



**09/28/07**

**To: Housing Counseling Agencies**

**Re: Update on Client Management System Compliance and New Reporting Requirements**

**Client Management System (CMS) Requirements**

The deadline for Client Management System (CMS) compliance, October 1, 2007, is almost here and HUD's final regulation [http://hudclips.org/sub\\_nonhud/cgi/pdf/19166.pdf](http://hudclips.org/sub_nonhud/cgi/pdf/19166.pdf) mandating the use of a CMS was published in the Federal Register on 09/28/07. The final rule should be opened in Adobe Reader. However, while a few CMS vendors are now offering fully functional products that interface with HUD, we understand that most are still putting the finishing touches on their systems.

If you or your CMS vendor has not completed the interface to HUD's database, don't worry. You will not be terminated from the Housing Counseling Program if the CMS interface is not completed by October 1<sup>st</sup>. In light of system development delays, HUD will require by October 1<sup>st</sup> only that you collect client level data:

- through a CMS vendor that has built an interface or is working to build an interface to HUD; or
- through your own CMS as long as you are working with HUD to build an interface with our database.

You will need to use a fully functional CMS that interfaces with HUD's database by the time you submit your FY 2008 First Quarter Report to HUD in January, 2008.

**New Reporting Requirements**

Reporting requirements have changed fundamentally. Beginning in FY 2008, HUD is requiring that *client level data* must be submitted on a quarterly basis. Required agency profile data elements have also been expanded. Client level and agency profile data submitted must include all required data fields in the Interface Control Document (ICD). There is a separate set of client level data requirements for one-on-one counseling and group education.

Attached is a simplified, non-technical document <http://www.hud.gov/utilities/intercept.cfm?/offices/hsg/sfh/hcc/cdfr101607.doc> listing and describing the required client level data and agency profile data fields. Your CMS may provide additional client level data fields and agency profile data fields for your use. However, all data fields required by HUD are listed in the attached documents.

Also required on a quarterly basis is the form HUD-9902, reflecting cumulative aggregate data.

Remember, when it comes time to submit reports to HUD, client level data requirements will apply only to data collected in FY 2008. Thus:

<b>Report</b>	<b>Data</b>	<b>Due</b>	<b>Submission Method</b>
FY 2007 Annual Report	Aggregate data (form HUD-9902)	December 31, 2007	CMS
FY 2008 1 <sup>st</sup> Quarter Report	Client level data Form HUD-9902	January 31, 2008	CMS
Ongoing	Agency Profile updates	Within fifteen days of organizational/staffing change	HCS until CMS interface to HUD is operational

### **Interface Control Document (ICD) Update**

Also, please note that a revised Interface Control Document (ICD) is attached and will be posted on HUD's CMS web page shortly. The ICD is a document for the software programmers of CMS vendors to identify the required data fields and build the interface to HUD's database. It can also be used by a housing counseling agency that wants to build its own interface directly to HUD.

For more information about CMS compliance, a listing of CMS vendors, a CMS FAQ, the ICD, and more, visit our website at: <http://www.hud.gov/offices/hsg/sfh/hcc/hccprof21.cfm>

We thank you for your patience and cooperation during this transition. We will continue to provide updates as additional information becomes available.

If you have any questions or concerns please feel free to contact your Government Technical Representative (GTR) or other Program Support Division staff for assistance.