

Chapter 15

COMMUNITY SERVICE POLICY/SELF SUFFICIENCY

Introduction

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes and other activities which help an individual toward self-sufficiency and economic independence. This is a requirement of the dwelling lease signed with all residents of IHA.

HUD issued the PIH 2015-15 notice to assist IHA's understanding and administration of the mandated Community Service and Self-Sufficiency Requirement (CSSR) and in response to an audit report issued by the Office of Inspector General on February 13, 2015. The Notice addressed:

- Statutory/Regulatory Requirements for Administering CSSR;
- Data Collection and Reporting Requirements;
- Action to take against non-compliant tenants; and,
- Penalties/sanctions against IHAs housing ineligible households.

Background: Section 12(c) [42 U.S.C. Section 1437j] of the United States Housing Act of 1937, as amended on October 12, 1998 by Section 512 (Pub. L. 105-276) of 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. Regulations for the CSSR requirement can be found at 24 CFR Subpart F, 960.600 through 960.609.

On April 7, HUD issued PIH 2016-06 to allow flexibility when verifying Community Service and Self-certification which was based on the March 8, 2016 final rule in the Federal Register providing programmatic streamlining across several HUD programs. The rule amended a provision in 24 CFR Subpart F, 960.605, to permit, but not require, a PHA to accept resident self-certifications of compliance with the CSSR. The final rule also amended 24 CFR, Subpart F, 960.607 to require a PHA that elects to accept self-certification to notify residents the self-certifications may be subject to third-party verification, and to require PHAs to validate a sample of the self-certifications annually. IHA will exercise the option to accept self-certifications.

Contents of Annual Notification to Residents and Self-Certification

Residents eligible to complete the CSSR must sign an acknowledgement of their obligation to complete the CSSR annually. This obligation is outlined in more detail in Notice PIH 2015-12. However, a PHA that elects to permit resident self-certifications must notify the resident of the resident's ability to submit a self-certification. Notifications are provided in in Form Attachments to these policies.

As required in Section 11 of Notice PIH 2015-12, in order to determine compliance with CSSR, at each regularly scheduled rent 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. IHA has developed a standardized form with places for signature confirmation by supervisors, instructors, or counselors certifying the number of hours contributed. IHA elects to permit self-certifications and IHA's developed form includes the following information:

- a statement that the resident has completed the number of hours listed and this statement is subject to penalties of perjury;
- the number of hours and type of activity (community service or self-sufficiency) that the resident completed;
- the name of the organization or person for which the activity was completed;
- the address of the organization or person;
- the phone number of the organization or person; and
- a contact person in the organization or the person for which the activity was completed.

If a resident completes their CSSR obligation for more than one organization or person during the course of a year, the resident must complete one self-certification for each organization or person for which the resident performed the CSSR activity.

IHA Policies: IHA chooses to accept resident self-certifications of compliance with CSSR and has made updates its CSSR policies prior to accepting resident self-certifications. Further, IHA understands that when it elects to accept self-certifications, it may only do so prospectively after making necessary policy changes. For residents under lease at the time IHA amends its policies, IHA must review annual compliance and obtain third party verification for that lease cycle. However, for any subsequent lease cycles beginning after IHA has adopted the policy change, IHA may accept resident self-certifications for those periods. IHA may not accept resident self-certifications for a tenant subject to a work-out agreement until the resident has completed, and the IHA has verified through a third party, that the resident has completed the required hours.

Sampling Methodology and Validation Requirements: As required by amended 24 CFR Part 960.605, IHA elects to accept self-certifications must validate a sample of self-certifications with the third-party for whom the resident completed the community service or self-sufficiency activity. The sample of self-certifications IHA validates must be a statistically valid, random sample. These policies provide the appropriate sampling methodology to be used by IHA when determining how many self-certifications must be validated annually.

The universe of self-certifications should only include residents that submitted a self-certification, and should not include:

- Residents that are under the age of 18 years or 62 years or older;
- Residents that are exempt;
- Residents for which IHA receives third party verification of completion with CSSR; and
- Residents that did not complete the required CSSR.

Because the number of resident's subject to the CSSR is constantly in fluctuation due to unit turnover, resident employment, etc., IHA must choose a point in time annually to calculate the universe of self-certifications received during the previous 12 months. However, IHA does not need to wait until the end of the 12-month period to begin validating self-certifications. For example, IHA can reasonably determine the expected number of self-certifications to be received throughout the 12-month period may validate the appropriate sample of self-certifications during the 12-month period rather than waiting until the end of that time period, subject to any necessary reconciliations once the final universe and sample size is determined.

To validate a self-certification, IHA must obtain third-party documentation that includes, at a minimum, the name of the organization or person, the number of hours completed by the resident, a signature from the appropriate staff person within the third-party organization or person and that staff person's contact information. Consistent with the written third-party verification techniques outlined in Notice PIH 2010-19, IHA may accept third-party generated documentation directly from the third-party or from the resident.

Treatment of Fraudulent Self-Certifications: In the event IHA determines a resident has submitted a fraudulent self-certification, IHA must provide a notice of noncompliance to the resident pursuant to 24 CFR 960.607. If the resident agrees to sign a work-out agreement, IHA must obtain written third-party documentation of the resident's compliance with the requirements of the workout agreement. Should the resident refuse to enter into a work-out agreement pursuant to the notice of noncompliance, IHA must take steps to terminate the tenancy of the resident. For more information on this process, see Notice PIH 2015-12.

HUD Oversight: IHA elects to accept self-certifications and must retain the self-certification, any third party validation, and any information related to fraudulent self-certifications in the resident's file for at least two years from the date the documents are received by IHA for possible HUD review. As part of HUD's oversight and regulatory review processes, and on a risk basis, HUD may review IHA's administration of CSSR, resident self-certifications, and sample validations.

Statutory/Regulatory Requirements for Administering CSSR: 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." (See 24 CFR 960.601(b)).

Community service and economic self-sufficiency requirements mandate that each nonexempt 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.

IHA requires residents to verify compliance annually, at least 30 days before the expiration of the lease term. Self-certification by residents is now acceptable as a form of verification.

Administrative Provisions: IHA must develop a local policy for administration of the CSSR for public

housing residents (see 24 CFR 960.605(a)) within the Admissions and Continued Occupancy Policies (ACOP). Elements of the CSSR policy include, but are not limited to, the PHA responsibility to administer the requirement; eligible and non-eligible activities; exemptions from the requirement; and compliance review standards. These elements are described further in this document.

IHA may administer qualifying community service and self-sufficiency activities directly, or make the activities available to residents through a contractor or partnership with qualifying organizations (including resident organizations), community agencies, or institutions (see 24 CFR 960.605(b)). In administering the CSSR, the IHA may provide names and contacts of agencies offering opportunities for residents, including persons with disabilities, to fulfill their community service obligations. In administering the CSSR, IHA may choose to coordinate with social service agencies, local schools and human service offices to develop a referral list of names and agency contacts. If IHA administers a ROSS or Family Self-Sufficiency program, IHA may wish to engage the Program Coordinating Committee in this endeavor. IHA is encouraged to create agreements with local organizations, including faith-based and community organizations, to assist CSSR. Specifically, such agreements would allow local organizations to advertise their programs, assist with transportation, child-care or other barriers to CSSR attainment and verify hours within individual monthly logs. HUD strives to provide maximum flexibility to IHA to allow successful CSSR implementation without adding excessive costs or administrative burdens (see 24 CFR 960.605(b)).

A. GENERAL PROVISIONS

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

IHA may form policy in regards to accepting community services at profit-motivated entities, acceptance of volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work.

Pursuant to 24 CFR 960.609, IHA may not substitute community service activity performed by a resident for work ordinarily performed by a IHA employee. However, residents may do community service on IHA property or with or through IHA programs to assist with or enhance work done by a IHA employee.

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.
- I. Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF).
- J. Employment and Training programs
- K. Homeownership educational programs or seminars (offered by IHA and other community organizations)
- L. Any kind of class that helps a person move toward economic independence

CSSR Partnerships: If IHA has a ROSS Service Coordinators program or Family Self-Sufficiency (FSS) program, IHA 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 IHA coordinators may satisfy CSSR activities and IHA Service Coordinators or FSS Program Coordinators may verify community service hours within individual monthly logs.

Exempt Residents: IHA is required to set out in their Admissions and Continuing Occupancy Policy (ACOP) how the IHA determines 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. 1. 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
2. is a primary caretaker of such individual;
- C. Engaged in work activities for 20 hours per week. 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)):

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 the State in which PHA is located 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 the State¹ in which the PHA is located, 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.
- F. HUD has determined that the Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state. Therefore, if a tenant is a member of family receiving assistance under SNAP, and has been found by the administering State to be in compliance with the program requirements, that tenant is exempt from the CSSR. (PIH 2015-12)

IHA must describe in its CSSR policy the process to determine which family members are exempt from the requirement, as well as the process for determining any changes to the exempt status of the family member. IHA provides the family a copy of CSSR policy at initial application and secure certification of receipt as shown in Attachment A, (see 24 CFR 960.605(c)(2)).

IHA makes the final determination whether to grant an exemption from the community service requirement. If a resident does not agree with the IHA’s determination, the resident may dispute the decision through the IHA’s Grievance Procedures (see 24 CFR Part 966 Subpart B, 24 CFR 960.607(b)).

Each adult member of the household must sign a Community Service Exemption Certification at each annual recertification or if they become an “exempt adult” at any time between recertification that the status should change.

At least 30 days before the annual reexamination and/or lease expiration, the IHA reviews the exempt or nonexempt status and compliance of family members (see 24 CFR 960.605(c)(3)).

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:

- A. Provide documentation, if applicable, that they qualify for an exemption; (Documentation provided by the tenant will be used by the IHA to determine whether the tenant is exempt from the CSSR) 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, per 24 CFR 966.4(1)(2)(iii)(D).

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

Documentation of CSSR Completion: IHA must include in the CSSR policy that exemption/CSSR completion is verified annually by the IHA. At least 30 days before the annual reexamination and/or lease expiration, the IHA reviews the exempt or nonexempt status and compliance of non-exempt family members (see 24 CFR 960.605(c)(3)). At each regularly scheduled rent re-examination, each non-exempt family member presents a signed certification or self-affidavit on a form provided by the IHA of CSSR activities performed over the previous twelve (12) months. IHA will allow the use of the self-certifications. When required, IHA must obtain third-party verification of CSSR completion administered through outside organizations. The IHA has developed a standardized form with 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 or if allowed, self-certification. Copies of the certification forms and supporting documentation will be retained in tenant file or community service file.

B. IHA REQUIREMENTS OF THE PROGRAM

1. The eight- (8) hours per month may be either volunteer service or self-sufficiency program activity or a combination of the two.
2. At least eight (8) hours of activity must be performed each month. An individual may skip a month and then double up the following month as long as the 96 hours are performed within the 12month period.
3. Activities must be performed within the community and not outside the jurisdictional area of IHA.
4. Family obligations
 - At lease execution or re-examination, all adult members (18 or older) of a public housing resident family must

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- 1) Provide documentation that they are exempt from Community Service requirement, if they qualify for an exemption, and;
 - 2) Sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the Community Service requirement will result in non-renewal of their lease.
- At each annual re-examination, non-exempt family members must present a completed documentation form (to be provided by IHA's recertification area) of activities performed over the previous twelve (12) months, or if allowed by HUD, a self-certification. This form may include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed. If allowed by HUD, the family member may provide self-certification.
 - If a family member is found to be noncompliant at re-examination, he/she and the Head of Household will sign an agreement with IHA to make up the deficient hours over the next twelve- (12) month period or certify that the non-compliant family member is no longer in the household.
5. Change in exempt status:
- If, during the twelve- (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the management office and provide documentation of such.
 - If, during the twelve- (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the management office. IHA will provide the person with the Recording/Certification documentation form and a list of agencies in the community that provide volunteer and/or training opportunities.

C. IHA OBLIGATIONS

1. To the greatest extent possible and practicable, IHA will:
 - Provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligations. (According to the Quality Housing and Work Responsibility Act, a disabled person who is otherwise able to perform community service is not necessarily exempt from the Community Service requirement).
 - Provide opportunities for volunteer service or self-sufficiency programs.
2. IHA offices will provide the family with: Community Service Exemption Certification Form; Community Service Compliance Certification Form ; Record and Certification of Community Service and Self-Sufficiency Activities Form; and Caretaker Verification for Community Service Exemption Form; and a copy of this policy at initial application and at lease execution.

3. IHA's Executive Director or their designee will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use the Grievance Procedure if they disagree with IHA's determination.
4. Non-compliance of family member. The responsibility for enforcement will be with the IHA.
 - At least thirty (30) days prior to annual re-examination and/or lease expiration, IHA will begin reviewing the exempt or non-exempt status and compliance of family members.
 - If IHA finds a family member to be non-compliant, the IHA will enter into an agreement with the non-compliant member and the head of household to make up the deficient hours over the next twelve- (12) month period.
 - If, at the next annual reexamination, the family member still is not compliant, the lease will not be renewed, unless the non-compliant member agrees to move out of the unit and a new lease is signed with the family amending its composition accordingly.
 - The family may use the Grievance Procedure to appeal the lease termination, after attending a private conference with the IHA representative.

Noncompliant Residents: IHA may not evict a family due to CSSR non-compliance. However, if PHA finds a tenant is non-compliant with CSSR, then the IHA must provide written notification to the tenant of the noncompliance which must include:

- A. A brief description of the finding of non-compliance with CSSR.
- B. A statement that the IHA 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 IHA or the family provides written assurance that is satisfactory to the IHA 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 IHA 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 IHA's nonrenewal of the lease because of such determination.

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, IHA is required to initiate termination of tenancy proceedings at the end of the current 12-month lease (see 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, the IHA 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 the IHA, 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.

Sanctions Against PHAs

Section 6(j)(4)(A) of the United States Housing Act of 1937 provides sanctions against any housing authority failing to comply substantially with any provision of the Act relating to the public housing program.

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.

Sample Universe for Determining Compliance with Self Certifications

Below is a chart that indicates the universe and required sample sizes that must be validated by IHA annually. A CSSR universe would be the number of age eligible residents that have submitted a self- certification. For universe sizes that fall between the universe sizes listed in the chart below, PHAs should utilize the sample size for the next largest universe size. For example, a PHA with a sample size of 27 self-certifications must validate at least 21 self-certifications. See Below:

Universe Size	Sample Size AT LEAST
≤ 10	ALL
15	13
20	16
25	19
30	21
35	24
40	26
50	29
60	33
100	41
150	47
200	51
250	54
300	56
350	57
400	58
450	59
500	60
600	61
700	62
800	63
900	63
1000	64
1500	65
2500	66
3500	67
4000	67
5000	67
6000	67
6500	67
≥ 7000	68

D. FORMS

The following forms shall be used to process and account for community service requirements.



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

ATTACHMENT "A"

Dear Mr./Ms.

Congratulations, and welcome to the Independence Housing Authority (IHA) Public Housing Program. We are happy that you have selected the IHA as your primary place of residency. We want to make every effort to ensure that your housing experience with us is safe, decent and above all, amicable. However, this can only be accomplished through our joint efforts. Therefore, we need your assistance.

During your Public Housing Orientation, the IHA staff, informed you about certain provisions of your lease; i.e. tenant obligations and landlord obligations; both of which must be followed in order to create the kind of housing experience you can enjoy. One of your obligations is the performance of 8 hours of community service. Housing and Urban Development (HUD) has mandated that every adult member of the household who is 18 years old or older who is not exempt from the following criteria **MUST** complete 8 hours of community service. The only persons who would not be required to complete these hours are persons who are:

- 62 years old or older
- Blind or disabled or caretaker of such individual
- Engaged in work activities (ask your manager for a list of qualified work activities)
- Exempted under the provisions of the regulations or PIH 2015-12

If you need to know if you are or are not required to perform these 8 hours of community service a month, you should contact your public housing manager as soon as possible. He or she will be glad to provide you with the necessary paperwork to fulfill the Mandatory Community Service Requirements.

Your failure to complete this HUD-Mandatory Community Service requirement could result in the refusal to renew your lease or eviction. Please, let's make every effort to keep you in compliance with the requirements of your lease.

Any questions, explanations or clarifications should be addressed with your manager. Again, thank you for your cooperation in this matter.

Sincerely,

Manager's name



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

Attachment "A"

Community Services and Self-Sufficiency Requirement Certification For Non-Exempt Individuals

Entrance Acknowledgement

Date:

Participant Name:

I have received and read the Community Service and Self Sufficiency Requirement (CSSR). I understand that as a resident of public housing, I am required by law to contribute 8 hours per month (96 hours over the course of every 12-month period) of community service or participate in an economic self-sufficiency program. I further understand that if I am not exempt, failure to comply with CSSR is grounds for lease nonrenewal. I understand that I may submit a self- certification of compliance with the CSSR, and that my self-certification of compliance may be subject to validation with the organization for which I completed the required hours. My signature below certifies I received notice of this requirement at the time of initial program participation.

Applicant

Date

Spouse

Date

Co-Head of Household

Date

IHA Representative

Date



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

ATTACHMENT "B"

Annual Renewal at Recertification

Community Services and Self-Sufficiency Requirement Certification
For Non-Exempt Individuals

Date:

Participant Name:

I understand that as a resident of public housing, I am required by law to contribute 8 hours per month (96 hours over the course of every 12-month period) of community service or participate in an economic self-sufficiency program. I further understand that if I am not exempt, failure to comply with CSSR is grounds for lease nonrenewal. I understand that I may submit a self-certification of compliance with the CSSR, and that my self-certification of compliance may be subject to validation with the organization for which I completed the required hours. My signature below certifies I received notice of this requirement at the time of initial program participation.

Signature: _____

Date of Signature: _____



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

Community Service Compliance Certification

I/We hereby certify that I/We have received a copy of, have read and understand the contents of the Independence Housing Authority's Community Service/Self Sufficiency Policy.

I have received and read the Community Services and Self Sufficiency Requirement. I understand that as a resident of public housing, I am required by law to contribute 8 hours per month (96 hours per year) of community service or participate in an economic self-sufficiency program. I further understand that if I am not exempt, failure to comply with CSSR is grounds for lease nonrenewal. My signature below certifies I received notice of this requirement at the time of initial program participation.

I/We understand that this is a requirement of the Quality Housing and Work Responsibility Act of 1998 and that if I/We do not comply with this requirement, our lease will not be renewed and I/We will be evicted.

Head of Household's Name

Date

Spouse's Name

Date

Co-Head of Household's Name

Date

IHA Representative

Date



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

Community Service Exemption Certification

I, _____, certify that I am eligible for an
(Tenant's Name)

exemption from the Community Service requirement for the following reason:

- I am 62 years old or older
- I have a disability which prevents me from working (Certification of Disability Form will serve as documentation)
- I am currently working (employment verification form will serve as documentation)
- I am participating in a Welfare to Work Program (may provide verification letter from agency)
- I am receiving TANF and am participating in a required economic self-sufficiency program or work activity (Must provide verification from the funding agency that you are complying with job training or work requirements)
- I am a full time student (Must provide verification letter from institution attending)
- I am in a member of a family receiving assistance under SNAP, and has been found by the administering State to be in compliance with the program requirements.

I understand that this self-certification is subject to validation by the IHA and that they will be performing a sample audit of the self-certifications for audit. I also understand that providing false or inaccurate information is a violation of the lease and subject to termination from the program.

Tenant's Name

Date

IHA Representative

Date



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
Edward Miller

Date: _____

Name: _____

Address: _____

City, State, Zip: _____

Dear

It has come to my attention that you have failed to complete the mandatory Community Service hours that are expected of you. Your failure to complete these hours can result in your being evicted from the Independence Housing Authority (IHA) public housing program.

To avoid eviction, please contact me as soon as possible to resolve this matter.

Please remember that this is a HUD-mandatory requirement and 8 hours a month (96 hours per year) must be completed. You may pick up a Community Service form at my office.

If you have any questions or need additional information, please contact me.

Sincerely,

Property Manager

Independence Housing Authority

CHANGE IN STATUS FORM

COMMUNITY SERVICE / SELF-SUFFICIENCY

Name (print)

Date Submitted

Full Address

City/State/Zip

I need to report a change of: (check the one that applies to you)

- a – Non-compliant become exempt
- b – Exempt becomes non-exempt

I understand that this self-certification is subject to validation by the IHA and that they will be performing a sample audit of the self-certifications for audit. I also understand that providing false or inaccurate information is a violation of the program and subject to termination from the program.

Signed

Date

**INDEPENDENCE HOUSING AUTHORITY
COMMUNITY SERVICE FORM**

Date Received	Agency/Business/Org.	Month for which hours completed	# of Hours Performed

The above statements above are true and correct. I understand that this self-certification is subject to validation by the IHA and that they will be performing a sample audit of the self-certifications for verification. I also understand that providing false or inaccurate information is a violation of the program and subject to termination from the program.

Name _____ Date



Independence Housing Authority

210 S. Pleasant Street, Independence, MO 64050
 Telephone (816) 836-9200 ♦ Fax (816) 833-2378 ♦ TTY 711

EXECUTIVE DIRECTOR
 Edward Miller

Date: _____

Tenant's Name: _____

Address: _____

****NOTICE****

Federal law requires adult residents of public housing to provide eight (8) hours of community service or to receive eight (8) hours of self-sufficiency training as a condition for retaining their tenancy. This form should be signed by the supervisor of the organization/agency for whom service was provided or by the instructor where training was given each time service or training was provided.

Additional verification forms are available from the main office. Please retain and submit all completed verification forms as part of your annual recertification.

DATE	COMPANY NAME & ADDRESS	HOURS	SUPERVISOR/INSTRUCTOR
			Print:
			Signature:
			Business Contact #:
			Print:
			Signature:
			Business Contact #:
			Print:
			Signature:
			Business Contact #:
			Print:
			Signature:
			Business Contact #:
Total			

Submitted by: _____

Date: _____

I understand that this self-certification is subject to validation by the IHA and that they will be performing a sample audit of the self-certifications for audit. I also understand that providing false or inaccurate information is a violation of the program and subject to termination from the program.

FOR IHA OFFICE USE ONLY

Manager's Signature: _____

Date: _____