Delaware County Housing Authority Community Service and Self-Sufficiency Requirement (CSSR)

The Quality Housing and Work Responsibility Act of 1998 contained a CSSR that every adult resident of public housing contribute eight hours of community service per month, or participate in an economic self-sufficiency program for eight hours per month.

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."

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

- Local public or nonprofit institutions, such as schools, Head Start Programs, beforeor 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 DCHA residents or their children, such as: Boy or Girl Scouts, Boys or Girls Club, Police Activities League (PAL), organized children's recreation, mentoring, or education programs, Big Brothers or Big Sisters, community clean-up programs, beautification programs;
- Programs funded under the Older Americans Act, such as senior meals programs, senior centers, Meals on Wheels;
- 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;
- Care for the children of other residents so parents may volunteer.

DCHA will not substitute community service activity performed by a resident for work ordinarily performed by a DCHA employee. However, residents may do community service on DCHA property or with DCHA programs to assist with or enhance work done by an employee.

Exempt Residents: Exemptions for adult residents include persons who are:

- 62 years or older;
- Blind or disabled, who certify that because of this disability, he or she is unable to comply with the service provisions, or is a primary caretaker of such individual;

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- 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 an activity that meets one of the following definitions of "work activity":
 - 1. Unsubsidized employment;
 - 2. Subsidized private or public-sector employment;
 - 3. On-the-job-training;
 - 4. Community service programs;
 - 5. Vocational educational training (not to exceed 12 months with respect to any individual);
 - 6. Job-skills training directly related to employment;
 - 7. 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;

Residents must complete 30 hours per week as the minimum number of hours for a work activity.

- Able to meet requirements under a State program funded under part A of title IV of the Social Security Act or under any other welfare program of the State including a Stateadministered Welfare-to-Work program; or,
- 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, or under any other welfare program, including a State-administered Welfare-to Work program, and has not been fund by the State or other administering entity to be in non-compliance with such a program. The Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program.

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

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

DCHAs Family Self-Sufficiency (FSS) program 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. The FSS Program Coordinators may verify community service hours within individual monthly logs and/or other designated tracking systems.

DCHA makes the final determination whether to grant an exemption from the community service requirement. If a resident does not agree with DCHA's determination, the resident may dispute the decision through DCHA's Grievance Procedures.

It is the resident responsibility at their annual re-examination, to provide documentation for all adult members (18 or older) that qualify for an exemption. DCHA will then make the determination as to whether the family member is exempt. If it is determined that the family member is not exempt, they will be required to sign a certification that they have received and read the policy and understand that if they are not exempt they must perform the eight hours of community service. Failure to comply with the requirements will result in nonrenewal of their lease.

Non-Compliance of Family Member:

- At least thirty (30) days prior to annual re-examination and/or lease expiration, DCHA will begin reviewing the exempt or non-exempt status and compliance of family members;
- If DCHA finds a member to be noncompliant, DCHA 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;
- The lease will not be terminated during that 12 month period. However, if any adult member of a household fails to satisfy the required hours per month, their lease will not be renewed after its 12 month period has expired.
- 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.

DCHA will notify residents that they are in non-compliance and that the lease will not be renewed unless the non-compliant resident enters into a written agreement with DCHA to comply and complete the requirement. If the family member no longer resides in the household, the family must provide written, satisfactory, verification to DCHA of the member's whereabouts. When a non-exempt person becomes exempt, it is his or her responsibility to report this to DCHA and provide documentation. When an exempt person becomes non-exempt, it is his or her responsibility to report this to DCHA as soon as possible.

At each regularly scheduled annual re-examination, each non-exempt family member must present a signed certification on a form provided by DCHA of CSSR activities performed over the previous twelve (12) months. Copies of the certification forms and supporting documentation will be retained in the tenant's files.

Tenant Self Certification: DCHA will accept a tenant's signed self-certification of compliance with the community service requirements. However, DCHA will review a sample of up to 10% of the self-certifications and validate their accuracy with third party verification to ensure compliance.