

HUD Office of Housing Counseling Oversight of Networks & Network Monitoring, 2/27/15

Shawna LaRue Moraille: Welcome to this webinar on network monitoring for intermediary organizations, state housing finance agencies, multi-state organizations, and local agencies with branches.

We are going to talk about network monitoring, and this is Shawna LaRue Moraille from ICF. I'll be the overall moderator for the session.

I'll go ahead and turn it over to Aisha Williams, who's a subcontractor to ICF who will be the main speaker today. Aisha?

Aisha Williams: Hello everyone, this is Aisha Williams with ADW and Associates. I will pass it over to Phyllis, and then talk with you guys in a moment.

Phyllis Ford: Good afternoon. My name is Phyllis Ford, and I am with the Office of Housing Counseling. I am the vision director with the Office of Oversight and Accountability, and, of course, this is a HUD agency. I wanted to take a moment to thank you for joining us today for this training on network monitoring. The Office of Housing Counseling is truly committed to providing training support for agencies where success is the success of the Housing Counseling programs. So in any way that we can support our stakeholders, we will.

This training, which is a repeat of a presentation that occurred in December, is designed for intermediaries with housing finance agencies, multi-state organizations, and local housing counseling agencies that have branches. If you have no oversight responsibilities, if you don't have branches, and you don't have agencies in a network, this particular webinar may not be of benefit to you. I'm sure that you will enjoy this presentation. There's a lot to learn.

I want to remind you that we all have points of contact. So at any point, if you have questions or need assistance with any aspect of your housing counseling program, you certain should reach out to them. And now, I guess, we can get back to the presentation. Thank you.

Shawna LaRue Moraille: Okay. Great. Thank you so much, Phyllis. Mr. Turner, can you explain how questions are asked through the presentation?

Lee Turner: Absolutely. Hi, everyone. My name is Lee Turner. I'm also with ICF International. I'm going to explain just really quickly how our questions are going to work today. If you have any questions you'd like to pose during the presentations, there's two ways that you can do it. If you're calling in by your mic and speakers today, we request that you submit all of your questions through the written questions panel that you have in your go-to webinar box there

If you're calling via telephone, you can use the written question box if you like. We actually would prefer that method. If you'd also like to ask your question orally, you're welcome to do that. Use the raise your hand function that's on your go-to webinar panel. And once we see that

and get to a designated question/answer session, we will un-mute you for you to ask your question orally. But, again, whether you're using your mic and speakers or telephone, you're certainly welcome to ask your question via the written question panel that you have there. So I will turn it over to Aisha for our content presentation.

Aisha Taylor: Great. Thank you, Lee. So as a reminder, this webinar series is for agencies with oversight responsibilities. The series additional consisted of four webinars which was an extent based on feedback that we've gotten from all of you. The first webinar that we had took place on October 15, and you can see the link there on your screen if you would like to go back to reviewing the content from that webinar.

And then, of course, they have networking monitoring. Then you see the remaining four webinars on topics such as grant administration, how to expand your network and evaluate your network for expansion, performance reviews and so forth. So information about those future webinars in the series will be forthcoming.

So today's webinar presentation will be divided into five parts. We will begin by reviewing key concepts from the first webinar that we did in the series. Then we will move into the second about network monitoring goals, the definition of network monitoring, and network monitoring activities. In part three, we will discuss key components of the quality control plans, and we'll also discuss just a little bit of background information and discussing concerning quality control plans. In part four, we will discuss how HUD will evaluate all of you oversight agencies for your performance of network monitoring activities. And then finally, we will share some network monitoring case examples to illustrate the practical applications of these concepts we discussed in the presentation today.

We will have Q&A throughout today's presentation at certain point, and then we will also have Q&A at the very end. So let's begin with a review of key concepts from the first webinar. An oversight agency is defined as any entity that provides housing counseling services through its branches, affiliates, or subgrantees. This includes both funded agencies and your housing counseling network, and non-funded agencies in your network. As an oversight agency, you're responsible for exercising control over the quality and type of housing counseling services provided through your network. And you must conduct oversight and monitoring activities to be sure everyone is in compliance.

There are four types of oversight agencies, which we have discussed already. There's an intermediary. They have finance agencies, multi-state organizations, and local housing counseling agencies that have grants.

When we talk about network monitoring, we are talking about activities that fall into four buckets. You'll recall those four buckets: ongoing monitoring, periodic reviews, financial monitoring, and technical support. Ongoing monitoring happens with high frequency. It's something that you do weekly, monthly, quarterly. It's in-between grant reporting, and it's always remote -- it's always done from your office -- and it has a focus on compliance. So we'll talk a little bit more about specific ongoing monitoring activities in the next few slides.

Periodic reviews occur annually, or every two or three years even. They can be remote, so they can be done from your office, or they can be done on site by going to the office of the housing counseling agency in your network. Again, periodic reviews focus on compliance monitoring as well.

Financial monitoring was previously referred to as management support. But today we've replaced that with financial monitoring because we wanted to be more specific, because really when you're talking about management support, we're talking about grant administration. So financial monitoring, grant administration -- those two things go hand in hand, so that's another type of monitoring activity.

And then finally, technical support. That may seem counter-intuitive because you're not actually monitoring something, but you're providing technical support for any of the areas that you've seen noted in the previous three slides. So technical support, things like training or capacity building or peer-to-peer support activities. Again, we'll talk about a few of these in the next few slides, so remember the content from this particular slide.

So we want to talk about why HUD expects grantees to have a quality control plan. You'll recall from the first webinar that HUD requires everybody to have a quality control plan. You can see here on the screen that the grantee -- again, that's all of you. This is language taken, by the way, from your housing counseling grant agreement from the fiscal year 2014. The grantee must have in place a quality control plan that specifically outlines how the grantee monitors the performance of its subgrantees. This quality control plan should be available to HUD upon request. So you can see there that the information regarding the requirement is in your grant agreement.

Then for agencies that have just been approved and may not have a grant agreement yet, some of them have filled out form 9900 to become an oversight agency. That form 9900 required you to have documentation of network monitoring policies and procedures, as well as any other intermediary activities you are conducting. That quality control plan will provide that documentation.

A second reason HUD expects oversight agencies to have a quality control plan is to help clarify each party's roles and responsibilities in administering the program. So there's really three participants when it comes to administering the housing counseling program. You have HUD, of course, the Office of Housing Counseling. You've got all of you as another category. Those are the oversight agencies. And then you have the housing counseling agencies that are in your network. Each of those parties that I just identified has a separate, but interconnected, set of roles and responsibilities.

The quality control plan will not only identify those roles and responsibilities, as well as the expectations for everyone, it will also help define the metrics that will be used when you're evaluating quality control. So how will it be measured? The agencies in your network want to know what specific areas you'll be looking at when you evaluate or monitor them.

Another reason that HUD wants agencies to have the quality control plans is that it creates transparency in how quality issues will be handled once they are identified. So when you're doing performance monitoring or an onsite performance review, agencies want to know what will happen if you should discover that there's an issue with regard to compliance or some other quality issue while you're there on site. The quality control plan will help do that.

Finally, transparency also encourages accountability. Giving your network agencies the information upfront about what's expected of them will help them do it right the first time. It'll help them do their job right, rather than having to redo things once a problem has been discovered.

So a few other benefits that weren't previously mentioned include improve client satisfaction and client outcomes. When everybody is on the same page about what is expected in terms of the administration that they have in counseling programs, clients get a consistent level of service, and ideally, they'll get a high-quality level of service as well. Of course, we talked about eliminating waste that comes from rework.

Then it also improves the confidence and motivation of network partners. So your agency staff -- both the oversight agency staff and your network agencies -- everybody will be a lot more confident about what they're doing because, again, we are all operating from the same foundation.

So part two, let's get into some goals of network monitoring. There are two primary goals to network monitoring. You can see them here on your screen. The first goal is that we want to preserve good performance where our performance is actually strong. So this means that if you're actually tracking the quality of the agencies within your network, you're then able to identify particular strategies affiliated with an agency that maybe is doing exceptionally well. When you do that, you can not only reward that performance, but you can share those strategies with other agencies who might benefit from implementing similar activities.

A second goal that's equally important is that you'll reduce the likelihood of activities or events that may negatively impact the program. So on the one hand, we want to preserve our program strengths; and on the other hand, we want to avoid those things that are going to create a problem for our program where we can.

So with those goals in mind, I want to talk about the true definition of network monitoring that we're talking about, or a more expanded definition. Network monitoring means supervising and reviewing network agencies' activities and performance, with particular attention to the abilities to fulfill the requirements, carry out mandates, and achieve expectations.

I'd like to point out that monitoring in something that happens continually. So you're continually checking in. You're not just checking in when it's time for reports, or when it's time for the agency to perhaps recertify themselves as a HUD-approved agency. You're checking in regularly, and you're observing what they're doing. So you're observing, again, either through on-site performance reviews or remote performance reviews. And then of course, you're documenting at every step of the way. You're documenting the activity you conducted to perform

in the network monitoring, and then you're also recording the results of the outcomes of the information that you reviewed.

The same information can be presented in question format. Were the requirements met? So for example, did the agency meet its housing counseling production targets and procedural requirements? Were mandates fulfilled? Did they affirmatively furthering fair housing and did they confirm those activities, and were the activities done in compliance? And then again, were expectations met? That word "expectations" keeps coming up. Were quality standards received?

So with that, I'm going to pause here and see if HUD has anything that they want to add before we move on to some basic network monitoring activities.

Phyllis Ford: Well, I would just like to say that when we talk about network monitoring, and we talk about the role of the supervisor and the types of techniques that we use, the most important thing for us to remember is you always want to document. You want to have a consistent process, and you want that process to be transparent. I think those are very important factors. The agencies that you are monitoring, those agencies in your network certainly know what is required of them, and they should be able to get from you assistance in meeting those requirements.

Shawna LaRue Moraille: Also, there is one person who asked if HUD could provide a sample best practice template of a quality control plan.

Phyllis Ford: We are absolutely working on that now. One is being developed, and we will be sharing that with you very shortly.

Shawna LaRue Moraille: Great. Thank you. Aisha?

Aisha Williams: Okay, great. Thank you, Shawna and Phyllis.

So let's talk about some basic networking monitoring activities. Now I want to just remind everybody that the activities we have here are basic examples. This is not, by any means, the exhaustive list of every activity you would need to conduct. To figure out what those activities are in a more extensive format, I encourage you to read your HUD handbook, as well as other tools, tips and materials available on HUD's website. Work with your point of contact, as Phyllis mentioned earlier, to really figure out what kinds of activities you're going to implement so that you're effectively monitoring your network.

The first two activities that we see on the slide are both geared to both financial monitoring, as well as ongoing monitoring. And you can see here -- I just want to mention on the right side of the table -- those columns are ongoing monitoring, periodic monitoring, financial monitoring, and technical support.

So you can see the first two activities use it under ongoing monitoring and financial monitoring. When you collect and review the HUD form 9902 or a personnel activity report, those are not only requirements for your grant, for conducting grant administration, so that financial

monitoring that we talked about, but it's also a chance for you to see if the agency is fulfilling the mandates and requirements that they committed to fulfill. So, for example, if they committed to do a certain number of counseling units, are they on pace to meet that expectation concerning the number of counseling units they would produce.

Also, look at the 9902 to see if the activities being conducted match the housing counseling, the agencies have enforcing their plans. As a reminder, agencies should only be conducting HUD-approved activities that they've actually been approved for. There's a whole other process to conduct additional activities. So they shouldn't be moving forward with anything without approval.

The next activity you see here is ensuring that counseling and education activities are properly reflected in the client management systems. It's really important that agencies -- you'll remember in the HUD handbook -- agencies can both record information in the physical files, as well as in the electronic file, which would be the client management system. Those two things should be reflective of each other so that when agencies produce reports to HUD, those reports are accurate.

Then monitor the financial performance of past due funds and ensure that everything is in compliance with the federal regulations. You see the OMB circulars noted there on your school. So, again, it's very important that agencies be able to monitor their network agencies for this information.

Some more basic network monitoring activities that you see on your screen, and I'm only going to discuss just numbers 8, 9, and 10 here. Pertaining to your learning and sharing best practices or strategies that oversight agencies could use to provide technical support. So, again, facilitating TA. We talked about that earlier on, and those are some activities you can conduct.

Regularly communicating with network agencies. Again, we talked about those regular check-ins just a couple of slides ago -- phone calls, emails. You certainly don't want the agencies to feel like you're harassing them, but you also don't want to feel like they're absent unless there's a report or an audit coming up. You want your network agencies to feel like they have a relationship with you, and they can come to you for technical assistance. I would add that the technical assistance in training is one strategy that you can use to enhance that regular communication with your network agencies.

And then follow-up and follow through. Once you conduct network monitoring, be sure that you document the information in a performance review letter, and then follow up with the agency to be sure that they've addressed the concerns you've identified. If you committed to providing some technical assistance or something else for that network agency, be sure that you are actually following through on that commitment.

So we have some additional recommended activities here. Again, I'm only going to talk about a few. It's great to conduct webinars. I've known of some agencies such as NCRC to conduct a grant kickoff webinars or a check-in webinar midway through the grant to address anticipated problems or issues that they're seeing with the current way the grant is being implemented.

Hosting monthly or quarterly calls. This is something that an agency in California does. They host regular calls so that their network agencies can discuss best practices that they're implementing. The Virginia Association of Housing Counselors, they create self-guided training materials for agencies to do with their staff at their leisure, so that they can address the latest and greatest when it comes to having counseling activities.

And then random file checks. That's something that if you have the network agencies, if you have them do some random file checks internally, which they should be doing anyway. That's one way that some staff can learn from other staff about things that might make the files more complete or more accurate.

And then finally, just a couple of other items. It's a good idea to request pictures. Again, it's not required, but it's a good idea to request pictures when you're conducting a remote review. For example, to be sure that an agency's facilities are in compliance the way that they said that they, or to see that they actually corrected a particular finding or issue that you had during the performance reviews during an earlier time.

And then having a plan that discusses the last internal review or the last oversight agency audit. That's just a good way to provide that documentation that HUD will be looking for to see that certain monitoring activities were conducted.

So with that, we're going to move into a pop quiz. I'm going to ask HUD momentary if you guys have anything to add. So which of these is not a reason to conduct network monitoring? Is it A, to reduce the likelihood of a negative active or event; B, to surprise agencies with random compliance tests; C, to increase transparency or, again, accountability; or D, to preserve program strength? Go ahead and answer by clicking the right answer on your screen. In the meantime, we're going to take some questions.

HUD, would you like to add anything before moving forward with those questions?

Phyllis Ford: Well, one of the things that I thought was interesting that we just talked about in terms of the items that you are looking at when you're doing a monitoring review, is looking at the counseling agency's work plan.

One of the most interesting things that I find that agencies, particularly agencies that have been established for a while, sometimes can't even find their work plan. Sometimes they have taken on new things or removed things from their activities, but they have not updated the work plan. The answer is the work plan is really like the bible of what they're doing. It's really important that folks pay attention to what their work plan is saying, and make sure that the work plan is consistent with what it is their activities are.

Aisha Williams: Great, thank you.

Shawna LaRue Moraille: So we only have one question that was written in. "Are there any other reference guides, other than the HUD handbook, 7610.1 Rev.5?"

Phyllis Ford: Are there any other reference guides for how to handle a performance review, or how to monitor --

Shawna LaRue Moraille: I believe it's on the topic of network monitoring. It was asked a few minutes ago.

Phyllis Ford: I think that some new things are going to be coming out. I would reach out to my point of contact. We're actually working on documents right now that will be guides. So actually, this particular document is in what I would call the beta stage. So you will have some additional information as in terms of almost a checklist to work with. However, until that comes out, I would reach out to my point of contact and have them go over what they think would be appropriate, maybe even to help interpret what the handbook is saying.

Shawna LaRue Moraille: Okay. No further written questions.

Aisha Williams: Okay. So I think we're going to wrap up our poll. And while Lee is wrapping up our poll results, I would just add to some of his comments that later on in the presentation, we'll have a slide in which we identify a couple of additional resources that are already available to you, and that hopefully you are reviewing or have already reviewed, so that you can then have all of the background information concerning the things we're discussing today.

Lee, are we able to get those polls up?

Lee Turner: Yep. They're showing right now.

Aisha Williams: Okay.

Shawna LaRue Moraille: So, Aisha, 91 percent chose B, surprise network agencies with random compliance tests.

Aisha Williams: Great. That is the correct answer. Again, the purpose of all of this is that we do not want agencies to have to be surprised and have what I call "gotcha" moments. We are all working in partnerships to deliver the best possible quality of services to consumers who need our assistance.

So part 3, we'll talk about the actual quality control plan. I'm going to start with a little bit of background information, a little bit of theory, and then we're going to move into a working definition of a quality control plan for our specific purposes.

So what you see on your screen is the technical definition of a quality control plan. It describes the methodology that an oversight agency uses to ensure quality standards are achieved. The plan details step-by-step practices that any monitoring agency will use to check that the product and output are being produced in the way that they're expected to be produced. Quality control plans are used in conjunction with quality assurance plans, which detail how a program activity should

take place in order to achieve a certain result. Then quality control plans are also used in conjunction with quality improvement plans.

So if you have the quality assurance plan that identifies what's supposed to be done. We'll talk about areas where HUD has already outlined some information about quality assurance. The quality control actually checks that you are doing things as outlined in the quality assurance plan. The quality improvement plan then identifies ways that you are going to correct issues that were identified in the process of conducting quality control.

Here, this information is presented graphically. You can see here, again, we start with the quality assurance. Quality assurance, I would say, are things like my HUD handbook outlines the way that your counseling styles should look, or the steps that you are required to take, such as ensuring that a consumer has received a reference to at least three resources to avoid things like conflict of interest. Those are the types of quality assurance for standards practices and processes that agencies should be using to achieve a certain level of consistency and quality. Again, those are primarily outlined in the HUD handbook, as well as some other documents that we'll follow up.

Then again, the quality control plan -- that's what we're talking about. That's what we're going to dig into here today. And then quality improvement are the technical assistance activities that you guys as network monitoring agencies are required to do.

So while those three elements are traditionally included in separate documents typically in the business world. For our purposes, what we really would like to see -- and what HUD would like to see from you guys -- is an integration of all three of those separate components into one document. So your quality control plan that HUD expects to see from you needs to include quality assurance, quality control, and quality improvement.

There are seven core or critical elements that should be included on your quality control plan. The first thing is that you should decide the roles and responsibilities, and we'll talk about that. The second critical element is that you want to outline standards, expectations, policies and procedures.

Third, we would want to identify risk and risk management. I just want to make a note that we're not going to discuss risk management and risk today. HUD's still working on some tools for you guys and some material for you all regarding that, but that is something that will be included typically in a quality control plan.

Fourth, the plan would identify the focus area and the metrics that you would be reviewing to assess quality; as well as evaluation and analysis methods. Then sixth, we would have the quality improvement or corrective action steps that you're going to take. And then finally, the rewards and consequences should be documented in the quality control plan.

So when we talk about roles, responsibilities, and authority, we're really talking about -- you'll recall from earlier in the presentation -- what is expected of the three parties who are involved in

administering the housing counseling program. Well, HUD we know. The Office of Housing Counseling is granted authority and created in that grant.

The Office of Housing Counseling is responsible for setting the overall policy direction of the housing counseling program, as well as identifying strategies, and grant management. HUD is also responsible for establishing policies and procedures, setting standards for operations, still do things like update the HUD handbook. When there is a change to policy, sometimes they'll see those things outlined in a notebook. They'll give guidance. Then, of course, HUD is responsible for authorizing the oversight agencies to do their work, as well as the housing counseling agencies to do their work.

HUD will also conduct their own monitoring work and oversight, as well as audits. This is a point that I actually just want to push on a little bit. While you, as an oversight agency, are responsible for performance reviews and conducting oversight, that does not mean that HUD will never conduct its own compliance monitoring and oversight. So when HUD does network monitoring, they might check maybe a couple of agencies in your network or they might come to your offices as an oversight agency to see that you are also in compliance with what you're supposed to be doing.

And then of course, HUD provides technical support with their webinars, like the one we're on today; toolkits; the newsletters, like The Bridge; as well as training. And then, finally, HUD can implement some these consequences. So HUD can recapture funds, they can suspend or revoke an agency's HUD approval status or their status as an oversight agency.

The oversight agency's roles and responsibilities are going to be different, but again are done in partnership with HUD. So the oversight agency is responsible for being sure that your agencies in your network are in line with the standards outlined by HUD in the handbook and other resources. So again, you recall the definition earlier, when we talk about an oversight agency exercising and being accountable for the quality of the services coming out of this network.

You're also responsible for setting your own standards in terms of how you will check those materials and conduct certain activities, which is what we're talking about today. On occasion, you will act on behalf of HUD and since -- with HUD approval or when you're conducting performance reviews. Again, that doesn't mean you replace HUD's role, but you will act on their behalf. You are the arm and leg of HUD, if you will, in managing all of the other field agencies in the network.

You can implement penalties, but that has to be done in conjunction with information from HUD and that is always subject to HUD's authority. The network agency also has some roles and responsibilities, as you see there on your screen. So the network agency is supposed to be implementing the things that are identified in the various documents that we have to reference. And then, the network agency shall also be conducting its own self-monitoring and oversight and quality control.

No agency should ever feel like it's up to their oversight agency only to be doing quality control. They should have a process internally that helps them to avoid being caught up with issues that

might, for instance, be a conflict of interest or a low level of quality when it comes to service. So everyone has a role, a network, in managing that quality and conducting that oversight, and especially the network agencies. They should be doing that internally.

And then, communication and coordination with the oversight agency, the same way that -- I mentioned that you should reach out to your point of contact as an oversight agency and be in communication with them. Your network agency should also be in communication with you, as the oversight agency when they are thinking about expanding their services or when they have questions. And you should be readily available to receive that communication and help answer their questions.

I mentioned earlier in the presentation that we would discuss some resources. So you see here, the second item is standards, expectations, policies, and procedures. You have your HUD handbook that someone asked about earlier. But then, also, look at your grant agreement. Look at the HUD Act of 1968. Look at the Code of Federal Regulations as well as the Federal Register. Those are all resources that you can use to, again, understand what's expected and required of you as an oversight agency, as well as in network agencies.

And so, before moving on, I just want to pause and see, Phyllis, if you have anything that you want to add regarding those couple of items.

Phyllis Ford: One of the things that you touched on in the fact that the -- your agency, as the -- monitoring and network, that HUD may also come out and look at agencies and as many of the intermediaries may have local housing council agencies as a subgrantee. So if that particular agency is certified, then they would have to have an independent performance review.

So HUD would be coming out, doing those performance reviews. And when we do, we share that information with the intermediary or the parent. We will send you an e-mail and a copy of the letter. We'll let you know when these will be going out and we certainly will share in the results. Because if there are findings that there are issues that need to be addressed, it's very helpful if you work with that agency to correct them.

They have some instances where we have partnered and gone out together with an intermediary. So you may want to take advantage of that opportunity if you want to have local housing agencies in your network that are certified under HUD as well. Okay?

Aisha Williams: Great. Thank you. And I just want to remind everybody, we'll be taking questions again in a moment. So quality control focus areas and metrics. So you see here to the right of your screen examples of the focus areas will be counseling services or program operations. Basically when I talk about focus areas, I'm really talking about identifying for your network agencies in your quality control plan those specific items or areas that you're going to look at when you come out to do an onsite review or a remote review or even when you're doing your ongoing monitoring, such looking at reports and certain activity reports.

Having something like a checklist that's in the appendix of the quality control plan is a good way to sort of let folks know these are some specific areas that we'll be looking at. If you have a

counseling file checklist, that's a good thing to append to your quality control plan because that agency is going to use that and ensure that their files are in order. You also want to think about the metrics that you're going to use. So we talked about looking at client files while perhaps the metrics are going to be the client outcome.

If you have an agency that is always, for instance, every single client that they conduct mental counseling for, every single client gets evicted. So they have a 100 percent eviction rate. That's not something you're required to look at, but I would say that looking at client outcomes in that case to see if maybe the agency could benefit from some evidence-based practices that you could share or from some peer sharing from another agency has better outcomes, those are the kinds of things that we would expect you to do in terms of metric examples.

And then, of course, production and output achievements. That is a requirement, and so the metric is very clear. Are you on pace to meet your quarterly goals in your annual commitment associated with the particular grant agreement? Quality control and evaluation and analysis method. Again, when we're talking about this, we just want to know what are you going to do? So we already said what are you going to look at and what's the measure you're going to use? Now, I want to know how you're going to look at it, and so an example of the analysis methods and evaluation methods, our performance reviews; look at customer satisfaction surveys. We already talked about 9902s, client file reviews, preparing that information to pack the HUD sample [ph]. So for example, HUD has available on their toolkit, they have a model disclosure statement, model personnel activity report.

If the analysis that you're going to do is going to compare what your network agencies have to those model materials that HUD has provided for you, then it's helpful for agencies to know that you're going to be comparing it to the model documents and then provide them with a copy of that model document. That's perfectly appropriate in this case.

And then, of course, the tools and you copied out the client management system; the 9910 if you're going to be documenting it in there. Perhaps bring a copy of the 9910 to agencies so that they know what you're looking at and what HUD is looking at.

And then finally a letter documenting the observations that you see. You always, always want to document things. We don't want to just see going out and then forget what happened. We want to document it and document what needs to be corrected about it, what's good about it, and then, if there is a corrective action that needs to be taken, when you will check up on that particular item.

And then, the last two items here, I probably won't belabor. The quality improvement and correct action I already mentioned. That refers back to your technical assistance as well as the corrective action steps if so required based on an item identified in the performance review. And then, rewards and consequences; things like recapturing funding or reallocating funding. You recall, though, at the very beginning of this particular section, I mentioned that those are things that are subject to HUD's ability and HUD's approval.

So if an agency is locally out of compliance and you think that the funds need to be -- they're captured for whatever reason or reallocated, that's a conversation you need to have with your

point of contact before taking any action, as well as with rescinding an agency's HUD approval or revoking an agency's HUD approval. That is something that you would need to go to HUD and a recommendation for. And then, at that point, HUD will get involved and the three parties -- again, you, the network agency, and HUD -- will then negotiate what needs to happen next.

And the final point I want to mention before moving is that you don't only want to talk about what's wrong with an agency. You want to talk about what's working well with an agency. And so that's the good work part, things like performance-based contracting; agencies that produce high numbers, giving them a higher portion of the grant rather than just doing everything equally across all agencies. Again, that's not a requirement, but it's a way that you can encourage some performance in the housing counseling program.

So we're going to get into a poll question and I wanted to -- as soon as I read it, I want to check in and see if HUD has anything to add and then we'll take some questions.

So the first poll question is, do you already have a quality control plan in place? It doesn't have to be a full quality control plan at this point. We just want to know what you have going.

So again, tap the answer on your screen. Your options are yes, you have a full QCP that reflects the seven areas we just went through; we have a partial quality control plan, that means it has some but not all of the seven critical elements we went through just now; no, we do not have any quality control plan; or finally, we have some other monitoring document that's not a quality control plan. Go ahead and tap the answer on your screen.

And Phyllis, do you have anything to add?

Phyllis Ford: The issue that I'd like to just touch base on is the conversation we just had about when you think that an agency should be removed, should lose its funding or should be removed as a HUD-certified or HUD-approved agency. We try to take very strong steps to protect the government's money. We don't want anybody being funded who is not performing in a way that they should.

But then a couple of questions that you want to ask yourself before you make that recommendation. What is it that can be done? How to act to correct this? How does this particular agency get into this situation and is there a way that it can be corrected? And the other important question is, in the clients that are being served, do we have a plan for the continuation of those services?

So that these are things that you think about and maybe have some suggestions when you come to your HUD upon the contract with the recommendations that an agency is still there, like the -- it's really placing the housing counseling program in jeopardy, have them continue. And we will help you work your way through whatever decision we need to make.

Aisha Williams: That's a really good segue, Phyllis, and to one of the written questions that was asked. "If an agency is not in compliance and we recommend a correct action plan, how long should the agency have to turn around and complete the corrective action plan?"

Phyllis Ford: It would really depend a lot on the areas that need to be corrected. We usually issue -- we'll ask the agency to come back to us with their plan for correction in 30 days. We usually allow 60 or 90 days, depending on the state or the issue that needs to be corrected. So I would suggest that we have a conversation with the point of contact and see just what the risk may be. And the risk may be the determining factor.

Sometimes, an agency needs to be placed in an active status in order correct. Other times, an agency can continue to function, but still be in the midst of making a correction. So I will say that the rule of thumb is 60 to 90 days. However, I would suggest that you have a conversation with your point of contact with HUD to help determine the process.

Aisha Williams: Okay. They wrote in and said that was very helpful, Phyllis. So thank you.

Phyllis Ford: Thank you. Are we able to take a look at the poll, Shawna, the poll, and then, get other questions? Again, feel free to chat in your questions if you have them and we're going to answer some more here in just a moment.

Shawna, are you able to get a look at that poll? It's very small on my screen.

Shawna LaRue Moraille: Yeah. So the poll results is that 55 percent of the respondents said they have a partial quality control plan and the other highest category was 42 percent have a full quality control plan. No one said they didn't have a quality control plan. And then, finally, 3 percent said they had an other monitoring document.

Phyllis Ford: Great. Thank you. So the next poll question that we have, I really want to try to target our technical assistance. We know that everyone is very interested to get this right so that we can all move forward with the program.

And so we want to know which quality control plan critical element do you need the most help with? So here, we're going to ask you just pick your top area here. Is it roles, responsibilities, expectations, and authority? Is it standards, policies, and procedures? So again, those are things like the HUD handbook or the Code of Federal Regulations, what have you.

Is the focus areas and the metrics? What you should be looking at and how you should be measuring it. Is it the evaluation and analysis method? So are you trying to figure out -- do you need help trying to figure out what you're going to do, how you're going to conduct the monitoring and review activities? Or is it something related to the quality improvement or corrective action steps for rewards and consequences? So that's what we do. You want something good or something not good that has been discovered.

Go ahead and tap the answer on your screen and we'll take some more questions.

Okay. Just a couple more moments here. I want to get us moving on here shortly for the evaluation of oversight agencies.

Aisha Williams: Okay. Maybe we could have one question. "Has HUD ever invoked penalties on an intermediary before?"

Phyllis Ford: The answer to that -- and I had to think about it -- but the answer to that question is yes. We have had issues where the ability to fund the network was no longer there, where there were issues where the agency and the network had many complaints and weren't getting the money that they were supposed to be getting.

So yes, we have in the past had to take action more than once with an intermediary. But I'd like to point out, and it kind of goes back to the statement that I just made, it was a long-term process and one of the biggest areas in terms of making an intermediary an active was making sure that the network of agencies were able to establish relationships that allowed them to continue.

Aisha Williams: Thank you. So we're going to go ahead and close that poll. And Shawna, are you able to share with us what you're seeing?

Shawna LaRue Moraille: Yes. I am. So the top category was focus areas and metrics that folks would like some help. The two tied categories were evaluation and analysis methods. And then, finally, the quality improvement, corrective action, rewards, and consequences. And then, close fourth was standards, policies, and procedures. Last, roles, responsibilities, expectations, authority.

Aisha Williams: Okay. Great. So it looks like everyone feels like we kind of know where to go to figure out what the expectations are and what the standards are. But it looks like we need to target technical assistance perhaps to what specific areas you think HUD wants you, as an oversight agency, to take a look at and what they want to see you doing specifically when you do that. So thank you for sharing that information.

So now, we're in the core part of our presentation and we're going to talk about how HUD is going to evaluate you. We've talked you as oversight agency and evaluating your network agency, but what does it look like when HUD evaluates you? I want to note here that there's a formal evaluation poll that is currently in development, but that is not ready for implementation yet.

We're going to spend some time in this section highlighting key areas in which HUD will evaluate oversight agencies' performance, sometimes with network monitoring, but we're not going to go specifically into that pool.

Phyllis, is there anything you want to add about that poll that's being piloted before I move forward?

Phyllis Ford: Well, I think you did pretty much say where we are. We have a development tool and it is now in what I call the data process. We've gone out and tested it with some of our agencies. And the response thus far from the agencies has been very positive because the tool allows you to know -- just like we said we want transparency, that you should have transparency when you're working with your networks. Certainly, you should expect that from HUD and I

think this document will help. So I would think we should be hearing in the next few months. We'll be sharing that with you.

Aisha Williams: Thank you so much. So we've already discussed that HUD will require agencies to have a quality control plan as well monitoring strategies and how we control records. And so we're not going to get back into that. But understand that it's been presented in today's presentation. It's in certain documents that you have and grant agreements and other materials that you have in your possession. And so of course HUD is going to evaluate whether or not these things exist as well as the quality of the particular item.

We also already discussed a lot of the items on this screen. So we talked about peer sharing and training, which you see down there on the green circles.

Technical assistance. HUD wants to know do you provide technical assistance regularly to your agencies and is it the kinds of things that are particularly useful for your agencies?

One point that I want to make here is that technical assistance this time are at regular intervals and we talked about that. But the reason I bring it up here is that sometimes we see technical assistance -- so when HUD notifies one of the network agencies that they're going to come do an audit, now all of a sudden the oversight agency depends upon one or several agencies that is going to get an audit.

And what happens is it's overwhelming and it's really counterproductive. If you are regularly providing all of those things here that you see bulleted on this screen for the agencies, then you really shouldn't have a mad dash when HUD notifies you that they're going to out to one of the agencies. Of course, that doesn't mean that you shouldn't provide technical assistance to help them through their auditing process. Help know what they expect and what to do. But again, we don't want people to wait until the last minute to do those things.

HUD is also going to evaluate you on your network satisfaction. So we talked about the agencies, that we're all here to make sure that consumers receive the highest quality possible when it comes to housing counsel and services. As an oversight agency, another responsibility that falls upon you is that you want to be sure your network agencies are receiving the highest possible quality oversight and monitoring from you and HUD will be checking that through network satisfaction surveys and you should be taking a look at that as well. So we would like agencies to perhaps conduct network satisfaction surveys and then HUD would be able to review those results as well.

And before I move forward, I also just want to mention that you should take that information from the network satisfaction surveys and use that as feedback to improve your overall practices. And again, we're all working in partnership and that's how the network satisfaction surveys should be reviewed.

And then, finally, quality counseling. Ultimately, if poor quality counseling is coming from your network and it's a large problem across the network, so we're seeing a lot of compliance issues. If we've had several reports of huge conflicts of interest or things that are just out of compliance,

HUD is going to view that as possibly a reflection of you as an oversight agency. Of course, your network agencies are responsible internally for themselves. But again, you're accountable for the level of quality of services coming out of your network. So HUD will then reach you on that as well.

So moving onto the fifth and final part of our presentation, and this is just before take some more questions and so forth. The next few slides are case examples and like I mentioned at the beginning of the presentation, these are examples that we hope help you to understand and illustrative of some of these things that we talked about earlier. This is not by any stretch exhaustive of what you could be doing, but it hopefully will give you an idea of how HUD expects certain things to play out and you can apply it to other areas.

So in the first case example, I've mentioned conflicts of interest several times. So the mandate that's in your Code of Federal Regulations and in your HUD handbook requires housing counseling agencies to avoid conflicts of interest and to actually implement quality control activities to avoid potential conflicts of interest. And where there are conflicts of interest that are questionable or apparent, the agency is required to disclose these issues to HUD and in a disclosure for the client. So you have to disclose to both HUD and the client.

So as an example, if the housing counseling agency in your network hires a licensed realtor to counsel foreclosure provision clients or pre-purchase clients, the housing counseling agency itself must take steps to ensure that the counselor doesn't give the appearance of receiving a financial benefit from the pipeline of clients with hardships or potential buyers. So I hope that makes sense to everyone. The counselor should not be referring clients to themselves or their realtor. They shouldn't be referring them to their realtor friends and collecting referral fees. Those are huge conflicts of interest.

And then, likewise, if the client asks for a realtor to help them, then the counselor should be referring them to several different realtors in the community. But again, you want to avoid anything that even looks like it might be inappropriate steering or a conflict of interest. Likewise, if the housing counseling agency in your network owns rental housing and a client comes in for rental counseling, the counseling agency is welcome to share with the client that they have rental housing available, but ideally they should also be at least sharing three other resources for rental housing with that particular client.

So one way that you might document this, you want to review this data or you would want to review their client disclosures. So first of all, you want to know what's going on with your agency so that you are aware of what should be in the client disclosure. And then, if they have need or similar other issues, you should review a list of their community resources for clients -- something you can check or that they can provide is documentation of it. You can provide documentation. Getting a copy of their employee policy statement when it comes to conflicts of interest and ethics. And then your quality control plan should have a conflict of interest policy ad document that support your policies when it comes to these things.

So Phyllis, did you have anything to do add? I know this is kind of a tough one for everybody.

Phyllis Ford: Okay. Conflicts of interest and disclosure statements are very, very important. I think that in your personnel policies and you should be able to pass those down to your agencies. The personnel policy should be very, very clear about disclosure. The agency's disclosure statements need to be very clear. We do have some on as tool that allow the client to know all of these financial relationships, which you may have with other entities or your network agencies have with other entities so that there can never be a hint of a conflict of interest.

So we're talking about avoiding conflicts of interest and we're also talking avoiding the perception of conflict of interest. There has to be disclosure, as we just heard in an example where someone is a realtor if hired as a counselor. And oftentimes agencies like to have the experience that comes with being a realtor when they're doing homeownership counseling. So they have to be disclosed and there has to be a mechanism to follow up to make sure that that particular counselor or a real estate agency, that that licensed real estate agent did not benefit from that relationship. So it puts a lot of emphasis on you, but that's a very, very important aspect of what we do in that forum, protecting the integrity of the program.

Aisha Williams: Great. Thank you so much, Phyllis. So we're going to move into a pop quiz and also answers some questions after I leave the scenarios here on the screen. An agency has received a grant from a lender for clients that obtained a mortgage with that lender. The manager has directed counselors to discuss this loan product option with all pre-purchase clients. That's the scenario that we have. The question is, what actions must the agency take to ensure that they meet all HUD requirements concerning conflicts of interest?

Is it A, do they need to include the lender relationship and the agency's disclosure? Is it B, they need to make sure the counselors discuss at least three mortgage options with clients? Is it C, they need to ensure client files contain documentation that alternative lending products were discussed, including FHA? Is it D, they need to ensure the lender agreement includes language that the agency will discuss other lending actions with clients? Or is it E, all of the above?

So everybody, go ahead and take a moment to tap the answer on your screen. And Shawna, do we have any questions?

Shawna LaRue Moraille: I just wanted -- and I thought Phyllis' example, similar to the scenario you just went through, is a really good place for people to pause and think about their own conflict of interest. Can you repeat your rental example that you started with, Aisha, about if a housing counseling agency happens to own rental property?

Aisha Williams: Sure. So we know that a lot of our agencies do have rental housing. That is another service that they provide that isn't necessary a HUD-approved service, but it's a benefit that they provide. And so if the client comes in and they need rental housing, for example you see the collapse of -- home within homelessness [ph], for example. I think it's perfectly fine -- and Phyllis, jump in and correct me if I'm wrong -- for the agency to disclose to the client that, yes, they have rental housing available, but it's really imperative that that agency share at least three full options, I would say not including themselves in them, that that client can choose from when it comes to searching for rental housing.

And then that information would need to be in the client disclosure, that they operate this rental housing program. And then, it will also need to be divulged to HUD through the proper channels, and the oversight agencies. So oversight agencies should know about it as well.

Shawna LaRue Moraille: I don't know if Phyllis has anything to add, but the follow-up question is asked, "Is this only because there's a potential conflict of interest due to the management of rental properties?"

Aisha Williams: I think it could be perceived as a conflict of interest. It could be perceived that the agency is running a counseling program to seed into their need to populate their rental properties. So you want to make sure that every client has had an opportunity to look at several rental properties or types of alternatives; they just not being fed into -- they're not using the counseling program to feed into their rental property program.

And we do have many agencies that offer a number of housing services, both rental housing -- some have for sale housing. So it's an excellent example and it does fit to the things that need to be done. Now, most clients are just happy to hear they're going to get a place, but we just have to make sure that they have and that we document that we provided a fair opportunity and that they weren't steered to anything.

Another example that I've run across is that agencies may do group training and they may ask realtors to come in and talk about the process and they ask lenders to come in and talk about the process. And I recently did a review and they were showing me the room and all of the issues that they covered. And on the table were all these cards from the realtors who had made the presentation. So that sparked my interest.

I mean, I understand that they'd want to make -- they may come out and do the speaking so that they could have some new clients. But the bottom line is that the agency is responsible to say we are not steering you to this particular person and maybe even providing a list of several realtors or local real estate agencies that they can go to so that it does not appear that that person has a first hand opportunity for those clients.

Aisha Williams: Great. Thank you. Are we able to take a look at those polls at all?

Shawna LaRue Moraille: You'll be happy to know that 97 percent said all of the above. Only 3 percent said document that alternative lending products were discussed.

Phyllis Ford: Great. So thank you so much, Shawna. That is the correct answer, is all of the above. You would want to be sure that as an oversight agency you work in partnership with your network agency to be sure all of these steps have been taken if a situation like this should arise.

Aisha Williams: Okay. The second case example is Affirmatively Furthering Fair Housing. All agencies have a mandate to integrate affirmatively fair housing activities into services and programs. Is that you'll recall from the very first webinar that we did in this series that housing counseling agencies must integrate AFFA activities into their work plan. They must set clear real estate goals for activities when it comes to AFFH. They must also ensure that reports and

marketing plans properly reflect the activities they've identified. Then, they must demonstrate evidence that they've achieved those AFFH goals.

Oversight agencies have a responsibility to ensure that those required steps that I just mentioned have been taken. And so, that means you need to be reviewing the work plan and the report. And, in fact, I would also mention this all starts with the NOFA application. I think it is Part F where people identify the Affirmatively Furthering Fair Housing activities that they'll do and the number of activities that will be around that. And so that's where you come in as an oversight agency to verify that things are happening as according to plan or what was projected.

HUD evaluates your monitoring of whether goals and targets that are set in the application phase actually occurred. And then something you can do to document this, again, the HUD form 9910, copies of the agency documentation markup is needed. So for instance, if you're an oversight agency, are there visiting them or you them or you done a remote review to collect some of their marketing materials, perhaps there's something else that they could have done.

So marking it up and sharing that with them is a way to help them and then saving that markup file is a way that, instead of sticking it in the file of the agency, there's a way that HUD can know that you actually have gone through and done that. And then, of course we talked about the performance review letter indicating whatever observances you made.

So an example of Affirmatively Fair -- I'm going to say AFFH so I don't trip over myself here with the words. Sample activities here would be helping families to identify housing opportunities in areas that provide community access. So things like helping families to identify areas of good schools, healthcare, transportation. Various agencies can host the community poor and assist this family with rental applications once they've identified a place that's desirable.

Oversight agencies can review client files to see if those activities that they've mentioned have actually taken place. An agency can provide translated marketing materials and/or language translation for persons with limited English proficiency. Oversight agencies, you can look for documentation of the translating marketing materials and keep a copy for you own records and for HUD to see when they are on site visiting you.

Another activity that agencies can do is to provide training to counselors on topics that the -- awareness of accessible design legal requirements, awareness of reasonable accommodation requirements, or awareness of housing marketing requirements. So Affirmatively Furthering Your Housing activities don't have to be just selected for our consumers. It can also be directed for counselors or outside entities that you may partner with in the community when it comes to fair housing. So those are some activities that your agency can do and you can check up on.

Our final case example relates to the counseling and education files. This is really important, which is why we've highlighted it. You know, we're in the business of doing housing counseling and education. And so, the files are ultimately the evidence that we've done that. And so, the mandate here is that the housing counseling agency's supervisors, so this is your network agency, the supervisor there monitors the work of the housing counselors to determine the adequacy and

the effectiveness of the housing counseling. And we talk about you as an oversight agency must ensure the quality of your network agency counseling and education services.

So to monitor this, you would review this list. You must review the files compared to the HUD handbook, which indicates what must be required, what must be included in the file. The HUD handbook also indicates what steps must be taken and those steps should be documented in the counselor notebook or other materials. There should be evidence that those steps were actually taken with the client.

Another thing that agencies do, I know some agencies who actually observe client counseling sessions while they're doing an onsite review or review education course goals or the outlines to be sure that they're hitting critical points that are required for continuous compliance.

And then, finally, essential documentation of follow-up activities. We talked about the 9910. We already about having a file checklist and a performance review letter. Providing verbal or written feedback. If you attend a counseling session, of course that network agency is probably going to put forth their best counselor and share some background information and file information with you before you bid in on that session. And so providing just some feedback to the counselor as well as the supervisor is a good way to provide assistance and conduct monitoring activities.

And then, finally, providing training on what housing counseling looks like; best practices when it comes to counseling or even just sending out recommended best practice activities to the network without having to do a training. Those are all things that you can do.

Here you see a sample checklist for client files. I know you can't necessarily view this, but the point here is you need to be clear. So you can see here that the client file number, you should know what file number you are looking at, the client's name, the basic information so that we know what file you looked at.

At the top there, we can see the counselor who reviewed it, the types of counseling file it was, because there may be more or less documentation required. For example, if you're looking at a HECM file, there's some different documentation that's required there. And then you can see here, at the very bottom, those are files containing the following items. Now, the list goes on longer than that, but, again, the point is we've identified the file and we said it does or does not include the following items or it's not applicable. And then, of course, you have your comments there.

And the same goes for the checklist for education files. We've identified the workshop session, the person who was doing the presenting, the title of the course, as well as the funding course. And then, you verified does it have a group ID number? There's a HUD grant activity, an amount. Is that somewhere in the file? Is there some sort of instructional goal associated with it? Those are the kinds of checklist items that you would want to have on your checklist. The delivery method, was it Internet or was it classroom? And then of course your comment.

And then finally here you have a sample performance review letter. Here, this agency has done a formal performance review letter. So I would encourage everybody, don't just make a

handwritten note and leave it at the agency or send a quick e-mail. This is a formal responsibility that you have and it deserves the formality of a letter. And so when you've done a performance review, you perform a letter here.

You set here, at the bottom, there are some terms or findings that the documentation they have wasn't sufficient. And then in the case of this particular agency, they actually took the client checklist and inserted it into the performance review letter and they have a red N wherever the agency didn't do what they were supposed to do. So that way it's clear and everybody is on the same page.

So I'm going to go ahead and just review some of these additional resources with you guys and then we are going to take some questions. You can see here, the model compliance monitoring procedures that comply with OMB. By the way, let me just back up and say these are all available on OHC's toolkit website. So you can follow the link for that.

I talked earlier about agency disclosure forms and the model personnel activity reports. Those are things that are simple documents that are available on HUD's website where OHC hosts their toolkits. And finally, also, the model personnel information and data review steps.

So with that --

Shawna LaRue Moraille: And Aisha, I just want to mention on some of these toolkits, really, they're going to be OMB circular changes, is it does sound like that HUD is in the process of updating these. So while they're available to you, they are going to be updated. So I just wanted to add that.

Aisha Williams: Great. Thank you. So with that, that's concluded this. We're going to go ahead and take some questions and then Phyllis, if you have any additional comments that you wanted to add, let's go ahead.

Phyllis Ford: Well, just in terms of just jumping on the OMB circular changes. There have been some major changes. I'm sure people in this audience have hopefully been attending the training that we offered on the OMB circular and the changes that have come forth. I think that it's important, even though that, in terms of your own operation, and as well as monitoring the agencies that are in the network.

One other thing that I wanted to mention that we didn't really touch on and that is we really are working -- HUD is really looking to make sure that we're providing good customer service. I know that we spoke about the surveys that you could possibly get from the agencies, but one of the things that I would recommend that you pay attention to is complaints that may come in to you from clients who have had a disappointment in working with agencies in your network.

At HUD, I handle the client complaints and I'm happy to say that most times they are baseless. People have expectations and sometimes those expectations are not reasonable and then they're trying to scapegoat and that scapegoat can be the agency.

However, I think it's important that you have a process for handling customer complaints that will allow you to look at the complaint and then either make a recommendation for the agency to make some correction or that you can indicate in this file that the complaint that the agency functioned in a way that wasn't in compliance with HUD requirements. So I just wanted to touch base on that issue, too.

Shawna LaRue Moraille: Okay. Great. There was a question asked a little bit ago, so thank you for your patience. I'm just going to read it and if other people want to write in now or raise your hand and we can also unmute you. "What are the top three issues HUD sees with intermediaries?" Phyllis, do you have a top three?

Phyllis Ford: No. I don't even know if you mean positive or negative. But I do think that there is a lot of emphasis that HUD is putting on now on working with intermediaries and finding ways in which you can work with your network.

You know, when the Office of Counseling came into play before that we had about 140, 150 points of contact. Now we have like 2,400 agencies and maybe 70 people. So one of the things that we're looking at, and I think that part of the impetus for developing a review process to change how we can work with our agencies, our intermediaries, to make sure that the quality of service is being provided.

So I think that the top one thing would be HUD and the intermediaries would be partnership. How can we build partners and make sure that there's quality housing servicing provided?

I think the second area would be what kinds of supports do we need to provide to you? How can we -- we're doing a lot of training, we're doing a lot of webinars, we encourage that our points of contact get out and work with you. So I can give you two top things. One is partnership and the other is support.

Shawna LaRue Moraille: Okay. Great. I think folks appreciate that positive spin on that. And then, one other question is -- and I don't know if we know this off the top of our heads. But was there another webinar like this for local housing counseling agencies/subgrantees?

And while you think about that -- because I'm not sure if I can provide the Web link to that -- is that this is part of the series for oversight agencies. So HUD is really emphasizing their relationship with you guys in terms of being oversight entities and your network, which is something that hadn't been done as fully in the past as Phyllis just said. So hopefully, you see the difference. There's been a lot of webinars, just generally, in housing counseling, that have been provided.

Phyllis Ford: Now, I can't really answer the question because I'm a mere guest here. I am not a part of the planning department that does this. But I do know that, yes, we've been doing a number of webinars and training and like I said, issues related to OMB circulars and a number of other things. But I can say that there was one similar to this. I may have to get back to you because I really don't know.

Shawna LaRue Moraille: Okay. And that's fair. Again, the link that we provided on slide two or three to the training archives, the webinar archives, there is a slew of other archive material you'd want to check out probably. I don't have any further questions that people wrote in or points, anything like that.

Lee, does anyone have their hands up want to be unmuted to ask verbal questions?

Lee Turner: Not that I can see.

Aisha Williams: Great. And so thank you, everyone. If you have additional questions that come up, you see the e-mail there, housing.counseling@hud.gov. So your questions can be answered there. And then, we have the evaluation here for this particular webinar.

Lee, do you want to talk about that and wrap us up?

Lee Turner: Sure. I'll just mention that you can find an evaluation at this link. It'll help us going forward with our webinar construction development. So please visit that. I'm going to leave this page up for about 15 minutes afterwards for you to copy into your Web browser. This link will also be available on the webinar slide that will be posted on the OHC resources page as well in the next week or so.

Aisha Williams: And also, Lee, isn't it available on the e-mail that folks received in terms of the registration, so they could simply click on that link or copy it?

Lee Turner: Correct. That's a great point. Yes. It's also there as well.

Aisha Williams: Okay. Great. I cannot stress how important it is to receive your feedback. We've been able to make certain changes to our webinars over time because of your feedback. So it's really important that you provide that to us.

Shawna LaRue Moraille: So thank you, everyone. Thank you, Phyllis. Thank you, Aisha. Thank you, Lee.

Phyllis Ford: And I hope everybody has a great weekend. Thank you.

Aisha Williams: Thank you.

Phyllis Ford: Thank you.