

VIA ELECTRONIC MAIL

December 12, 2013

Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th St, SW, Room 10276
Washington, DC 20410

**RE: Request for Comment: Housing Counseling Program: New Certification
Requirements (Docket No. FR 5339-P-01)**

To HUD:

The National Foundation for Credit Counseling (“NFCC”) provides these comments in response to the Department of Housing and Urban Development’s (“HUD’s”) request for comments regarding the implementation of a new housing counselor certification program. The NFCC commends HUD for undertaking this important effort to ensure that all Americans have access to quality housing counseling services from certified counselors.

While we firmly believe that HUD’s new housing counselor certification program will ensure that millions of Americans have access to a consistently high-quality housing counseling experience, we are concerned that the structure of the program could, due to resource constraints at counseling organizations, potentially displace long-standing, high quality certification programs such as the NFCC’s and others in the sector. Accordingly, this letter will focus on how HUD can preserve the value that organizations such as the NFCC provide through their certification programs while also ensuring that all housing counselors in the industry are competent to provide quality service. We believe that HUD can do so by (1) integrating existing third-party counselor exams into the new certification program; and (2) structuring the parameters of the to-be-established training program so as to allow aspiring counselors to choose from a number of industry-provided training programs.

The NFCC’s housing counseling training materials and Counselor Certification Program are highly respected and have become one of the nation’s leading training programs. We began offering counselor certification for housing counseling in 1994 and, since then, we have certified thousands of counselors, including issuing 284 new certifications in the last year alone. The NFCC’s member agencies represent one of the nation’s largest networks of certified housing counselors, with more than 1,500 NFCC-Certified Housing Counselors currently providing quality service to hundreds of thousands of Americans each year. Taken together with the NFCC’s Counselor Certification program, which all NFCC Certified Housing Counselors must

complete and which has been in development since 1974, the NFCC's Certification Program ensures that our agencies' clients receive the highest possible quality of service.

We also have a number of questions about the details of the proposed certification program, and the NFCC will address those questions in a separate comment letter to be filed jointly with other housing counseling intermediaries.

I. Integrate existing third-party counselor-certification exams into HUD's new certification.

The NFCC urges HUD to integrate existing testing systems such as the NFCC's into the new housing counselor certification program. All NFCC counselors must complete the NFCC's comprehensive, quality training program, and all counselors are strongly encouraged to complete a housing counseling-specific exam and obtain NFCC certification. NFCC counselors must obtain a "Certified Consumer Credit Counselor" certification within one year (12 months) of their date of hire or promotion to provide counseling services. Certification requirements include passing tests on the first six books in the Counselor Certification series, which cover a comprehensive set of financial counseling topics. In order to become a NFCC-Certified Housing Counselor, a counselor must study and pass an examination on Book 7 entitled "Housing." The Book 7 exam is specifically designed to test a counselor's knowledge of housing-related information and issues. Information covered in Book 7 includes basic skills for housing counseling, rental housing counseling, purchasing a home, counseling clients with mortgage delinquency default, counseling for reverse mortgages, and other housing issues. As we cover in further detail below, the NFCC believes that the topics and competencies covered by its certification program include all of the areas in which HUD must certify counselors' knowledge under the Dodd-Frank Act. However, the NFCC Counselor Certification Program may be modified to the extent necessary to ensure that all aspects of the newly established framework are met.

While the NFCC understands that existing certifications cannot by themselves qualify counselors for certification under HUD's new certification program, we strongly believe that HUD should permit third-party exams to demonstrate that individual counselors are competent to provide housing counseling services in accordance with the criteria HUD will establish. The statutory framework permits HUD to recognize such third-party exams, and doing so would recognize and preserve the existing quality service that organizations such as the NFCC provide. Moreover, the integration and preservation of existing counselor certification programs would allow consumers to identify counselors and networks that may provide a more in-depth, comprehensive level of service than others, as established by the continued competition on quality amongst third-party non-profit certification organizations.

The Dodd-Frank Act does not require HUD's new exam to be the only exam by which housing counselors may demonstrate their competence. Subsection (e)(2) of the counseling section of the Act calls for HUD to adopt "standards and procedures for testing and certifying counselors" that "by written examination" demonstrate counselors' "competence to provide counseling" in each of six areas. 12 U.S.C. § 1701x(e)(2). In turn, HUD must contract with "an appropriate entity . .

. . . to carry out a program . . . to train individuals to provide homeownership and rental counseling,” and administer HUD’s examination. *Id.* § 1701x(f)(1). That contracted entity will “administer the examination . . . and, on behalf of the Secretary, certify individuals successfully completing the examination. The Secretary, in consultation with such entity, shall establish the content and format of the examination.” *Id.* § 1701x(f)(4). The statute thus requires HUD to create a written examination and require that counselors who successfully complete that examination receive HUD certification.

Nothing in this statutory framework restricts HUD’s ability to certify counselors that have completed any *other* exams, as long as the other exams demonstrate counselors’ competence across the mandatory six topic areas. For example, HUD could certify housing counselors who successfully complete the HUD-drafted test, the NFCC’s test, NeighborWorks America’s test, or any other acceptable examination. The contracted entity then would require proof of successful completion of any of these written examinations in order to certify the counselor.

HUD articulated in the recent “Frequently Asked Questions on the Housing Counselor Certification Proposed Rule” document that HUD has concluded it may not “grandfather” existing counselors into the new certification program, and that all housing counselors must pass an examination to be HUD certified. The NFCC agrees with this interpretation of the Dodd-Frank Act. However, HUD has the regulatory discretion to allow third-party exams to demonstrate counselors’ competence to provide counseling in each of the six identified areas. This is distinct from the “grandfathering” HUD identified in its FAQ. HUD would not be certifying counselors based on those counselors already obtaining certification from another entity. Instead, HUD would certify counselors based on those counselors providing proof of completion of an examination that demonstrates their competence to provide housing counseling.

The impact of implementing this certification scheme is significant. First, this system would ensure that all housing counselors have a solid understanding of the core issues in each of the six identified areas, while enabling counselors to choose to take a third-party examination that may demonstrate a more in-depth understanding of a broader array of topics. Second, it may save *thousands* of counselors across the country significant additional testing and training costs in preparing for a new exam. The NFCC alone currently has more than 1,500 Certified Housing Counselors in its network who have completed the NFCC’s housing counseling examination. Third, incorporating multiple tests into the certification program would maintain competition among certification organizations, allowing them to continue to compete on the quality of their training. There is significant risk that, if HUD were to require all counselors to take a HUD-specific test, non-profit training and certifying organizations may be unable to continue to provide their rigorous training and certification programs. Fourth, consumers would be able to identify HUD-certified counselors, while also continuing to be able to identify those counselors who have undertaken the additional steps to obtain a more robust set of training. By integrating both the new HUD exam and existing third-party exams into the new HUD certification system, HUD can ensure that the substantial value and quality that trusted housing counseling institutions have developed are maintained while also ensuring that all housing counselors have the ability to cross-identify housing issues outside of their specialization.

II. Training materials and programs under the new Rule

The Dodd-Frank Act requires that HUD contract with an entity that will prepare individuals for the new exam so they can become HUD-certified housing counselors. The Act does not require individuals to obtain training through the designated entity, however. The NFCC urges HUD to make this training available at the lowest possible cost, leveraging web-based platforms as well as in-person training. While we recognize that HUD's designated training entity will need to charge a fee to cover the cost of providing the training, the NFCC urges HUD to make its exam available for free. By charging a fee to individuals who choose to participate in HUD's optional training program and allowing individuals to take the exam free of charge, HUD can ensure that third party organizations can compete to offer high-value training for HUD's exam. In this way, aspiring housing counselors will have a number of options to consider when preparing to take the exam.

Further, allowing prospective counselors to obtain the training of their choice while taking HUD's certification exam at no cost will ensure that third-party counselor certification programs will continue to compete to offer the most robust, substantive certification programs possible, without those certification programs having to compete with HUD on the price of the examination. For example, individuals who are training for NFCC Housing Counselor Certification must pay the NFCC a fee to cover the cost of NFCC training materials, but are able to take the NFCC certification exam for free whenever they like. If HUD were to offer its exam for free and not require prospective counselors to obtain HUD-provided training, aspiring counselors could continue to obtain NFCC training, which could prepare them for both the HUD exam and the NFCC exam, if both were required. This type of flexibility ensures continued competition and innovation in the sector and preserves the considerable value and quality that entities such as the NFCC have established over many decades of providing quality service to millions of consumers.

About the NFCC

The NFCC's vision is "to create a national culture of financial responsibility." Its core mission is to support and promote a national agenda for financially responsible behavior and to build capacity for its members to deliver the highest quality financial education and counseling services. The NFCC accomplishes this mission through investments in outreach campaigns; developing educational and counseling training programs, materials, standards, and best practices; advocating on behalf of consumers for better credit solutions; and obtaining federal and private grant funding to support financial counseling.

The NFCC's member agencies make up the nation's largest and longest-serving network of non-profit credit and financial education counseling agencies. Our 80-plus member agencies deliver services from over 650 offices, with more than 2,000 Certified Financial Professionals serving consumers in communities across the country. NFCC member agencies are often known as Consumer Credit Counseling Services, and all are 501(c)(3), not-for-profit organizations. In the past two years, NFCC member agencies have provided counseling, education, and related services to more than 5 million consumers in an effort to help them manage their finances and debt.

NFCC-certified counselors take a holistic view of clients' finances and assist them to manage their finances responsibly. Our members' counselors work with each client – without regard for the client's financial condition or ability to pay – to bring their finances into focus, construct a budget and action plan that includes tackling their debt, and provide ongoing assistance as needed to reach their financial goals.

NFCC Certified Consumer Credit Counselor program:

The National Foundation for Credit Counseling (NFCC) requires that all counselors employed by our affiliated members undertake the professional preparation to become “Certified Consumer Credit Counselors” (CCCC). Counselors must obtain counselor certification within one year (12 months) of their date of hire or promotion to provide counseling services. Certification requirements include passing tests on the first six books in the Counselor Certification series.

To become a CCCC requires an understanding of the theories, principles, issues, counseling techniques, and forms that are applicable to credit and financial counseling. The required subjects (Books 1-6) are: (1) Basic Counseling Principles, (2) Budgeting, (3) Credit, (4) Collections & Debt Management, (5) Consumer Rights & Responsibilities, and (6) Bankruptcy. Each book includes objectives, key concepts, and review questions. Each section of the counselor certification examination consists of a variety of multiple-choice questions.

Once certification is obtained, counselors are expected to maintain and aspire to the highest possible level of professional development. Counselors are initially certified for two years and must submit annual documentation of continuing development. A certified counselor must accumulate a minimum of 20 Professional Development Units (PDUs) every two years to maintain certification. Professional development and continuing education areas that fulfill the PDUs requirement include such activities as direct counseling, association memberships, attendance at workshops and conferences, teaching, as well as publishing and research activities.

The NFCC Counselor Certification Task Force, comprised of NFCC staff and NFCC member agency professionals, oversees the counselor certification program. Policy recommendations are presented to the NFCC Operating Committee and compliance issues are referred to the NFCC's Monitoring and Compliance Subcommittee. An independent third-party contractor, a professional educational services company, maintains and updates the on-line Counselor Certification program.

Housing Counseling Certification

In addition to the 6-book Counselor Certification series, the NFCC offers a Housing Counselor Certification to member agency counselors. In order to become a NFCC Certified Housing Counselor, a counselor must study and pass an examination on Book 7 entitled “Housing.” The Book 7 test is specifically designed to test a counselor's knowledge of housing-related information and issues. Information covered in Book 7 includes basic skills for housing counseling, rental housing counseling, purchasing a home, counseling clients with mortgage delinquency default, counseling for reverse mortgages, and other housing issues.

As with the core NFCC Counselor Certification, the Housing Counseling Certification is designed for online, independent self-study using a comprehensive workbook and optional self-test. Testing is conducted online and results are available immediately. Once certified, counselors must participate in continuing education classes and provide regular counseling in order to retain certification.

The NFCC believes that the topic areas covered by its Consumer Credit Counselor Certification and its Certified Housing Counselor program align with the six major areas of housing counseling as described by HUD in the request for comment. Specifically, those areas are: (1) financial management; (2) property maintenance; (3) responsibilities of homeownership and tenancy; (4) fair housing laws and requirements; (5) housing affordability; and (6) avoidance of, and responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default.

The cost for each of the seven training modules is \$70, and the exam for each module is available without an additional fee. Accordingly, the total cost to certify an individual counselor under the NFCC Certification Program is \$490.

Conclusion

Thank you for the opportunity to submit comments on HUD's proposed counselor certification program. HUD's efforts to ensure that all housing counselors provide consumers with a high quality service are an important step forward for the housing counseling community. We urge HUD to consider ways to integrate this new counselor certification program with existing industry certification programs such as NFCC's Certified Housing Counselor program. Doing so will allow organizations such as the NFCC to continue to provide consumers with the industry-leading quality of service that we have for the past several decades. We also hope that HUD will allow aspiring counselors to obtain training from the provider of their choice, and that any prospective counselor be able to take HUD's certification exam free of charge. We look forward to working closely with HUD as it develops this important new program.

Sincerely,

Susan C. Keating
President and CEO
National Foundation for Credit Counseling

Consumer Credit Counseling Service of Alabama, Inc.
(Montgomery, AL)

Consumer Credit Counseling Service of Mobile-Family Counseling Center of Mobile, Inc.
(Jackson, Mobile, Montrose, AL)

Gateway Financial Freedom
(Birmingham, AL)

Family Service Agency – CCCS
(Conway, Fort Smith, North Little Rock, Russellville, AR)
(Southaven, MS)
(Bartlett, Memphis, TN)

Credit Counseling of Arkansas, Inc.
(Bentonville, Fayetteville, Fort Smith, Siloam Springs, Springdale, AR)

Springboard Nonprofit Consumer Credit Management, Inc.
(Riverside, El Cajon, Hemet, Ladera Ranch, Long Beach, CA)
(Mesa, AZ)
(Orlando, FL)
(Burlington, MA)
(Albuquerque, NM)
(Las Vegas, NV)
(Columbia, SC)
(San Antonio, TX)

Consumer Credit Counseling Service of Kern & Tulare Counties
(Bakersfield, Visalia, CA)

CCCS of San Francisco
(San Francisco, Santa Rosa, CA)

Consumer Credit Counseling of Orange County, Inc.
Santa Ana, Anaheim, Brea, Fountain Valley, Laguna Hills
(Lake Forest, CA)

SurePath Financial Solutions
(Camarillo, San Jose, Watsonville, CA)

Consumer Credit Counseling Service of the North Coast
(Arcata, Crescent City, Ukiah, Willits, CA)

Consumer Credit Counseling Service of West Florida, Inc.
(Pensacola, Crestview, Defuniak Springs, Fort Walton Beach
Panama City, FL)

Family Foundations
(Jacksonville, Jacksonville Beach, FL)

Consumer Debt Counselors
(Winter Park, Orlando, Port Charlotte, FL)
(Wheaton, IL)
(Baton Rouge, Lafayette, Metairie, LA)
(Merrick, NY)

InCharge Debt Solutions
(Orlando, FL)

Consumer Credit Counseling of Middle Georgia, Inc.
(Macon, Warner Robbins, GA)

Consumer Credit Counseling Service of Central Savannah River Area
(Augusta, GA)

Consumer Credit Counseling Service of the Savannah Area, Inc.
(Savannah, Brunswick, Hinesville, Rincon, Statesboro)
(Beaufort, SC)

Consumer Credit Counseling Service of Greater Atlanta, Inc. dba CredAbility
(Atlanta, Decatur, Douglasville, Duluth, Gainesville, Marietta, Rome,
Stockbridge, GA)
(Boca Raton, Deltona, Fort Myers, New Port Richey, Orlando, Port St. Lucie,
Sarasota, Stuart, Tampa, FL)
(Johnson City, Knoxville, Maryville, TN)

CredAbility dba CCCS of Central Mississippi
(Jackson, MS)

Consumer Credit Counseling Service of Upstate South Carolina
(Greenville, SC)

Consumer Credit Counseling of West Georgia/East Alabama
(Columbus, LaGrange, GA)

Consumer Credit Counseling Service of Southwest Georgia
(Albany, Valdosta, GA)

JCVision and Associates, Inc.
(Hinesville, GA)

Consumer Credit Counseling Service of Hawaii
(Honolulu, Hilo, Wailuku, HI)

Family Counseling Service/Consumer Credit Counseling Service of Aurora
(Aurora, IL)

Chestnut Credit Counseling Services
(Belleville, Bloomington, Chicago, Crete, Decatur, Frankfort
Granite City, Joliet, Kankakee, Maryville, Morris
Orland Park, Peoria, Wheaton, IL)

Consumer Credit Counseling Service of Elgin (A Division of Family
Service Association/Greater Elgin Area)
Elgin, Streamwood, IL)

Consumer Credit Counseling Service of McHenry County, Inc.
(Woodstock)

Consumer Credit Counseling Service of Lake County

(Waukegan, IL)

FinancialHope Counseling and Education
(Fort Wayne, Auburn, Huntington, Warsaw, IN)

Consumer Credit Counseling Service of Northwest Indiana
(Merrillville, Chesterton, Hammond, La Porte, Michigan City,
Portage, Rensselaer, Valparaiso, IN)

Horizons Consumer Credit Counseling Service
(Cedar Rapids, Coralville, IA)

Consumer Credit Counseling Service of Northeastern Iowa
(Waterloo, Ames, Marshalltown, Mason City)

Consumer Credit Counseling Service of the Greater Dubuque Area
(Dubuque, IA)

Mid-Iowa Credit Counseling
(Des Moines, IA)

Consumer Credit Counseling Service, Inc.
(Salina, Wichita, KS)

Consumer Credit Counseling Service of Topeka (A Division of Housing and
Credit Counseling, Inc.)
(Topeka, Lawrence, Manhattan, KS)

Consumer Credit Counseling Service of Maryland & Delaware
(Baltimore, Bel Air, Easton, Essex, Owings Mills, Parkville, Salisbury, MD)
(Dover, Wilmington, DE)

GreenPath, Inc.
(Farmington Hills, Ann Arbor, Battle Creek, Detroit, Flint, Grand Rapids,
Jackson, Lansing, Marquette, Monroe, Muskegon, Port Huron,
Portage, Roseville, Saginaw, Southfield, Southgate, Traverse City,
Troy, Utica, Westland, MI)
(Tempe, AZ)
(Fort Collins, Greeley, Longmont, CO)
(Brandon, Gainesville, Ocala, Tampa, FL)
(Chicago, Moline, IL)
(Elkhart, Mishawaka, IN)
(Concord, Dover, Manchester, NH)
(New York, Brooklyn, Garden City, Hauppauge, Kew Gardens,
White Plains, NY)
(Brownville, Corpus Christi, Denton, Harlingen, McAllen,
McKinney, Plano, TX)
(South Burlington, VT)
(Greenville, Madison, WI)
(Cheyenne, WY)

Consumer Credit Counseling of Duluth (A Program of Lutheran Social Services of Minnesota)
(Duluth, Badger, Eveleth, Mankato, Willmar, MN)

Lutheran Social Services Financial Counseling Service
(Brainerd, Duluth, Minneapolis, St. Paul, St. Louis, Park, MN)
(East Superior, WI)

FamilyMeans Consumer Credit Counseling Service
(Stillwater, Minneapolis, Minnetonka, Rochester, St. Paul, MN)
(Eau Claire, Hudson, WI)

Consumer Credit Counseling Service of Springfield
(Springfield, Joplin, West Plains, MO)
(Mountain Home, AR)

Rural Dynamics, Inc.
(Great Falls, Billings, Bozeman, Butte, Helena, Kalispell, Missoula, MT)
(Lewiston, ID)

Consumer Credit Counseling Service of Nebraska, Inc.
(Omaha, Grand Island, Lincoln, Norfolk, North Platte, Scottsbluff, NE)
(Council Bluffs, IA)

Consumer Credit Counseling Service
(Des Moines, IA)

Financial Guidance Center
(Las Vegas, Nellis Air Force Base)

Consumer Credit Affiliates
(Carson City, NV)

Consumer Credit Counseling Service of Utah
(St. George, UT)

Consumer Credit Counseling Service of Northern Nevada
(Reno, NV)

Consumer Credit Counseling Service of New Jersey
(Cedar Knolls, Somerville, NJ)

Consumer Credit Counseling of Central New Jersey (A Division of Family Guidance Center)
(Hamilton, NJ)

Novadebt, A Garden State Consumer Credit Counseling Service
(Freehold, NJ)
(Chico, San Diego, CA)
(Champaign, Peoria, IL)
(Owing Mills, MD)
(Farmington, MI)
(Roseville, MN)
(Raleigh, NC)
(Henderson, NV)
(Dallas, TX)

Consumer Credit Counseling Service of Buffalo, Inc.
(West Seneca, Buffalo, NY)

Consumer Credit Counseling Service of Rochester, Inc.
(Rochester, NY)

CCCS of Western North Carolina, Inc. dba
(OnTrack Financial Education & Counseling)
(Asheville, Waynesville, Boone, Brevard, Franklin, Hendersonville,
Marion, Sylva, NC)

Consumer Credit Counseling Service of Fayetteville
(Fayetteville, New Burn, Havelock, Jacksonville, Kinston, Sanford,
Smithfield, Southern Pines, Wilmington)

Consumer Credit Counseling Service of Goldsboro
(Goldsboro, NC)

Consumer Credit Counseling Service of Lumberton
(Lumberton, NC)

Financial Solutions of the Carolinas
(Gastonia, Statesville, NC)

Consumer Credit Counseling Service of Greater Greensboro
(A Division of Family Service of the Piedmont, Inc.)
(Greensboro, Asheboro, Burlington, High Point, Reidsville, NC)

Consumer Credit Counseling Service of Caswell County
(Yanceyville, NC)

Consumer Credit Counseling Service of Jamestown
(Jamestown, NC)

Consumer Credit Counseling Service of Lexington
(Lexington, NC)

Consumer Credit Counseling Service of Catawba Valley
(Hickory, Morganton, NC)

Consumer Credit Counseling Service (A Division of Triangle
Family Services)
(Raleigh, NC)

Consumer Credit Counseling Service of Durham
(Durham, NC)

Consumer Credit Counseling Service of Forsyth County Inc.
(Winston-Salem, NC)

Consumer Credit Counseling Service of Davie County
(Mocksville, NC)

Financial Pathways
(Elkin, Mount Airy, NC)

Senior Financial Care, A Program of Financial Pathways of the Piedmont
(Mocksville, NC)

Consumer Credit Counseling Service of the Village Family Service Center
(Fargo, Bismarck, Grand Forks, Jamestown, Minot, ND)
(Alexandria, Brainerd, Detroit Lakes, Fergus Falls, Moorhead,
St. Cloud, MN)

Village Financial Counseling Service
(Crystal, MN)

Consumer Credit Counseling Service of Central Ohio dba Apprisen
(Columbus, Mansfield, OH)
(Indianapolis, Evansville, OH)
(Florence, KY)
(Clackamas, OR)

Consumer Credit Counseling Service of South Florida, Inc.
(Davie, Miami, Pinecrest, FL)

Consumer Credit Counseling of Greater Kansas City & Mid Missouri
(Overland Park, KS)
(Independence, MO)

Consumer Credit Counseling of Central Kentucky
(Frankfort, Lexington, KY)

Consumer Credit Counseling Service of Louisville

(Elizabethtown, Louisville, KY)
Consumer Credit Counseling Service of Greater Cincinnati
(Cincinnati, OH)

Consumer Credit Counseling Service of Northeastern Ohio
(Rocky River, Akron, Beachwood, Boardman, Canton, Cleveland, Parma, Warren, OH)

Consumer Credit Counseling Service of Mid-Willamette Valley, Inc.
(Salem, OR)

Consumer Credit Counseling Service of Middle Tennessee, Inc.
(Murfreesboro, Nashville, TN)

Consumer Credit Counseling Service of Olympic-South Sound
(Olympia, University Place, WA)

Consumer Credit Counseling Service of the Tri-Cities
(Kennewick, WA)

Consumer Credit Counseling Service of Yakima Valley
(Yakima, WA)

Consumer Credit Counseling Service of Southern West Virginia
(Bluefield, Cross Lanes, WV)

Consumer Credit Counseling Service of the Miami Valley
(Sponsored by Graceworks Lutheran Services)
(Dayton, Sidney, Springfield, OH)
(Richmond, IN)

LifeSpan Credit Counseling, Consumer Credit Counseling Service
(Hamilton, Mason, Middletown, OH)

SmartMoney Community Services
(Cincinnati, OH)

Consumer Credit Counseling Service of Family & Community
Services, Inc.
(Ravenna, Chagrin Falls, East Liverpool, East Palestine, New Philadelphia,
Salem, Wooster, OH)

Consumer Credit Counseling Service of Columbiana County
(Lisbon, OH)

Family and Community Services, Inc. Credit Counseling
(Akron, Medina, OH)

Consumer Credit Counseling Service of Central Oklahoma, Inc.
(Bethany, Enid, Oklahoma City, Stillwater, Tinker Air Force Base, OK)

Consumer Credit Counseling Service of Oklahoma, Inc.

(Tulsa, Broken Arrow, Sapulpa, OK)

Consumer Credit Counseling Service of Southern Oregon, Inc.
(Medford, OR)

Douglas Consumer Credit Counseling Service
(Roseburg, OR)

Consumer Credit Counseling Service of Grants Pass
(Grants Pass, OR)

Advantage Credit Counseling Service, Inc.
(Pittsburgh, Altoona, Butler, Greensburg)

Consumer Credit Counseling Service of Greater Harrisburg
(Harrisburg, PA)

Consumer Credit Counseling Service of Northwestern Pennsylvania
(Erie, PA)

Consumer Credit Counseling Service of York
(York, PA)

Consumer Credit Counseling Service of Northeastern Pennsylvania, Inc.
(Pittston, Bloomsburg, Hazleton, Milford, State College, Stroudsburg,
Sunbury, Williamsport, PA)

Consumer Credit Counseling Service of Central Pennsylvania
(A Division of Tabor Community Services, Inc.)
(Lancaster, PA)

Family Service Consumer Credit Counseling Service
(North Charleston, SC)

Rushmore Consumer Credit Counseling Resource Center dba
Consumer Credit Counseling of the Black Hills
(Rapid City, Spearfish, Pierre, SD)

Consumer Credit Counseling Service of Lutheran Social Services of South Dakota
(Sioux Falls, Aberdeen, Brookings, Huron, Mitchell, North Sioux City,
Watertown, Yankton, SD)

Partnership for Families, Children and Adults, Inc.
Consumer Credit Counseling Division
(Chattanooga, Cleveland, TN)
(Dalton, GA)

Consumer Credit Counseling Service of Tennessee River Valley
(Huntsville, AL)

Consumer Credit Counseling Service of Greater Dallas, Inc.

(Dallas, Amarillo, Arlington, Irving, Longview, Tyler, Wichita Falls, TX)
(Ardmore, OK)

Consumer Credit Counseling Service of Southern Colorado, Inc.
(Colorado Springs, CO)

Consumer Credit Counseling Service of Austin
(Austin, TX)

Consumer Credit Counseling Service of the YWCA/
Paso Del Norte Region
(El Paso, El Paso [East], El Paso [Lower Valley], El Paso [Northeast], El Paso [West]
Alamogordo, NM)

YWCA Credit Counseling and Homeownership Center
(Las Cruces, NM)

Consumer Credit Counseling Service of Greater San Antonio, Inc.
(San Antonio, TX)

Consumer Credit Counseling Service of Hampton Roads
(A Program of Center for Child & Family Services, Inc.)
(Hampton, Newport News, Williamsburg, VA)

ClearPoint Financial Solutions, Inc. dba ClearPoint Credit Counseling
Solutions
(Richmond, Chesapeake, Fredericksburg, Hampton, Midlothian, VA)
(Seattle, WA)
(San Diego, Santa Ana, Granada Hills, Commerce, Fresno, Lakewood, Sacramento,
San Bernardino, Stockton, Glendale, CA)
(Miami, FL)
(Marion, O'Fallon, IL)
(Lanham, MD)
(St. Charles, St. Louis, MO)
(Raleigh, Charlotte, Greensboro, NC)
(Syracuse, Albany, Binghamton, Rochester, Watertown, Yorkville, NY)
(Beaverton, Portland, OR)
(Clarksville, Memphis, TN)
(Austin, San Antonio, TX)

Williamsburg-Bayland Federal Credit Union
(Williamsburg, VA)

American Financial Solutions (A Division of North Seattle Community College Foundation)
(Seattle, Bremerton, WA)

Consumer Credit Counseling Service of Huntington, A Division of Goodwill Industries
(Huntington, Milton, WV)
(Ashland, KY)

Consumer Credit Counseling Service of the Mid-Ohio Valley
(Parkersburg, Elizabeth, Harrisville, Pt. Pleasant, Ravenswood,
St. Marys, Sistersville, Spencer, WV)
(Athens, OH)

Consumer Credit Counseling Service of Sheboygan (A Division of
Family Service Association)
(Sheboygan, Fond Du Lac, WI)

Consumer Credit Counseling of La Crosse
(La Crosse, WI)

Consumer Credit Counseling of West Bend
(West Bend, WI)

Consumer Credit Counseling Service of Northeastern Wisconsin (FISC-A Program
Of Goodwill Industries)
(Menasha, Green Bay, Oshkosh, Sturgeon Bay, Waupaca, WI)

Consumer Credit Counseling of Greater Milwaukee
(Milwaukee, East Troy, Oak Creek, Waukesha, Wauwatosa, Whitefish Bay, WI)

Consumer Credit Counseling of Beloit/Janesville
(Beloit, Janesville, WI)

Catholic Charities Credit Counseling
(La Crosse, Eau Claire, Prairie Du Chien, Wausau, WI)

Consumer Credit Counseling Services of Puerto Rico, Inc.
(Arecibo, Bayamon, Caguas, Carolina, Mayaguez, Ponce, Santurce, PR)

CCCS of Greater Fort Worth, Inc.
(Abilene, Fort Worth/North, Fort Worth/West, Grapevine, Killeen, Lubbock, Mansfield
(Odessa, San Angelo, TX)

Consumer Credit Counseling Service of Lehigh Valley
(Easton, Pottstown, PA)

Consumer Credit Counseling Service of the Gulf Coast Area
(Bryan, Houston, Houston [East])

Consumer Credit Counseling of North Central West Virginia (Criss-Cross, Inc.)
(Clarksburg, Morgantown, WV)