

Clarification for Notice PIH 2011-24 (HA)

Paragraph IV. Requirement for Qualified Public Housing Agencies in PIH Notice 2011-24 (HA).

- (1) SF-LLL and SF-LLL-A. This paragraph did not address whether qualified PHAs are required to submit the SF-LLL, Disclosure of Lobbying Activities and the SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet.

SF-LLL and the SF-LLL-A should be submitted "as necessary". The SF-LLL contains instructions on when it must be submitted—basically, whenever a PHA undertakes a covered action. Therefore, if the PHA has not undertaken a covered action, it need not submit the form. The requirement for the submission of the SF-LLL and the SF-LLL-A applies to qualified and non-qualified PHAs.

- (2) Civil Rights Certification (HUD-50077-CR). As discussed in paragraph IV of the Notice PIH 2011-24 (HA), qualified PHAs are required to submit this certification annually. The PHA Plan website requires that a PHA submit this form 75 days before the beginning of the PHA's fiscal year. The website is found at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/pha/qualified

If a qualified PHA has already submitted this certification to HUD it is not necessary for the PHA to submit it with the Capital Fund ACC Amendment during the annual grant awards. Where the PHA has not submitted the certification it should be submitted with the PHA's Capital Fund ACC Amendments.