

COMMUNITY SERVICE & SELF-SUFFICIENCY REQUIREMENT (CSR)
POLICIES & PROCEDURES

I. Overview of the Community Service & Self-Sufficiency Requirement

The Community Service and Self-Sufficiency Requirement is mandated by Congress as a part of the Public Housing Reform Act of 1998. This law requires that low-income families in public housing contribute or participate for eight (8) hours a 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.

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.

Service Requirement: The obligation of each adult resident (18 – 61), other than an exempt individual, to perform community service or participate in an economic-self sufficiency program required in accordance with Sec. 960.603.

- (a) Service requirement. Except for any family member who is an exempt individual, each adult resident of public housing must:
 - (1) Contribute 8 hours per month of community service; or
 - (2) Participate in an economic self-sufficiency program for 8 hours per month; or
 - (3) Perform 8 hours per month of combined activities as described in paragraphs (a)(1) and (a)(2) of this section. (Residents have to do the 8 hours each month, rather than just 96 hours by the end of the year.)

II. AHA Annual Review Process

Information regarding the CSR will be included in the letter sent to residents from AHA Property Management regarding their annual review. The clock for required self-sufficiency or community service hours will begin at the time the annual recertification takes effect. Prior to annual review meetings, AHA will verify and notify residents who meet at least one of the following exemptions:

- 62 years or older
- Blind or Disabled (if known to AHA)
- Employed (employer verification on number of hours per month is already part of the existing employment verification form)

- ❑ Member of a Family Household with someone who is in compliance with the state welfare program/Temporary Assistance for Needy Families (TANF)
- ❑ Snap or Food Stamp Benefits.

If a resident wants to apply for another exemption, s/he must follow the exemption process below. If the resident is not exempt, then s/he is required to start participation in a self-sufficiency activity or performing community service when the recertification takes effect. Residents will be provided with a list of exemptions with verification resources for each. Each resident file will include verification of the resident's exempt or non-exempt status and a tracking log for self-sufficiency or community service activities. Upon determination by the Authority that a family has non-exempt, non-compliant members, the Authority will notify the head of household and non-compliant resident(s) as soon as possible of the non-compliance and of their right to enter into a written agreement to cure the non-compliance and to request a grievance hearing. For each household, the CSR will be reviewed at each annual review.

III New Residents

New resident orientations will include the CSR. New residents will be identified as exempt or non-exempt immediately upon residency, with the same 30-day window to apply for another exemption before community service is to commence. The CSR will begin 30 days after the lease is signed if no exemption is granted.

IV. Residents Living in AHA Communities Managed by Other Agencies

AHA residents living in public housing managed by other agencies are also required to perform the CSR, and will receive the same information and assistance from their property managers.

V. The Process for Obtaining an Exemption

Prior to each annual review, residents will be informed if they are automatically exempt from the CSR (see Annual Review Process above). At the annual review, residents can apply for another exemption through self-certification or Third-Party Verification. Residents may **self-certify** that:

- 1) S/he is Blind or Disabled and unable to comply with the service provisions.
- 2) S/he is a victim of domestic violence, and program participation would put her/him at risk.
- 3) S/he graduated from an educational or training program within the past six months and is currently job searching (exemption for up to 6 months from graduation).
- 4) S/he is 55 or older and unable to comply with the service provisions. Residents may also obtain an exemption form for **Third-Party Verification** for one of the following exemptions:
 - a. Work Exempt via a state welfare/TANF/Social Security Administration (SSA) program with Third-Party Verification from the agency.
 - b. Primary caretaker of someone disabled or elderly, with Third-Party Verification by an established agency providing oversight, or by the doctor of the elderly/disabled person.

- c. Providing Child Care for someone doing CSR with Third Party Verification by an established agency providing oversight.
- d. Pregnant with Third Party Verification from a Doctor/Medical Provider.
- e. Person with pending SSI or unemployment applications with Third Party Verification (this exemption can be used only once).
- f. Person with DSHS/SSA disputes with Third Party Verification (this exemption can be used only once).
- g. Sick or suffering from a temporary disability expected to last 60 days or more with Third Party Verification from a Doctor/Medical Provider.
- h. Parent/legal guardian home schooling a child under the age of 18 with Third Party Verification from Skagit Public Schools.
- i. Active Duty Reservists/Military personnel with official Third Party Verification.

The exemption request form must be returned to Property Management within 30 days of the annual review. When an exemption is granted, it will be in effect until the next annual review, except for the allowance for a six-month job search after graduation. Exemptions requested after the CSR has been implemented can be granted with approval from the resident's Property Manager, and will be in effect until the next annual review.

VI. Self-Sufficiency Options

Residents who are not exempt may fulfill this requirement by participating in the following activities for a minimum of eight (8) hours a month. Residents will need to provide proof of enrollment, and a staff person with the program, school or college will need to verify hours every month, just as required for community service activities.

- Economic Self-Sufficiency Programs – Enrollment in any employment program.
- Vocational Education Programs/Job Skills Training
- On-the-Job Training, Apprenticeships or Internships
- High School/GED Programs
- ESL Program
- Higher Education (college or university)

VII. Community Service

Non-exempt residents are required to find their own opportunities to perform community service. To verify community service activities, residents can utilize the log, postcards, meeting minutes and/or other documentation that provides the same information as the postcards and logs. Service verification documents may be sent or taken to the resident's property management office at any time, but must be provided to property management by their next annual review. It is recommended that residents keep a copy of their service verification forms since the resident is responsible for ensuring that property management receives the forms by their annual review. Residents may make up any missed CS hours during any subsequent month with authorization from their Senior Property Manager.

VIII. Resident-Generated Community Service

At the resident orientation or annual review, residents will also receive a AHA policy regarding on-site services in AHA communities, which will include a list of acceptable and not acceptable CSR activities. Each community council or resident club may decide if they want to serve as Third-Party Verification for council/club meetings and activities. Residents who want credit for community service hours in a AHA community must get authorization from the Property Manager prior to performance. Property Managers may delegate this authority to other property staff. Property Managers may allow Third-Party Verification by property management staff for meeting attendance or participation in a community activity. All meetings and activities verified as performance of the CSR by a community council, resident club or property management staff must have a minimum of three attendees, and meet one or more of the following criteria:

- 1) Promote social connections;
- 2) Increase community safety, and/or
- 3) Increase the quality of life for residents. Under no circumstances AHA serve as Third-Party Verification if a resident performs CSR inside a resident's unit, or with vulnerable populations (such as the elderly, disabled or children).

This policy requires that residents applying for the following exemptions *must do so only under the oversight of another agency*:

- Primary caretaker of someone disabled or elderly.
- Providing Child Care for someone doing CSR.

IX. AHA Volunteers

At the resident orientation or annual review, residents will receive an AHA policy regarding service as a AHA volunteer. Property Managers may organize and authorize CSR activities, such as community clean-ups, but only with prior approval from both Risk Management and Human Resources. Factors to be addressed for AHA volunteers include, but are not limited to, the need for a job description, volunteer orientation, training, safety equipment, and supervision.

X. Grievance Hearings

Grievance hearings will be available to residents under the form of a **CSR Review Staff**: This staff will review disputes between property management and residents related to exemptions and qualifying self-sufficiency and community service activities. The staff will also address other issues that arise related to CSR policies and procedures and HUD's review of the plan. The staff will also review and approve all "cure agreements" between property management and residents to make up CSR hours. At the point of eviction due to noncompliance, a resident would then be eligible for a standard AHA grievance hearing.