

**COMMUNITY SERVICE AND SELF-SUFFICIENCY REQUIREMENT
POLICY**

**For the
HOUSING AUTHORITY OF THE CITY OF WILLIAMSON
WILLIAMSON, WEST VIRGINIA**

Adopted by Board of Commissioners

Resolution No: _____

Date of Adoption: _____

Effective Date of Implementation: _____

Authorized Use by the Housing Authority of the City of Williamson

© 2015 The Nelrod Company, Fort Worth, Texas 76109

Community Service and Self-Sufficiency Requirement (CSSR) Policy

BACKGROUND

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 offers public housing residents an opportunity to contribute to the communities that support them while gaining work experience. Community Service is not employment and may not include political activities.

Section 512 of the Quality Housing and Work Responsibility Act of 1998, which amends Section 12(c) of the Housing Act of 1937, mandates that each non-exempt adult family member (18 years old or older) who resides in public housing must contribute eight (8) hours per month of community service or participate in an economic self-sufficiency program for eight (8) hours per month. This CSSR requirement can also be met by performing a combination of eight (8) hours of community service and participation in an economic self-sufficiency program per month.

The required community service contribution or self-sufficiency participation, or combination of both activities, may be completed at 8 hours each month or aggregated throughout the year, as long as 96 hours is completed by each annual reexamination.

The Housing Authority of the City of Williamson (hereinafter referred to as PHA) believes that the community service and self-sufficiency requirements should not be perceived by the resident to be a punitive or demeaning activity, but rather to be a rewarding activity that will benefit both the resident and the community.

Pursuant to 24 CFR Subpart F, 960.600 – 960.609, the PHA establishes the following Community Service and Self-Sufficiency Requirement (CSSR) Policy.

PROGRAM ADMINISTRATION

The effective date of participation for all non-exempt family members is the date the family executes the lease containing the CSSR requirement. New admissions, as well as families in occupancy, are affected by this requirement.

1. The PHA will provide written notice to all applicants and residents of the CSSR requirement and describe the process to determine which family members are exempt from the requirement and the process to change the exemption status of family members.
2. The PHA has the option to administer the CSSR requirement directly.
 - a. The PHA will not provide names and contact information of agencies offering opportunities for residents, including persons with disabilities, to comply with the CSSR requirements.
 - b. The PHA will not choose to coordinate with social service agencies, local schools, and human service offices to develop a referral list of names and agency contacts.

The PHA will create an agreement with the local organizations to allow the organizations to advertise their program, assist with transportation, child care, or other barriers, and be able to verify the CSSR hours completed by the non-exempt family members.

COMMUNITY SERVICE ACTIVITIES

The PHA will provide guidance and a list of acceptable activities or advance approval of a community service activity to avoid the possibility of refusing to recognize the activity as eligible after the non-exempt family member performs it.

1. Eligible community service activities include, but are not limited to, those provided by the following entities:
 - a. 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).
 - b. 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.
 - c. Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels.
 - d. 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.
 - e. PHA housing management to improve grounds or provide gardens (as long as such work does not alter the PHA's insurance coverage).
 - f. 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.
 - g. Care for the children of other residents so parents may volunteer.

The PHA will accept community services activities performed at for profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based community service.

The PHA will not substitute community service activity performed by a non-exempt family member for work ordinarily performed by a PHA employee. The non-exempt family member may perform community service on PHA property or through PHA programs to assist with or enhance work done by a PHA employee.

ECONOMIC SELF-SUFFICIENCY ACTIVITY

Economic Self-Sufficiency Activity is any program designed to encourage, assist, train, or facilitate the economic independence of assisted families or to provide work experience for such families. It includes any work activities as defined in the Social Security Act.

Eligible economic self-sufficiency activities 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 RESIDENTS

The following family members are exempted from the CSSR requirements:

1. The elderly, age sixty-two (62) years of age or older.
2. Blind or disabled as defined under law and who certify that because of this disability, he/she is unable to comply with the CSSR requirement. Existing documentation will be accepted as evidence of disability; however, disabled family members are not automatically exempt from the requirement.
3. A family member who is the primary caretaker for someone who is blind or disabled.
4. An adult family member engaged in work activities. The PHA will consider twenty (20) hours per week as the minimum number of hours for a work activity. The non-exempt family member must be participating in one of the following work activities:
 - 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
 - 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 certificate of general equivalency (in the case of a recipient who has not completed secondary school or received such a certificate)
5. A family member who meets the requirements of being exempted for having to engage in a work activity under the State program funded under Part A of Title IV of the Social Security Act (42 U.S.C. 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

6. A family member 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. 601 et seq.) or under any other State welfare program (Temporary Assistance for Needy Families [TANF] and Supplemental Nutrition Assistance Program [SNAP] for which the PHA is eligible, including a State-administered Welfare-to-Work program, and who is in compliance with the requirements of such program.

CHANGE IN EXEMPT STATUS

1. When a non-exempt family member becomes exempt, it is his/her responsibility to report the change in exempt status and provide documentation to the PHA.
2. When an exempt family member becomes non-exempt, it is his/her responsibility to report the change in status to the PHA.

The PHA will make the final determination whether to grant an exemption from CSSR. If a resident does not agree with the PHA's determination, the resident has the right to dispute the decision through the grievance process.

RESIDENT'S RESPONSIBILITIES

At lease execution or annual reexamination all adult family members of a public housing resident family must:

1. Provide documentation, if applicable, that they qualify for an exemption from CSSR.
2. Sign the CSSR Certification that they have received and read the CSSR Policy and understand that failure to comply with CSSR requirements will result in non-renewal of their lease, unless they are exempt from the CSSR requirement.

At each regularly scheduled rent reexamination:

1. Each non-exempt family member must present a signed certification, on a form provided by the PHA, of his/her CSSR activities performed over the previous twelve (12) months.
2. Each exempt family member must present verification that the/she is still exempt.

PHA'S RESPONSIBILITIES

The PHA will verify annually exemptions to the CSSR requirement and completions of the CSSR requirements for non-exempt family members.

1. At least 30 days before the annual reexamination and/or lease expiration, the PHA will review the exempt or non-exempt status and compliance of non-exempt adult family members.
2. The PHA will obtain third-party verification of the completion of CSSR activity completed outside of the PHA.
3. The PHA will retain reasonable documentation of service requirement performance or exemption in the resident's file.
4. The PHA will comply with non-discrimination and equal opportunity requirements.

NONCOMPLIANT RESIDENTS

The PHA will not evict a family due to non-compliance with CSSR requirements. The PHA will provide a written notification to the family which must include:

1. A brief description of the finding of non-compliance with CSSR.
2. A statement that the PHA will not renew the lease at the end of the current 12-month lease term unless the tenant enters into a written Work-Out Agreement with the PHA or the family provides written assurance satisfactory to the PHA explaining that the tenant or other non-compliant resident no longer resides in the unit.

The Work-Out Agreement will include:

1. The means by which the non-compliant non-exempt family member will comply with the CSSR requirement
2. The number of delinquent CSSR hours
3. How the delinquent hours will be remedied during the next 12 months
4. The number of hours, if any, that will be required under the new lease

THE COMPLIANCE (WORK-OUT AGREEMENT) ENFORCEMENT

If a family refuses to sign or fails to comply with the terms of the written Work-Out Agreement, the PHA will initiate termination of the tenancy at the end of the current 12-month lease. The termination is due to the family's failure to comply with lease requirements.

The PHA will provide the following when initiating the termination of tenancy:

1. A 30-day notice to the tenant of the grounds for terminating the tenancy and for non-renewal of the lease
2. The tenant's right to request a grievance hearing on the PHA's determination
3. The tenant's right to exercise any available judicial remedy to see timely redress for the PHA's nonrenewal of the lease because of noncompliance with the CSSR requirements;
4. The tenant's rights to be represented by counsel
5. Opportunity for the tenant to 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
6. A decision on the merits

NOTICE

The Nelrod Company has made its best efforts to comply with regulations, laws, and Federal/local policies. The Nelrod Company does not offer advice on legal matters or render legal opinions. We recommend that this policy be reviewed by the Housing Authority's general counsel and/or attorney prior to approval by the Board of Commissioners.

The Nelrod Company is not responsible for any changes made to these policies by any party other than The Nelrod Company.