



# COMMUNITY SERVICE AND SELF-SUFFICIENCY REQUIREMENT

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Resident Requirements, PHA Administration of  
the Requirement and HUD Oversight

December 2015



# BACKGROUND



- **Section 512 (Pub. L. 105-276) of the Quality Housing and Work Responsibility Act of 1998**
- **Every adult resident of public housing must contribute eight hours of community service per month, or participate in an economic self-sufficiency program for 8 hours per month**
- **24 CFR Subpart F, 960.600 through 960.609**
- **Notice PIH 2015-12**



# PHA POLICIES



- PHAs develop local policies in ACOP
- Elements of the CSSR policies include, but are not limited to:
  - PHA responsibility to administer the requirement
  - Eligible and non-eligible activities
  - Number of service hours for compliance
  - Exemptions from the requirement
  - Compliance review standards



# ADMINISTRATION OF CSSR

## PHAs have flexibility to administer CSSR

### PHAs may:

- administer CSSR activities directly
- make the CSSR activities available to residents through a third party
- provide information on agencies offering opportunities
- coordinate with third parties to develop a referral list of information





# EXAMPLES OF COMMUNITY SERVICE ACTIVITIES

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

- Local public or nonprofit institutions
- Nonprofit organizations serving PHA residents or their children
- Programs funded under the Older Americans Act
- Public or nonprofit organizations serving special populations
- Local PHA opportunities
- Care for the children of other residents so parents may volunteer





# EXAMPLES OF SELF-SUFFICIENCY ACTIVITIES

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

- Job readiness or job training while not employed
- Training programs
- 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





# STATUTORY EXEMPTIONS

## The following persons are exempt from the requirement:

- An individual that is 62 years of age or older
- A blind or disabled individual, who is unable to comply with the requirement, or is a primary caretaker of such individual
- An individual who is engaged in a work activity
- An individual who meets the requirements for being exempted from having to engage in a work activity under the State program funded under part A of title IV of the Social Security Act or under any other welfare program of the State in which the public housing agency is located
- An individual who is in a family receiving assistance and in compliance with a State program funded under part A of title IV of the Social Security Act or under any other welfare program of the State in which the public housing agency is located, including a State-administered welfare-to-work program





# WORK ACTIVITIES

## Work activities include:

- Unsubsidized employment
- Subsidized private-sector employment
- Subsidized public-sector employment
- Work experience if sufficient private sector employment is not available
- On-the-job-training
- Job-search and job-readiness assistance





# WORK ACTIVITIES CNT'D

## Work activities include:

- Community service programs
- Vocational educational training
- Job-skills training directly related to employment
- 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
- 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





# ADMINISTRATION OF EXEMPTIONS

- PHAs are encouraged, but not required, to use 30 hours per week as the minimum number of hours for a work activity
- CSSR policies must describe the process:
  - to determine exemptions
  - for determining any changes to exempt status
- PHAs make determination to grant an exemption
- Residents may dispute a PHA decision through the PHA's grievance process





# RESIDENT RESPONSIBILITY

At lease execution all adult members of a public housing resident family must:

- Provide documentation, if applicable, that they qualify for an exemption
- Sign a certification that they have received and read the policy and understand that failure to comply with the community service requirement will result in nonrenewal of their lease

At each lease renewal, all non-exempt adult members of a public housing resident family must:

- 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
- present a signed certification on a form provided by the PHA of CSSR activities performed over the previous 12 months





# DOCUMENTATION OF CSSR ACTIVITIES

**PHAs must obtain third-party verification of CSSR Completion for activities completed through a third-party:**

**Residents must submit a signed form certifying the number of hours completed**

**PHAs must:**

- review the CSSR status at least 30 days in advance of the annual reexamination
- Retain copies of all relevant documentation and certifications in the resident file

**PHAs may:**

- Require additional supporting documentation from the resident to verify CSSR participation or exempt status





# NONCOMPLIANT RESIDENTS

- **If a resident is noncompliant with CSSR, the PHA must provide written notification which must include:**
  - A brief description of the finding of non-compliance
  - A statement that the PHA will not renew the lease and will initiate termination of tenancy 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 noncompliant resident no longer resides in the unit.
- **The tenant may request a grievance hearing on the PHA determination**





# ENFORCEMENT DOCUMENTATION AND TERMINATION OF TENANCY

**PHAs may not renew the current lease and initiate termination of tenancy proceedings at the end of the current 12-month lease if the resident does not sign a work-out agreement**

**The PHA must provide the following procedural safeguards:**

- **Adequate notice to the tenant**
- **Right of the tenant to be represented by counsel**
- **Opportunity for the tenant to refute the evidence presented by the PHA**
- **A decision on the merits of the grievance**

**If a resident does not win the grievance, the PHA may formally terminate tenancy. If the resident fails to vacate the unit upon the expiration of the 12-month lease or the end of the grievance procedures, whichever comes last, the PHA may begin eviction procedures for such failure to vacate.**





# 50058 CODING

At the time of program admission, enter either 3 or 4

At each annual re-examination, enter code 1, 2, or 4 as described below:

- **1 - PHA determines resident is *not exempt* and is *in compliance* with CSSR**
- **2 - PHA determines resident is *not exempt* and *not complying* with CSSR**
- **4 - PHA determines resident is exempt**

PHAs should not use code 5 for “not applicable” under any circumstance





# CSSR MONITORING REPORTS

**HUD will generate quarterly reports for CSSR**

**The reports will include, for each PHA:**

- **Information on all residents that are coded as noncompliant with CSSR**
- **Information on all residents whose exempt status is in question**

**The reports will be posted on HUD's website**

**HUD will provide instructions to PHAs on how to obtain and interpret the information contained in the reports**





# EXPECTED PHA ACTIONS BASED ON QUARTERLY REPORTS

Upon the posting of a new quarterly report, PHAs are expected to:

- Review the information
- For each resident that is included in the report, review the file and take actions as appropriate

PHA actions shall include:

- Entering into work out agreements
- Determining whether the current exempt status is correct
- Correct improperly coded residents





# SANCTIONS FOR NOT ENFORCING CSSR

**The United States Housing Act of 1937 provides sanctions against any housing authority failing to comply substantially with any provision of the Act**

**Sanctions include, but are not limited to, terminating, withholding, or reducing assistance payments**

**These sanctions are applicable to housing authorities failing to substantially comply with the CSSR requirement**

**HUD will address issues of substantial noncompliance with the CSSR requirement on a case-by-case basis**





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QUESTIONS?  
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