



Akron Metropolitan Housing Authority

Community Service Policy

(In accordance with 24 CFR 960.603-960.611)

A. Requirement/Background

Community Service and Self-Sufficiency Requirement (CSSR) 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.” (See 24 CFR 960.601(b)).

The Quality Housing and Work Responsibility Act of 1998 mandates housing authorities to administer community service and economic self-sufficiency requirements that each nonexempt (see definitions) adult household member (18 years or older) shall either contribute 8 hours per month of community service, or participate in an economic self-sufficiency program for 8 hours per month (see 24 CFR 960.603(a)).

The requirements can also be met by performing a combination of 8 hours of community service and participation 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.

This is a requirement of the Public Housing Lease.

B. Exemptions

The PHA shall provide an exemption from the community service requirement for any persons who are:

1. 62 years of age or older;
2. Blind or disabled individual, as defined under section 216 [i][I] or 1614 of the Social Security Act, and who certify that, because of this disability, she or he is unable to comply , or
 - a) is a primary caretaker of such individual;

3. Engaged in work activities (see Notice PIH 2003-17 (HA)). 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;
 - 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;
4. 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
5. 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 Ohio, including a State-administered Welfare-to-Work program, and has not been found by the State or other administering entity to be in noncompliance in noncompliance with such a program.

The PHA will re-verify exemption status annually except in the case of an individual who is 62 years of age or older.

The PHA will make the final determination whether to grant an exemption from the community service requirement. If a resident does not agree with the PHA’s determination, the resident may dispute the decision through the Grievance Process.

C. Community Services: Eligible community service activities include, but are 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. 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,
6. Care for the children of other residents so parents may volunteer.

No PHA may substitute community service activity performed by a resident for work ordinarily performed by a PHA employee. However, residents may do community service on PHA property or with or through PHA programs to assist with or enhance work done by a PHA employee.

The PHA will give residents the greatest choice possible in identifying community service opportunities.

D. Self-Sufficiency: Eligible 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.

E. CSSR Partnerships AMHA will work with available grant programming including the ROSS Service Coordinators program or Family Self-Sufficiency (FSS) program and may coordinate Individual Training and Services Plans (ITSPs) with CSSR. The ITSP is a tool to plan, set goals and track movement towards self-sufficiency through education, work readiness and other supportive services such as health, mental health and work supports. Specific CSSR activities may be included in ITSPs to enhance a person's progress towards self-sufficiency. Regular meetings with PHA coordinators may satisfy CSSR activities and PHA Service Coordinators or FSS Program Coordinators may verify community service hours within individual monthly logs.

F. Resident Responsibilities at Lease Execution or Re-examination: 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, if applicable, that they qualify for an exemption; (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 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).

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 as soon as possible.

The PHA will provide certifications for exemptions at any initial, annual, or interim certification. The CSSR policy along with certifications will be provided at the initial and annual recertification as part of the required process.

G. Documentation of CSSR Completion: Exemptions and CSSR completion is verified annually by the PHA. PHA must include in the CSSR policy that exemption/CSSR completion is verified annually by the PHA. At least 30 days before the annual reexamination and/or lease expiration, the PHA reviews the exempt or non-exempt status and compliance of non-exempt family members (see 24CFR960.605(c)(3)).

At each regularly scheduled annual re-examination, each non-exempt family member presents a signed certification on a form provided by the PHA of

CSSR activities performed over the previous twelve (12) months. PHAs must obtain third- party verification of CSSR completion administered through outside organizations. PHA form will include places for signature confirmation by supervisors, instructors, or counselors certifying the number of hours contributed. Additional supporting documentation may be requested of the resident to verify CSSR participation or exempt status. Copies of the recertification forms and supporting documentation must be retained in PHA files.

H. Non-compliance: PHAs may not evict a family due to CSSR non-compliance. However, if PHA finds a tenant is non-compliant with CSSR, then the PHA must provide written notification to the tenant of the non-compliance 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 that is satisfactory to the PHA explaining that the tenant or other non-compliant resident no longer resides in the unit. Such written work-out agreement must include the means through which a non-compliant family member will comply with the CSSR requirement.

The tenant may request a grievance hearing on the PHA determination, in accordance with 24 CFR Part 966, subpart B, and the tenant may exercise any available judicial remedy to seek timely redress for the PHA's non-renewal of the lease because of such determination.

I. Enforcement Documentation: Should a family member refuse to sign a written work-out agreement, or fail to comply with the terms of the work-out agreement, PHA will initiate termination of tenancy proceedings at the end of the current 12-month lease (24 CFR 966.53(c)) due to the fact that the family is failing to comply with lease requirements. When initiating termination of tenancy proceedings, PHA will provide the following procedural safeguards:

1. Adequate notice to the tenant of the grounds for terminating the tenancy and for non-renewal of the lease;
2. Right of the tenant to be represented by counsel;
3. 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; and,
4. A decision on the merits.

J. PHA Responsibility The PHA will monitor CSSR compliance reports per HUD recommendations. The PHA will administer its own community service program, and encourage collaborative agreements with volunteer and community agencies.

The PHA will provide residents with a list of examples of community service activities and volunteer opportunities available throughout the community.

If you would like more information about community resources available to help you complete community service requirements, please call the Resident Services Information Line 330-376-9699 or your Property Management office.