

COMMUNITY SERVICE AND SELF SUFFICIENCY REQUIREMENT (CSSR) POLICY

Background

- 1) 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 requirement that every adult resident of public housing contribute eight hours of community service each month, or participate in an economic self-sufficiency program for eight hours each month. Regulations for the CSSR requirement can be found at 24 CFR Subpart F, 960.600 through 960.609.
- 2) The Housing Authority City of Franklin's objective is to carry out this provision in a manner consistent with Congressional intent, as discussed in the Senate Committee Report (S. Rep. No. 63, 105th Congress, 1st Session 1997) that states "*the provision is not intended to be perceived as punitive, but rather considered as rewarding activity that will assist residents in improving their own and their neighbors' economic and social well-being and give residents a greater stake in their communities*". The requirement is intended to provide residents an opportunity to demonstrate that they are "giving something back" to their communities and to facilitate upward mobility.

Definitions

Community Service is "The performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self responsibility in the community. Community service is not employment and may not include political activities.»

Eligible community service activities include, but are not limited to, work at:

- 1) local public or nonprofit institutions, such as schools, Head Start Programs, before or after-school programs, public library, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult daycare programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing);
- 2) Nonprofit organizations serving PHA residents or their children, such as: Boy or Girl Scouts, Boys or Girls Club, 4•H Clubs, Police Activities league (PAL), organized children's recreation, mentoring, or education programs, Big Brothers or Big Sisters, Garden Centers, community clean up programs, beautification programs;
- 3) Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels;
- 4) Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods or performing arts;
- 5) PHA housing to provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board; and,
- 6) Care for the children of other residents so parents may volunteer.
- 7) Pursuant to 24 CFR 960.609, **no** PHA may substitute community service activity performed by a resident for work ordinarily performed by a PHA employee.

- **NOTE: Political activity is excluded.**

Self Sufficiency Activities - are activities which include, but are not limited to:

- 1) Job readiness or job training;
- 2) Training programs through local One-Stop Career Centers, Workforce Investment Boards (local entities administered through the U.S. Department of Labor) or other training providers;
- 3) Higher education (junior college or college);
- 4) GED classes;
- 5) Apprenticeships (formal or informal);
- 6) Substance abuse or mental health counseling;
- 7) Reading, financial and/or computer literacy classes;
- 8) English as a second language and/or English proficiency classes;
- 9) Budgeting and credit counseling; and,
- 10) Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF).

Exempt Adult - Exemptions for adult residents unable to participate, as codified at 24 CFR 960.601. include persons who are:

- 1) 62 years or older;
- 2) Blind or disabled, as defined under 216(i)(1) or 1614 of the Social Security Act (42 U.S.C. Section 416(i)(1); Section 1382c),
 - a) who certify that, because of this disability, she or he is unable to comply with the service provisions of this subpart, or
 - b) is a primary caretaker of such individual;
- 3) Engaged in a minimum of **20 hours per week work activities**. In order for an individual to be exempt from the CSSR requirement because he/she is "engaged in work activities," the person must be participating in an activity that meets one of the following definitions of "work activity" contained in Section 407(d) of the Social Security Act (42 U.S.C. Section 607(d)):
 - a) Unsubsidized employment;
 - b) Subsidized private-sector employment;
 - c) Subsidized public-sector employment;
 - d) Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available;
 - e) On-the-job-training;
 - f) Job-search and job-readiness assistance;
 - g) Community service programs;
 - h) Vocational educational training (not to exceed 12 months with respect to any individual);
 - i) Job-skills training directly related to employment;
 - j) Education directly related to employment in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency;
 - k) Satisfactory attendance at secondary school or in a course of study leading to a
 - l) certificate of general equivalency, in the case of a recipient who has not completed
 - m) secondary school or received such a certificate; and,
 - n) The provision of childcare services to an individual who is participating in a community service program;
 - o) Able to meet requirements under a State program funded under part A of title IV of the Social Security Act (42 U.S.C. Section 601 et seq.) or under any other welfare program of the State in which PHA is located including a State-administered Welfare-to-Work program; or,
 - p) A member of a family receiving assistance, benefits, or services under a State program funded under part A of title IV of the Social Security Act (42 U.S.C. Section 601 et seq.), or under any other welfare program of the State in which the PHA is located, including a State-

administered Welfare-to-Work program, and has not been found by the State or other administering entity to be in noncompliance with such a program.

Requirements of the Program

- The eight (8) hours per month may be either volunteer work or self sufficiency activity or a combination of the two.
- At least eight (8) hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration prior approval required.
- Volunteer activities must be performed within Franklin and not outside the jurisdictional area of the Housing Authority City of Franklin.

Resident Responsibilities: At lease execution or re-examination, after the effective date of the adopted policy, all adult members (18 or older) of a public housing resident family must

- 1) Provide documentation that they qualify for an exemption, if they claim to be exempt from the CSSR. (24 CFR 960.601(b)). Documentation provided by the tenant will be used by the PHA to determine whether the tenant is exempt from the CSSR; and,
- 2) Sign a certification (Attachment A) that they have received and read the policy and understand that if they are not exempt, failure to comply with the community service requirement will result in nonrenewal of their lease, per 24 CFR 966.4(l)(2)(iii)(D).
- 3) At each annual reexamination, nonexempt family members must present documentation (Attachment D) of activities performed over the previous 12 months. Documentation will include signatures of supervisors, instructors, or counselors certifying to the number of hours contributed.
- 4) If during reexamination a family member is found to be non-compliant, then the member and the head of household sign an agreement (Attachment C) with the PHA to make up the deficient hours over the next 12-month period (see 24 CFR 960.607(c)) or the lease will be terminated.
- 5) When a non-exempt person becomes exempt, it is his or her responsibility to report this to the PHA and provide documentation. When an exempt person becomes non-exempt, it is his or her responsibility to report this to the PHA

Authority obligations:

- 1)To the greatest extent possible and practicable, the Authority will provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligations. (*According to the Quality Housing and Work Responsibility Act, a disabled person who is otherwise able to be gainfully employed is not necessarily exempt from the Community Service requirement*)
- 2)The Authority will provide the family with exemption verification forms and Recording/Certification documentation forms and a copy of this policy at initial application and at lease execution
- 3)The Authority will make the final determination as to whether or not a family member is exempt from the Community Service requirement Residents may use the Authority's Grievance Procedure if they disagree with the Authority's determination.

Noncompliant Residents:

Pursuant to 24 CFR 960.605 and 960.607, PHAs annually reviews resident compliance at least 60 days prior to the end of the twelve-month lease. PHAs secures a certification (Attachment B) of CSSR compliance from non-exempt family members. If a PHA finds a tenant is non-compliant with CSSR, then written notice from the PHA to the tenant states:

- 1) Finding of non-compliance with CSSR.
- 2) Lease renewal is contingent upon compliance or execution of a written work-out agreement (Attachment C) with the PHA presenting the means through which noncompliant family members will comply or the family provides written assurance that is satisfactory to the PHA explaining that the tenant or other noncompliant resident no longer resides in the unit.
- 3) The tenant may request a grievance hearing on the PHA determination, in accordance with 24 CFR Part 966, subpart B, and that the tenant may exercise any available judicial remedy to seek timely redress for the PHA's nonrenewal of the lease because of such determination

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

Entrance Acknowledgement

Date:

Participant Name:

I have received and read the Community Services and Self Sufficiency Requirement. I understand that as a resident of public housing, I am required by law to contribute 8 hours per month 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. My signature below certifies I received notice of this requirement at the time of initial program participation.

Signature: _____

Date of Signature: _____

Community Services 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 of community service or participate in an economic self-sufficiency program. I certify I have complied with this requirement.

Signature: _____

Date of Signature: _____

ATTACHMENT C

COMMUNITY SERVICE RECORD FORM

Community Service Extension

I, _____ have read the Community Service/Self Sufficiency Policy (CSSR) and understand that _____ did not comply with CSSR's requirement for completing the number of community service hours required to renew my lease for **2010**. I understand that my lease renewal is contingent upon execution of a written workout agreement with the Housing Authority presenting the means through which noncompliant family members will comply.

I hereby request an agreement to make up the ___ deficient hours.

I realize that this extension does not constitute a waiver of my obligation to comply with CSSR's requirements for the current lease term. I also understand that only one (1) extension will be granted and failure to submit written documentation of the hours completed by _____ will result in termination of my lease without reinstatement.

Head of Household _____ Date _____

Resident Signature _____ Date _____

Approved _____ Date _____

Housing Authority: _____ Executive Director
Signature *Title*