

Community Service & Self-Sufficiency Requirement (CSSR) Policy

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Article I. Purpose / Scope of the Policy

Section 1.01 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 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.

Article II. Requirements

Section 2.01 Each Adult resident of KCHA, who is not exempt, must:

- (a) Contribute 8 hours per month of community service; or
- (b) Participate in an economic self-sufficiency program (as defined in the regulations) for 8 hours per month; or
- (c) Perform 8 hours per month of combined activities (community service and economic self-sufficiency programs)

Section 2.02 Community service activities must be performed within the community and not outside KCHA jurisdictional area, unless KCHA makes an exception for good cause. Families must request exceptions in writing. Within 10 days of receiving the family's request, KCHA will notify the family in writing of its decision. KCHA may require the family to provide documentation to support their request.

Section 2.03 An individual may not skip a month and then double up the following month, unless special circumstances warrant it. KCHA will make the determination of whether to permit a deviation from the schedule. No hours may be "donated" or performed by any individual other than the family member who is required to perform the community service.

Section 2.04 Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month, must notify KCHA in writing within 10 days of the circumstances becoming known. KCHA may require those individuals to provide documentation to support their claim.

Article III. Definitions

Section 3.01 Exempt Individual. An exempt individual is an adult who:

- (a) Is under 18 years of age;
- (b) Is age 62 years or older;
- (c) Is blind or disabled (as defined under section 216[i][1] or 1614 of the Social Security Act);
- (d) Is a primary caretaker of such an individual, as described in 3.01 (c);
- (e) Engaged in work activities for a minimum 30 hours per week (must be verified).

Work activities are defined as the following:

- i. Unsubsidized employment;
 - ii. Subsidized private-sector employment;
 - iii. Subsidized public-sector employment;
 - iv. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available;
 - v. On-the-job-training;
 - vi. Job-search;
 - vii. Community service programs;
 - viii. Vocational educational training (not to exceed 12 months with respect to any individual);
 - ix. Job-skills training directly related to employment;
 - x. 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;
 - xi. 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;
- (f) Is 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 of Illinois, including a state-administered welfare-to-work program (including compliance with SNAP program requirements)

Section 3.02 Community Service. 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 or service to an individual. Eligible community service activities include, but are not limited to, work at:

- (a) Local or nonprofit institutions such as schools, head start programs, before or after school programs, childcare centers, hospitals, hospices, nursing homes, recreation homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods) or clothes centers (distributing donated clothing);
- (b) Nonprofit organizations serving KCHA residents or their children;

- (c) 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;
- (d) KCHA public housing sites to improve grounds or provide gardens (so long as such work does not alter the KCHA's insurance coverage); or work through resident organizations to help other residents with issues, including service on the Resident Advisory Board; and
- (e) Care for the children of other residents so parent may volunteer or perform hours for parents performing hours for Temporary Assistance for Needy Families (TANF).

Section 3.03 Economic Self-Sufficiency Program. For purposes of satisfying the community service requirement, an economic self-sufficiency program is defined by HUD as: any program designed to encourage, assist, train or facilitate economic independence of assisted families or to provide work for such families. Eligible self-sufficiency activities include, but are not limited to:

- (a) Job readiness or job training;
- (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) Employment counseling, work placement, or basic skills training;
- (d) Education, including higher education (junior college or college) or GED classes;
- (e) Financial or computer literacy classes;
- (f) Apprenticeships (formal or informal);
- (g) English proficiency or English as a second language classes;
- (h) Budgeting and credit counseling;
- (i) Any activity required by DHS under TANF; and
- (j) Any other program necessary to ready a participant to work (such a substance abuse or mental health counseling).

Section 3.04 As it relates to an exemption from the community service requirement, work activities means:

- (a) Unsubsidized employment;
- (b) Subsidized private sector employment;
- (c) Subsidized public sector employment;
- (d) On-the-job training;
- (e) Job search and job readiness assistance;
- (f) Community service programs;
- (g) Vocational educational training (not to exceed 12 months with respect to any individual);
- (h) 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;
- (i) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate; and

- (j) Provision of child care services to an individual who is participating in a community service program.

Article IV Notification Requirements

Section 4.01 KCHA will provide the family with a copy of the CSSR Policy and CSSR information packet at lease-up, lease renewal, when a family member is determined to be subject to the community service and self-sufficiency requirement during the lease term and at any time upon the family's request.

Section 4.02 On an annual basis, at the time of lease renewal, KCHA will notify the family of the family members who are subject to the CSSR and the family members who are exempt. If the family includes non-exempt individuals, the Occupancy Specialist will provide the family the CSSR information packet that includes a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform and the number of hours contributed. The form will also have a place for a signature by an appropriate official who will certify to the activities and hours completed.

Article V Determination of Exemption Status and Compliance

Section 5.01 KCHA will review and verify family compliance with CSSR in conjunction with the family's scheduled annual reexamination interview.

Section 5.02 Determination of exemption status:

- (a) An exempt individual is excused from the CSSR;
- (b) At least 60 days prior to lease renewal, KCHA will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis unless the family reports a change or KCHA has reason to believe that an individual's exemption status has changed. For individuals who are exempt because they are 62 years of age or older, verification or exemption status will be done at the initial examination; and
- (c) Upon completion of the verification process, KCHA will notify the family of its determination in accordance with the policy.

Section 5.03 Determination of compliance:

- (a) KCHA must review resident family compliance with CSSR annually at least 30 days before the end of the twelve-month lease term. As part of this review, KCHA must verify that any family member that is not exempt from CSSR has met his or her service obligation.
- (b) Approximately 90 days prior to the end of the lease term, KCHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will be required to submit KCHA required documentation form(s) at their scheduled reexamination interview; and

- (c) If the family fails to submit the required documentation at the interview or by the KCHA approved extension, the subject family members will be considered noncompliant with CSSR, and notices of noncompliance will be issued pursuant to the policies regarding noncompliance.

Article VI Documentation and Verification

Section 6.01 All family members who claim they are exempt from CSSR will be required to sign the community service exemption certification form. KCHA will provide a completed copy to the family upon request and will keep a copy in the tenant file.

Section 6.02 KCHA makes the final determination whether or not to grant an exemption from the CSSR. If a resident does not agree with KCHA determination, he/she can dispute the decision through the KCHA's grievance procedures.

Section 6.03 Families will be required to submit the documentation to KCHA upon request.

Section 6.04 Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form.

Section 6.05 If KCHA has reasonable cause to believe that the certification provided by the family is false or fraudulent, KCHA has the right to require third-party verification.

Section 6.06 If anyone in the family is subject to the community service requirement, the KCHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request by the family. The forms will notify the family that self-certification forms are available, and that a sample of self-certifications will be validated through third-party documents.

Section 6.07 Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The PHA will accept the individual's self-certification.

Section 6.08 An individual subject to performing community service must complete the hours him/herself. No other resident may perform the community service hours on the behalf of another resident. Community service hours may not be "donated" by another resident to an individual subject to completion of community service.

Section 6.09 The PHA will validate a sample of self-certifications. The sample size will be determined based on the chart in Appendix C of Notice PIH 2016-06. In order to validate the selected sample, the PHA will request that the family provide third-party documentation of hours contributed as community service or self-sufficiency activities. The PHA will follow the verification hierarchy in Notice PIH 2017-12 when validating this sample.

Article VII Noncompliance

Section 7.01 Noncompliance: The notice of noncompliance will be sent at least 45 days prior to the end of the lease term.

Section 7.01.1 The family will have 10 calendar days from the date of the notice of noncompliance to enter into a written work-out agreement to cure the noncompliance over the 12 month term of the new lease, provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

Section 7.01.2 If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the PHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the family member that previously resided with them.

Section 7.01.3 If the family does not request a grievance hearing, or does not take either corrective action required by the notice of noncompliance within the required 10 calendar day timeframe, the PHA will terminate tenancy in accordance with the policies in Section 13-IV.D.

Section 7.01.4 The PHA may elect to not renew the lease of a family that is found to be noncompliant for two consecutive recertification periods.

Section 7.02 Continued Noncompliance: Notices of continued noncompliance will be sent at least 30 days prior to the end of the lease term and will also serve as the family's termination/non-renewal notice. The notice will meet the requirements for termination notices described in Section 13-IV.D, Form, Delivery, and Content of the Notice.

Section 7.02.1 The family will have 10 calendar days from the date of the notice of noncompliance to provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

Section 7.02.2 If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the PHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the noncompliant family member that previously resided with them.

Section 7.02.3 If the family does not request a grievance hearing, or provide such documentation within the required 10 calendar day timeframe, the family's lease and tenancy will automatically terminate at the end of the current lease term without further notice.