

3/8/19

Many PHAs are allowing residents to volunteer at the PHA to fulfill their community service hours. This is permissible but some of you may not know, especially if you are new to the program, that there are some stipulations regarding the kind of work they may do. The regulations at 24 CFR §960.609 state that "in implementing the service requirement under this subpart, the PHA may not substitute community service or self-sufficiency activities performed by residents for work ordinarily performed by PHA employees, or replace a job at any location where residents perform activities to satisfy the service requirement." This is reinforced in PIH 2009-48 which states "no PHA may substitute community service activity performed by a resident for work ordinarily performed by a PHA employee." So, as long as the tasks are not those usually done by a paid PHA staff person, you're good.

Some of the most common tasks PHAs are giving to these resident volunteers are

- bus stop crossing guard for children boarding and getting off school buses
- cleaning bathrooms and community rooms
- helping with make-ready on vacant units
- cleaning up the grounds
- weeding and cleaning flower beds
- washing windows
- helping with children's programs
- organizing, setting up and decorating for resident events
- distributing flyers

Allowing residents to work in the PHA offices is not recommended for confidentiality reasons. Even if you have them sign a confidentiality agreement--not a good idea. Their curiosity about their neighbors and pressure from their neighbors for "inside info" is pretty powerful. This puts the PHA at risk.

We periodically get questions regarding liability or workers comp coverage for volunteers. What if they get hurt? Most PHAs in Texas have TMLIRP Liability Insurance and Workers Comp. We are attaching a letter to THA from TMLIRP back in 2003 addressing the coverage of volunteers. Our TMLIRP contact tells us that the letter is still valid. Volunteers are covered by the PHA insurance if they are working at the authority and not off premises. They are not automatically covered by Workers' Comp but coverage is available, "if either the inside or outside volunteer coverage is added and contribution paid."

The letter also states "tenants can also now satisfy the eight-hour requirement by performing community service at the Housing Authority where they reside, PROVIDED that Housing Authority employees do not normally perform these community service activities."

Some of the suggested partnerships for helping residents fulfill their requirement are

- 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 PHA 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. PHA housing to improve grounds or provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board; and,
- F. Care for the children of other residents so parents may volunteer.