



Section 3 Action Plan

2018-2019

Purpose:

To ensure employment opportunities for businesses and lower income persons in connection with the project, and the Section 3 Plan and Policy to the greatest extent feasible is adhered to, and to serve as the “assurance of compliance” certification and action plans as required in the bid documents and to implement progressive efforts to attain Section 3 compliance.

Responsibilities:

Better Housing Coalition will work with its general contractors and subcontractors for upcoming projects to fill vacant positions with City (or county) resident applicants, applicants within a 3.5 mile radius of the project and/or very low income area residents. The contractor and subcontractors shall recruit or attempt to recruit from the Section 3 area, the necessary number of low-income and very low income residents. Applicants that meet minimum qualifications, but not hired due to lack of job openings or for other reasons, will be placed on a hiring list, maintained by the recipient Section 3 coordinator and by the general contractor, and offered positions on a permanent, temporary, or trainee basis upon the occurrence of the first available job opening.

Documentation of any and all efforts is paramount.

Better Housing Coalition (recipient), general contractor and subcontractor efforts will consist of four stages:

- Notification
- Encouragement
- Facilitation
- Compliance



Better Housing
COALITION

The projects for this year may include:

- Demolition and Land Prep
- Rehab/Construction
- Redevelopment/Construction

Scope of work may include, but not limited to, the following: hazardous material abatement, selective demolition, limited site work, concrete, masonry, metal fabrications, wood framing, finish carpentry, waterproofing, building insulation, roofing repairs, doors, frames, and hardware, window restoration, window coverings, finishes, residential appliances, residential casework, elevator, fire protection, mechanical, plumbing, HVAC, and electrical systems.



Notification

Mandatory

- ❖ Posting signage at project site
- ❖ Provide notices/flyers to the Public Housing Authority's developments and offices
- ❖ Provide notices/flyers to the nearest BHC development office

Additional Measures-at least two methods

- ❖ Advertise on social media (Facebook, Twitter, LinkedIn, etc)
- ❖ Advertise in public service programming (newspaper, online news, television, radio)
- ❖ Contact resident/tenant councils, neighborhood civic groups, or community organizations in HUD assisted neighborhoods to request their assistance in notifying residents of positions to be filled
- ❖ Contact community organizations, state-local agencies, probation-parole agencies, reentry agencies, unemployment compensations programs, and other applicable officials or organizations to assist with recruiting Section 3 residents.
- ❖ Consult with local employment providers (i.e. ResCare, Goodwill, and Workforce Innovation Center)

Encouragement – Section 3 Businesses

Activities may include:

- ❖ Bid and solicitations
 - Provide bid notices to all Section 3 businesses
 - Develop a Section 3 communication network
 - Emphasize Section 3 at pre-bid conferences
- ❖ Provide written notice to known Section 3 business concerns of the contracting opportunities
 - Following up with Section 3 businesses that have expressed interest
- ❖ Contact business assistance agencies, minority contracting associations and community organization to inform them of opportunities and seek assistance in identifying eligible businesses
- ❖ Advertise the contracting opportunities through trade association's papers and newsletters, and through the local media, such as community news websites, newspapers, and radio advertising.
- ❖ Encourage financial institutions to comply with their CRA requirements
- ❖ Actively support joint ventures with Section 3 businesses

Facilitation – Greatest Extent Feasible

Goals: 30% of all new hires to be Section 3 residents

10% of contracts to be Section 3 businesses

“First Source” hiring agreement – contractor or subcontractor must notify the Section 3 Coordinator prior to interviewing or hiring if a job opening exists during the time of construction. The Section 3 coordinator will assist in finding possible workers residing in the neighborhood/target project area, and the contractor will be obligated to interview these candidates and document these conversations.

Mandatory

- ❖ Hold Mandatory pre-bid meetings
- ❖ Provide copies of Section 3 Plan and have contractors certify receipt
- ❖ Include Section 3 Clause in all contracts. Assess hiring and contracting needs at time of contract award
- ❖ Review payroll date to verify a contractor’s need for new hires. Re-hires are considered new hires.

Additional

- ❖ Match potential Section 3 employees or business with contractors
 - Public Housing Authority Section 3 Coordinator should provide a list of potential hires/trainees
- ❖ Sponsor (schedule, advertise, finance, or provide in-kind services) a job informational meeting to be conducted by the Housing Authority or contractor representative or representative at a location in the public housing developments or in the neighborhood or service area of the Section 3 covered project
- ❖ Encourage job interviews at the public housing developments or at locations within the neighborhood or service area of the Section 3 covered project
- ❖ Refer residents to job counseling, education, and related programs in association with local educational institutions

Compliance

Better Housing Coalition, its general contractor, and their subcontractors are responsible for maintaining documentation to demonstrate their compliance with Section 3 requirements. BHC, its contractor and their subcontractors should maintain a copy of this Section 3 plan along with reportable data and documentation of efforts.



- ❖ This document serves as the typical Section 3 plan for Better Housing Coalition’s development projects, with goals of “greatest extent feasible” as defined in the previous section, and proposed activities to include those described in Notification, Encouragement, and Facilitation sections. Covered general contractors and subcontractors may provide their own plans or may adhere to the plan outlined herein.
- ❖ Compliance monitoring should include evaluation of : Actual hiring, in relation to goals; Actual contracting in relation to goals (number and value); efforts to meet requirements
- ❖ Future payments/ contract awards may be tolled until compliance is achieved
- ❖ Vendors and sub-recipients will receive written notice prior to the issuance of any consequence and will receive a reasonable period to make corrective action
- ❖ Multifamily Section 3 contracts are bound by the Davis-Bacon Act (DBA). The DBA requires the payment of prevailing wage rates to all laborers and mechanics on all federally funded construction projects in excess of \$2,000 and over 8 CDBG- or 12 HOME-affected units.

Maintaining Records

The contractor/subcontractors shall maintain on file all record related to employment and job training of low-income and very low-income residents or other such records, such as Section 3 Summary Report, Section 3 Program Employment Information Sheet, Eligibility for Preference form, assurances of compliance from subcontractors, etc. in connection with this contract. If there is a report that is needed as part of the submission you agree to provide it in a timely manner.

Reports

The contractor/subcontractor shall provide reports as required (with every payment request) in connection with the contractor specifications to include:

- Section 3 Summary Report - Quarterly
Economic Opportunities for Low- and Very Low-income persons
OMB Approval No. 2529-0043
- Minority Business Report
Contract and Subcontract Activity
OMB Approval No. 2577-0088
- All certified and regular payrolls shall clearly detail which employees qualify under Section 3