

# COMMUNITY SERVICE AND SELF SUFFICIENCY POLICY

## A. Overview of the Community Service & Self-Sufficiency Requirement

The Community Service and Self-Sufficiency Requirement (CSSR) is mandated by Congress as a part of the Public Housing Reform Act of 1998. This law requires that every adult resident (18 or older) in public housing contribute or participate for eight (8) hours each month in a community service or a self-sufficiency activity or combination of both, as a condition of receipt of Federal housing assistance. Under this provision of law, noncompliance with the community service and self-sufficiency requirement is a violation, and is grounds for non-renewal of the lease at the end of a 12-month lease term.

## B. Definitions

**Community Service:** 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. Activities must be performed within the community and not outside the jurisdictional area of the Authority.

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

- 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);
- 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;
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels;
- 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;
- PHA housing 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; and,
- Care for the children of other residents so parents may volunteer.

**Self Sufficiency:** A self-sufficiency program includes any program designed to encourage, assist, train, or facilitate the economic independence of the family in public housing. This includes, but is not limited to:

- Job search after graduation (temporary 6 month allowance); a minimum of 8 hours per month (48 hours over the course of 6 months)
- Job training
- Employment counseling
- Work placement
- Basic skills training
- Education
- English proficiency
- Reading or computer literacy classes
- Budgeting or credit counseling

- Apprenticeship
- Substance abuse and mental health treatment programs necessary for an individual to become ready to work

Service Requirements: The obligation of each adult resident, other than an exempt individual, to perform community service or participate in an economic self-sufficiency program required in accordance with 24 CFR 960.603.

Except for any family member who is an exempt individual, each adult resident of public housing must:

- Contribute 8 hours per month of community service; or
- Participate in an economic self-sufficiency program for 8 hours per month; or
- Perform a combination of 8 hours per month of community service and participate in an economic self-sufficiency program.

*The required community service or self-sufficiency activity may be completed at 8 hours each month or may be aggregated across a year. Any blocking of hours is acceptable as long as 96 hours is completed by each annual certification.*

### C. New Residents

New residents will be provided with a copy of the CSSR Policy. The new resident and all adult household members (18 or older) must sign a certification that they received and read the policy and understand that if they are not exempt, failure to comply with the CSSR will result in nonrenewal of their lease.

At lease execution, new residents and all adult household members (18 or older) will be identified as exempt or non-exempt and must certify to their status. If non-exempt, the CSSR will begin 30 days after the lease is signed.

### D. Exemptions from Community Service

At lease execution and/or at least 30 days before the annual reexamination, residents can apply for an exemption by completing the LHAND Exemption Certification and must provide documentation (Third-Party Verification), if applicable, that they qualify for one of the following exemptions:

FAMILY EXEMPTIONS (If a member of the household receives one of the following, then the entire family is exempt)

- TAFDC (and is in compliance with the program)
- EAEDC (and is in compliance with the program)
- SNAP (and is in compliance with the program)
- SSI
- State subsidized child care (i.e. by the Office of Child Care Services ("OCCS") or the Department of Education's Community Partnerships for Children)
- The state Earned Income Tax Credit
- State Veteran's Services benefits

INDIVIDUAL EXEMPTIONS (If a member of the household qualifies for one of the following, then only that member is exempt)

- Will be 60 years of age or older before lease-up or before the upcoming annual recertification
- Disabled or blind and meets one of the following:
  - receives SSDI disability benefits
  - receive MassHealth due to disability
  - has a disability that meets the TAFDC standard for disability exemption
- The primary caretaker for a disabled or blind family member who lives in the resident's home and the disabled person meets one of the following:

- the disabled person receives Social Security or MassHealth on the basis of a disability
  - the disabled person's doctor verifies that resident is needed to care for the disabled person
- The parent or legal guardian of a child under the age of 2 who lives in the resident's home (in a two parent family, only one person can be exempt on this basis)
- Within the last 120 days of pregnancy
- A teen parent age 18 or 19 and attending full-time high school or a full-time GED training or work program that totals at least 20 hours per week
- On TAFDC and exempt from its work program
- A foster parent taking care of a foster child with serious care needs as determined by the Department of Social Services
- Engaged in the following types of work activities at least 20 hours per week
  - Paid work including self-employment
  - On the job training
  - Job search and job readiness
  - Vocational and job skills training
  - Job related education (such as GED)
  - Paid or unpaid childcare for someone who is doing public housing community service or TAFDC community service

LHAND will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use LHAND's Grievance Procedure if they disagree with LHAND's determination.

#### **E. Non-Exempt Residents:**

Residents who are not exempt may fulfill this requirement by performing community service and/or participating in approved self-sufficiency programs.

##### Community Service

Residents are required to find their own opportunities to perform community service. LHAND will provide residents with a list of volunteer resources. To verify community service activities, residents must utilize the LHAND Activity Log or similar certification.

##### Self-Sufficiency

To verify participation in self-sufficiency programs, residents may utilize the LHAND Activity Log or similar certification or must provide proof of enrollment (Third-Party Verification) describing the type of training/educational program, the number of hours the resident will participate each month, and the date the program will end.

- Activity Logs may be submitted to the Management Office at any time, but must be provided to Management by their next annual review. It is recommended that residents keep a copy of the Activity Logs since the resident is responsible for ensuring that Management receives the logs by their annual review. The Activity Log will include places for supervising official's signature verifying to the number of hours contributed.

#### **F. Changes in Exempt/Non-Exempt Status:**

- If, during the twelve (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the LHAND and provide documentation of such.
- If, during the twelve (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the LHAND.

#### **G. Noncompliance of family members:**

- At least thirty (30) days prior to annual re-examination and/or lease expiration, the LHAND will begin reviewing the exempt or non-exempt status and compliance of family members;

- If the LHAND finds a family member to be noncompliant, the LHAND will enter into an Agreement with the noncompliant member and the Head of Household to make up the deficient hours over the next twelve (12) month period. If the noncompliant member and the Head of Household fail to enter into an Agreement, the lease will not be renewed and the entire family will have to vacate, unless the noncompliant member agrees to move out of the unit;
- If at the next annual re-examination, the family member still is not compliant, the lease will not be renewed and the entire family will have to vacate, unless the noncompliant member agrees to move out of the unit;
- The family may use the LHAND's Grievance Procedure to protest the lease termination.