

COMMUNITY SERVICE AND SELF SUFFICIENCY REQUIREMENT (CSSR) POLICY

A. Background

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes and other activities which help an individual toward self sufficiency and economic independence. This is a requirement of the Public Housing Lease. (24 CFR Subpart F, 960.600 through 960.609)

B. Definitions

Community Service - volunteer work which includes, but is not limited to:

1. Local public or nonprofit institutions, such as schools, Head Start Programs, before-or after-school programs, 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. The PHA to improve grounds or 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, outreach and assistance with PHA-run self-sufficiency activities including supporting computer learning centers

6. Care for the children of other residents so parents may volunteer

NOTE: Political activity is excluded.

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

1. Job readiness or job training while not employed
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. Apprenticeships (formal or informal)
5. Substance abuse or mental health counseling
6. Reading, financial and/or computer literacy classes
7. English as a second language and/or English proficiency classes
8. Budgeting and credit counseling

Exempt Adult

1. A person who is 62 years or older
2. A person who is 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), and who certifies that, because of this disability, she or he is unable to comply with the service provisions of this subpart
3. A primary caretaker of a person who is blind or disabled
4. A person engaged in work activities. In order for an individual to be exempt from the CSSR 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”

- a. Working at least 30 hours per week in an unsubsidized job
 - b. Subsidized private-sector employment
 - c. Subsidized public-sector employment
 - d. On-the-job-training
 - e. Job-search
 - f. Community service programs
 - g. Vocational educational training (not to exceed 12 months with respect to any individual)
 - h. Job-skills training directly related to employment
 - i. 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
 - j. Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalency, in the case of a recipient who has not completed secondary school or received such a certificate
- 5. A member of a family receiving and compliant with requirements of the Temporary Assistance for Needy Families (TANF) (45 CFR Part 260)
 - 6. A member of a family receiving and compliant with requirements of the Supplemental Nutrition Assistance Program (SNAP) (7 CFR Parts 271, 272 and 273)
 - 7. A member of a family receiving assistance, benefits, or services 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.

C. Basic Requirements of the Program

- 1. The eight (8) hours per month may be either volunteer work or self sufficiency program activity or a combination of the two.

2. 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. The PHA will make the determination of whether to allow or disallow a deviation from the schedule.
3. Activities must be performed within the community and not outside the jurisdictional area of the PHA.

D. Family obligations

1. At lease execution, all adult members (18 or older) of a public housing resident family must
 - a. provide documentation that they are exempt from CSSR if they qualify for an exemption, and
 - b. sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the CSSR will result in nonrenewal of their lease.
2. At each annual re-examination, non-exempt family members must present a completed documentation form (to be provided by the PHA) of activities performed over the previous twelve (12) months. This form will include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed.
3. At each annual re-examination, exempt family members must present verification that they are still exempt.
4. Change in exempt status:
 - a. If, during the twelve (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the PHA and provide documentation of such.
 - b. If, during the twelve (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the PHA. The PHA will provide the person with the Recording/Certification documentation form and a list of agencies in the community that provide volunteer and/or training opportunities.
5. If a family member is found to be noncompliant at re-examination, he/she and the Head of Household will sign an agreement with the PHA to make up the deficient hours over the next twelve (12) month period.

E. PHA obligations

1. To the greatest extent possible and practicable, the PHA will
 - a. provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their CSSR 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 CSSR)*
 - b. provide in-house opportunities for volunteer work or self sufficiency programs.
2. The PHA 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 PHA will make the final determination as to whether or not a family member is exempt from the CSSR. Residents may use the PHA's Grievance Procedure if they disagree with the PHA's determination.

F. Noncompliance of Family Member

1. At least thirty (30) days prior to annual re-examination and/or lease expiration, the PHA will begin reviewing the exempt or non-exempt status and compliance of family members.
2. If the PHA finds a family member to be noncompliant, the PHA will provide written notification to the noncompliant family member including
 - a. a brief description of the finding of noncompliance
 - b. a statement that the PHA will not renew the lease at the end of the current 12-month lease term unless
 - 1) the tenant enters into a written work-out agreement with the PHA, or
 - 2) the family provides written assurance, satisfactory to the PHA, explaining that the noncompliant member no longer resides in the unit

3. If the noncompliant family member refuses to sign a written work-out agreement or fails to comply with the terms of the work-out agreement, the PHA will initiate termination of tenancy proceedings at the end of the current 12-month lease due to the fact that the family is failing to comply with lease requirements.
4. The PHA will provide 30 days notice to the family of the grounds for terminating the tenancy and for the non-renewal of the lease and inform them
 - a. that they may request a grievance hearing in accordance with 24 CFR Part 966
 - b. that they may exercise any available judicial remedy to seek timely redress for the PHA's non-renewal of the lease (be represented by counsel, refute the evidence presented by the PHA, including the right to confront and cross-examine witnesses and present any affirmative legal or equitable defense which the tenant may have)