



**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Special Attention of:

Public Housing Agency Directors;
Public Housing Hub Office Directors;
Public Housing Field Office Directors;
Program Center Coordinators;

Resident Management Corporations;
Resident Councils

Notice PIH-2016-06 (HA)

Issued: April 7, 2016

Expires: Effective until amended or
superseded

Cross References: PIH Notice 2015-12

Subject: Administering the Self-Certification Flexibility when Verifying Community Service and Self-Sufficiency Requirement (CSSR) Compliance

- 1. Purpose:** The Department is issuing this Notice to assist public housing agencies (PHAs) in understanding the resident self-certification process when administering the Community Service and Self-Sufficiency Requirement (CSSR).
- 2. Applicability:** This Notice applies to PHAs that administer the Public Housing Program and all HUD Field Offices with Public Housing Programs. This Notice supplements all previous guidance and provides clarification guidance on administering the resident self-certification of compliance with the CSSR.
- 3. Background:** Section 12(c) [42 U.S.C. Section 1437j] of the United States Housing Act of 1937, as amended on October 12, 1998 by Section 512 (Pub. L. 105-276) of the Quality Housing and Work Responsibility Act of 1998, contained a CSSR that every adult resident of public housing contribute eight hours of community service per month, or participate in an economic self-sufficiency program for eight hours per month. Certain individuals, including individuals that are employed and individuals with disabilities, are exempt from this requirement as outlined in 24 CFR 960.601(b). Regulations for the CSSR can be found at 24 CFR Subpart F, 960.600 through 960.609.

On March 8, 2016, HUD published a final rule in the Federal Register providing programmatic streamlining across several HUD programs. The rule amended a provision in 24 CFR Subpart F, 960.605, to permit, but not require, a PHA to accept resident self-certifications of compliance with the CSSR. The final rule also amended 24 CFR, Subpart F, 960.607 to require a PHA that elects to accept self-certification to notify residents the self-certifications may be subject to third-party verification, and to require PHAs to validate a sample of the self-certifications annually.

- 4. Contents of Annual Notification to Residents and Self-Certification:** Residents eligible to complete the CSSR must sign an acknowledgement of their obligation to complete the CSSR annually. This obligation is outlined in more detail in Notice PIH 2015-12. However, a PHA that elects to permit resident self-certifications must notify the resident of the resident's ability to submit a self-certification. Examples of such notifications are provided in Attachments A and B.

As required in Section 11 of Notice PIH 2015-12, in order to determine compliance with CSSR, at each regularly scheduled rent re-examination, each non-exempt family member presents a signed certification on a form provided by the PHA of CSSR activities performed over the previous twelve (12) months. Each PHA develops a standardized form with places for signature confirmation by supervisors, instructors, or counselors certifying the number of hours contributed. If a PHA elects to permit self-certifications, this PHA-developed form must include the following information:

- a statement that the resident has completed the number of hours listed and this statement is subject to penalties of perjury;
- the number of hours and type of activity (community service or self-sufficiency) that the resident completed;
- the name of the organization or person for which the activity was completed;
- the address of the organization or person;
- the phone number of the organization or person; and
- a contact person in the organization or the person for which the activity was completed.

If a resident completes their CSSR obligation for more than one organization or person during the course of a year, the resident must complete one self-certification for each organization or person for which the resident performed the CSSR activity.

5. **PHA Policies:** A PHA that chooses to accept resident self-certifications of compliance with CSSR must update its CSSR policies prior to accepting resident self-certifications. Further, a PHA that elects to accept self-certifications only may do so prospectively after making necessary policy changes. For residents under lease at the time the PHA amends its policies, the PHA must review annual compliance and obtain third party verification for that lease cycle. However, for any subsequent lease cycles beginning after the PHA has adopted the policy change, the PHA may accept resident self-certifications for those periods. A PHA may not accept resident self-certifications for tenants subject to a work-out agreement until the resident has completed, and the PHA has verified through a third party, that the resident has completed the required hours.
6. **Sampling Methodology and Validation Requirements:** As required by amended 24 CFR Part 960.605, a PHA that elects to accept self-certifications must validate a sample of self-certifications with the third-party for whom the resident completed the community service or self-sufficiency activity. The sample of self-certifications the PHA validates must be a statistically valid, random sample. Attachment D to this notice provides the appropriate sampling methodology to be used by a PHA when determining how many self-certifications must be validated annually. For example, a PHA that has a universe of self-certifications of 50 must validate at least 29 of the self-certifications to meet the statistically valid requirement. A PHA with a universe of self-certifications of 500 must validate 60 self-certifications to meet the statistically valid requirement.

The universe of self-certifications should only include residents that submitted a self-certification, and should not include:

- Residents that are under the age of 18 years or 62 years or older;
- Residents that are exempt;
- Residents for which a PHA receives third party verification of completion with CSSR; and
- Residents that did not complete the required CSSR.

Because the number of residents subject to the CSSR is constantly in fluctuation due to unit turnover, resident employment, etc., a PHA must choose a point in time annually to calculate the universe of self-

certifications received during the previous 12 months. However, PHAs do not need to wait until the end of the 12-month period to begin validating self-certifications. For example, a PHA that can reasonably determine the expected number of self-certifications to be received throughout the 12-month period may validate the appropriate sample of self-certifications during the 12-month period rather than waiting until the end of that time period, subject to any necessary reconciliations once the final universe and sample size is determined.

To validate a self-certification, the PHA must obtain third-party documentation that includes, at a minimum, the name of the organization or person, the number of hours completed by the resident, a signature from the appropriate staff person within the third-party organization or person and that staff person's contact information. Consistent with the written third-party verification techniques outlined in Notice PIH 2010-19, a PHA may accept third-party generated documentation directly from the third-party or from the resident.

- 7. Treatment of Fraudulent Self-Certifications:** In the event a PHA determines a resident has submitted a fraudulent self-certification, the PHA must provide a notice of noncompliance to the resident pursuant to 24 CFR 960.607. If the resident agrees to sign a work-out agreement, the PHA must obtain written third-party documentation of the resident's compliance with the requirements of the workout agreement. Should the resident refuse to enter into a work-out agreement pursuant to the notice of noncompliance, the PHA must take steps to terminate the tenancy of the resident. For more information on this process, see Notice PIH 2015-12.
- 8. HUD Oversight:** A PHA that elects to accept self-certifications must retain the self-certification, any third party validation, and any information related to fraudulent self-certifications in the resident's file for at least two years from the date the documents are received by the PHA for possible HUD review. As part of HUD's oversight and regulatory review processes, and on a risk basis, HUD may review a PHA's administration of CSSR, resident self-certifications, and sample validations.
- 9. Further Information:** Direct inquiries to Todd Thomas of the Office of Public Housing and Voucher Programs at (678) 732-2056.
- 10. Paperwork Reduction:** The information collection requirements contained in this Notice will be submitted for approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3520) and assigned OMB control numbers 2577-0083 and 2577-0226.

_____/s/_____
Lourdes Castro Ramirez,
Principal Deputy Assistant Secretary
for Public and Indian Housing

Attachment A

Community Service and Self-Sufficiency Requirement Certification
For Non-Exempt Individuals

Entrance Acknowledgement

Date:

Participant Name:

I have received and read the Community Service and Self Sufficiency Requirement (CSSR). I understand that as a resident of public housing, I am required by law to contribute 8 hours per month (96 hours over the course of every 12 month period) of community service or participate in an economic self-sufficiency program. I further understand that if I am not exempt, failure to comply with CSSR is grounds for lease nonrenewal. I understand that I may submit a self-certification of compliance with the CSSR, and that my self-certification of compliance may be subject to validation with the organization for which I completed the required hours. My signature below certifies I received notice of this requirement at the time of initial program participation.

Signature: _____

Date of Signature: _____

Attachment B

Community Service and Self-Sufficiency Requirement Certification
For Non-Exempt Individuals

Annual Renewal

Date:

Participant Name:

I understand that as a resident of public housing, I am required by law to contribute 8 hours per month (96 hours over the course of every 12 month period) of community service or participate in an economic self-sufficiency program. I further understand that if I am not exempt, failure to comply with CSSR is grounds for lease nonrenewal. I understand that I may submit a self-certification of compliance with the CSSR, and that my self-certification of compliance may be subject to validation with the organization for which I completed the required hours. My signature below certifies I received notice of this requirement at the time of initial program participation.

Signature: _____

Date of Signature: _____

Attachment C

Below is a chart that indicates the universe and required sample sizes that must be validated by a PHA annually. A CSSR universe would be the number of age eligible residents that have submitted a self-certification. For universe sizes that fall between the universe sizes listed in the chart below, PHAs should utilize the sample size for the next largest universe size. For example, a PHA with a sample size of 27 self-certifications must validate at least 21 self-certifications.

Universe Size	Sample Size AT LEAST
≤ 10	ALL
15	13
20	16
25	19
30	21
35	24
40	26
50	29
60	33
100	41
150	47
200	51
250	54
300	56
350	57
400	58
450	59
500	60
600	61
700	62
800	63
900	63
1000	64
1500	65
2500	66
3500	67
4000	67
5000	67
6000	67
6500	67
≥ 7000	68