Alerts Data Quality Alerts have been identified for this 9902 report and have not been addressed. | | | | | | | | | | | | | | |
| <input type="button" value="Review Data Quality Alerts"/> | | | | | | | | | | | | | | |
| <input type="button" value="Update"/> <input type="button" value="PDF Version"/> <input type="button" value="Close"/> | | | <table border="1"> <thead> <tr> <th colspan="3">TOTAL</th> </tr> <tr> <th>All Activities</th> <th>All HUD Funded Activities</th> <th>Calculated HUD Housing Counseling Activities</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | | TOTAL | | | All Activities | All HUD Funded Activities | Calculated HUD Housing Counseling Activities | | | |
| TOTAL | | | | | | | | | | | | | | |
| All Activities | All HUD Funded Activities | Calculated HUD Housing Counseling Activities | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| <input type="button" value="View 9902 Using Client Data"/> | | | | | | | | | | | | | | |
| 3. Ethnicity of Households (select only one) | | | | | | | | | | | | | | |
| a. Hispanic | | | 1 | 1 | 0.30 | | | | | | | | | |
| b. Not Hispanic | | | 34 | 34 | 10.20 | | | | | | | | | |

Data Quality Checks

- The Data Quality Alerts indicate that, while the 9902 has been submitted and accepted by HCS, there may be some errors in the report.
- The agency should review the information provided in the alert pop-up.
- The user has 3 options:
 - Ignore the alert for the moment.
 - Update the 9902 reporting to remove the alert.
 - Accept the alert to indicate that the reporting reflects valid reporting on the counseling activities conducted during the reporting period.

For instructions on how to address or accept these alerts, review the [Improvement Release v.14.18.0.0](#).

Data Quality Checks

- (0) outcomes entered in Section 10 Outcome of One-on-One Counseling Services.
 - Indicates HCA is not reporting any outcomes.
- Total outcomes entered in Section 10 total is the same as the Section 9 total for one-on-one counseling.
 - Indicates HCA is not reporting multiple outcomes.
- Total outcomes entered for 10c (developing a sustainable budget) is less than Section 9 total for one-on-one counseling.
 - Indicates HCA is not developing a budget with counseled clients. A financial analysis, which may include a budget, is a counseling requirement.
- (0) outcomes reported for 10e - households gained access to resources to improve their housing situation
 - Indicates HCA is not properly reporting outcomes
- HCA's yearly budget was not entered.



Resources

How Your OHC “POC” Can Help!

- Your Point of Contact (POC) can reset your HCA’s HCS password
- 9902 projections (POC compares grantees’ projections against actual 9902 report and reviews against the quarterly report narrative)
- If merited, can modify 9902s submitted late (i.e. transmission problems; or if HCA revisions to 9902 changes original submission date when report is retransmitted)
- Can provide instructions for inputting 9902 data manually if the HCA cannot transmit.
- Confirm data submission of 9902 report
- Can assist with training and provide resources.

9902 Submission Troubleshooting

If you are experiencing 9902 submission issues, it could be an issue with the CMS or HCS.

- For CMS issues:
 - HUD recommends that you the CMS vendor directly.
 - The list of HUD compliant CMS Products is updated regularly and lists the CMS vendors' help desk contact.
- For HCS issues:
 - For technical questions, contact: HUD National Help Desk at (888) 297-8689 or (202) 708-3300 and choose option 9. Ensure the ticket is routed to HSNG → HCS – > ARM group.
 - For a general HCS question, send the question to your HUD POC.

HCS Password Resets

Email Housing.Counseling@hud.gov using the subject “HCS Password Reset.”

Please also include the following information:

- Your request for password reset
- Your name
- Your Housing Counseling System (HCS) user ID
- HCS housing counseling agency identification number
- Your agency’s name

The FHA Resource Center will reset your password so you can access the HCS application. If you have any questions, please contact the FHA Resource Center by calling: (800) 225-5342 or email: Housing.Counseling@hud.gov.

HUD 9902 HUD Resources

Housing Counseling 9902 Online Toolkit



HUD-9902 General
Overview



Completing the HUD-9902
Report



Client Management
System Guidance



Program Impact Data
Displays

HUD 9902 General Overview

- Reporting Period Schedule
- Find by Topic
 - What is HUD-9902 Reporting?
 - Who files the HUD-9902
 - How do I report?
 - How do I make sure my reporting is accurate?
 - HUD-9902 Additional Resources

Completing the HUD-9902 Report

Completing the HUD-9902 Report

This page explores the HUD-9902 section by section and provides users with tips and examples for filling out the form.

This toolkit reflects the updates to the HUD-9902 form effective Fiscal Year (FY) 2022.

Download the Full FY 2022 Toolkit (PDF)

For agencies still reporting on the HUD-9902 form for FY 2021, the guidance from the previous version of this toolkit is still available as a PDF.

Download the Full Toolkit for FY 2021 and Prior (PDF)

Print

Find by Section

- Frequently Asked Questions
- Section 1: Counseling Agency Name
- Section 2: Reporting Period and Budget
- Section 3: Ethnicity
- Section 4: Race
- Section 5: Income Levels
- Section 6: Rural Area Status
- Section 7: Limited English Proficiency Status
- Section 8: Households Receiving Education, by Purpose
- Section 9: Households Receiving One-on-One Counseling, by Purpose

Frequently Asked Questions

Use the menu on this webpage to view section by section instructions for completing the HUD-9902 report. The Frequently Asked Questions (FAQs) below cover some of the most common questions about the HUD-9902.

- What is the HUD-9902 form?
- What does HUD consider an individual household?
- How many times can a household be counted on the HUD-9902 form?
- May I count an outcome multiple times for one household during a reporting period?
- As a Housing Counseling Agency (HCA), which clients may I attribute to a HUD grant, for example, on HUD-9902 reporting?
- How should agencies report carryover clients from one fiscal year to the next?
- Why should I submit my HUD-9902 form reports on time every quarter?

View All 9902 FAQs

- Search for guidance by each section of the 9902
 - Scroll through each of the 12 9902 sections
- Search frequently asked 9902 questions
- Case studies for Section 10


Housing Counseling 9902 Toolkit

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For detailed instructions and tips, click the button below to find information on how to fill out each section of the form.

[Completing the HUD-9902 Report](#)

 [Download the Full Toolkit \(PDF\)](#)

[Housing Counseling 9902 Online Toolkit](#)

Client Management System Guidance

Find by Topic

- Overview
- CMS Benefits
- Reporting Requirements
- Choosing CMS
- Making CMS HUD Compliant
- Agency Reporting Module (ARM Requirements)
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- Technical Support and Help Desk

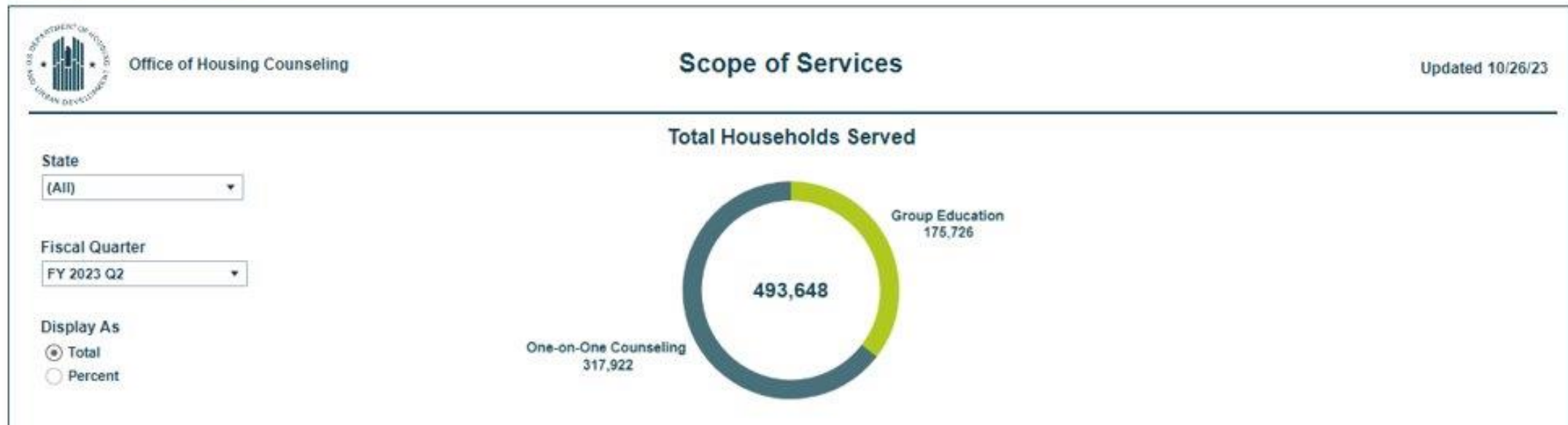
9902 Data Displays

- Through the 9902 Data Displays, the Office of Housing Counseling reports its program effectiveness to the public.
- The 9902 Data Displays are interactive dashboards that display data from the HUD-9902 Housing Counseling Activity Report that is populated by agency-level data submitted through HUD's Housing Counseling System (HCS).
- Data is usually one quarter behind to account for quality control process. Data is a snapshot for the reporting period.

9902 Data Displays

Data can be searched by scope of services, households served by state, race and ethnicity, income level, outcome of services, and state profiles.

Scope of Services



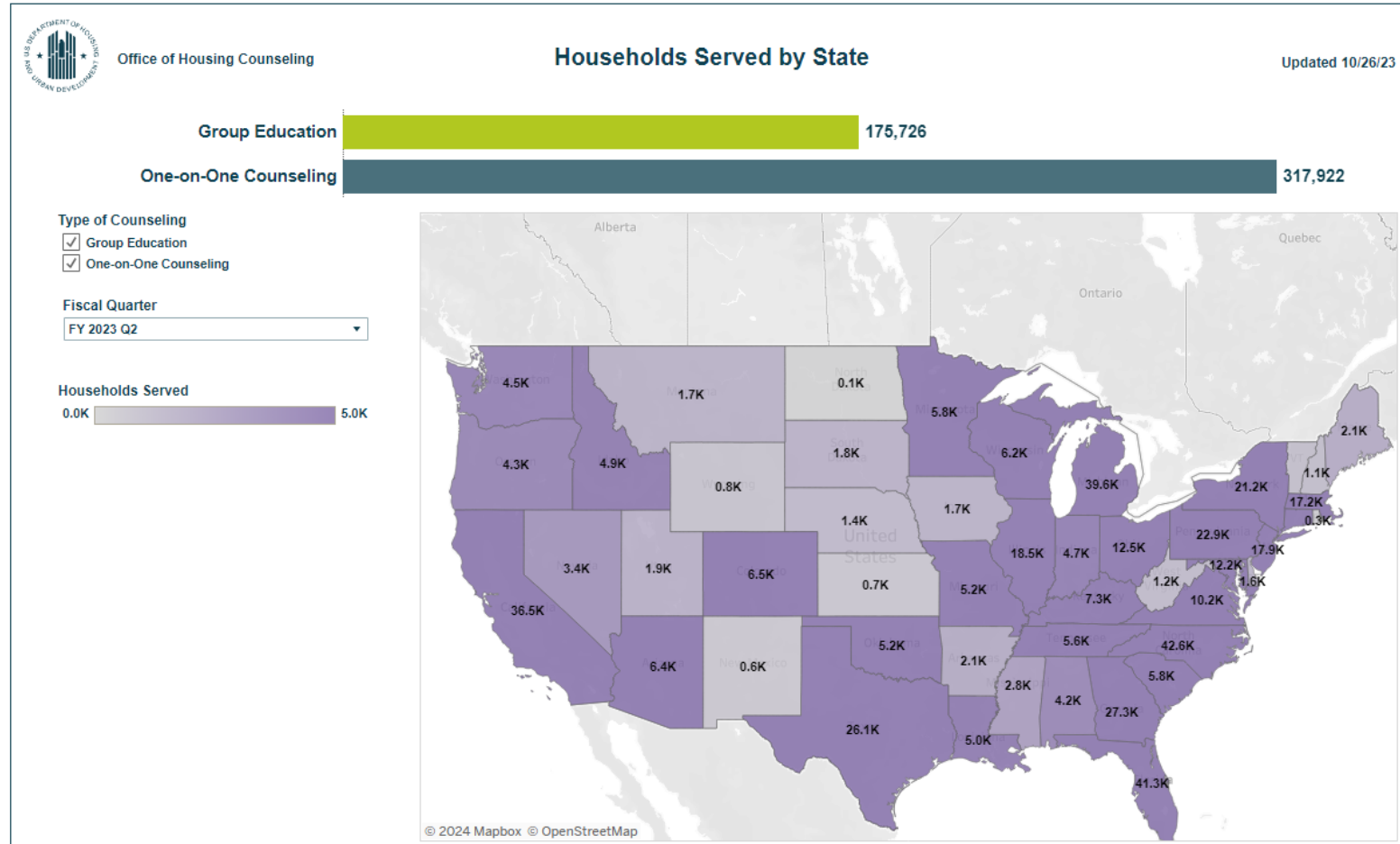
9902 Data Displays

You can click on each state to see group education and one-on-one counseling numbers by state.

Navigation is required, but data is available for Alaska, Hawaii, and Puerto Rico.

Households Served by State

[Back to Top](#)





Frequently Asked Questions

Frequently Asked Question

How do you report the 9902 demographic data and client record for a household or one-on-one counseling activity that includes more than one person?

When a household includes more than one person, generally the demographic data for the individual completing the intake process is identified for all demographic information recorded for that household. Client households should be encouraged to self-identify the one race and ethnicity that will be recorded, along with the remaining demographic information.

Frequently Asked Question

What if a client comes in for multiple, distinct types of counseling in a reporting period? Would an agency consider them as a new client each time and record their demographic data each time?

Yes - record their ethnicity, race, income, rural area status, and Limited English Proficiency (LEP) status data each time they visit the agency for a different type of counseling service. For example, if an individual comes in for one type of counseling, for example pre-purchase, the agency will record their demographic data, the type of counseling, and the outcomes. If, later in the same fiscal year reporting period, the same individual comes in for another type of counseling, for example default counseling, record this new activity and then record their demographic data again.

Frequently Asked Question

Does each group education session or course/workshop require its own file?

Yes. Each distinct group education session, complete course, or workshop should have its own file and file number. The file may be electronic or a combination of electronic and paper. An individual file does not need to be established for each participant; however, the agency must also record participation in the education/workshop session or course in a client's existing individual file, if any. The file must include the following items:

- A file number for the education/workshop session
- All required fields listed in the Interface Control Document (ICD)
- An indication that the activity was partially or fully funded by a HUD housing counseling grant or sub-grant, when applicable
- Course title, course outline, established curriculum and instructional goals
- Name of each housing counselor, instructor, or presenter participating in the session
- Date, place, and duration of each session
- List of participants and their race, ethnicity, and income data for each household
- The disclosure statement to be provided to each household that is relevant to the subject of the session
- Cost of services: If applicable, the amount paid through client fees and a copy of the receipt provided to the client

Frequently Asked Question

Does the HCA create an individual file for clients that just attend a group education session?

There is no need to create an individual file for clients just attending a group education session. If the client follows up with individual counseling, a file would then be created and reflect that they attended the group education session(s). Similarly, if an individual client file already exists, please note the group education session attendance by the client.

Frequently Asked Question

How should households seeking information from an HCA about fair housing, or the fair housing complaint process be reported in the HUD-9902 form?

Counseling provided to a household with a Fair Housing Complaint should be reported in Section 9 under the applicable type of counseling (e.g. a renter with a Fair Housing Complaint would be reported as receiving Rental Topics counseling). That same household would also be reported in Section 10.b. (Households that received information on fair housing, fair lending and/or accessibility rights), and in any other applicable Section 10 categories, to show the outcome of that counseling.

Frequently Asked Question

Regarding Sections 8 and 9 of the HUD-9902 form, if a client is participating in a rental workshop and receives one-on-one counseling on rental topics, should we report them in both sections?

If a household received both group education and one-on-one counseling, then the household received two unique counseling services, and the agency will report the household twice - once in Section 8 for the group education service, and once in Section 9 for the one-on-one counseling service. The agency will also report the household in Section 10.a, and in any other applicable Section 10 categories. The household may have more than one outcome to report in Section 10.

Since the household was counted twice (in Sections 8 and 9), household demographics should also be counted twice in Sections 3 through 7.

Frequently Asked Question

How should agencies report carryover clients from one fiscal year to the next?

Carryover clients are households that received counseling in a previous reporting year and continue to receive counseling services on the same topic in the current year. Households meeting this criterion are counted again on the current year's form HUD-9902. Do not count households counseled in a previous reporting year whose result changed, but who received no additional services in the current reporting year.

Frequently Asked Question

Can a counseling activity have more than one outcome in Section 10 (Outcome of One-on-One Counseling Services)?

Yes. One type of counseling may have multiple outcomes during the continuum of counseling. Section 10 is the only section in which the total does not have to be the same as the other sections. The section total formula is Section 3 Total = Section 4 Total = Section 5 Total = Section 6 Total = Section 7 Total = (Section 8 Total + Section 9 Total).

Frequently Asked Question

When reporting client outcomes in Section 10 of the HUD-9902 form, do outcomes follow a client from fiscal year to fiscal year?

In certain cases, outcomes may follow a client from one fiscal year to the next. For example, if a budget was created for a client at the end of FY22, and a housing counseling agency is still counseling this client in FY23, following the same Action Plan, that outcome of “developed a sustainable household budget” can be reported for the client in FY23.

Please note that in order to continue to report a client outcome from fiscal year to fiscal year, the client must be receiving counseling on the same subject.



**Thank you
for joining us!**

For more information visit the [9902 toolkit](#)