

# FAQs for HECM Counselor Roster

---

1. Are instructions for how to apply to be on the HECM Counselor Roster available on hud.gov?

Yes, please go to <http://www.hud.gov/offices/hsg/sfh/hcc/hecm/> you will find detailed instructions for registering to be on the HECM counselor roster.

2. Who can apply to be on the roster?

To be eligible to be on the Roster the counselor must:

- 1) Be employed by a HUD-approved housing counseling agency or affiliate of a HUD-approved intermediary or state housing finance agency
- 2) Have successfully passed a standardized HECM counseling exam administered by HUD or a party selected by HUD, within the last three years. In order to maintain eligibility, a counselor must successfully pass a standardized HECM counseling exam every three years
- 3) Have received training and education related to HECMs within the prior two years. In order to maintain eligibility, a counselor must complete continuing education every two years.
- 4) Have access to and is supported by technology that enables HUD to track the results of the counseling offered to each client
- 5) Not be listed on:
  - i) The General Services Administration's Suspension and Debarment List;
  - ii) HUD's Limited Denial of Participation List; or
  - iii) HUD's Credit Alert Interactive Response System

3. Can I still apply for the roster even if I passed the exam more than three years ago?

Yes, counselors who have taken the exam anytime prior to the effective date of the regulation will not have to retake the exam to apply and be placed on the Roster provided they meet all other eligibility requirements.

4. After I have gotten on the Roster, why do I need a FHA Connection ID?

Form HUD-92902, Certificate of HECM Counseling is generated from FHA Connection. You will have to access FHA Connection to input client information to generate the HECM Counseling Certificate.

5. Do I have to use the HECM Counseling Certificate that is generated in FHA Connection?

Yes, as of the effective date of the HECM Roster final rule, all HECM certificates must be generated in FHA Connection.

6. Will lenders continue to accept HECM Counseling Certificates that were not FHA Connection generated but were issued prior to the effective date of the HECM Roster final rule?

Yes, lenders must accept non-FHA Connection generated HECM Counseling Certificates that are dated prior to the effective date of the HECM Roster final rule until the expiration date 180 days from the date of the certificate.

7. The HECM Counseling Certificates generated in FHA Connection do not have the counseling agency's tax identification number (TIN) or employer identification number (EIN). Will this be a problem for the lenders?

No, each certificate will have a unique alpha-numeric ID which the lender will use to look the client up in FHA Connection. As of the effective date of the HECM Roster final rule, the TIN and EIN are no longer required on the HECM Counseling Certificate.

8. Why do I get an error message telling me that there are no exam records on file when I try to register for the Roster? I took and passed the HECM exam.

If you have changed your name since you registered for the exam, your exam records only reflect the name you registered with to take the exam. In this case, please make a screen shot of your Roster application and send it along with your current name to [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov) noting the Subject as 'HECM Exam Error.'

Also, if you have not changed your name since you took the test, you may be registering your name slightly differently on the Roster than you did for the HECM exam, e.g. using a middle initial, using your middle name, etc. Reapply for the Roster inputting your name exactly as you registered for the HECM exam.

9. Where do I find information about the HECM exam?

For information about how to register to take the HECM exam go to the website [www.hecexam.org](http://www.hecexam.org).

10. Is there a cut-off date for registering for the Roster?

No, the Roster is on-going and counselors may register on it at any time.

11. Once I am on the Roster, are there requirements for staying on it?

Yes. All counselors on the roster must receive HECM training within two years of getting on the roster and every two years thereafter. The counselor must submit a certificate of training as proof. All counselors must pass the HECM exam every three years from the date they get on the roster and every three years thereafter.

12. Can my name be removed from the Roster for any reason?

Yes. HUD can remove you from the Roster for cause. You can also be removed if you have failed submit proof of training within the two year timeframe or if you have not taken the HECM exam within the three year timeframe.

13. What are the causes for removal?

HUD can remove counselors from the Roster for cause such as failure to:

- comply with education and training requirements;
- respond to HUD inquiries within a reasonable time; comply with applicable fair housing and civil rights requirements;
- comply with applicable statutes and regulations;
- provide information to clients on options other than HECMs, the financial implications of a HECM loan, the tax consequences and any other information required by HUD or requested by the applicant;
- to maintain registration or certification requirements of a state or local authority;

- unsatisfactory performance in providing counseling to HECM loan applicants; or
- by providing misrepresentations or fraudulent statements; promotion, representation or recommendation of any specific lender; or
- any other reason HUD determines to be so serious as to justify an administrative sanction.

**14. How do I know if I am removed for cause?**

HUD will provide the HECM counselor with a written notice of the proposed removal with the reasons for and the duration of the removal.

**15. Is there an appeal process if I am removed from the Roster for cause?**

The counselor has 30 days from the date the notice of proposed removal is received to submit a written appeal and request for a conference. HUD will review the appeal and respond within 30 days after receiving the appeal or within 30 days after the requested conference was held. If the counselor does not submit a timely written response, the removal will be effective 31 days after the date of HUD's initial removal notice. If a written response is submitted and the removal decision is affirmed or modified, the removal will be effective on the date of HUD's notice affirming or modifying the initial removal decision.

**16. How long can I be removed from the Roster?**

The maximum time period for removal from the Roster is twelve months. A counselor who has been removed must apply for reinstatement on the Roster after the period of removal has expired. HUD may require the counselor retake and pass the HECM exam for reinstatement when the reason for removal was particularly egregious. Typically, a counselor will not have to retake and pass the exam to be reinstated on the Roster.

**17. Will the Roster be available to the public?**

Yes. The Roster will be available to the public on [www.hud.gov](http://www.hud.gov). Potential HECM clients will be able to look up counseling agencies and counselors using a variety of search criteria.

**18. What is the role of the Application Coordinator?**

The Application Coordinator's role is to validate that the counselor actually works for the agency that he/she input in his/her Roster application. It is a way to check that the counselor meets the requirement of being employed by a HUD-approved counseling agency.

The Application Coordinator will also remove the counselor from the Roster if and when the counselor is no longer employed at the agency.

**19. Can a counselor work part-time for more than one HUD-approved agency? If so, do I have to register on the roster for each agency?**

Yes, a counselor can work for more than one agency. The counselor would complete one application using one of the agency's HCS ID numbers. The counselor would notify the Application Coordinator for each agency that employs him/her. The Application Coordinator for each agency will validate the counselor's employment with their agency.

**20. How do I print out the roster application so I can sign, date and scan it?**

Once you have entered your information in the HECM application you will hit the Send button at the bottom of the screen. The next screen that appears has all the information you input in each data field. At the top of the form there is a link that says 'Generate Application Form'. Hitting this link will generate the application form HUD-92904 that you will sign, date and scan to upload with your application.

**21. Should I submit proof that I passed the HECM exam?**

No, HUD receives this information directly from the testing company.

**22. Can I just fax in my application for the Roster?**

No, all applications must be submitted through FHA Connection at <https://entp.hud.gov/idapp/html/f17hecm-rost-application.cfm>

**23. What if I am both a HECM counselor and an Application Coordinator for my agency? How do I register?**

An Application Coordinator can also be a HECM Roster counselor. In this case the counselor would apply to the Roster first and then apply to the FHA Connection for a user ID as an Application Coordinator and counselor.

**24. How do I register for the roster if I am the CEO, an Application Coordinator and a counselor?**

Your agency will have to designate a second Application Coordinator who will validate your employment with the agency so that you can appear on the roster.