

CITY OF NEW ORLEANS  
OFFICE OF COMMUNITY  
DEVELOPMENT



Section 3 of the Housing and Urban  
Development Act of 1968  
Policy and Procedures

24 CFR Part 75

**Section 3 Policy and Procedures Updates**

<b>Version</b>	<b>Date</b>	<b>Summary of Changes</b>
1.0	January 18, 2013	Completed CNO Section 3 Plan.
2.0	October 19, 2017	Revision of Policy and Procedures and all forms.
3.0	January 16, 2018	Updated cover page. Included updates page. Clarified Section 3 applicability to task orders.
4.0	April 19, 2022	Revised Section 3 Policy and Procedures per the new Section 3 regulations at 24 CFR Part 75.

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## **Exhibits to Section 3 Policy and Procedures**

- Exhibit A – Section 3 Plan
- Exhibit B – Section 3 Validation Contract Routing Form
- Exhibit C – Section 3 Worker Self-Certification
- Exhibit D – Section 3 Worker Employer Certification
- Exhibit E – Section 3 Business Certification
- Exhibit F – Section 3 Compliance Report

## **I. Introduction**

### **A. Section 3 Regulation**

Section 3 is a provision of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) whose purpose is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, or residents of the community in which the Federal assistance is spent. The regulations are found at 24 CFR Part 75.

### **B. Purpose of This Document**

This Section 3 Policy and Procedures document outlines how the City of New Orleans (herein referred to as the “City”) and its subrecipients, prime contractors, and subcontractors will comply with HUD’s Section 3 requirements in implementing the City’s HUD-funded programs. The City will, to the greatest extent feasible, ensure that employment and other economic opportunities are directed to low- and very low-income persons (Section 3 workers and Targeted Section 3 workers) and to eligible businesses (Section 3 businesses), and requires the same of its subrecipients and contractors.

The City may amend its Section 3 Policy and Procedures document as necessary to ensure continued compliance with HUD’s requirements and/or to reflect updated Section 3 guidance and outreach strategies.

### **C. 24 CFR Part 75 Amendments and Conflicts**

Amendments to 24 CFR Part 75 shall apply to this Policy as of the effective date of the updated regulation. Where provisions of this Policy conflict with 24 CFR Part 75, the latter shall prevail.

### **D. Section 3 Coordinator**

The City will designate a Section 3 Coordinator to serve as the central point of contact for Section 3 compliance. Subrecipients and contractors are encouraged to reach out to that individual with any questions or requests for guidance regarding Section 3 compliance.

## **II. Applicability**

Section 3 applies to public housing financial assistance and Section 3 projects, as set forth in 24 CFR §75.3:

### **A. Public Housing Financial Assistance**

Public housing financial assistance means:

1. Development assistance provided pursuant to section 5 of the United States Housing Act of 1937 (the 1937 Act);
2. Operations and management assistance provided pursuant to section 9(e) of the 1937 Act;
3. Development, modernization, and management assistance provided pursuant to section 9(d) of the 1937 Act; and
4. The entirety of a mixed-finance development project as described in 24 CFR 905.604, regardless of whether the project is fully or partially assisted with public housing financial assistance as defined in paragraphs (a)(1)(i) through (iii) of this section.

## **B. Section 3 Projects (Housing and Community Development Financial Assistance)**

1. Section 3 projects means housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance (such as CDBG and HOME) when the total amount of assistance to the project exceeds a threshold of \$200,000. The threshold is \$100,000 where the assistance is from the Lead Hazard Control and Healthy Homes programs, as authorized by Sections 501 or 502 of the Housing and Urban Development Act of 1970 (12 U.S.C. 1701z-1 or 1701z-2), the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 *et seq.*); and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 *et seq.*). The project is the site or sites together with any building(s) and improvements located on the site(s) that are under common ownership, management, and financing.
2. The Secretary must update the thresholds provided in paragraph (a)(2)(i) of this section not less than once every 5 years based on a national construction cost inflation factor through Federal Register notice not subject to public comment. When the Secretary finds it is warranted to ensure compliance with Section 3, the Secretary may adjust, regardless of the national construction cost factor, such thresholds through Federal Register notice, subject to public comment.
3. The requirements in this part apply to an entire Section 3 project, regardless of whether the project is fully or partially assisted under HUD programs that provide housing and community development financial assistance.

## **C. Contracts for Materials**

Section 3 requirements do not apply to material supply contracts.

## **III. Definitions**

**1937 Act** means the United States Housing Act of 1937, 42 U.S.C. 1437 *et seq.*

**Contractor** means any entity entering into a contract with the City of New Orleans or one of its subrecipients to perform work in connection with a Section 3 project.

**Housing and community development financial assistance** has the meaning ascribed by HUD and includes, without limitation, the following sources of funding:

- a. Community Development Block Grants (CDBG)
- b. HOME Investment Partnerships Program (HOME)
- c. National Disaster Resilience (NDR)
- d. Housing Opportunities for Persons with AIDS (HOPWA)
- e. Emergency Solutions Grants (ESG)
- f. Neighborhood Stabilization Program (NSP)
- g. Lead Hazard Control Grants
- h. Healthy Homes Production Grants
- i. Disaster Recovery Grants
- j. Economic Stimulus Funds

**HUD** means the United States Department of Housing and Urban Development.

**Labor hours** means the number of paid hours worked by persons on a Section 3 project or by persons employed with funds that include public housing financial assistance.

**Low-income person** means a person whose income does not exceed 80 percent of the area median income, as defined in Section 3(b)(2) of the 1937 Act.

**Material supply contracts** means contracts for the purchase of products and materials, including, but not limited to, lumber, drywall, wiring, concrete, pipes, toilets, sinks, carpets, and office supplies.

**Metropolitan area** means a metropolitan statistical area (MSA) as established by the Office of Management and Budget. The New Orleans-Metairie MSA contains the following eight parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. James, St. John the Baptist and St. Tammany.

**Professional services** means non-construction services that require an advanced degree or professional licensing, including, but not limited to, contracts for legal services, financial consulting, accounting services, environmental assessment, architectural services, and civil engineering services.

**Public housing financial assistance** means assistance as defined in 24 CFR §75.3(a)(1); outlined in section III. Applicability above.

**Public housing project** is defined in 24 CFR 905.108:

The term “public housing” means low-income housing, and all necessary appurtenances thereto, assisted under the 1937 Act, other than assistance under 42 U.S.C. 1437f of the 1937 Act (section 8). The term “public housing” includes dwelling units in a mixed-finance project that are assisted by a public housing agency with public housing capital assistance or Operating Fund assistance. When used in reference to public housing, the term “project” means housing developed, acquired, or assisted by a PHA under the 1937 Act, and the improvement of any such housing.

**Recipient** means any entity that receives directly from HUD public housing financial assistance or housing and community development assistance that funds Section 3 projects, including, but not limited to, any State, local government, instrumentality, PHA, or other public agency, public or private nonprofit organization.

**Section 3** means Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

**Section 3 business concern** means a business concern meeting at least one of the following criteria, documented within the last six-month period:

1. It is at least 51 percent owned and controlled by low- or very low-income persons;
2. Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
3. It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

**Section 3 project** means a project as defined in 24 CFR §75.3(a)(2); also outlined in section II. Applicability above.

**Section 3 worker** means any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:

1. The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
2. The worker is employed by a Section 3 business concern.

3. The worker is a YouthBuild participant.

**Section 8-assisted housing** refers to housing receiving project-based rental assistance or tenant-based assistance under Section 8 of the 1937 Act.

**Service area or the neighborhood of the project** means an area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

**Subcontractor** means any entity that has a contract with a contractor to undertake a portion of the contractor's obligation to perform work in connection with a Section 3 project.

**Subrecipient** means an entity that receives a subaward from the City of New Orleans to carry out part of a Federal award, but does not include an individual that is a beneficiary of the award.

**Targeted Section 3 worker** for Housing and Community Development Financial Assistance, as defined in 24 CFR §75.21, means a Section 3 worker who is:

1. A worker employed by a Section 3 business concern; or
2. A worker who currently fits or when hired fit at least one of the following categories, as documented within the past five years:
  - a. Living within the service area or the neighborhood of the project; or
  - b. A YouthBuild participant.

**Very low-income person** means a person whose income does not exceed 50 percent of the area median income, per the definition for this term set forth in section 3(b)(2) of the 1937 Act.

**YouthBuild programs** refers to YouthBuild programs receiving assistance under the Workforce Innovation and Opportunity Act (29 U.S.C. 3226).

#### **IV. Section 3 Requirements and Benchmarks**

##### **A. Prioritization of Effort in Employment, Training, and Contracting**

To the greatest extent feasible, employment and training opportunities shall be provided to Section 3 workers in the metropolitan area, and contracting opportunities shall be provided to Section 3 businesses that provide economic opportunities to Section 3 workers in the metropolitan area.

Subrecipients and contractors will be required to certify that they will and have made best efforts to follow the order of prioritization listed below:

##### **Employment and Training**

Where feasible, priority for opportunities and training should be given to:

1. Section 3 workers residing within the service area or neighborhood of the project, and
2. Participants in YouthBuild programs.

##### **Contracting**

Where feasible, priority for contracting opportunities should be given to:

1. Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the service area or the neighborhood of the project, and
2. YouthBuild programs.

## B. Safe Harbor Compliance

Subrecipients and contractors will be considered to have complied with Section 3 requirements, absent evidence to the contrary, if they certify that they have followed the prioritization of effort outlined above in section A, and meet or exceed the Section 3 benchmarks outlined below in section C.

## C. Benchmarks

The safe harbor benchmark goals are as follows:

1. Twenty-five (25) percent or more of the total number of labor hours worked by all workers on a Section 3 Project are performed by Section 3 workers; and
2. Five (5) percent or more of the total number of labor hours worked by all workers on a Section 3 Project are performed by Targeted Section 3 workers.



$$\frac{\text{Section 3 Labor Hours}}{\text{Total Labor Hours}} = 25\%$$

AND

$$\frac{\text{Targeted Section 3 Labor Hours}}{\text{Total Labor Hours}} = 5\%$$

HUD establishes and updates the benchmarks for Section 3 and Targeted Section 3 workers at least once every 3 years through a document published in the Federal Register. This Policy will be revised as needed to include updated benchmarks.

All subrecipients and contractors are required to certify that they will comply with the requirements of Section 3, and are responsible for implementing efforts to achieve Section 3 compliance. Any subrecipient or contractor that does not meet the Section 3 benchmarks must demonstrate why meeting the goals was not feasible.

## D. Multiple Funding Sources

If a project receives funding from multiple sources that trigger Section 3, the project may follow either the requirements of 24 CFR 75.9 pertaining to public housing assistance or the requirements pertaining to housing and community development assistance outlined above and found at 24 CFR 75.19. Section 3 applicability and related provisions will be specified in the contract or other agreement(s) in accordance with 24 CFR 75.29.

## **V. Qualitative Efforts**

In accordance with 24 CFR 75.25, subrecipients and contractors must engage in qualitative efforts to satisfy the Section 3 benchmarks and provide economic opportunities to Section 3 workers and business concerns. Example of such efforts may include, but are not limited to the following:

- **Applicant Outreach** –
  - Engage in outreach efforts to generate job applicants who are Targeted Section 3 workers, including posting job openings at the job site, HUD Opportunity Portal, social media pages, and other platforms.
  - Clearly indicate Section 3 eligibility on all job postings, notifications, and advertisements with the following statement: *“This is a Section 3 eligible job opportunity. We encourage applications from individuals that are low-income, live in public housing, and/or receive a Section 8 voucher.”*
  - Include the Section 3 Worker Self-Certification form in all job postings.
- **One-Stop / YouthBuild Outreach** – Engage in outreach or referrals with local YouthBuild programs, Louisiana Workforce Commission, JOB 1, or other community organizations to assist with training and recruiting Section 3 and Targeted Section 3 workers.
- **Training and Apprenticeship** – Provide training or apprenticeship opportunities.
- **Job Fairs** – Hold one or more job fairs, or sponsor a job informational meeting in the Service Area / Neighborhood of the Project.
- **Business Concern Outreach** –
  - Engage in outreach efforts to identify and secure bids from Section 3 businesses by advertising notices of contracting opportunities and related information on the HUD Opportunity Portal and local community papers.
  - Provide written notice to all known Section 3 business concerns, with sufficient time for interested businesses to respond to bid invitations.
  - Send notice of contracting opportunities to local community development organizations, business development organizations, or minority contracting associations.
  - State clearly in all notices that the contracting opportunity is Section 3 eligible, and include a copy of the Section 3 Business Concern Certification form.
- **Competition Assistance** – Provide technical assistance to help Section 3 business concerns understand and bid on contracts.
- **Contract Sizing** – Size, split, or divide contracts into smaller jobs to facilitate participation by Section 3 business concerns, particularly where economies of scale or efficiency of delivery are not factors. [2 CFR 200.321(b)(3)]
- **Bidder Viability Support** – Provide bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- **Business Registries** – Promote use of the HUD Opportunity Portal or other business registries designed to create opportunities for disadvantaged and small businesses.

In addition to efforts to meet the benchmark goals directly, subrecipients and contractors can also engage in other activities aimed at increasing economic opportunities for Section 3 workers and businesses. Examples of such efforts may include, but are not limited to the following:

- Employment Assistance – Provide technical assistance to help Section 3 workers compete for jobs, or connect them with assistance in seeking employment, including:
  - Resume assistance
  - Interview preparation
  - Coaching
  - Job placement services
- Work Readiness and Retention – Provide or refer Section 3 workers to services supporting work readiness and retention, such as:
  - Interview clothing
  - Licensing or testing fees
  - Transportation
  - Childcare
- Financial Literacy – Help Section 3 workers obtain financial literacy training or coaching.
- Education Assistance – Provide assistance to Section 3 workers to apply for or attend:
  - Community college
  - Four-year educational institution
  - Vocational or technical training

## **VI. Contracting Procedures**

The City will utilize the following procedures during procurement and contracting involving HUD financial assistance to ensure that subrecipients, prime contractors, and subcontractors are aware of and prepared to comply with applicable Section 3 requirements.

### **A. Bids and Proposals**

1. Solicitation (ITB/RFP/RFQ)
  - a. All invitations to bid and requests for proposals or qualifications contain a Section 3 Plan (**Exhibit A**) as a required submission. This document contains information about Section 3 requirements, and serves as the bidder's or respondent's commitment and plan to meet the Section 3 benchmarks.
  - b. The Section 3 Coordinator will provide additional information about Section 3 regulations and the required plan submission at pre-bid/ pre-proposal meetings.
2. Bid/Proposal Submission
  - a. In a formal sealed bid, the two lowest bidders are required to submit a Section 3 Plan as part of their post-bid documents submission.
  - b. RFP/RFQ respondents must submit a plan as part of their proposal or qualifications submission.
  - c. Bidders or respondents that fail to submit a Section 3 Plan may be deemed non-responsive and ineligible for contract award.
3. Contract Award
  - a. After the lowest responsive bidder or successful respondent has been identified, all identified subcontractors must also complete and submit a Section 3 Plan.

- b. The Section 3 Coordinator will review all Section 3 submissions for completeness, and may request additional information or documentation as necessary.
- c. The Section 3 Coordinator must receive all required documentation, including subcontractors' Section 3 Plans, before the contract can be executed.
- d. Once the review is complete, the Labor Compliance Unit will complete a Section 3 Validation Contract Routing Form (**Exhibit B**) to confirm that all required documentation has been received.

## **B. Task Orders**

For HUD-funded task orders pursuant to maintenance contracts or service agreements, Section 3 applicability is determined at the time the task order is issued. Contractors that are issued a task order on a Section 3 project must submit a Section 3 Plan for their own company and any subcontractors that will work on the project.

## **C. CEAs**

All cooperative endeavor agreements involving HUD financial assistance for housing construction, rehabilitation, or other public construction projects contain Section 3 regulatory language and provisions. Subrecipients must submit either a project-specific Section 3 Plan or their organization's Section 3 Policies and Procedures, as appropriate, and any other documentation deemed necessary by the Section 3 Coordinator for review before the CEA is executed. Once the review is complete, the Section 3 Coordinator will complete a Section 3 Validation form to confirm that all required documentation has been received.

## **D. NOFAs and Subrecipient Agreements**

All notices of funding availability for HUD housing and community development financial assistance for housing construction, rehabilitation, or other public construction projects contain Section 3 regulatory language and provisions. Each applicant must complete and submit a Section 3 Plan to the City with their application. Section 3 applicability is determined after the award amount and funding source are finalized. Subrecipients subject to Section 3 must submit all required documentation including Section 3 Plans for all identified prime contractors and subcontractors. The Section 3 Coordinator must receive and review all Section 3 documentation before the grant agreement is executed. Once the review is complete, the Section 3 Coordinator will complete a Section 3 Validation form to confirm that all required documentation has been received.

For activities receiving funding from multiple sources, the City of New Orleans may coordinate Section 3 monitoring and enforcement with other agencies in accordance with 24 CFR 75 Subpart D, "Provisions for Multiple Funding Sources, Recordkeeping, and Compliance."

The City may choose to allow its subrecipient to follow another monitoring agency's Section 3 Policy regarding compliance and reporting, as long as that policy is in accordance with 24 CFR Part 75. In such cases, specific compliance and reporting requirements will be agreed upon by all parties and communicated to the subrecipient prior to commencement of the contract. Compliance information and records will be shared among all relevant parties.

## **E. Contract Provisions**

The City of New Orleans includes standard Section 3 language in all HUD-funded subrecipient agreements and contracts to ensure compliance with the regulations in 24 CFR Part 75.

Subrecipients and contractors are required to meet the requirements of 24 CFR Part 75, regardless of whether Section 3 language is included in subrecipient agreements, program regulatory agreements, or contracts.

## **VII. Section 3 Certification and Recordkeeping**

Individuals and businesses that meet Section 3 criteria may seek Section 3 preference from the City or its contractors/subcontractors for training, employment, or contracting opportunities generated by the City's HUD-funded programs. To qualify as a Section 3 worker, Targeted Section 3 worker, or Section 3 business concern, the City maintains and requires the submission of documentation certifying that they meet the applicable criteria. For the purpose of determining Section 3 worker eligibility, the City will use **individual** income rather than family/household income. The income limits will be determined annually using the guidelines published online by HUD at [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html).

Businesses that misrepresent themselves as Section 3 business concerns or report false information to the City may have their contracts terminated as default and be barred from ongoing and future considerations for contracting opportunities.

### **A. Section 3 Workers**

For an individual to qualify as a Section 3 worker, the City requires one of the following:

1. A Section 3 Worker Self-Certification form (**Exhibit C**) from the individual certifying that their income for the previous or annualized calendar year is below the HUD income limit, or that they are a YouthBuild participant; or
2. A Section 3 Worker Employer Certification form (**Exhibit D**) from the employer certifying that currently, or when hired within the last five years:
  - a. The worker's income from that employer is below the income limit when based on a calculation of what the worker's wage rate would translate to if annualized on a full-time basis;
  - b. The worker is employed by a Section 3 business concern; or
  - c. The worker is a YouthBuild participant.

### **B. Targeted Section 3 Workers**

For a worker to qualify as a Targeted Section 3 worker, the City requires one of the following:

1. A Section 3 Worker Self-Certification from the individual certifying that they are a YouthBuild participant; or
2. A Section 3 Worker Employer Certification from the employer certifying that:
  - a. The worker is employed by a Section 3 business concern; or
  - b. The worker's residence is currently, or was when hired within the past five years, within one mile of the work site or, if fewer than 5,000 people live within one mile of a work site, within a circle centered on the work site that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

### **C. Section 3 Business Concerns**

Businesses seeking designation as a Section 3 business concern shall submit a Section 3 Business Certification form (**Exhibit E**) in order to be added to the City's list of certified Section 3 businesses. Businesses must meet one or more of the following criteria:

1. At least 51 percent of the business is owned and controlled by low- or very low-income persons; or
2. At least 51 percent of the business is owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing; or
3. Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers.

The City reserves the right, but is not obligated, to accept a business's Section 3 certification approved by another governmental entity including such certifications provided by HUD.

Certification as a Section 3 business concern does not relieve contractors from their Section 3 obligations on covered projects, including the achievement of Section 3 benchmarks. Businesses which are identified as Section 3 business concerns on covered projects may be required to provide the City with an updated Section 3 Business Certification form, regardless of whether the business previously submitted this form or was determined eligible by the City.

#### **D. Additional Documentation**

The City reserves the right to request any additional documentation it deems necessary to verify Section 3 eligibility. All Section 3 workers, employers, and businesses submitting certification forms agree to provide such documentation to the City upon request.

### **VIII. Reporting**

#### **A. Section 3 Compliance Reports**

Subrecipients and contractors are required to submit periodic and project end reports using the Section 3 Compliance Report form (**Exhibit F**), as well as supporting documentation of their qualitative efforts and achievements. Such documentation may include:

- Section 3 worker and Targeted Section 3 worker certification forms
- Section 3 business concern certification forms
- Payroll or time-and-attendance based records
- Documentation of qualitative efforts

#### **B. Reporting of Labor Hours**

1. Subrecipients and contractors are required to report the following [24 CFR 75.25(a)]:
  - a. The total number of labor hours worked;
  - b. The total number of labor hours worked by Section 3 workers; and
  - c. The total number of labor hours worked by Targeted Section 3 workers.
2. Section 3 workers' and Targeted Section 3 workers' labor hours may be counted for five years from when their status as a Section 3 worker or Targeted Section 3 worker is established pursuant to § 75.31.
3. The labor hours reported must include the total number of labor hours worked on a Section 3 project, including labor hours worked by any subrecipients, prime contractors and subcontractors.
4. Subrecipients and contractors may report labor hours by Section 3 workers and labor hours by Targeted Section 3 workers from professional services without including labor hours from professional services in the total number of labor hours worked.

### **C. Additional Reporting if Benchmarks Are Not Met**

If the safe harbor benchmarks are not met, subrecipients and contractors must report on the nature of their efforts to meet the benchmarks, as well as any other activities or efforts aimed at increasing economic opportunities for Section 3 workers and business concerns. See section V. Qualitative Efforts above for examples of such efforts.

### **IX. Monitoring and Compliance**

The City, via the Office of Community Development Labor Compliance Unit, will monitor contractors' performance for compliance with Section 3 requirements throughout a covered project and at project end, including the collection and review of Section 3 Compliance Reports and related supporting documentation.

Noncompliance with Section 3 by any business may be used to determine contractor responsibility and bid responsiveness on future contracting opportunities with the City. In addition, noncompliance may result in sanctions, debarment, suspension, or limited denial of future participation in HUD programs pursuant to 24 CFR Part 75.

### **X. Resources**

#### **A. General Information**

The Section 3 implementing regulations at 24 CFR Part 75 can be found online in the Electronic Code of Federal Regulations at [www.ecfr.gov/current/title-24/subtitle-A/part-75](http://www.ecfr.gov/current/title-24/subtitle-A/part-75).

HUD publishes general information about Section 3 online at [www.hud.gov/section3](http://www.hud.gov/section3).

Current HUD Income Limits can be found at [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html).

The HUD Section 3 Opportunity Portal can be found at [hudapps.hud.gov/OpportunityPortal](http://hudapps.hud.gov/OpportunityPortal).

#### **B. Forms**

All City of New Orleans compliance, certification, and reporting forms referenced in this policy are available online at [www.nola.gov/section-3](http://www.nola.gov/section-3).

#### **C. Questions and Complaints**

Questions or complaints regarding the City's Section 3 policy should be directed to the Section 3 Coordinator in the Office of Community Development:

Section 3 Coordinator  
Office of Community Development  
City of New Orleans  
1340 Poydras St, Ste 1000  
New Orleans, LA 70112  
Phone: 504-658-8418  
Email: [section3@nola.gov](mailto:section3@nola.gov)

Consistent with 24 CFR 75.33, complaints alleging failure of compliance may be reported to the HUD program office responsible for the Section 3 project, or to the local HUD field office.

# Exhibit A

Section 3 Plan

## Section 3 Plan

Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u and 24 CFR Part 75) requires that employment and economic opportunities generated by certain HUD financial assistance shall be directed to low- and very low-income persons, particularly those who receive government assistance for housing and those residing in the community in which the federal assistance is spent.

This project will be funded using HUD Housing and Community Development Financial Assistance and is therefore subject to Section 3. The selected bidder, respondent or funding applicant will be responsible for ensuring compliance with all applicable Section 3 requirements. More information as well as Section 3 worker and business certification forms can be found online at [www.nola.gov/section-3/](http://www.nola.gov/section-3/).

**Instructions:** For sealed bids, the two lowest bidders must complete and submit this form with your post-bid document submission. RFP/RFQ respondents must submit this form as part of your proposal or qualifications submission. All subrecipients, contractors and subcontractors on Section 3 projects must submit this form. The entity receiving a contract from the City of New Orleans must submit all required documentation, including subcontractors' Section 3 Plans, prior to contract award. General questions about Section 3 requirements and forms can be directed to [section3@nola.gov](mailto:section3@nola.gov).

**Project:** \_\_\_\_\_ **Solicitation #:** \_\_\_\_\_

Business Name:	Address:
Authorized Representative:	Title:
Phone #:	Email:
Trade/Services Provided:	

### **Section 3 Requirements**

#### *Employment and Training*

To the greatest extent feasible, employment and training opportunities arising in connection with Section 3 projects shall be provided to Section 3 workers within the New Orleans metropolitan area. Where feasible, priority for employment and training will be given to:

1. Section 3 workers residing within the service area or neighborhood of the project, and
2. Participants in YouthBuild programs.

#### *Contracting*

To the greatest extent feasible, contracts for work awarded in connection with Section 3 projects shall be provided to business concerns that provide economic opportunities to Section 3 workers residing within the New Orleans metropolitan area. Where feasible, priority for contracting opportunities will be given to:

1. Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the service area or the neighborhood of the project, and
2. YouthBuild programs.

### **Compliance Benchmarks**

To demonstrate compliance with Section 3, contractors are required to follow the prioritization of effort outlined above and meet or exceed the following benchmarks:

1. **25 percent** or more of the total number of labor hours worked by all workers on the project shall be performed by **Section 3 workers**, and
2. **5 percent** or more of the total number of labor hours worked by all workers on the project shall be performed by **Targeted Section 3 workers**.

## Definitions

- **Section 3 worker:** Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
  - (1) The worker's income for the previous or annualized calendar year is below the income limit established by HUD (*see Income Limits table below*).
  - (2) The worker is employed by a Section 3 business concern.
  - (3) The worker is a YouthBuild participant.
- **Targeted Section 3 worker:** A Section 3 worker who is:
  - (1) A worker employed by a Section 3 business concern; or
  - (2) A worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
    - (i) Living within the service area or the neighborhood of the project; or
    - (ii) A YouthBuild participant.
- **Service area or the neighborhood of the project:** An area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

## HUD Income Limits

The table below shows the income limits set by HUD that determine eligibility for certain programs, including Section 3. HUD develops income limits based on Area Median Income (AMI) estimates and Fair Market Rent (FMR) area definitions. For more information, please see the HUD Income Limits Documentation System online at [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html).

**New Orleans-Metairie, LA HUD Metro FMR Area**

Fiscal Year	2022	2021	2020	2019	2018	2017
Low-income (80% AMI)	<b>\$43,900</b>	<b>\$39,300</b>	<b>\$39,450</b>	<b>\$37,750</b>	<b>\$36,750</b>	<b>\$35,500</b>

The New Orleans-Metairie, LA HUD Metro FMR Area contains the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany.

**1. Does your business qualify as a Section 3 business concern?**  YES  NO

If you answered YES, complete the Section 3 Business Certification form on p. 6 and submit with this Plan. If you answered NO, you do not need to complete the Section 3 Business Certification.

A **Section 3 business concern** is a business that satisfies **at least one** of the following criteria, as documented within the last six-month period:

- a. The business is at least 51% owned and controlled by low- or very low-income persons;
- b. The business is at least 51% owned and controlled by residents who currently live in public housing or Section 8-assisted housing; or
- c. Over 75% of the labor hours performed for the business over the prior three-month period were performed by Section 3 workers – *i.e.*, workers who currently are, or when hired within the past five years were: i) low-income persons or ii) YouthBuild participants.



#### 4. Do you commit to engage in good faith efforts to meet or exceed the Section 3 Benchmarks?

YES  NO

Such qualitative efforts may include, but are not limited to:

- Applicant Outreach –
  - Engage in outreach efforts to generate job applicants who are Targeted Section 3 workers, including posting job openings at the job site, HUD Opportunity Portal, social media pages, and other platforms.
  - Clearly indicate Section 3 eligibility on all job postings, notifications, and advertisements with the following statement: *“This is a Section 3 eligible job opportunity. We encourage applications from individuals that are low-income, live in public housing, and/or receive a Section 8 voucher.”*
  - Include the Section 3 Worker Self-Certification form in all job postings.
- One-Stop / YouthBuild Outreach – Engage in outreach or referrals with local YouthBuild programs, Louisiana Workforce Commission, JOB 1, or other community organizations to assist with training and recruiting Section 3 and Targeted Section 3 workers.
- Training and Apprenticeship – Provide training or apprenticeship opportunities.
- Job Fairs – Hold one or more job fairs, or sponsor a job informational meeting in the project area.
- Business Concern Outreach –
  - Engage in outreach efforts to identify and secure bids from Section 3 businesses by advertising notices of contracting opportunities and related information on the HUD Opportunity Portal and local community papers.
  - Provide written notice to all known Section 3 business concerns, with sufficient time for interested businesses to respond to bid invitations.
  - Send notice of contracting opportunities to local community development organizations, business development organizations, or minority contracting associations.
  - State clearly in all notices that the contracting opportunity is Section 3 eligible, and include a copy of the Section 3 Business Concern Certification form.
- Competition Assistance – Provide technical assistance to help Section 3 business concerns understand and bid on contracts.
- Contract Sizing – Size, split, or divide contracts into smaller jobs to facilitate participation by Section 3 business concerns, particularly where economies of scale or efficiency of delivery are not factors. [2 CFR 200.321(b)(3)]
- Bidder Viability Support – Provide bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- Business Registries – Promote use of the HUD Opportunity Portal or other business registries designed to create opportunities for disadvantaged and small businesses.
  - Visit <https://hudapps.hud.gov/OpportunityPortal/> to post jobs and contracting opportunities.

Additional activities and efforts aimed at increasing economic opportunities for Section 3 workers and businesses may include, but are not limited to:

- Employment Assistance – Provide technical assistance to help Section 3 workers compete for jobs, or connect them with assistance in seeking employment, including resume assistance, interview preparation, coaching, or job placement services.
- Work Readiness and Retention – Provide or refer Section 3 workers to services supporting work readiness and retention, such as interview clothing, licensing or testing fees, transportation, or childcare.
- Financial Literacy – Help Section 3 workers obtain financial literacy training or coaching.
- Education Assistance – Provide assistance to Section 3 workers to apply for or attend community college, four-year educational institution, or vocational/technical training.

**5. Do you commit to prioritize your efforts in hiring, training, and contracting as required by the Section 3 regulations and outlined on page 1 of this Plan?**

**YES**       **NO**

**Certification**

The business entity identified above commits to comply with Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 75). If awarded a contract subject to Section 3, the business agrees to adhere to all such requirements, including meeting the benchmarks set forth by the regulations, maintaining records of Section 3 activity, providing evidence of qualitative efforts, and submitting compliance reports to the City of New Orleans periodically or upon request. The business will submit any additional documentation as necessary, including updates or revisions to this Section 3 Plan, documentation of labor hours, and certification forms for Section 3 workers and business concerns.

\_\_\_\_\_  
**Authorized Representative Signature**

\_\_\_\_\_  
**Date**



### Section 3 Business Certification

Section 3 requires that, to the greatest extent feasible, contracts for work awarded in connection with Section 3 projects shall be provided to Section 3 business concerns, as defined in 24 CFR 75.5.

Business Name:	Address:
Authorized Representative:	Title:
Phone #:	Email:
Trade/Services Provided:	

**Section 3 Eligibility:**

**Does your business qualify as a Section 3 business concern per 24 CFR 75.5?**     YES     NO

Your business qualifies as a **Section 3 business concern** if it satisfies **at least one** of the following criteria, as documented within the last six-month period (*check all that apply*):

- The business is at least 51% owned and controlled by low- or very low-income persons (see qualifying income limits below, or refer to [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html)).
- The business is at least 51% owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
- Over 75% of the labor hours performed for the business over the prior three-month period were performed by Section 3 workers – *i.e.*, workers who currently are, or when hired within the past five years were: i) low-income persons or ii) YouthBuild participants.

The City of New Orleans Office of Community Development reserves the right to request additional documentation at any time to verify the information provided on this form.

**HUD Income Limits**

The income limits for the **New Orleans-Metairie, LA HUD Metro FMR Area** apply to the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany.

Fiscal Year	2022	2021	2020	2019	2018	2017
Low-income (80% AMI)	<b>\$43,900</b>	<b>\$39,300</b>	<b>\$39,450</b>	<b>\$37,750</b>	<b>\$36,750</b>	<b>\$35,500</b>

**Certification:**

By submitting this form, I hereby certify under penalty of perjury that the information provided above is true and correct. I understand that providing false information is grounds for termination of Section 3 certification. I further understand that qualifying as a Section 3 business concern is not an entitlement or guarantee of contract award. I agree to allow this information to be shared with local and federal entities in an effort to increase my business's contracting potential.

\_\_\_\_\_ **Authorized Representative Signature**

\_\_\_\_\_ **Date**



# Exhibit B

Section 3 Validation Contract Routing Form



OFFICE OF COMMUNITY DEVELOPMENT  
Compliance Unit  
Section 3 Validation Contract Routing Form

Project Information	
Project Name/Description:	Solicitation No.:
Subrecipient/Contractor:	Federal Funding:
Section 3 Review	
Has the subrecipient/contractor submitted a Section 3 Plan? <input type="checkbox"/> Yes / <input type="checkbox"/> No	
Has OCD received all necessary documentation including subcontractors' Section 3 Plans? <input type="checkbox"/> Yes / <input type="checkbox"/> No / <input type="checkbox"/> N/A	
Validation	
	The subrecipient or contractor named above has submitted the required Section 3 Plan, and the plan has been reviewed and accepted. The Labor Compliance Unit will monitor and work with the subrecipient/contractor throughout the contract to ensure compliance with Section 3 requirements.
Reviewed By: _____ Date: _____	

If you have any questions or require additional information, please contact Michelle Redler, Section 3 Coordinator, at 504.658.8418 or [meredler@nola.gov](mailto:meredler@nola.gov).

# Exhibit C

Section 3 Worker Self-Certification

### Section 3 Worker Self-Certification

Section 3 requires that, to the greatest extent feasible, employment and training opportunities arising in connection with Section 3 projects shall be provided to Section 3 workers, as defined in 24 CFR 75.5.

Name:	Address:
Phone #:	Email:
Job Skills/Work Classifications:	

#### **Section 3 Eligibility:**

**Based on the criteria below, do you qualify as a Section 3 worker?**       YES       NO

You qualify as a **Section 3 Worker** if you meet **at least one** of the following criteria. Please check the box next to each category that applies to you:

- I am a YouthBuild participant.
- My income for the previous or annualized calendar year is below the limit established by HUD for the New Orleans-Metairie FMR Area (see below, or refer to [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html)).

The City of New Orleans Office of Community Development reserves the right to request additional documentation at any time to verify the information provided on this form.

#### **HUD Income Limits:**

**FY 2022**

**New Orleans-Metairie, LA HUD Metro FMR Area**

Low-income (80% of Area Median Income)

No more than **\$43,900**

The New Orleans-Metairie, LA HUD Metro FMR Area contains the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany.

#### **Certification:**

By submitting this form, I hereby certify under penalty of perjury that the information provided above is true and correct. I agree to provide documentation verifying my Section 3 eligibility to the City of New Orleans if requested.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**



# Exhibit D

Section 3 Worker Employer Certification

## Section 3 Worker Certification Employer Certification and Project Information

Contractors on Section 3 projects must submit this form for each employee reported as a Section 3 worker or Targeted Section 3 worker, as defined in 24 CFR 75.5.

Section 3 Worker Name:	Address:
Position/Job Title:	Project:
Employer Name:	Authorized Representative Name and Title:
Employer Phone #:	Employer Email:

### **Section 3 Eligibility:**

**1. Does this employee qualify as a Section 3 worker per 24 CFR 75.5?**  YES  NO

**Section 3 worker** means any worker who currently fits, or when hired within the past five years fit, **at least one** of the following criteria, as documented (*check all that apply*):

- The worker's income for the previous or annualized calendar year is below the limit established by HUD (see below, or refer to [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html)).
- The worker is employed by a Section 3 business concern.
- The worker is a YouthBuild participant.

### **HUD Income Limits**

The income limits for the **New Orleans-Metairie, LA HUD Metro FMR Area** apply to the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany.

Fiscal Year	2022	2021	2020	2019	2018	2017
Low-income (80% AMI)	<b>\$43,900</b>	<b>\$39,300</b>	<b>\$39,450</b>	<b>\$37,750</b>	<b>\$36,750</b>	<b>\$35,500</b>

**2. Does this employee qualify as a Targeted Section 3 worker per 24 CFR 75.21?**  YES  NO

A **Targeted Section 3 worker** for housing and community development financial assistance means a Section 3 worker who is (*check all that apply*):

- A worker employed by a Section 3 business concern; or
- A worker who currently fits or when hired fit **at least one** of the following categories, as documented within the past five years:
  - Living within the service area or neighborhood of the project, as defined in 24 CFR Part 75.5; or
  - A YouthBuild participant. (*If checked, attach a copy of the employee's self-certification.*)

The City of New Orleans Office of Community Development reserves the right to request additional documentation at any time to verify the information provided on this form.

### **Certification:**

By submitting this form, I hereby certify under penalty of perjury that the information provided above is true and correct, and that I am authorized on behalf of the company to make this certification. I agree to provide documentation verifying the employee's Section 3 eligibility to the City of New Orleans if requested.

\_\_\_\_\_  
**Authorized Representative Signature**

\_\_\_\_\_  
**Date**



# Exhibit E

Section 3 Business Certification

### Section 3 Business Certification

Section 3 requires that, to the greatest extent feasible, contracts for work awarded in connection with Section 3 projects shall be provided to Section 3 business concerns, as defined in 24 CFR 75.5.

Business Name:	Address:
Authorized Representative:	Title:
Phone #:	Email:
Trade/Services Provided:	

#### **Section 3 Eligibility:**

Does your business qualify as a Section 3 business concern per 24 CFR 75.5?     YES     NO

Your business qualifies as a **Section 3 business concern** if it satisfies **at least one** of the following criteria, as documented within the last six-month period (*check all that apply*):

- The business is at least 51% owned and controlled by low- or very low-income persons (see qualifying income limits below, or refer to [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html)).
- The business is at least 51% owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
- Over 75% of the labor hours performed for the business over the prior three-month period were performed by Section 3 workers – *i.e.*, workers who currently are, or when hired within the past five years were: i) low-income persons or ii) YouthBuild participants.

The City of New Orleans Office of Community Development reserves the right to request additional documentation at any time to verify the information provided on this form.

#### **HUD Income Limits**

The income limits for the **New Orleans-Metairie, LA HUD Metro FMR Area** apply to the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany.

Fiscal Year	2022	2021	2020	2019	2018	2017
Low-income (80% AMI)	<b>\$43,900</b>	<b>\$39,300</b>	<b>\$39,450</b>	<b>\$37,750</b>	<b>\$36,750</b>	<b>\$35,500</b>

#### **Certification:**

By submitting this form, I hereby certify under penalty of perjury that the information provided above is true and correct. I understand that providing false information is grounds for termination of Section 3 certification. I further understand that qualifying as a Section 3 business concern is not an entitlement or guarantee of contract award. I agree to allow this information to be shared with local and federal entities in an effort to increase my business's contracting potential.

\_\_\_\_\_  
**Authorized Representative Signature**

\_\_\_\_\_  
**Date**



# Exhibit F

Section 3 Compliance Report

## Section 3 Compliance Report

**Instructions:** All subrecipients, contractors, and subcontractors on Section 3 projects must complete and submit this Section 3 Compliance Report. The report summarizes efforts and progress toward achieving the Section 3 benchmarks. If more space is needed, you may attach additional pages, a spreadsheet supplying the required information, or a letter to further state your efforts, achievements, or obstacles encountered. Attach all supporting documentation including Section 3 Worker Certification forms, payroll information, and evidence of qualitative efforts to comply with Section 3 as applicable.

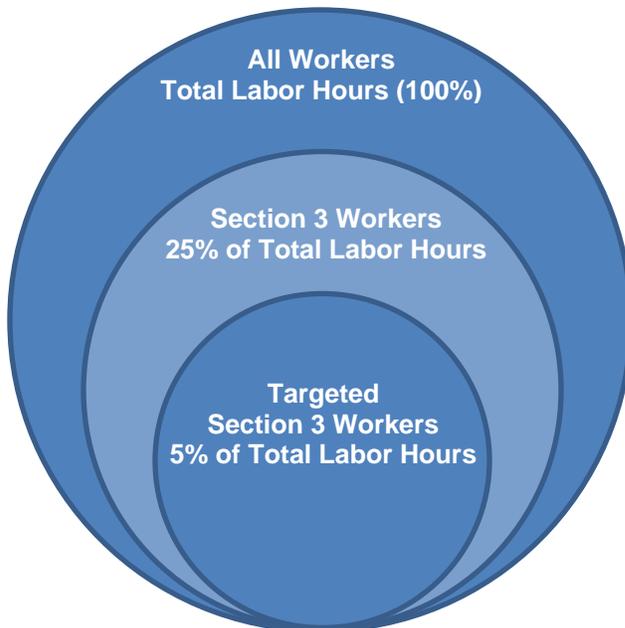
Business Name:	Project:
Authorized Representative:	Title:
Phone #:	Email:
Reporting Period:	

### General Guidance

#### Compliance Benchmarks

To demonstrate compliance with Section 3, contractors are required to follow the prioritization of effort outlined in 24 CFR 75.19 and meet or exceed the following benchmarks:

1. **25 percent** or more of the total number of labor hours worked by all workers on the project shall be performed by **Section 3 workers**, and
2. **5 percent** or more of the total number of labor hours worked by all workers on the project shall be performed by **Targeted Section 3 workers**.



$$\frac{\text{Section 3 Labor Hours}}{\text{Total Labor Hours}} = 25\%$$

AND

$$\frac{\text{Targeted Section 3 Labor Hours}}{\text{Total Labor Hours}} = 5\%$$

#### Definitions

- **Section 3 worker:** Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
  - (1) The worker's income for the previous or annualized calendar year is below the income limit established by HUD (*see Income Limits table below*).
  - (2) The worker is employed by a Section 3 business concern.
  - (3) The worker is a YouthBuild participant.

- **Targeted Section 3 worker:** A Section 3 worker who is:
  - (1) A worker employed by a Section 3 business concern; or
  - (2) A worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
    - Living within the service area or the neighborhood of the project; or
    - A YouthBuild participant.
- **Section 3 business concern:** A business meeting at least one of the following criteria, documented within the last six-month period:
  - (1) It is at least 51 percent owned and controlled by low- or very low-income persons;
  - (2) Over 75 percent of the labor hours performed for the business over the prior three-month period were performed by Section 3 workers who are currently, or were at the time of hire within the last five years: i) low-income persons or ii) YouthBuild participants; or
  - (3) The business is at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
- **Service area or the neighborhood of the project:** An area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

**HUD Income Limits**

HUD develops income limits based on Area Median Income (AMI) estimates and Fair Market Rent (FMR) area definitions. For more information, please see the HUD Income Limits Documentation System online at [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html).

The income limits for the **New Orleans-Metairie, LA HUD Metro FMR Area** apply to the following parishes: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany.

Fiscal Year	2022	2021	2020	2019	2018	2017
Low-income (80% AMI)	<b>\$43,900</b>	<b>\$39,300</b>	<b>\$39,450</b>	<b>\$37,750</b>	<b>\$36,750</b>	<b>\$35,500</b>

**Part I: Labor Hours**

Report the number of labor hours worked on this project during the reporting period by *ALL workers*, *Section 3 workers*, and *Targeted Section 3 workers*.

Note—subrecipients/contractors may count an employee as Section 3 or Targeted Section 3 for five years from when their certification as a Section 3 worker or Targeted Section 3 worker is established.

**1. Section 3 hours**

A. Total number of labor hours worked by <b>ALL workers</b>	B. Number of labor hours worked by <b>Section 3 workers</b>	% Section 3 hours (Divide column B by column A)
		%

**2. Targeted Section 3 hours**

A. Total number of labor hours worked by <b>ALL workers</b>	B. Number of labor hours worked by <b>Targeted Section 3 workers</b>	% Targeted Section 3 hours (Divide column B by column A)
		%

**3. Documentation**

You must provide documentation supporting labor hours data. Check below as appropriate:

- Labor hours have been certified in LCPtracker.
- Other salary-based or time-and-attendance payroll records are attached to this report.



## Part IV: Qualitative Efforts

Check the boxes below to indicate the efforts you have made to satisfy your Section 3 obligations, or the nature of activities you pursued in the absence of meeting the labor hour benchmarks.

- Posted notice of job openings calling for Section 3 applicants at the job site, on the HUD Opportunity Portal, social media pages, and other platforms.
- Consulted with local YouthBuild programs, Louisiana Workforce Commission, JOB 1, or other community organizations to assist with training and recruiting Section 3 workers and Targeted Section 3 workers.
- Provided training or apprenticeship opportunities.
- Held one or more job fairs.
- Advertised contracting opportunities on the HUD Opportunity Portal.
- Sent written notice of Section 3 contracting opportunities to local business development organizations, minority contracting associations, or other similar organizations.
- Searched the HUD Opportunity Portal or other business registries for Section 3, disadvantaged and small businesses to identify potential Section 3 subcontractors.
- Provided technical assistance to help Section 3 businesses understand and bid on contracts.
- Divided contracts into smaller jobs to facilitate participation by Section 3 businesses.
- Provided bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- Provided technical assistance to help Section 3 workers compete for jobs, or connected them with assistance in seeking employment, including resume assistance, interview preparation, coaching, or job placement services.
- Provided or referred Section 3 workers to services supporting work readiness and retention, such as interview clothing, licensing or testing fees, transportation, childcare.
- Helped Section 3 workers to obtain financial literacy training and/or coaching.
- Provided assistance to Section 3 workers to apply for or attend community college, four-year educational institution, or vocational/technical training.
- Other, please describe:

### Additional Notes or Comments

\_\_\_\_\_  
**Authorized Representative Signature**

\_\_\_\_\_  
**Date**

