

CITY OF SLIDELL
CONTRACTOR
SECTION 3 PLAN



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Prepared for the U.S Department of HUD
By the City of Slidell
Planning Department
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The following is a template for a Section 3 Plan to support compliance with Housing and Urban Development (HUD) Section 3 hiring, training and contracted goals for covered projects. Use of this template is voluntary and contractors may choose to use an alternate plan that supports evidence of Section 3 compliance goals, to ensure that employment and other economic opportunities generated by HUD financial assistance be directed, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, to low- and very low-income persons, particularly those who are recipients of government housing assistance, and to business concerns which provide economic opportunities to low- and very low-income persons.

Section 3 applies to economic opportunities (i.e., training, employment, contracting) that arise in connection with the expenditure of Housing and Community Development assistance that is used for housing rehabilitation; housing construction; and other public construction. Other public construction includes infrastructure work, such as extending water and sewage lines, sidewalk repairs, site preparation, installing conduits for utility services, etc. The requirements apply to construction and rehabilitation activities that are funded with HUD Community Development financial assistance.

CONTRACTOR SECTION 3 PLAN

As a recipient of Community Development Block Grant (CDBG) funding _____ (Contractor) acknowledges and intends to comply with Section 3 regulations outlined in 24CFR Part 75 of the Housing and Urban Development Act of 1968, as amended (12USC1701u).

_____ (Contractor) agrees to comply with & enforce with respective subcontractors:

- Requirement to meet the employment, training, and contractor requirements of 24 CFR 75.19 regardless of whether Section 3 language is included in recipient or subrecipient agreements, program regulatory agreements, or contracts.
- The contractor will certify that any vacant employment positions, including training positions, that are filled
 - after the contractor is selected but before the contract is executed, and
 - with persons other than those to whom the regulations of 24 CFR Part 75 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR. Part 75.

Section 3 Plan Purpose

This document serves as the Section 3 Plan for _____ (Contractor) on the _____ Project(s) funded in whole or in part by the City of Slidell's Community Development Block Grant (CDBG) in compliance with the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended. This document identifies the goal requirements and plan on how to achieve those goal requirements.

These regulations will not be construed to mean that _____ (Contractor) is required to hire Section 3 Workers or award contracts to Section 3 Business Concerns other than as needed to fulfill regulatory obligations for covered projects and activities.

_____ (Contractor) understands that it is not a requirement to hire or enter into contracts with unqualified Section 3 Workers or Business Concerns simply to meet the Section 3 goals, Individuals or entities selected for employment or contracting opportunities must meet the qualifications for the job or contract.

Goals for Training, Employment, and Contracting Opportunities

_____ (Contractor) will commit to at least the minimum employment, contracting and training goals identified in 24 CFR. 75.19 and 24 CFR 75.23 which apply to contract awards that exceed the \$200,000 threshold, or in the instance of designated Lead Hazard projects, \$100,000, in connection with a Section 3 covered project and new hiring.

_____ (Contractor) will apply these minimum goal requirements to their subcontractors, and will, to the greatest extent feasible, strive to comply with the goals established.

Employment and Training

_____ (Contractor) will make best efforts to provide employment and training opportunities to Section 3 workers in the priority order listed below:

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

Contractors and subcontractors will be required to certify that they made the best efforts to follow the prioritization of effort requirements.

_____ (Contractor) will, to the greatest extent feasible, meet the Section 3 HUD benchmarks for Section 3 workers or Targeted Section 3 workers, as described in 24 CFR 75.13. 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 Section 3 workers defined at 24 CFR Part 75.21;

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

and

- 2) Five (5) percent or more of the total number of labor hours worked by all workers on a Section 3 project are Targeted Section 3 workers, as defined at 24 CFR Part 75.21;

Targeted Section 3 Labor Hours/Total Labor Hours = 5%

Section 3 Business Concern

_____ (Contractor) will enforce and identify contracting opportunities for Section 3 Business Concerns.

Section 3 Business Self-Certification Form

_____ (Contractor) confirms staff will be assigned to perform to review any self-certifications provided and complete all due diligence to ensure validity of information and supporting documentation provided before submitting to the City of Slidell CDBG Administrator. *(See City of Slidell Section 3 Guidelines: Section 3 Business Concern Self-Certification Form)*

Section 3 Workers/Targeted Workers Self-Certification Form

_____ (Contractor) confirms that staff will be assigned to perform the review of any self-certifications provided and complete all due diligence to ensure validity of the information and supporting documentation provided before submitting to the City of Slidell CDBG Administrator. *(See City of Slidell Section 3 Guidelines: Section 3 Worker Self-Certification Form)*

Conducting Outreach and Documentation of Outreach Efforts

_____ (Contractor) will list the available types of efforts for Section 3 hiring and contracting as delineated in the City of Slidell Section 3 Guidelines and as identified by HUD at 24 CFR. Part 75.

_____ (Contractor) agrees to document efforts for hiring and contracting Section 3 Workers and Section 3 Business Concerns to the greatest extent feasible.

_____ (Contractor) agrees to ensure documentation of Section 3 Workers hiring and contracting efforts with all subcontractors to the greatest extent feasible.

Section 3 Training and Employment Efforts

_____ (Contractor) will notify Section 3 workers and Targeted Section 3 workers by means that may include but not be limited to the following strategies:

- 1) Clearly indicate Section 3 eligibility on all job postings with the following statement: *“This job is a Section 3 eligible job opportunity. We encourage applications from individuals that are low income and/or live in Public Housing and/or receive a Section 8 voucher”;*

- 2) Include the Section 3 Worker and Targeted Section 3 Worker Self-Certification Form in all job postings;
- 3) Establish a current list of Section 3 eligible applications;
- 4) Contact local community organizations and provide them with job postings for Section workers;
- 5) Advertise job opportunities via social media;
- 6) Advertise job opportunities via flyer distributions, posting ad in common areas of housing developments and all public housing management offices; and,
- 7) Contact resident councils, and neighborhood community organizations to request their assistance in notifying residents of available training and employment opportunities.

Reporting

_____ (Contractor) will submit monthly reports that summarize the number of Section 3 new hires, employees, and trainees and a Summary Report upon completion of the project to the City of Slidell CDBG Administrator.

_____ (Contractor) will maintain Section 3 documentation for minimum of five years and forward same documentation to the City of Slidell CDBG Administrator.

Documentation of Workforce

Prior to the Notice to Proceed, contractor and subcontractors must document the workforce for the project. They may use either <https://hudapps.hud.gov/OpportunityPortal/>; documentation forms provided in the City of Slidell Contractor Guidelines or their own documentation as long as the following information appears on the contractors/subcontractors form:

- 1) Name of Project;
- 2) Name of Contractor;
- 3) Job Titles;
- 4) Number of Positions needed for a specific job title;
- 5) Total expected hours throughout the project;
- 6) Total persons on the payroll that meet the Section 3 definition and their title;
- 7) Number of positions expected to be filled during the life of the project;
- 8) Number of positions anticipated to be filled with Section 3 residents.

Contractors, including subcontractors, will be required to submit New Hire forms with its certified payrolls. The contractor must comply with the Section 3 requirement throughout the life of the contract.

Complaints

_____ (Contractor) will adopt and enforce the following complaints alleging failure to comply with the provisions of 24 CFR Part 75.33 and forward to the City of Slidell CDBG Administrator.

Signature

_____ Date _____
Authorized Representatives Signature

_____ Date _____
Authorized Representatives Name

