

Congress of the United States
Washington, DC 20515

June 11, 2020

The Honorable Ben Carson
Secretary
Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Dear Secretary Carson,

We write to urge the Department of Housing and Urban Development (HUD) to delay the housing counselor certification deadline for at least one year, in light of ongoing interruptions to test preparation and administration caused by COVID-19. COVID-19 has created multiple obstacles to certification for prospective housing counselors. In-person test trainings are now indefinitely postponed, nearly all in-person testing is canceled, proctored at-home online testing is fraught with logistical difficulties, and the ongoing economic crisis has created a substantial demand for housing and community services. Given that the social disruptions caused by COVID-19 will, at a minimum, continue through the end of the year, we ask HUD to delay the August 1, 2020 deadline for housing counselor certification, and for HUD to make plans to reasonably accommodate the needs of prospective housing counselors during this difficult time.

HUD's Housing Counseling Assistance Program has a successful record of helping low- and middle-income Americans navigate the housing market, obtain a mortgage, and avoid foreclosure and eviction. Housing counselors prepare consumers to make informed housing decisions, increasing homeownership, saving people money, and ultimately ensuring that people know about all the options and resources available to them. Housing counselors also have a proven record of helping people through disaster preparedness, response, and recovery—assistance that will undoubtedly be needed now during COVID-19 and in the upcoming hurricane season.

Community development organizations nationwide have testified to the difficulties in meeting the August 1, 2020 certification deadline.¹ All current test preparation must either be self-administered or done virtually, with both methods of instruction less effective than traditional in-person classes. Further, test administration has been seriously disrupted. Between statewide public health directives and a prudent desire to reduce the spread of COVID-19, nearly all testing sites in the United States are closed. Based on current and projected data on COVID-19, it is extremely unlikely that enough in-person testing sites will be operational by August 1—and even if some sites were to open between now and August 1, it would leave test takers with less than two months to figure out their testing situation.

¹ Dorpalen, Bruce et al., "NHRC Letter to HUD," March 13, 2020.
<https://drive.google.com/file/d/1uHX2yQQ8SJKI3XccznrewkCdS7H7ina/view?usp=sharing>

HUD currently allows counselors to take a proctored, at-home certification exam. We greatly appreciate HUD providing this flexibility; however, an online test should supplement, and not replace, in-person testing. At-home testing presents many logistical challenges and puts the burden of compliance on the test taker. To ensure that no eligible housing counselor is unnecessarily excluded from certification, HUD needs to extend the certification deadline to accommodate the need for in-person testing.

Keeping the August 1, 2020 deadline will severely disrupt the provision of housing counseling services at the same time that many Americans will be seeking support. Housing counseling will soon be in greater demand as the effects of high unemployment and reduced economic activity reverberate through the housing market. Millions of Americans from all communities are at risk of foreclosure or eviction, and many will require the advice and guidance provided by the Housing Counseling Assistance Program. However, many HUD Certified Housing Counseling Agencies stand to lose their certification and federal funding if their current counselors are unable to be certified.

During these incredibly difficult times, it is absolutely necessary for HUD and other federal agencies to ensure the continued provision of vital social programs. We ask that you take these concerns and extraordinary circumstances into consideration and extend the August 1, 2020 housing counselor certification deadline for at least one year.

Sincerely,



Mary Gay Scanlon
Member of Congress

Brendan F. Boyle
Member of Congress

Madeleine Dean
Member of Congress

Brian Fitzpatrick
Member of Congress

Dave Loebsack
Member of Congress

Bonnie Watson Coleman
Member of Congress

Cindy Axne
Member of Congress

Cheri Bustos
Member of Congress

Dwight Evans
Member of Congress

Jahana Hayes
Member of Congress

Bill Pascrell, Jr.
Member of Congress