



Attachment 8

COMMUNITY SERVICE & SELF SUFFICIENCY POLICY

I. Background

The United States Housing Act of 1937, as amended on October 12, 1998 by the Quality Housing and Work Responsibility Act of 1998, contained a Community Service and Self Sufficiency Requirement (CSSR) that every adult resident of public housing contribute eight hours of community service each month, or participate in an economic self sufficiency program for eight hours each month. The Housing Authority of the City of Cumberland (HACC) has updated the required policy to reflect the most recently published HUD Notice PIH-2015-12 dated August 13, 2015.

II. Requirements of the Program

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 is not employment and may not include political activities."

Community service and economic self-sufficiency requirements mandate that each nonexempt adult household member (18 years or older) need to either:

- A. Contribute eight (8) hours per month of community service, or
- B. Participate in an economic self sufficiency program for eight (8) hours per month.

The requirements can also be met by performing a combination of eight (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 eight (8) hours each month or may be aggregated across a year. Any blocking of hours is acceptable as long as ninety-six (96) hours is completed by each annual certification.

III. Community Services

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

- 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 HACC 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; or 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. HACC to improve grounds or provide gardens (so long as such work does not alter the HACC'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 HACC run self sufficiency activities including supporting computer learning centers; and,
- F. Care for the children of other residents so parents may volunteer.

HACC cannot substitute a community service activity performed by a resident for work ordinarily performed by a HACC employee. However, residents may do community service on HACC property or with or through HACC programs to assist with or enhance work done by a HACC employee.

IV. Self Sufficiency

Eligible self sufficiency activities include, but are not limited to:

- A. Job readiness or job training while not employed;
- B. 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;
- C. Higher education (junior college or college);
- D. Apprenticeships (formal or informal);
- E. Substance abuse or mental health counseling;
- F. Reading, financial and/or computer literacy classes;
- G. English as a second language and/or English proficiency classes;
- H. Budgeting and credit counseling.

V. Partnerships

The HACC Resident Services Coordinators 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 the Resident Services

Coordinators may satisfy CSSR activities and the coordinator may verify community service hours within individual monthly logs.

VI. Exempt Residents

HACC is responsible for determining if an individual is exempt from the CSSR and the documentation needed to support the exemption. Exemptions for adult residents, as codified at 24 CFR 960.601, include persons who are:

- A. 62 years or older;
- B. 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 certify that, because of this disability, she or he is unable to comply with the service provisions of this subpart, or is a primary caretaker of such individual;
- C. Engaged in work activities. 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 a minimum of 30 hours per week 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)):
 - 1. Unsubsidized employment;
 - 2. Subsidized private-sector employment;
 - 3. Subsidized public-sector employment;
 - 4. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available;
 - 5. On-the-job-training;
 - 6. Job search;
 - 7. Community service programs;
 - 8. Vocational educational training (not to exceed 12 months with respect to any individual);
 - 9. Job-skills training directly related to employment;
 - 10. 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;
 - 11. 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;
- D. Able to meet requirements 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 Maryland including a State-administered Welfare-to-Work program; or,
- E. 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 Maryland, 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.

VII. Resident Responsibilities

At lease execution or re-examination, after the effective date of the adopted policy, all adult members (18 or older) of a HACC resident family must:

- A. Provide documentation, if applicable, that they qualify for an exemption; and,
- B. 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.

When a non-exempt person becomes exempt, it is his or her responsibility to report this to HACC and provide documentation. When an exempt person becomes non-exempt, it is his or her responsibility to report this to HACC as soon as possible.

VIII. Documentation of CSSR Completion

HACC is required to verify annually the CSSR exemption or completion by each adult resident. At least 30 days before the annual reexamination and/or lease expiration, HACC will review the exempt or nonexempt status and compliance of non-exempt family members.

At each regularly scheduled rent re-examination, each non-exempt family member presents a signed certification on a form provided by HACC of CSSR activities performed over the previous twelve (12) months. The form provides places for signature confirmation by supervisors, instructors, or counselors certifying the number of hours contributed and thus providing a third-party verification of CSSR completion administered through outside organizations.

Additional supporting documentation may be requested of the resident to verify CSSR participation or exempt status. Copies of the certification forms and supporting documentation must be retained in resident files.

IX. Noncompliance

HACC may not evict a family due to CSSR non-compliance. However, if HACC finds that a tenant is noncompliant with CSSR, then HACC must provide written notification to the tenant of the noncompliance which must include:

- A. A brief description of the finding of noncompliance with CSSR; and
- B. A statement that HACC 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 HACC, or the family provides written assurance that is satisfactory to HACC, explaining that the tenant or other noncompliant resident no longer resides in the unit. Such written work-out agreement must include the means through which a noncompliant family member will comply with the CSSR requirement.

The tenant may request a grievance hearing on the HACC 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 HACC's non-renewal of the lease because of such determination

X. 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, HACC is required to 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. When initiating termination of tenancy proceedings, HACC will provide the following procedural safeguards:

- A. Adequate notice to the tenant of the grounds for terminating the tenancy and for non-renewal of the lease;
- B. Right of the tenant to be represented by counsel;
- C. Opportunity for the tenant to refute the evidence presented by HACC, including the right to confront and cross-examine witnesses and present any affirmative legal or equitable defense which the tenant may have; and,
- D. A decision on the merits.

XI. Housing Authority Obligations

HACC shall identify all adult family members who are apparently not exempt from the community service requirement. HACC shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. HACC shall verify such claims.

- A. HACC will coordinate with social service agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions.
- B. Together with the Resident Advisory Councils, HACC may create volunteer positions such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.
- C. To the greatest extent possible and practicable, HACC will provide:
 - 1. Names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligations; and
 - 2. In-house opportunities for volunteer work or self-sufficiency programs.
- D. HACC 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.