

Ralph M. Perrey, Executive Director



**HOMEBUYER EDUCATION AND COUNSELING PROGRAM  
AND STANDARDS GUIDE**

**REVISION 1**

March 18, 2015

**Remove and discard:**

**Replace with enclosed:**

Page 3 (August 2014).....	Page 3 (Revised 03/04/15)
Page 4 (August 2014).....	Page 4 (Revised 03/04/15)
Page 8 (August 2014).....	Page 8 (Revised 03/04/15)
Page 9 (August 2014).....	Page 9 (Revised 03/04/15)
Page 10 (August 2014).....	Page 10 (Revised 03/04/15)
Page 11 (August 2014).....	Page 11 (Revised 03/04/15)
Page 14 (August 2014).....	Page 14 (Revised 03/04/15)
Page 15 (August 2014).....	Page 15 (Revised 03/04/15)
Page 17 (August 2014).....	Page 17 (Revised 03/04/15)
Page 30 (August 2014).....	Page 30 (Revised 03/04/15)
Page 31 (August 2014).....	Page 31 (Revised 03/04/15)
Page 39 (August 2014).....	Page 39 (Revised 03/04/15)
Page 40 (August 2014).....	Page 40 (Revised 03/04/15)

**EFFECT OF CHANGE**

The above page(s) should be removed/replaced in your guide. Complete guide is located on THDA's website, [www.thda.org](http://www.thda.org) at <http://thda.org/DocumentCenter/View/5406>.

Changes are as described below:

- Page 10 contains additional specifications regarding preferred language needs. Providers should not turn away a homebuyer due to language barriers. If Providers are unable to obtain at least two bids or the cost of translation exceeds \$100 per hour and service exceeds four hours, THDA staff should be contacted for prior approval.
- Page 11 and 40 contain the addition of Executive Director. HBEI Agency Compliance reports will be delivered to the HBEI agency's designated contact person and Executive Director.

- Page 14 and 15 contain the following additional sentence: Each person on the loan is required to attend a homebuyer education class.
- Page 17 contains the following additional sentence in Section 4.4: Classes are reviewed and approved 6 months out.
- Page 39 contains revision of the payment to HBEI approved agencies providing online homeownership education to \$150. The date for HBEI staff to generate a report that shows the names of funded loan customers for the previous month has been revised to read “no later than the 15<sup>th</sup> of each month”.
- All other pages contain minor corrections of text, not affecting actual guidelines.



# **Homebuyer Education and Counseling Program and Standards Guide**

AUGUST 2014

Latest Revision: 3/04/2015

**THDA'S Mission:**

*Leading Tennessee Home by creating safe, sound, affordable housing opportunities.*

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## **1.4 HBEI BASIC PROGRAM DESCRIPTION**

### **A. Role of HBEI Providers**

Agencies in THDA's HBEI Network are dedicated to providing affordable, high-quality, effective homeownership education and counseling services to Tennessee consumers. HBEI Providers are committed to the following:

- Adhering to the HBEI Program Agreement (See Section 13), standards and policies that are based on national best practices but reflect Tennessee's homebuyer education and counseling environment
- Reporting programming outcomes to THDA
- Participating in periodic program reviews
- Collaborating with network partners to promote and advance the professionalism of the Network and the homeownership education and counseling industry

HBEI Providers adhere to standards in this HBE Program and Standards Guide which comply with and in some instances exceed the National Industry Standards for Homeownership Education and Counseling [www.homeownershipstandards.com](http://www.homeownershipstandards.com). THDA recognizes the importance of promoting professionalism and quality assurance in homebuyer education and counseling at the national level while supporting the standards that reflect the local counseling industry. Where THDA standards exceed the National Industry Standards, as addressed in the Guide, THDA standards take precedence.

### **B. Role of THDA**

THDA supports HBEI Providers by offering technical assistance, capacity building support, training, consumer training materials, marketing and outreach support, and coordinated networking. THDA HBEI staff is available to provide guidance on program delivery, program management, and a range of best practices. THDA conducts public education and outreach and is responsible for research and analysis of program delivery, outcomes and trends. THDA also serves as a funder to Providers.

THDA provides approved HBEI Providers with consumer training materials and payment for their homebuyer education and counseling services for THDA's loan customers. THDA also provides NeighborWorks® America place-based certification training events and an annual meeting featuring continuing education and networking opportunities for Tennessee's HBEI Providers.

THDA participates in a variety of partnerships with industry stakeholders in an effort to further the mission of the network. In addition, THDA raises funds through other private and public entities and uses these funds to support training for the Providers. HBEI Providers also secure their own funding through grants, government contracts and donations.

and Counseling. Adhering to this code of ethics is critical to demonstrating ethical conduct within the housing counseling profession. A copy of the Code of Ethics and Conduct for Homeownership Professionals is located in Section 13.

2. HBEI Provider homeownership educators and counselors sign and adopt the written National Industry Code of Ethics and Conduct for Homeownership Professionals upon the HBEI Provider Agency becoming a member of the HBEI Network.

## **B. Conflict of Interest**

1. THDA requires HBEI Providers to serve participants without conflict of interest. A conflict of interest exists when the Provider has an interest that has the potential to compromise the Provider's ability to fully represent the best interests of the participant. In order for the participant to make a fully informed decision they must be made aware of any real or potential conflict of interest that could be created on the part of the Provider and homeownership advisor. The following are examples of relevant conflicts of interest:
  - Provider owns or purchases property that the client may choose to purchase
  - Provider accepts a fee for participating in any way in the sale of a property for the client.
  - Provider holds or services the mortgage on a client's property.
  - Provider makes available an in-house mortgage product or real estate services.
2. When a conflict of interest exists or may exist, HBEI Providers give a written disclosure to participants revealing the conflict and stating that participants are under no obligation to receive additional services from the Provider. Both parties sign the disclosure. Providers offer information on alternative services and programs. The signed disclosure is maintained in the client file. A sample Conflict of Interest and Disclosure Agreement is included in Section 13.
3. Providers may use an alternative disclosure, subject to THDA's approval. Such disclosure language should clarify that:
  - The participant household is seeking homebuyer education and/or counseling services and is not applying for a loan or real estate representation.
  - The participant household will be offered objective advice about loan products for which the household may be eligible.
  - The participant household is free to select lenders, lending products and real estate services of their own choosing.
  - No information will be shared with an in-house or outside loan officer without the written consent of the participant household.
4. HBEI Providers may not accept a fee from a lender, real estate agent, developer, home inspector, appraiser, or insurance company, or any other homeownership industry representative for referring participants.
5. HBEI Providers of homebuyer education and counseling may not be associated with the decision to approve or deny in-house mortgage loans, grant programs or the sale of property to participants that receive their homeownership education and counseling services.

### **C. Customer Feedback**

Before receiving their certificates, participants completing homebuyer education classes, workshops, clubs, and counseling sessions complete a satisfaction survey (See Section 13).

1. Clients are to be given customer satisfaction surveys to complete at the conclusion of their training.
2. A copy of the Customer Survey should be placed in the customer's file or class file.

### **D. Data Privacy**

HBEI Providers adhere to federal regulations and statutory laws pertaining to the release of private data about individuals to outside parties. Before releasing private client data, HBEI Providers must secure written authorization from the client. The authorization must include the parameters of information to be shared and may not be a blanket waiver. Clients are not required to share private data with counselors or third parties. Provision of service must not be contingent on clients' providing their consent to share data. See Privacy Policy and Housing Counseling Agreement in Section 13.

### **E. Fair Housing**

HBEI Providers must affirmatively further fair housing by making special efforts to reach and accommodate populations that are typically underserved. HBEI Providers comply with the provisions of the Americans with Disabilities Act (ADA) and observe all laws pertaining to fair housing in the administration of homebuyer services. Providers ensure the accessibility of their services for people with disabilities and offer reasonable accommodation when necessary. In cases where reasonable accommodations are requested, all actions taken to facilitate service delivery should be documented.

### **F. Fees**

HBEI Providers may charge up to \$25 to customers already in the process of obtaining a THDA loan and a reasonable fee to other participants for face-to-face homebuyer education. Providers also may waive the fee or establish a sliding fee scale, based on income. Any customer paying more than \$25 for a loan that is not initially THDA and then changes to a THDA loan must be refunded the amount over \$25 by the Provider.

HBEI Providers who elect to charge fees must have a written fee policy that is made available to participants. Third party fees that present a conflict of interest are prohibited. This includes direct payment from a lender or real estate agent on behalf of the participant.

Fees are based on the actual cost of delivering services. HBEI Providers should consider what other Providers in their area charge.

1. THDA homebuyer education class fees: A reasonable maximum fee for a THDA loan customer for an 8 hour homebuyer education class or a minimum four hour one-on-one service is \$25 per household (HEAB, HUD).
2. Fees must be reasonable and customary.

## **G. Marketing**

Reaching participants early is key to providing effective services. Early participation increases the likelihood of success in homeownership. Raising awareness about the availability of homebuyer education and counseling is a critical component of programming. To assist with marketing efforts, THDA has outreach materials and support services available for Providers' use.

1. Providers are responsible for marketing their homebuyer services. Providers should develop, maintain, and utilize a marketing plan that employs a variety of outreach methods for reaching participants early.
2. Providers should have an affirmative marketing process to communicate that homebuyer services are administered in a non-discriminatory manner. This may include equal housing opportunity messages, logos or slogans on written materials, and tailoring marketing messages to populations less likely to participate in services.

## **H. Preferred Language**

Providers should accommodate language needs of participants and refer homeowners to advisors within their organization, or to another Provider that offers language specific services whenever possible.

1. Providers should not turn away a homebuyer due to language barriers.
2. If language specific services are not available, translators should be made available to homeowners requesting the service.
3. Providers should get at least two bids, selecting the most reasonable rate considering availability. If Providers are unable to obtain at least two bids or the cost of translation exceeds \$100 per hour and service exceeds four hours, THDA staff should be contacted for prior approval.

## **I. Program Expansion**

To ensure the best use of limited resources and to maximize coverage across the State while avoiding duplication of services, if expansion is considered, THDA requires prior approval/notification before Providers expand their THDA service area. The following are considered minimal approval criteria and requirements for expansion:

1. Successful administration of homebuyer services for a minimum of one year
2. Demonstrated need and the ability of the Provider to deliver expanded services to the geographic area and/or population
3. A plan for offering expanded services that demonstrates staff and financial capacity
4. A proposed timeline
5. Collaboration with current Providers serving the proposed geographic area and/or target population (if applicable)

Before program expansion, Providers must submit a written request to THDA HBEI staff. The request will be reviewed and noted in the Provider's file, unless the Provider has had a less



than satisfactory performance during their most recent THDA HBEI Program Review. In the case of an unsatisfactory performance review, THDA reserves the right to refuse to list or promote the Provider's activities in the proposed expansion area.

## **J. Program Compliance Review**

The HBEI Program Review process is designed to examine Providers strengths and areas that may need improvement and ensure compliance with the HBE Program and Standards Guide. The program review includes observation of homebuyer education, interview with Provider Agency staff, file and reports review and customer feedback. The following are considered during the Program Compliance Review.

1. THDA conducts the program review at least once every year for each provider. New Providers are reviewed within the first 9 months of offering services. Providers are notified no later than 30 business days before a program review. For Provider's who have completed the program review, an abbreviated review is conducted within 12 months of hiring new staff or if deemed necessary by THDA to ensure compliance.
2. Organizations who are approved by THDA to act as HBEI Providers hereunder shall submit acceptable documentation annually or when necessary, as determined by THDA in its sole discretion, to remain an HBEI Provider.
3. HBEI staff members periodically review customer reporting, website calendar usage, adoption of National Standards, Peer Session attendance and other HBEI Program compliance indicators. Staff will produce a report indicating what compliance areas may be lacking and/or what corrections are necessary. HBEI Agency Compliance reports will be delivered to the HBEI agency's designated contact person and the Executive Director. Each report will indicate the final deadline for each compliance area. Failure to satisfactorily meet the compliance deadline may result in removal from THDA's list of approved HBEI agencies.
4. Third party, unidentified monitor will observe classes and provide report findings to THDA.

## **K. Record Keeping**

Customer files should be maintained by Providers. A household or group file should be maintained for homebuyer education and household files are maintained for homebuyer counseling. Files should be maintained in a secure location and kept for a minimum of 3 years following the end of the program year in which the file was closed.

At the time of disposal, paper files should be shredded and electronic files permanently deleted. A Checklist should be used to ensure files are consistently maintained and meet reporting standards and quality assurance. See sample Counseling Documentation Checklist for group files and one-on-one files in Section 13.

1. Homebuyer Education Customers

*Homebuyer education should be provided to two or more participant households in a class or workshop format. At a minimum, participant files for homebuyer education should include:* 1) Class/Workshop Registration; 2) Class/Workshop Satisfaction Survey;

## **PART II: HBEI PROGRAM DELIVERY STANDARDS**

### **SECTION 3: BASIC HBEI HOMEBUYER SERVICES**

The HBEI program model is designed to meet the needs of participants by understanding what steps, if any, have been taken towards homeownership, determining mortgage readiness and customizing services based on the needs of the participant. HBEI educators and counselors should have a working knowledge of and be able to share information with their customers about THDA mortgage loans, HUD Programs, and Rural Development mortgage loans, as well as other special affordable loan products available in their area. Trainers can access [www.thda.org](http://www.thda.org), [www.HUD.gov](http://www.HUD.gov), and [www.rurdev.usda.gov/TN](http://www.rurdev.usda.gov/TN) for more information.

#### **3.1 FORMAT AND TIME REQUIREMENTS**

Homebuyer education is provided to two or more participant households in a class or workshop format while homebuyer counseling is provided to one customer household at a time. Each person on the loan is required to attend a homebuyer education class. THDA HBEI approved providers serve THDA loan customers through a variety of formats, including the following:

- An eight hour class or workshop
- A seven hour class or workshop, paired with a minimum of one hour of individual counseling
- A minimum of four hours of face-to-face, one-on-one homebuyer counseling
- In limited, prior-approved exceptions, a minimum of one hour of individual counseling coupled with an approved online homeownership education course

#### **3.2 SCREENING**

The process of screening helps participants understand what services are available and best fits their needs. HBEI agencies should use customer intake forms to collect required client information and to track the services provided for the client. THDA gathers this information to meet federal requirements. Information from the forms will help counseling agencies prepare pay requests and activity reports, and also will be useful if the client needs additional services. The staff person performing screening and/or intake must be trained in requirement of the Privacy Act. This staff may obtain basic information to determine if the agency can assist a potential client, schedule an appointment with a housing counselor or refer the potential client to other resources.

- 1) Screening should be completed for all participants interested in homebuyer services and can be done by the client or facilitated by the homeownership advisor or support staff. Screening may take place in person, by telephone or email, or through website applications.
- 2) For Providers who offer online registration, the webpage must include information on homebuyer counseling and the benefit of those in the initial stage first meeting with a homeownership advisor.

- 3) Providers must contact participants who register online by phone or email to complete screening.
- 4) For the purposes of screening, participants are identified as one of the following:
  - Initial Stage: The client has not been preapproved for a mortgage loan or submitted a purchase agreement.
  - In Process: The client has been preapproved for a mortgage loan, submitted a purchase agreement, or has a closing scheduled.

### **3.3 INTAKE**

During intake, contact and demographic information should be collected for each household. Applicable forms and authorizations are reviewed with participants. Intake should be completed immediately following the screening or at the first homebuyer counseling session or homebuyer education session. Each person on the loan is required to attend a homebuyer education class.

#### **A. Client Numbers and Forms**

Standardized intake forms should be used for each household. Intake can be facilitated by the homeownership advisor or support staff and may be done in person, by telephone or email, or through a website application. See samples of Client Intake Forms in Section 13.

All clients must be assigned a six digit client number. At a minimum, customers should be asked to sign an agreement to participate, a Conflict of Disclosure form and a Combined Privacy Act Notice form. A copy of the form(s) should be given to the customer and the original(s) should be placed in the customer's file.

#### **B. One-on-One Client File**

A client file must be maintained on each client household that is receiving housing counseling. The intake form should be kept in the client's file as well as copies of budget sheets and any client communication or other pertinent information.

#### **C. Group Education File**

Providers must maintain a separate confidential file for each course provided. The file may be electronic or a combination of electronic and paper. The file must include the items identified below. An individual file does not need to be established for each education attendee. However, if a client has an existing individual file and attends a group workshop the client's participation in the workshop session must be documented in his/her individual file.

1. File Number - A file number for the education/ workshop session
2. Data - All required fields are listed in Section 7.

## **SECTION 4: HOMEBUYER EDUCATION SERVICE DELIVERY**

Homebuyer education is delivered in a group setting and is designed for anyone considering or in the process of buying a home as a primary residence. Education is not limited to first-time home buyers. Ideally participants attend homebuyer education before signing a purchase agreement. However services are beneficial to participants regardless of their status in the home buying process.

### **4.1 CUSTOMER SERVICE STATUS**

Participants shall not be refused service regardless of their status in the home buying process.

### **4.2 MARKETING FOR EARLY PARTICIPATION**

Providers shall market their services within their communities to encourage participants to attend homebuyer education prior to signing a purchase agreement.

### **4.3 CLASS SIZE**

No maximum limits have been set for number of attendees; however, Providers should consider the capacity of the space and the impact on learning when registering participants.

### **4.4 THDA WEBSITE CLASS CALENDAR**

At least a month before the event, HBEI Providers should utilize THDA's website calendar to post their homebuyer education classes, in addition to notifying their community industry partners and publicizing the classes with local media (See Section 9 for calendar instructions). Classes are reviewed and approved 6 months out.

### **4.5 APPROVED CURRICULUM**

Workshops and classes held by HBEI approved agencies and marketed as homebuyer education will utilize the NeighborWorks® America "Realizing the American Dream" (RTAD) curriculum provided at no cost by THDA. The curriculum is available in English, Spanish, Mandarin Chinese and Vietnamese.

When Providers need consumer training materials and are current on their customer reporting, HBEI Providers may order RTAD (and/or Keeping the American Dream) materials through THDA HBEI staff. (See Section 8)

Providers should thoroughly utilize the RTAD. Each customer household is given a copy of the RTAD curriculum for class use and to take home to keep as a personal resource after the class. The homebuyer education curriculum requirements are outlined in Section 13.

Providers may incorporate supplemental materials and activities into homebuyer education and make materials available to participants as long as the topics covered are listed on the approved curriculum outline in Section 13.

## SECTION 7: CUSTOMER REPORTING

### **7.1 REPORTING & SHARING CUSTOMER DATA WITH THDA**

THDA requires all HBEI agencies to share homeownership education and counseling customer data with THDA by using Fannie Mae's Home Counselor Online (HCO) system or Counselor Max.

Agencies must complete four basic steps in order to provide THDA with required customer data:

1. Register, as an administrator, on Fannie Mae's Home Counselor Online System.
2. Set up shared access with THDA.
3. Set up shared cases with THDA.\*
4. Enter required customer data. (Minimum information fields listed under Section D below.)

#### **A. HCO Registration Process**

The revised Home Counselor Online registration process includes interactive documents, which are now available on efanniema.com. Electronic documents may be accessed at: <https://www.efanniema.com/sf/technology/accountmanage/counselingreg.jsp>

HCO users upload documents from efanniema.com, type in the required information, print, sign, and submit for processing. When registering as HCO users, HBEI UT trainers should enter their "organization" or "agency" name as follows: UT Extension – Montgomery County (or Bradley or Knox etc.).

After agency gets HCO User ID and password, agency should set up shared access and case sharing with THDA.

#### **B. Sharing Access**

- After logging into Home Counselor Online at: [https://hco.efanniema.com/hco/index.jsp?da\\_forward=login](https://hco.efanniema.com/hco/index.jsp?da_forward=login)
- Place your mouse cursor over the word Administration, it's located in the top menu, and then move your mouse cursor to Set Up after the drop down menu appears.
- When the next menu appears place your mouse cursor over Agency Relationships and then left click once.
- Left Click the Establish New Relationship button.
- In the Agency Name textbox type "Tennessee Housing Development Agency". (everything inside the double quotes)
- In the Agency State select "Tennessee".
- In the Agency City textbox type "Nashville". Left Click the Search button.
- In the Agency Search Results, place a dot in the radio button to the left of Tennessee Housing Development Agency and left click the Next button

- In the Establish Agency Relationship, place a check in the checkbox to the right of Shared Access.
- Left Click the Save Relationship button.

### C. Sharing Cases

- In order to share a case, go to the Administration tab at the top right of the home page and scroll down to Share Cases.
- On the next page, search for any number of cases within the agency and share them with another agency.
- Through this function, one or more cases may be shared.\*

**\*Must be an Administrator on HCO set-up to be able to complete this step.**

### D. Minimum Required HBEI Customer Data Collection Fields

1. Case Information
  - Agency
  - Case Number
2. Primary Address
  - Street
  - City
  - State
  - Zip Code
  - County
  - Residency Status
3. Financials
  - Monthly Income (Gross Amount)
4. Client Information
  - First Name
  - Last Name
  - Social Security Number (Worker ID #, or enter 9's in place of SS#)
5. Demographics
  - Ethnicity
  - Client Race - Single Column
  - Client Race - Multiple Column
  - Birth Date (In rare case where not available, make an educated guess)
  - Number of Dependents
  - Household Size
  - Marital Status
  - Gender
  - Female Head of Household
  - Single Head of Household
  - Owned Home In Last 3 Years

## **SECTION 11: PAYMENT FOR HBEI SERVICES FOR THDA CUSTOMERS**

A payment of \$250 will be made to approved HBEI agencies from THDA after they have provided face-to-face homebuyer education for customers that obtain THDA loans. HBEI approved agencies that provide online homeownership education and counseling for customers that obtain THDA loans will receive a payment from THDA for \$150.

The payment is made on a monthly basis **after** the loan has been closed by the lender *and then purchased* by THDA. Lenders should send purchase requests to THDA 3 to 5 days after closing. If a HBEI serviced loan is purchased (funded) during one month, then the HBEI payment will be made to the agency during the following month. However, if a loan is closed at the end of one month and the lender sends the purchase request early the next month the HBEI payment will not arrive until two months after the closing.

No later than the 15<sup>th</sup> of each month, HBEI staff will generate a report that shows the names of the funded loan customers for the previous month. That report also shows the name of the agency that provided the service for the customers. THDA staff sends a notice to each agency that had funded loan customers the month before. THDA requires each agency to review their report, check their files, and confirm that each customer on the report actually was served by their agency. Each agency must mark a confirmation space on the report and return to THDA via fax or email. THDA will not issue payment unless the homeownership education agency has confirmed their HBE service, has reported the funded loan customer in HCO, and is in good standing with the HBEI Program.

The payment will be wired to the agency's account on the last business day of the month by THDA. See Section 13 for a copy of the wire transfer form HBEI agencies use to provide their banking information to THDA.

NOTE: THDA recommends its approved HBEI agencies not charge more than \$25 to THDA loan customers (single or couple) for the required 8 hour pre-purchase class. HBEI agencies also should be willing to serve pre-purchase customers at no cost if the customer can't afford to pay for a class.

## **SECTION 12: THDA HBEI COMPLIANCE REVIEW**

HBEI staff members annually and periodically review customer reporting, website calendar usage, adoption of National Standards, Peer Session attendance and other HBEI Program compliance indicators. Staff will produce a report indicating what compliance areas may be lacking and/or what corrections are necessary. HBEI Agency Compliance reports will be delivered to the HBEI agency's designated contact person and Executive Director. Each report will indicate the final deadline for each compliance area. Failure to do so may result in removal from THDA's list of approved HBEI agencies