Chapter 11

**COMMUNITY SERVICE**

**INTRODUCTION**

This chapter explains HUD regulations requiring PHAs to implement a community service program for all nonexempt adults living in public housing.

This chapter describes HUD regulations and PHA policies related to these topics in two parts:

Part I: Community Service Requirements. This part describes who is subject to the community service requirement, who is exempt, and HUD’s definition of economic self-sufficiency.

Part II: PHA Implementation of Community Service. This part provides PHA policy regarding PHA implementation and program design.

**PART I: COMMUNITY SERVICE REQUIREMENT**

**11-I.A. OVERVIEW**

This section is an overview. **No policy decisions are required.**

**11-I.B. REQUIREMENTS**

Each adult resident is required to provide community service or participate in economic self-sufficiency activities 8 hours per month [24 CFR 960.603(a)].

**Definitions**

***Exempt Individual [24 CFR 960.601(b), Notice PIH 2015-12]***

**☑ Decision Point: How many hours does the PHA use to define work activities?**

Things to Consider

* Both PIH Notice 2003-17 and Notice 2015-12 encourage PHAs to consider 30 hours per week as the minimum number of hours for a work activity as described in Section 407(d) of the Social Security Act, and implementing regulations 45 CFR Section 261.31(a)(1).
* The model policy follows this recommendation.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will consider 30 hours per week as the minimum number of hours needed to qualify for a work activity exemption.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

***Community Service [24 CFR 960.601(b), Notice PIH 2015-12]***

**☑ Decision Point: Will the PHA accept community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, or court-ordered or probation-based work as eligible community service activities?**

Things to Consider

* Notice PIH 2015-12, issued August 13, 2015, states that PHAs may form their own 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. The model policy opts to consider these as eligible community service activities.
* PHAs could object to using hours from some organizations or private citizens due to verification difficulties, which would make them susceptible to abuse, or because it diminishes the meaning of “community service.” PHAs who opt for a policy reflecting this issue may determine which of these would be acceptable community activities, if any.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work will not be considered eligible community service activities.

* *Option 2: Use PHA-established policy. Edit the model ACOP language to take into consideration the specific activities that would count as eligible.*
* *Option 3: Delete the model ACOP language and substitute language as shown below.*

The PHA will accept community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work as eligible community service activities.

***Economic Self-Sufficiency Program [24 CFR 5.603(b), Notice PIH 2015-12]***

This section explains what is considered an economic self-sufficiency program. **No policy decisions are required.**

***Work Activities [42 U.S.C. 607(d)]***

This section lists eligible work activities as defined in the Social Security Act.

**☑ Decision Point: Does the PHA choose to add any guidelines in clarifying the list of work activities?**

Things to Consider

* PIH Notice 2015-12, issued August 13, 2015, states: “PHAs can use reasonable guidelines in clarifying this statutory list of work activities in coordination with the Temporary Assistance to Needy Families (TANF) agency, as appropriate.”
* The model policy does not include any clarifying language. If you have worked with your local TANF agency to further clarify any of the listed work activities, you may wish to include these definitions as PHA policy.

🞎 *Option 1: Do not include any clarifying language to work activities. No changes to the model ACOP are required.*

🞎 *Option 2: Add PHA clarifying language to further explain work activities.*

**Notification Requirements [24 CFR 960.605(c)(2), Notice PIH 2015-12,   
Notice PIH 2016-06]**

**☑ Decision Point: How will the PHA notify public housing families about the community service requirement?**

Things to Consider

* Each PHA must develop a local policy for administration of the community service and economic self-sufficiency requirement [24 CFR 960.605(a)].
* The PHA must give the family a written description of the service requirement [24 CFR 960.605(c)(2)]. The family must then sign a certification (such as Attachment A of Notice PIH 2015-12) that they have received and read the policy and understand that if they are not exempt, failure to comply with the requirement will result in nonrenewal of their lease. A certification must also be signed at annual reexamination (such as Attachment B of 2015-12).
* There is a sample Community Service and Self Sufficiency Policy in Appendix VI of the Public Housing Occupancy Guidebook. The model ACOP has made some revisions to the sample policy provided in the Public Housing Occupancy Guidebook to account for current notices and guidance, and included it as Exhibit 11-1.
* If the PHA accepts self-certification of compliance with the community service requirement, clients must be notified that the PHA will validate a sample of certifications (see Section 11-I.D). If your agency does not accept self-certification you may delete the final sentence under Option 1.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will provide the family with a copy of the Community Service Policy found in Exhibit 11-1 of this chapter, at lease-up, lease renewal, when a family member is determined to be subject to the community service requirement during the lease term, and at any time upon the family’s request. The policy will notify the family that self-certification forms are subject to review by the PHA.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: How often will the PHA notify public housing families which family members are subject to and which are exempt from the community service requirement and what will the notice include?**

Things to Consider

* The PHA must notify the family of its determination identifying the family members who are subject to the service requirement, and the family members who are exempt [24 CFR 960.605(c)(2)].
* The model policy clarifies that in concert with lease renewal, the PHA will notify the family regarding each family member’s status as it relates to the community service requirement, and will provide families that include nonexempt members with information and documentation necessary for them to fulfill the requirement.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals, the notice will include 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.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**11-I.C. DETERMINATION OF EXEMPTION STATUS AND COMPLIANCE [24 CFR 960.605(c)(3)]**

**☑ Decision Point: Will the PHA change the effective date of the annual reexamination to coincide with the lease term in cases where they do not coincide?**

Things to Consider

* The regulations state that the PHA must review family compliance with service requirements annually at least thirty days before the end of the 12-month lease term [24 CFR 960.605(c)(3)].
* The Public Housing Occupancy Guidebook [page 176], states: “At least thirty days before the annual re-examination and/or lease expiration, the PHA must begin reviewing the exempt or nonexempt status and compliance of family members.” There is no statutory or regulatory justification for basing the review of compliance on the annual reexamination date rather than the end of the lease term. Therefore, the model policy language clarifies that when the lease term and annual reexamination do not coincide, the annual reexamination date will be changed to coincide with lease term.
* It is not a requirement for the annual reexamination date and lease term to coincide, but if they don’t, the PHA will be unable to take any significant action related to community service at the time of the annual reexamination (e.g. requiring the tenant to enter into a written agreement to cure noncompliance, or non-renewal of the lease for noncompliance) because the family will be in the middle of the lease term and the cure period is specifically tied to the 12 month lease term.
* The policy language also clarifies that if the annual reexamination date is changed, the PHA will not allow more than 12 months to elapse between annual reexaminations.
* The policies in Section 9-I.B., Scheduling Annual Reexaminations, and 12-IV.F., Reexamination Policies for Transfers, state that the PHA will perform a new annual reexamination if a family moves to a new unit. Section 9-I.B. states that the PHA may also schedule an annual reexamination for completion prior to the anniversary date for administrative purposes. If changes are made to the policy in this section, the policies in Section 9-I.B. and 12-IV.F. may need to be revised or deleted to ensure consistency between the policies.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Where the lease term does not coincide with the effective date of the annual reexamination, the PHA will change the effective date of the annual reexamination to coincide with the lease term. In making this change, the PHA will ensure that the annual reexamination is conducted within 12 months of the last annual reexamination.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Annual Determination**

***Determination of Exemption Status***

**☑ Decision Point: How often will the PHA re-verify exemption status?**

Things to Consider

* 24 CFR 960.605(c)(1), under PHA responsibilities, states, “The PHA policy must describe how the PHA determines which family members are subject to or exempt from the service requirement, and the process for determining any changes to exempt or nonexempt status of family members.”
* The Public Housing Occupancy Guidebook does not address this issue.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

At least 60 days prior to lease renewal, the PHA 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 the PHA has reason to believe that an individual’s exemption status has changed. For individuals who are exempt because they are 62 years of age and older, verification of exemption status will be done only at the initial examination.

Upon completion of the verification process, the PHA will notify the family in accordance with the policy in Section 11-I.B., Notification Requirements.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

***Determination of Compliance***

**☑ Decision Point: At what point will the PHA begin to review compliance of family members and what will the process be?**

Things to Consider

* The PHA must review family compliance with service requirements annually at least thirty days before the end of the 12-month lease term [24 CFR 960.605(c)(3)].
* The model policy states that the PHA will begin reviewing compliance at least 60 days prior to the end of the lease. It is important for the PHA to begin this process early so that if the family is found to be in noncompliance, the PHA will have time to enter into an agreement to cure the noncompliance, and/or offer the family the opportunity for a hearing prior to the end date of the lease.
* For administrative ease, the policy uses the standard 10 business day timeframe for the family to submit the required documentation. However, the policy does allow for the PHA to approve an extension.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Approximately 60 days prior to the end of the lease term, the PHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit the PHA required documentation form(s).

If the family fails to submit the required documentation within the required timeframe, or PHA approved extension, the subject family members will be considered noncompliant with community service requirements, and notices of noncompliance will be issued pursuant to the policies in Section 11-I.E., Noncompliance.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Change in Status Between Annual Determinations**

**☑ Decision Point: What is the PHA process when a family member’s exemption status changes from exempt to nonexempt or vice versa during the lease term?**

Things to Consider

* 24 CFR 960.605(c)(1), under PHA responsibilities, states that PHA policy must describe the process for determining any changes to exempt or nonexempt status of family members.
* The Public Housing Occupancy Guidebook [page 177] states that it is the responsibility of the family to report when an adult resident’s status changes from exempt to nonexempt or vice versa.
* The Guidebook also states that if an exempt person becomes nonexempt, the PHA should provide the person with a recording/certification documentation form and a list of agencies in the community that provide volunteer and/or training opportunities.
* The policy language incorporates this safe harbor language from the PH Occupancy Guidebook. It also states that if the PHA determines a change in exemption status is needed (regardless of whether the family reported it), the PHA will notify the family of the change in status.
* For administrative ease, the policy uses the standard timeframe (10 business days) for the family to report the change, and the PHA to respond to the change.
* Neither the regulations nor the guidebook address the effective date of the community service requirement when someone’s status changes from exempt to nonexempt. The model policy calls for a 30 day notice. A PHA could choose to provide shorter notice, but the notice period should be long enough to allow the individual to make arrangements to volunteer, or enroll in a self-sufficiency activity.
* The model policy calls for the effective date to be immediate when someone changes from nonexempt to exempt status.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Exempt to Nonexempt Status

If an exempt individual becomes nonexempt during the 12-month lease term, it is the family’s responsibility to report this change to the PHA within 10 business days.

Within 10 business days of a family reporting such a change, or the PHA determining such a change is necessary, the PHA will provide written notice of the effective date of the requirement, a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which the family member may record the activities performed and number of hours contributed.

The effective date of the community service requirement will be the first of the month following 30-day notice.

*Determination of Initial Compliance*  

When an adult family member becomes subject to community service, they must perform 8 hours of community service for the months they are subject to the requirement before the end of the lease term (anniversary date).

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| Example 1: Alberto Jones turns 18 on 5/10 and is not exempt from the community service requirement. His community service requirement begins on 7/1, and his initial compliance is reviewed before the end of the lease term (anniversary date), which is 11/30.  Alberto must perform 5 months of community service in his initial compliance period, before the end of the lease term (anniversary date) |

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| Example 2: Lisa Dewhurst leaves her job on 9/20 and is not exempt from the community service requirement. Her community service requirement begins on 11/1, and her initial compliance is reviewed before the end of the lease term (anniversary date), which is 6/30.  Ms. Dewhurst must perform 8 months of community service in her initial compliance period, before the end of the lease term (anniversary date). |

Nonexempt to Exempt Status

If a nonexempt person becomes exempt during the 12-month lease term, it is the family’s responsibility to report this change to the PHA within 10 business days. Any claim of exemption will be verified by the PHA in accordance with the policy at 11-I.D., Documentation and Verification of Exemption Status.

Within 10 business days of a family reporting such a change, or the PHA determining such a change is necessary, the PHA will provide the family written notice that the family member is no longer subject to the community service requirement, if the PHA is able to verify the exemption.

The exemption will be effective immediately.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**11-I.D. DOCUMENTATION AND VERIFICATION [24 CFR 960.605(c)(4), 960.607, Notice PIH 2016-08]**

**Documentation and Verification of Exemption Status**

**☑ Decision Point: How will the PHA document exemption status?**

Things to Consider

* The regulations require the PHA to retain reasonable documentation of exemption in participant files.
* The model policy states that the PHA will require all exempt family members to sign the certification form found in Exhibit 11-3 of the model ACOP. This form shows that both the family and the PHA agree that the family member qualifies as exempt.
* The model policy clarifies that it is the responsibility of the PHA to verify whether someone is exempt or not. Families may be required to submit documentation, but ultimately PHA’s are responsible for obtaining appropriate verification in accordance with the policies in Chapter 7.
* The model policy also clarifies that if a family disagrees with the PHA’s decision regarding exemption status, the family may dispute the decision through the grievance process.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

All family members who claim they are exempt from the community service requirement will be required to sign the community service exemption certification form found in Exhibit 11-3. The PHA will provide a completed copy to the family and will keep a copy in the tenant file.

The PHA will verify that an individual is exempt from the community service requirement by following the verification hierarchy and documentation requirements in Chapter 7.

The PHA makes the final determination whether or not to grant an exemption from the community service requirement. If a resident does not agree with the PHA’s determination, s/he can dispute the decision through the PHA’s grievance procedures (see Chapter 14).

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Documentation and Verification of Compliance**

**☑ Decision Point: What documentation will the PHA require to verify compliance with the community service requirement?**

Things to Consider

* The regulations require the PHA to retain reasonable documentation of service requirement performance.
* If qualifying community service activities are administered by an organization other than the PHA, a family member who is required to fulfill a service requirement must provide documentation required by the PHA. The PHA may require a self-certification or certification from a third party [24 CFR 960.607].
* The option to accept self-certification of the community service requirement is intended to reduce administrative burden. To minimize the risk of falsified certifications, HUD requires the PHA to validate a sample of certifications through third-party documentation. HUD also strongly encourages PHAs to investigate community service compliance when accuracy is in question.
* Notice PIH 2016-06 describes HUD’s requirements for PHAs that opt to accept resident self-certification of community service compliance. The PHA must:
  + Develop a standardized self-certification form for the collection of HUD-specified information
  + Notify nonexempt applicants and residents that self-certification forms are available and that a sample of self-certifications will be validated through third-party documentation
  + Select a sample of files for validation, using Appendix C of Notice PIH 2016-06 to determine the required sample size
  + Obtain third-party documentation of compliance, using verification procedures as required by Notice PIH 2017-12
* Self-certification can only be accepted prospectively, for lease cycles beginning after the PHA has adopted self-certification policies.
* Self certification may not be used for family members under a work-out agreement for past community service noncompliance.
* The model policy states that the family is required to submit documentation upon request by the PHA. This gives the PHA flexibility to require submission of documentation forms more often than annually if the PHA so desires.
* Due to the administrative burdens imposed by Notice PIH 2016-06, the default policy states that the PHA will require third-party documentation of compliance from all nonexempt residents.
* If you wish to implement the option for accepting resident self-certification, select Option 2.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Each individual who is subject to the community service requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying to the number of hours contributed.

Families will be required to submit the documentation to the PHA, upon request by the PHA, at least annually.

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

🞎 *Option 2: If you wish to accept self-certification of community service compliance, delete the model policy language and insert the following:*

If anyone in the family is subject to the community service requirement, the PHA 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.

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.

Families will be required to submit the documentation to the PHA, upon request by the PHA, at least annually.

If the PHA has reasonable cause to believe that the certification provided by the family is false or fraudulent, the PHA will require third-party verification.

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.

The PHA will not accept self-certification for any family member who is under a work-out agreement for previous community service noncompliance.

🞎 *Option 3: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**11-I.E. NONCOMPLIANCE**

**Noncompliant Residents**

This section explains that violation of the service requirement is grounds for nonrenewal of the lease at the end of the 12-month lease term, but not for termination of tenancy during the course of the 12-month lease term.

**☑ Decision Point: When will the PHA issue notices of noncompliance and how long will the family be given to respond to the notice?**

Things to Consider

* The model policy states that notices will be sent at least 45 days prior to the end of the lease term.
* In establishing a timeframe, it is important to allow enough time for the family to respond to the notice or request a hearing, prior to the termination date of the lease.
* For administrative ease, the model policy uses the standard time frame of 10 business days for the family to request the hearing, sign an agreement to cure the noncompliance (over the next 12 months), or submit documentation that the non-compliant family member has left the household.
* A longer timeframe could be established for the family to sign the agreement or provide documentation that the non-compliant family member has left the household.
* The model policy describes the type of documentation the family will be required to provide to verify that the tenant or other noncompliant resident no longer resides in the unit [24 CFR 960.607(b)(2)(ii)(B)]. This same language also appears under “Continued Noncompliance.” If you change the policy here, it should also be changed in that section.
* If the family fails to respond to the noncompliance notice, or to request a hearing within the required timeframe, the PHA will initiate termination (or nonrenewal) by sending a termination notice in accordance with the policies in Chapter 13.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

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

The family will have 10 business 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.

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.

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 business day timeframe, the PHA will terminate tenancy in accordance with the policies in Section 13-IV.D.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Continued Noncompliance and Enforcement Documentation [24 CFR 960.607(b)]**

**☑ Decision Point: What policy does the PHA follow for issuing a notice of noncompliance when the family did not cure the noncompliance during the 12-month cure period?**

Things to Consider

* 24 CFR 966.4(l)(2)(iii)(D) states, under Grounds for termination of tenancy: “Other good cause. Other good cause includes, but is not limited to, Failure of a family member to comply with service requirement provisions of part 960, subpart F – as grounds only for nonrenewal of the lease and termination of tenancy at the end of the 12-month lease term.”
* If the family has not cured their noncompliance during the 12 month cure period, the only way for the family to stay in the unit is for the noncompliant family member to move out.
* This policy describes the documentation needed to prove that a noncompliant family member has moved out of the unit and is identical to the policy contained in the section above entitled Initial Noncompliance. If changes are made to the documentation requirements here, they should also be changed above.
* In the case of continued noncompliance, the notice of noncompliance will serve as the family’s termination notice. This prevents the PHA from having to send a second notice if the family does not respond to the notice of continued noncompliance.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

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 notice. The notice will meet the requirements for termination notices described in Section 13-IV.D, Form, Delivery, and Content of the Notice.

The family will have 10 business 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.

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.

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

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**PART II: IMPLEMENTATION OF COMMUNITY SERVICE**

**11-II.A. OVERVIEW**

**PHA Implementation of Community Service**

**☑ Decision Point: What obligations does the PHA have when residents will be performing community service at the PHA?**

Things to Consider

* The model policy states that the PHA will notify its insurance company if residents will be performing community service. This is important for liability reasons.
* The policy also commits the PHA to ensure that residents are not subject to hazardous conditions while performing community service.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will notify its insurance company if residents will be performing community service at the PHA. In addition, the PHA will ensure that the conditions under which the work is to be performed are not hazardous.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: If a disabled resident is not exempt from performing community service how will the PHA handle reasonable accommodation requests related to performance of community service?**

Things to Consider

* It is possible that a disabled person may be able to able to comply with the community service, and therefore would not be exempt. This policy simply clarifies that in this situation, the resident may request a reasonable accommodation and that the PHA will review it in accordance with the policies in Chapter 2.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

If a disabled resident certifies that they are able to perform community service, the PHA will ensure that requests for reasonable accommodation are handled in accordance with the policies in Chapter 2.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**PHA Program Design**

**☑ Decision Point: How will the PHA design its community service program to provide residents the greatest choice possible?**

Things to Consider

* In order to provide a service program that offers residents viable choices and opportunities to increase their knowledge, skills, and abilities, the PHA should offer the broadest choice possible to residents as they choose their community service or self-sufficiency activities. This may include resident choices that are not on the list of volunteer opportunities, as long as they are not political activities or hazardous.
* The model policy commits the PHA to working with resident and community organizations to design and implement its community service program. This type of policy promotes commitment and buy-in for all involved parties.
* The model policy states that to the extent possible the PHA will identify organizations that can provide community service opportunities or self-sufficiency activities for residents. Although this requires a time and resource commitment on the part of the PHA, it will result in a more effective program in the long-run.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will attempt to provide the broadest choice possible to residents as they choose community service activities.

The PHA’s goal is to design a service program that gives residents viable opportunities to become involved in the community and to gain competencies and skills. The PHA will work with resident organizations and community organizations to design, implement, assess and recalibrate its community service program.

The PHA will make every effort to identify volunteer opportunities throughout the community, especially those in proximity to public housing developments. To the greatest extent possible, the PHA will provide names and contacts at agencies that can provide opportunities for residents, including persons with disabilities, to fulfill their community service obligations.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: Where will the PHA document its written agreements, such as Memorandums of Understanding, contracts, etc., in the development, design and implementation of the community service program?**

Things to Consider

* PHAs have a wide array of options in how to develop the program. PHAs 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, community agencies, or institutions. A PHA could contract out or develop collaborations with other entities to provide volunteer activities, monitor compliance, and/or document compliance. However, it is the PHA’s ultimate responsibility to comply with community service requirements and to ensure that public housing families comply with service requirements.
* The PHA Plan must include a statement of the PHA’s community service and self-sufficiency programs [24 CFR 903.7(l)]. The statement must describe:
  + Any PHA programs relating to services and amenities coordinated, promoted or provided by the PHA for assisted families, including programs provided or offered as a result of the PHA’s partnership with other entities.
* Because this information should already be provided in the PHA plan and partnerships are subject to change, the model policy refers to the PHA plan rather than having the information included here.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Any written agreements or partnerships with contractors and/or qualified organizations, including resident organizations, are described in the PHA Plan.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: Will the PHA allow residents to fulfill their service requirements by volunteering at the PHA?**

Things to Consider

* The model policy language provides flexibility to the PHA by stating that the PHA will offer community service opportunities when possible.

🞎 *Option 1:* *Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will provide in-house opportunities for volunteer work or self-sufficiency programs when possible.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: Will the PHA coordinate the community service with ROSS/FSS?**

Things to Consider

* Notice PIH 2015-12, issued August 13, 2015, states that PHAs with a ROSS program, ROSS Service Coordinators, or FSS program, may coordinate individual training and services plans (ITSPs) with the community service requirement. Specific community service activities may be included in the ITSP, which is a tool for tracking movement towards self-sufficiency. Regular meetings with PHA coordinators may therefore satisfy community service activities and PHA coordinators may verify community service hours within individual monthly logs. If your PHA has any of these resources, you may want to consider incorporating such language into your policy.

🞎 *Option 1:* *Use the model ACOP language shown below. No changes to the model ACOP are needed.*

When the PHA has a ROSS program, a ROSS Service Coordinator, or an FSS program, the PHA will coordinate individual training and service plans (ITSPs) with the community service requirement. Regular meetings with PHA coordinators will satisfy community service activities and PHA coordinators will verify community service hours within individual monthly logs.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**FINALIZING THE DOCUMENT**

Take a final look at the changes you have made in this chapter of the ACOP.  
Have you:

(1) Added or subtracted any exhibits at the end of the chapter?  Yes  No.

(2) Added, subtracted or reordered any major sections (at the A, B, or C level?)  Yes  No

If you answered yes to either of these questions, you must adjust the chapter to match your changes.

**☑ Decision Point: Are any changes required to this chapter?**

No. No changes to the model policy are needed.

Yes. Edits only. Edit and insert PHA language as appropriate.

Yes. PHA changed the organization of the chapter. Adjust the chapter to reflect your changes **and** review the rest of the document to make sure that any references to section numbers are correct.

**☑ Decision Point: Are changes required in other chapters as a result of changes to this chapter?**

Check the “Things to Consider” under each decision point to identify if changes to the model policy will require changes to policies in other chapters of the ACOP.

No. Changes to other chapters are not necessary.

Yes. Changes to the following chapters are also required: