



# HUD Counseling's Forgotten Population:

## The Military-Connected Community

Modernizing Section 106 to Serve Servicemembers, Veterans, and Surviving Spouses

### 2026 Report

Published by the Veterans Association of Real Estate Professionals (VAREP)  
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# COVER & IMPRINT

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For policy inquiries: [nlc@varep.org](mailto:nlc@varep.org)

# CREDITS & METHODOLOGY

## Authors & Contributors

Prepared under the direction of the Office of the Founder & National President, Veterans Association of Real Estate Professionals (VAREP) DBA VHFA.

## Data & Research Sources

This report synthesizes publicly available federal oversight, policy, and research, including:

- HUD Section 106 statutory authority and implementing regulations governing the Housing Counseling Program
- HUD Housing Counseling Program handbooks, operating guidance, and performance frameworks
- HUD-9902 reporting structure and national housing counseling system requirements
- Congressional Research Service (CRS) reports on housing counseling, homelessness prevention, and veteran reintegration
- U.S. Government Accountability Office (GAO) findings on federal program design, implementation gaps, and population-level outcomes
- U.S. Department of Defense and Department of Veterans Affairs research on military transition, housing instability, and lifecycle risk
- Academic and federal research on veteran housing outcomes, foreclosure pathways, and post-service stability
- Legislative history and policy frameworks related to Section 106 modernization and military-connected inclusion

## METHODOLOGY NOTE

This report applies a systems lens to evaluate HUD's Housing Counseling Program as federal reintegration infrastructure for military-connected households. Rather than assessing individual client behavior or agency performance, the analysis examines institutional design—how eligibility, delivery, training, and reporting are structured, and which populations the system is architected to recognize.

The report evaluates:

- Whether HUD's Section 106 framework is designed to identify and serve servicemembers, veterans, and surviving spouses as a distinct population
- How the absence of a defined military track affects access, continuity, and outcomes
- How FHA's counseling architecture demonstrates a proven federal model for population-aware delivery
- Whether existing HUD authority can modernize delivery for military-connected households without creating new bureaucracy

The objective is to document the gap between statutory intent and operational reality—and to demonstrate why servicemembers, veterans, and surviving spouses experience preventable instability in a system not designed to recognize military lifecycle risk.

This report reflects independent analysis by the Veterans Association of Real Estate Professionals (VAREP) and does not represent the official position of any federal agency.

# FOREWORD

## A Proven Federal Framework—Not Built for a Federal Population

HUD's Housing Counseling Program is the gold standard for civilian housing stability. Authorized under Section 106 of the National Housing Act, it provides readiness before purchase, independent guidance during complexity, and early intervention during hardship.<sup>1</sup> It is a lifecycle system—built on continuity, casework, and measurable outcomes. It works.

It is precisely the model the military-connected community needs most.

Servicemembers, veterans, and surviving spouses are not a niche population. They are a federal population—created by federal service, governed by federal systems, and shaped by federal policy across every stage of life. Yet within HUD's counseling architecture, they remain structurally invisible.

This is not a question of intent.  
It is a question of design.

Military life is defined by mobility, compressed timelines, institutional dependency, and abrupt civilian transition. PCS cycles, deployments, variable income, and separation produce predictable housing risk.<sup>2</sup> These are not anomalies. They are structural conditions of service.

HUD's counseling framework was not built with these realities in mind.

As a result, military-connected households encounter a system that is technically available but operationally misaligned. Intake assumes civilian norms. Counselors are not trained in VA benefits or military systems. Reporting cannot identify military clients or track military-specific outcomes. What should function as early stabilization becomes late-stage remediation.

This is not a failure of counselors.  
It is a failure of architecture.

Because military-connected households are not named, they are not tracked. Because they are not tracked, outcomes are not defined. Because outcomes are not defined, capacity is never built.<sup>3</sup>

The result is a workforce gap: there is no national pipeline of military-competent HUD-certified housing counselors—not because the profession is unwilling, but because the system has never required, trained, or measured that competency.

Section 106 is the right system.  
It is simply missing the right inclusion.

**This report does not propose a new program.  
It completes an existing one.**

Modernizing HUD Housing Counseling to include servicemembers, veterans, and surviving spouses is not expansion. It is alignment. It brings a proven federal framework into coherence with a federal population whose housing risk is created by public service.

The solution is structural: a formal partnership between HUD and a HUD-certified housing counseling agency that is also a Veteran Service Organization—dedicated to military financial literacy, housing stability, homeownership, and VA loan navigation—with the authority and capacity to:

- Establish military-competency standards
- Train and credential existing HUD-certified counselors
- Build and maintain a national, searchable directory of military-competent specialists
- Serve as HUD's intermediary for this population

**A system built for prevention cannot remain blind to predictability.**

Section 106 already works.  
It simply has not been told who it must serve.

A federal framework that misses a federal population is unfinished. This report explains how to complete it.

### Son Nguyen

Founder & National President  
Veterans Association of Real Estate Professionals (VAREP)



# EXECUTIVE SUMMARY

## Inclusion Is Not a New Benefit—It Is a Modernization of Delivery

HUD's Housing Counseling Program is the federal government's most effective housing-stability framework. Authorized under Section 106 of the National Housing Act, it delivers readiness before purchase, independent guidance during complexity, and early intervention during hardship.<sup>1</sup> It is the civilian gold standard for preventing housing instability.

It is also a system that does not recognize the military-connected community.

Servicemembers, veterans, and surviving spouses are not identified as a distinct population within HUD's counseling architecture. There is no defined eligibility track. No population-aware intake. No standardized training requirement. No reporting mechanism capable of measuring military outcomes.<sup>4</sup>

As a result, a population defined by predictable housing risk is served by a framework that cannot see it.

Military life is structurally different. PCS cycles, deployments, variable income, spouse employment disruption, and abrupt civilian transition create repeatable housing stress.<sup>2</sup> These are not episodic hardships. They are lifecycle conditions of service.

HUD's counseling framework was not built for these realities.

In practice, this means military-connected households encounter a system that is technically available but operationally misaligned. Intake assumes civilian norms. Counselors are not trained in VA benefits or military systems. Reporting cannot distinguish military clients or track military-specific outcomes. What should function as early stabilization becomes late-stage remediation.<sup>5</sup>

The consequence is structural invisibility.

Populations that are not named are not tracked. Outcomes that are not defined are not produced. Workforces that are not required are not built.<sup>3</sup>

This is not a failure of counselors.  
It is a failure of design.

The solution does not require a new federal program.  
It requires modernization of an existing one.

HUD already possesses the statutory authority, program infrastructure, and intermediary model needed to deliver population-aware counseling at scale.<sup>1</sup> Section 106 can support a defined "military track" that establishes:

- Eligibility for servicemembers, veterans, and surviving spouses
- Population-aware intake and referral pathways
- Military-competent training standards for counselors
- A national intermediary—via MOU with a HUD-certified VSO—to set standards, train providers, and manage outcomes
- Reporting fields within HUD's existing systems to make military outcomes visible

This is not expansion.  
It is alignment.

It brings a proven federal framework into coherence with a federal population whose housing risk is created by public service.

A military track within HUD Housing Counseling:

- Applies the civilian gold standard where it is most needed
- Converts predictability into prevention
- Builds a national workforce of military-competent counselors
- Produces measurable, reportable outcomes

It transforms availability into access.

This report demonstrates why inclusion is necessary, how it can be implemented under existing authority, and what must be measured to ensure accountability. It offers a federal design that does not create a new system—but completes one.

Section 106 already works.  
It simply has not been told who it must serve.

A federal framework that misses a federal population is unfinished.

This report explains how to complete it.

# How to Use This Report

This report is designed for Members of Congress and congressional staff, HUD leadership, housing counseling intermediaries, appropriators, and national partners engaged in housing stability and reintegration policy for military-connected households. It supports both full reading and targeted reference. Each section may be read independently, while the full report presents a unified framework for understanding HUD Housing Counseling as federal infrastructure—and what is required to make it work for servicemembers, veterans, and surviving spouses

The analysis is population-level and systems-focused. Its purpose is to inform durable policy design—not to evaluate individual counselors, agencies, or clients. The report examines institutional architecture: how a federal framework is structured, whom it is designed to recognize, and what must change for a proven system to serve a federal population it currently cannot see.

**This is not a program proposal.  
It is a systems correction.**

The question it answers is not whether HUD Housing Counseling works—it does. The question is whether it is designed to work for the military-connected community.

This report explains what it would take to make that true.

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# KEY FINDINGS

## 1- The framework works; the population is missing.

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HUD Housing Counseling is the federal gold standard for civilian housing stability. Yet servicemembers, veterans, and surviving spouses are not designated as a covered population within Section 106's operating architecture.<sup>6</sup> What is proven for civilians is structurally unavailable to those who need it most.

## 2- Availability is not access.

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Military-connected households are technically eligible for counseling, but the system is not designed to recognize them, route them, or measure them. Without population-aware intake, referral triggers, and reporting fields, "open to all" produces functional exclusion.<sup>7</sup>

## 3- Military housing risk is predictable.

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PCS cycles, deployments, compressed timelines, benefit complexity, and abrupt civilian transition create repeatable points of housing instability.<sup>8</sup> These are lifecycle conditions of service—not episodic hardship—and they demand upstream, case-based intervention.

## 4- HUD's current design assumes civilian norms.

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Intake models, counseling categories, and performance metrics presume permanence, voluntary mobility, and market fluency. Military life violates each of these assumptions.<sup>9</sup> The framework is misaligned with the population it now serves in growing numbers.

## 5- Invisibility prevents prevention.

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Populations that are not named are not tracked. Outcomes that are not defined are not produced. Risk that is not recognized is not prevented.<sup>10</sup> Without a military identifier and outcome set, HUD cannot see need, allocate capacity, or measure impact.

## 6- The workforce gap is structural, not voluntary.

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There is no national pipeline of military-competent HUD-certified counselors—not because the profession is unwilling, but because the system has never required, trained, or measured that competency.<sup>11</sup> Workforce capacity follows program design.

## 7- Cultural competence is operational, not symbolic.

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Effective service for military-connected households requires fluency in VA benefits, military pay structures, transition timelines, and service culture. When barriers are institutional, generic counseling is insufficient.<sup>12</sup>

## 8- The intermediary model already exists.

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HUD's program architecture recognizes national intermediaries for standards, training, quality assurance, and performance management.<sup>13</sup> A military track can be implemented through an MOU with a HUD-certified VSO without creating new bureaucracy.

## 9- Modernization is feasible under existing authority.

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Section 106 already authorizes counseling, contracting, and program design flexibility.<sup>14</sup> A defined military track—eligibility, training, reporting, and outcomes—can be launched administratively and refined through a pilot.

## 10- This is alignment, not expansion.

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Adding a military track does not create a new benefit. It completes a proven one. It applies the civilian gold standard where housing risk is most predictable and most costly to ignore. The system already works. It simply has not been told who it must serve.

# VAREP'S POLICY FRAMEWORK

The Veterans Association of Real Estate Professionals (VAREP) is a national Veteran Service Organization and the only HUD-approved housing counseling agency founded specifically to serve military-connected households.

VAREP operates at the intersection of housing, finance, and civilian reintegration, including:

A military track within HUD Housing Counseling:

- HUD-certified housing counseling
- Military and veteran financial literacy
- VA home loan navigation and readiness
- Foreclosure prevention and post-default recovery
- Transition and reintegration support
- Professional training for military-competent practitioners
- National policy development and advocacy

This dual role—direct service delivery and systems design—positions VAREP uniquely within the federal housing ecosystem. VAREP does not approach this issue as an external observer. It operates inside the very frameworks this report evaluates, delivering HUD-compliant counseling while serving a population the system was not built to recognize.

The findings in this report align with six core principles:

**1- Military-connected households constitute a distinct federal population.**

They are created by public service and governed by public systems. Federal delivery frameworks must be population-aware to serve them equitably.

**2- Housing stability is reintegration infrastructure.**

For servicemembers and veterans, housing is not a lifestyle choice—it is a structural determinant of transition success, family stability, and long-term outcomes.

**3- Access without navigation produces inequity.**

When benefits are complex and populations are distinct, “available to all” becomes functionally inaccessible without guided entry.

**4- One-on-one, military-competent counseling changes outcomes.**

Generic education does not resolve institutional barriers. Effective service requires fluency in military systems, benefits, timelines, and culture.

**5- Transition is the highest-risk stage and requires continuity.**

The shift from service to civilian life concentrates financial and housing risk. Systems must bridge this moment rather than abandon it.

**6- Federal benefits succeed only when delivery matches lived reality.**

A framework designed for civilian permanence cannot serve a population defined by mobility, compression, and institutional dependence.

These principles translate to a single premise:

**HUD Housing Counseling must be designed as continuity, not availability.**

VAREP refers to this architecture as the **Continuum of Service™**—a model that follows military-connected households across service and civilian life, providing continuity in housing guidance, financial stability, benefit navigation, and recovery.

**Applied to HUD Housing Counseling, this framework requires:**

- Converting eligibility and intake into intentional entry points
- Embedding military-competent, one-on-one counseling as the default path
- Treating PCS, deployment, and separation as structural risk events
- Establishing warm handoffs at transition and during hardship
- Building a national workforce of military-competent HUD-certified counselors
- Aligning Section 106 delivery with the realities of military life

This publication does not advocate isolated programs.

It establishes the structural context in which HUD Housing Counseling must operate—and demonstrates why implementation, not intent, now determines outcomes.

## **The system already works.**

**It simply was not built for everyone it must now serve.**

# PART I — THE PROBLEM

## Section I — A Federal Framework Built for Civilians

HUD's Housing Counseling Program was built to stabilize households across the civilian housing lifecycle. Its architecture assumes voluntary mobility, market fluency, and incremental change. Clients typically move by choice. Income changes gradually. Housing decisions are elective. Risk emerges over time.

Within those parameters, the framework performs exceptionally well.

Section 106 authorizes readiness before purchase, independent guidance during complexity, and early intervention during hardship.<sup>15</sup> It treats housing stability as a process, not a moment. It embeds continuity. It measures outcomes. It prevents crisis rather than reacting to it.

This is why HUD Housing Counseling is the civilian gold standard. The problem is not that the framework fails.

The problem is that the framework was never designed for a population whose housing risk is created by public service.

Military-connected households do not move voluntarily. They move by order. They do not experience gradual change. They experience compression. They do not enter civilian systems incrementally. They are dropped into them.

PCS cycles impose fixed deadlines. Deployments alter income patterns. Separation collapses institutional support overnight. Housing, employment, healthcare, and benefits

**These are not market conditions.**

**They are service conditions.**

Yet HUD's counseling architecture assumes civilian norms:

- That housing decisions are elective
- That timelines are flexible
- That income is stable
- That systems are familiar
- That risk emerges slowly

Military life violates each assumption.



The framework does not fail military households because it is ineffective. It fails because it does not recognize them.

Eligibility is generic.  
Intake is civilian-coded.  
Counseling categories are population-neutral.  
Training standards are non-specialized.  
Reporting cannot identify military status or outcomes.

**The system functions exactly as designed.  
It simply was not designed for this population.**

A framework that cannot see a population cannot serve it intentionally.

A system that cannot measure outcomes cannot produce them.

A model built for permanence cannot stabilize mobility.

**Section 106 works.**

It just does not know who military-connected households are.

## Section II — When “Open to All” Becomes Invisible

HUD Housing Counseling is technically available to everyone. Any household may seek assistance. In theory, servicemembers and veterans are not excluded.

In practice, “open to all” becomes “designed for none.”

Populations with distinct barriers require distinct architecture. When eligibility, intake, training, and reporting are generic, systems default to serving those whose needs match the assumptions embedded in design.

Military-connected households do not match those assumptions.

They do not self-identify at intake because the system does not ask.

They are not tracked because no field captures them.

They are not measured because no outcome framework defines them.

**They are present in the data only as civilians. This is structural invisibility.**

Because the system cannot see the population, it cannot:

- Allocate capacity
- Build workforce specialization
- Define performance
- Measure equity
- Prevent risk

Counselors cannot specialize in what the system does not name. Agencies cannot build programs the framework does not recognize. HUD cannot evaluate impact it cannot measure.

The result is a workforce gap.

There is no national pipeline of military-competent HUD-certified counselors—not because the profession is unwilling, but because the system has never required, trained, or funded that competency.<sup>17</sup>

**Workforce follows architecture.**

If the framework does not define a population, it does not produce specialists. If it does not produce specialists, service quality varies.

If service quality varies, outcomes diverge.

Military-connected households therefore experience:

- Late entry into counseling
- Generic guidance for institutional barriers
- Misalignment between advice and reality
- Crisis-stage intervention
- Fragmented continuity

**This is not counselor failure.**

It is systems failure.

A population created by public service cannot be served by accident.

If HUD Housing Counseling is to function as reintegration infrastructure for military-connected households, the population must be named, designed for, trained for, and measured.

A system that is “open to all” but built for civilians will always miss those who are not civilian.

Part II examines what a population-aware framework requires—and how a military track within Section 106 converts invisibility into infrastructure.

# PART II — THE SOLUTION

## Section III — What Population-Aware Design Requires

A federal framework becomes equitable only when it is population-aware.

Population-aware design does not mean preference. It means recognition.

It means the system can:

- Identify who is being served
- Understand how their risk is created
- Design entry points around that reality
- Train the workforce to meet it
- Measure whether outcomes are achieved

HUD Housing Counseling already does this for civilians.

It identifies first-time buyers.

It differentiates renters from owners.

It distinguishes pre-purchase from post-purchase.

It tracks foreclosure prevention outcomes.

It measures delinquency resolution.

These distinctions are not symbolic. They are operational.

They shape funding, training, delivery, and accountability.

The military-connected community lacks this architecture. Servicemembers, veterans, and surviving spouses are not defined as a covered population. The system therefore cannot:

- Trigger early intervention at PCS or separation
- Route clients to military-competent counselors
- Track VA benefit navigation
- Measure transition outcomes
- Evaluate geographic concentration near installations

## The absence is structural.



Population-aware design requires five elements:

### 1- Designation

the population must be named.

### 2- Eligibility Logic

the system must recognize when an individual qualifies.

### 3- Delivery Path

the framework must define how service is provided.

### 4- Workforce Competency

counselors must be trained for the population.

### 5- Measurement

outcomes must be defined and tracked.

It simply has not been instructed to do so for the military-connected community.

A “military track” within HUD Housing Counseling is not a new program.

It is the application of existing federal design logic to a population that has never been named.

**Section 106 already contains the architecture to do each of these.**

## Section IV — The Military Track

A military track within Section 106 operationalizes inclusion.

It converts invisibility into infrastructure.

**At minimum, a military track establishes:**

- **Covered Population**

Servicemembers (active duty, Guard, Reserve), veterans within a defined transition window, and surviving spouses.

- **Population-Aware Intake**

Military status becomes a standard data element at entry. Risk events—PCS, deployment, separation—become referral triggers.

- **Defined Service Path**

Military-connected households are routed to one-on-one counseling across:

- Pre-purchase readiness
- Post-purchase stabilization
- Early-stage hardship
- Transition planning

- **Workforce Standards**

Counselors serving this population meet military-competency requirements: VA benefits fluency, military pay structures, transition timelines, service culture, and institutional navigation.

- **Outcome Measurement**

HUD's existing systems capture military-specific fields and milestones:

- VA benefit navigation
- Pre-purchase readiness
- Delinquency avoidance
- Sustained housing stability
- Transition outcomes

**This does not alter HUD's mission.  
It completes it.**

The system already prevents housing instability.  
The military track ensures it does so where risk is most predictable.



## Section V — The Intermediary Model

HUD's Housing Counseling Program already recognizes national intermediaries.

Intermediaries exist to:

- Set standards
- Train providers
- Ensure quality
- Aggregate data
- Manage performance
- Scale delivery

A military track requires the same architecture.

The solution is a formal MOU between HUD and a HUD-certified housing counseling agency that is also a Veteran Service Organization—dedicated to military financial literacy, housing stability, homeownership, and VA loan navigation.

This intermediary must be capable of:

- Developing military-competency standards
- Training and credentialing existing HUD-certified counselors
- Maintaining a national, searchable directory of military-competent specialists
- Coordinating referrals across federal and civilian systems
- Aggregating and reporting military-specific outcomes to HUD

Local agencies remain the service providers.

HUD remains the regulator and funder.

The intermediary becomes the population steward.

This model:

- Builds workforce capacity without recreating agencies
- Preserves HUD's existing compliance structure
- Enables national consistency
- Creates a visible pipeline of military-competent counselors
- Allows Congress and HUD to see outcomes

Most importantly, it transforms availability into access.

A system cannot serve what it cannot see.

A workforce cannot exist without demand.

A population cannot be stabilized by accident.

The military track converts a proven civilian framework into federal reintegration infrastructure. Part III examines how this model integrates with HUD's existing reporting and accountability systems—and how outcomes become visible for the first time.

**This is not a new bureaucracy.  
It is a specialized application  
of an existing one.**

# PART III — MEASUREMENT & ACCOUNTABILITY

## Section III — What Population-Aware Design Requires

A federal system cannot govern what it cannot see.

HUD's Housing Counseling Program is built on one of the most sophisticated performance frameworks in domestic policy. Through the HUD-9902 and the Housing Counseling System, the Department tracks:

- Who is served
- What services are delivered
- When intervention occurs
- What outcomes result

**This architecture is why Section 106 works.**

It is also why military-connected households remain invisible.

There is no standard field for military status.

There is no designation for servicemembers, veterans, or surviving spouses.

There is no outcome category for VA benefit navigation.

There is no way to measure transition-related housing risk.

There is no mechanism to evaluate equity across military geographies.

Military-connected households are present only as civilians.

When a population cannot be identified in the data, it cannot be:

- Planned for
- Funded for
- Staffed for
- Trained for
- Evaluated for
- Improved for

This is not an oversight. It is a design consequence.

HUD's reporting system does exactly what it was built to do.

It tracks what the framework defines.

Because the military-connected community is not defined, it does not exist in the data.

This is why inclusion must begin with architecture.

A military track within Section 106 requires that:

- Military status becomes a standard data element at intake
- Risk events such as PCS and separation become recognizable triggers
- Military-specific service categories are defined
- Outcomes relevant to this population are named
- Performance can be evaluated across geography and time

Capacity can be planned.  
Training can be targeted.  
Funding can be aligned.  
Equity can be measured.  
Outcomes can be improved.

**Once a population is visible,  
it becomes governable.**

**Visibility is not symbolic.  
It is operational.**

## Section VII — Outcomes That Matter

A military track is only meaningful if it produces military-relevant outcomes.

Generic housing metrics do not capture the realities of service-connected risk. Stability for a civilian household does not look the same as stability for a transitioning servicemember.

Military-connected outcomes must reflect:

- Readiness before purchase
- Successful navigation of VA benefits
- Stability through PCS cycles
- Delinquency avoidance during deployment or separation
- Sustained housing after transition
- Recovery following disruption

**These outcomes already exist in practice. They are simply not measured.**

A modernized Section 106 framework must

- Military-connected client identification
- Pre-purchase readiness milestones
- VA benefit awareness and utilization
- Transition-period stabilization
- Early-stage delinquency intervention
- Sustained housing at 6, 12, and 24 months
- Renter-to-owner pathways for military households
- Re-default prevention

**These data points do not require a new system. They require fields.**

HUD already captures client-level data.

It already aggregates nationally.

It already reports to Congress.

The military track makes these systems population-aware.

For the first time, HUD and Congress would be able to answer:

- How many military-connected households are being served?
- Where are they concentrated?
- When does risk emerge?
- What interventions work?
- Which geographies lack capacity?
- What outcomes justify scale?

Policy becomes evidence-based.

Appropriations become targeted.

Delivery becomes accountable.

A system that cannot measure cannot improve.

## Section VIII — Accountability at Scale

Federal programs succeed when responsibility is clear. In the current model, military-connected outcomes belong to no one.

Local agencies serve whoever arrives.

Counselors deliver what they are trained to deliver.

HUD measures what the framework defines.

Congress receives aggregate civilian data.

No actor is responsible for military-connected success. A military track changes this.

It establishes:

- A defined population
- A defined delivery path
- A defined workforce standard
- A defined outcome set
- A defined intermediary steward

The intermediary becomes the population custodian.

It is responsible for:

- Developing and maintaining military-competency standards
- Training and credentialing counselors
- Certifying agencies for military-track participation
- Maintaining a national directory of specialists
- Aggregating military outcomes
- Reporting performance to HUD

HUD remains the regulator and funder.  
Local agencies remain the service providers.  
The intermediary becomes the systems integrator.

This is how federal frameworks scale without fragmentation.  
It mirrors how HUD already operates in other domains.  
It mirrors how VA operates for other benefits.  
Most importantly, it creates accountability.

Someone is responsible for whether the system works.

## **Not in theory. In practice.**

A population created by public service deserves a system that can see it, measure it, and improve it.

Part IV examines how this architecture can be launched under existing authority—and how Congress can ensure durability.

# **PART IV — POLICY PATHWAY**

## **Section IX — Administrative Launch Under Existing Authority**

Modernizing HUD Housing Counseling for the military-connected community does not require Congress to create a new program.

Section 106 already authorizes HUD to:

- Provide housing counseling and assistance
- Establish program standards
- Contract with qualified entities
- Utilize intermediaries
- Define performance frameworks
- Report outcomes to Congress

The missing element is population design.

Under existing authority, HUD can administratively establish a military track by:

- 1- Defining servicemembers, veterans, and surviving spouses as a covered population within the Housing Counseling Program
- 2- Adding military status and lifecycle risk indicators to intake and reporting systems
- 3- Establishing military-competency standards for counselors serving this population
- 4- Executing a Memorandum of Understanding with a HUD-certified housing counseling agency that is also a Veteran Service Organization to serve as the national intermediary

5- Authorizing that intermediary to:

- Develop training and credentialing
- Certify participating agencies
- Maintain a national directory of military-competent counselors
- Aggregate and report military-specific outcomes

6- Launching a pilot in high-density and high-risk geographies

This approach:

- Preserves HUD's existing regulatory framework
- Uses existing program authority
- Avoids new bureaucracy
- Builds capacity within the current network
- Produces immediate data for oversight

## **The military track becomes an overlay, not a replacement.**

**Local agencies remain HUD-certified.  
Counselors remain HUD-certified.**

Reporting remains HUD-9902-based.  
Compliance remains unchanged.  
What changes is intentionality.

The system begins to recognize a population whose risk is created by public service.

## Section X — Legislative Codification (If Congress Chooses)

Administrative action can begin modernization.

Congress can ensure permanence.

If Congress elects to codify inclusion, legislative action can be narrowly tailored to:

- Explicitly designate servicemembers, veterans, and surviving spouses as a covered population under Section 106
- Authorize HUD to establish a military track within Housing Counseling
- Recognize a HUD-certified VSO intermediary model
- Require military-specific reporting to Congress
- Permit a dedicated funding set-aside within existing appropriations
- Establish a time-bound pilot with continuation authority

**This is not a program expansion.  
It is a clarification of scope.**

It affirms that:

- Federal populations require population-aware delivery
- Housing stability is reintegration infrastructure
- Predictable risk warrants upstream prevention
- Proven systems should not exclude those created by public service

Codification ensures that military inclusion is not discretionary.  
It becomes structural.

**It protects continuity across administrations.  
It anchors appropriations.  
It formalizes accountability.**

Congress created Section 106 to prevent housing instability.

It now has the opportunity to ensure that prevention applies to those whose risk is predictable by design.

# ENDNOTES & SOURCES

- 1- 12 U.S.C. § 1701x (Section 106 of the National Housing Act), authorizing HUD to provide and contract for housing counseling and assistance; 24 C.F.R. Part 214 (HUD Housing Counseling Program implementing regulations).
- 2- U.S. Department of Defense, *Profile of the Military Community* (annual), documenting PCS frequency, deployment cycles, income structure, and transition conditions.
- 3- U.S. Department of Housing and Urban Development, *Housing Counseling Program Handbook 7610.1* and program guidance, establishing intake, delivery, and performance architecture.
- 4- U.S. Department of Housing and Urban Development, HUD-9902 *Housing Counseling Agency Activity Report* and Housing Counseling System (HCS) reporting requirements
- 5- Government Accountability Office, reports on federal program design, population targeting, and the relationship between measurement and outcomes in social programs.
- 6- 12 U.S.C. § 1701x; 24 C.F.R. Part 214 (statutory and regulatory authority for HUD to define covered populations, program standards, and delivery mechanisms).
- 7- U.S. Department of Housing and Urban Development, Housing Counseling Program guidance on eligibility, intake, and service categories.
- 8- U.S. Department of Defense and Department of Veterans Affairs, transition readiness and military lifecycle research (PCS, deployment, separation, income volatility).
- 9- Congressional Research Service, reports on military transition, veteran reintegration, and housing instability.
- 10- Government Accountability Office, findings on program invisibility, data limitations, and the consequences of non-designated populations in federal systems.
- 11- HUD Housing Counseling workforce materials and certification guidance; absence of population-specific competency requirements for military-connected households.
- 12- Department of Veterans Affairs, VA Home Loan and benefit navigation guidance; studies on institutional barriers faced by military-connected households.
- 13- HUD intermediary program architecture and national network design, including standards-setting, training, quality assurance, and performance aggregation functions.
- 14- 12 U.S.C. § 1701x; HUD program authorities permitting administrative modernization, pilot structures, and performance-based design.
- 15- HUD Housing Counseling statutory purpose and lifecycle framework as articulated in Section 106 and implementing guidance.
- 16- Department of Defense, PCS and transition timelines; Department of Veterans Affairs, separation and reintegration research.
- 17- HUD Housing Counseling Program workforce development guidance; absence of a national pipeline for military-competent HUD-certified counselors.



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