

# 2023 HOME Rental GRANTEE WORKSHOP

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Community Housing Division  
Tennessee Housing Development Agency

December 12, 2023

# Congratulations!!!



# Promoting Fair Housing and the ADA

All program material must include the fair housing and ADA logos:



# Fair Housing and Equal Opportunity

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FHEO laws are designed to protect individuals and groups against discrimination and to provide equal opportunities in housing, employment and contracting with federal funds.

- No person shall on the grounds of race, color, religion, sex, familial status, national origin or disability be excluded from participation, denied benefits or subjected to discrimination under any program funded in whole or in part by HOME Rental

# Fair Housing Activities

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The Grantee must provide each applicant with a copy of the **Fair Housing: Equal Opportunity for All** brochure as part of the application process

- **Maintain documentation in your files that all potential tenants have received the brochure – Prospective tenant to acknowledge receipt**

# Fair Housing Activities

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The Grantee must take steps outlined in their Policies and Procedures to encourage the application for assistance of those who are least likely to apply for assistance

- To accomplish, the Grantee may advertise for assistance availability at public places including but not limited to:
  - Churches
  - Convenience stores
  - Libraries
  - Senior centers
  - Local offices of the TN Department of Human Services

# Limited English Proficiency

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- Each Grantee must have policies and procedures to assist non-English speaking applicants
- Each Grantee must also have a process that notifies LEP persons of language assistance available (i.e. notices, signs) and that is accessible to individuals seeking assistance
- Grantee staff should be knowledgeable of all procedures and processes

# Americans with Disabilities Act (ADA)

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- Title II requires that State and local governments give people with disabilities an equal opportunity to benefit from all of their programs, services, and activities
- State and local governments must relocate programs or otherwise provide access in older buildings that are inaccessible and communicate effectively with people who have hearing, vision, or speech disabilities
- Grantees must take steps to promote the availability of HOME Rental assistance at locations that are accessible to individuals with disabilities, including any web sites that are used to publicize the program



# FY2023 Application Round

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## Scoring Matrix:

- \$5.8M available for program activities
- \$4M in eligible applications for program activities from 4 qualified applicants across TN
- \$1.6M awarded to 2 applicants
- Total rental units to be developed (build/renovated): 10

# The Contract

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The HOME Rental Program is a performance contract....

- THDA has a contract with HUD to perform....
- Each grantee has a contract with THDA to perform....

...those recipients that meet the terms of the THDA HOME Rental program will receive funds to cover eligible costs based on your specific project and application criteria.

# General Requirements

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- Income restricted at 80% < of AMI (HUD) or Federal Poverty Guideline
- Rents restricted to be affordable at 80% of AMI (HUD)
- 15 year affordability period for Rehabilitation when HOME subsidy is \$40,000 or more per unit
- Ongoing monitoring for property condition and compliance
- Year One financial review
- Environmental Review: Follows regulations of HUD Part 58

## General Requirements (cont)

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- Maximum per-unit subsidy will follow current HOME Rental program limits as published
- Tenant protections: Lease required, Prohibited lease terms, Termination only for cause
- Fair Housing, ADA and other applicable laws apply

# Role of the Grantee

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- Ultimate responsibility for the grant lies with the Grantee
- A developer contact or consultant is a grant management resource, not a substitute for the **Grantee's** hands-on involvement with the project and full responsibility for oversight of the grant implementation
  - Disputes will be settled with the grantee not the limited partner or Developer.
- The **Grantee** will be **100% responsible** for providing all required project information including progress reports, pay requests and all requested documentation as the project matures.

# Written Agreements

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- **December 1, 2023 through November 30, 2026**
- Expenses or commitments incurred prior to November 1, 2023 will not be eligible with the exception of qualified A&E expenses
- **60 days** after November 30, 2026 to submit final draws
- The applicant must sign and return to THDA with all required Start-up Forms.
- **Written Agreements are due at THDA within 30 days of receiving them.**

# Attachment A

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- Details of the activities funded by the HOME grant, including specific addresses or legal descriptions
  
- Affordability period for rental projects must be secured by Grant Note, Deed of Trust and Restrictive Covenant prior to drawing down HOME funds

# Attachment B

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- HOME Project Budget
- Shows uses and sources of HOME and other funding
- HOME funds must be drawn down in proportion to the other funding in the project



# Attachment C

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- Detailed implementation plan for carrying out HOME project

# HOME Legal Documents

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HOME affordability period must be secured by a lien on the property before the 1<sup>st</sup> draw can occur

- **Restrictive Covenant**
  - RECORDED FIRST
- **Deed of Trust**
  - RECORDED SECOND
- **Grant Note**

# Level of Subsidy

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## Minimum and Maximum HOME Rental investment per unit:

- Minimum HOME Rental Funds: \$1,000 per unit
- Maximum HOME Rental Funds Per Unit:
  - \$129,758            0-Bedroom (Efficiency) Limit
  - \$148,748            1-Bedroom Limit
  - \$180,882            2-Bedroom Limit
  - \$234,004            3-Bedroom Limit
  - \$256,862            4-Bedroom Limit

# Design Standards

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**All rental housing units constructed or rehabilitated with HOME Rental funds must meet all of the below:**

- THDA Design Standards
- Have Broadband Access
- Applicable local, county and state codes
- Rehabilitation standards
- Uniform Property Condition Standards (UPCS)
- All local zoning ordinances

# Other Requirements

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## All projects must also meet other federal requirements

- Uniform Relocation Act
- 2 CFR 200 (Uniform Administrative Requirements, cost principals, and audit requirements for federal awards)
- **Section 3 Requirements**
- Affirmative Fair Housing Marketing
- Conflict of Interest
- MBE/WBE reporting
- FFATA (Federal Funding Accountability and Transparency Act)
- Violence against Women Act (VAWA)

# Environmental Review

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- **HOME funds cannot be committed to a Project prior to the completion of the Environmental Review and Release of Funds**
- This also applies to any non-federal funds in a project
- Complete own environmental review
- Submit original environmental review to THDA
- THDA approves and provides Notice for publication
- After comment period, THDA requests Release of Funds from HUD/Knoxville

# Environmental Review

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- HUD provides a few online training opportunities for the ERR process. You will find them at the following links:

YouTube:

<https://youtu.be/ytkzT4HvXQY>

HUD WISER Training:

<https://www.hudexchange.info/trainings/wiser/>

These links are also available at: <https://thda.org/business-partners/home>

# Environmental Review

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- The applicability of the Environmental Review requirements is based on the HOME activity (new construction and/or acquisition/rehabilitation) **as a whole, not on the type of the cost paid for with HOME funds**
- If the grantee has a release of funds for this project from HUD, there must still be a release of funds for this HOME grant from THDA.
  - A prior ER can be used as information towards the completion of the ER for the HOME-funded activity providing the information is accurate and current at the time the HOME ER is completed.



# Environmental Review

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- HOME funds **ABSOLUTELY MAY NOT** be committed to a project prior to the completion of the environmental review and release of funds.
- The Grantee **MAY NOT** take any choice limiting actions prior to completion of the environmental review
  - This includes all funds contemplated for investment into the project

# Responsibility for the Environmental Review

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- Grantees gather environmental review data
- Grantees submit original environmental review documentation to THDA prior to publishing Notice
- THDA reviews and authorizes notice publication and issues Release of Funds from HUD/Knoxville after the comment period

## Environmental Review Record (ERR)

- The ERR contains all relevant documents, public notices, and written determinations about the project
- Some environmental factors can be considered on a county-wide basis while others require a site-specific analysis

# Levels of Environmental Review

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Exempt (not applicable to rental projects)

Categorically Excluded not subject to the authorities of the  
Statutory Checklist

Categorically Excluded subject to the authorities of the Statutory  
Checklist

Categorically Excluded activities converted to Exempt

Environmental Assessment



# HOME RENTAL PROCESSES AND PROCEDURES



# EFT (Electronic File Transfer)

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## Required method of sending documents to THDA:

- All work write-ups and estimates, pay requests, and ERRs
- Your THDA Senior Housing Program Coordinator will assist you with getting your account set up.
- Please notify your assigned coordinator when documents are uploaded.
- <https://edt.thda.org/EFTClient/Account/Login.htm>



# Start-up

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## **Confirm the budget and funding sources from the application.**

- Provide documentation that all funding has been secured
  - No draws can be processed until all funding sources for the project have been secured.
- If there have been changes to the funding stack or development budget at any time during the project you must complete the development, operating and proforma update
- If the funds are being loaned from the Grantee to a development entity
  - The intent to create the loan must be disclosed prior to payment of any draws
  - The loan must not have any principal or interest payments due during the period of affordability (20 years).



# Start-up Forms

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## Return the following forms to THDA at Start Up

- Signed Written Agreement
- W-9 – Request for Taxpayer Identification Number and Certification (Must be latest Rev.)
- Authorized Signature Form
- Remittance Advice Form

### **PLEASE PAY SPECIAL ATTENTION:**

Return the original (W-9 and Supplier Direct Deposit Authorization) Form, completed and signed by bank official **DIRECTLY** to the **State of Tennessee Finance and Administration**



# Set-up Forms

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**All Project Set up Forms MUST be submitted prior to requesting any draws**

- HOME Rental Environmental Review
- Project Set-Up Form
- Lead Based Paint Compliance Form
- Copy of LBP Inspection/ Risk Assessment (if applicable)
- Copy of the final project budget indicating all funding sources and costs
- Commitment letter for ALL non-HOME Rental funding in the project
- Copy of Legal Description for Legal Doc Prep

# Submitting Draw Requests to THDA

# Drawing Funds....

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## Prior to first draw, THDA must have:

- All Start-Up documents and information
- All Set-Up documents and information
- Updated financial budgets and proforma.
- Firm commitment letters for ALL other funding for the project
- Completed and approved HOME Rental specific Environmental Review
- Copy of the rehabilitation contract between the grantee and the general contractor (needed for 1st draw request only)

# Pay Request

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## For Remaining Draws THDA Must Have:

- Completed HOME Rental Request for Payment Form
- All supporting documentation for the eligible project expenses being paid with this draw;
- General Contractor's Sworn Construction Statement of percentage of completion; (HOME Rental Interim Draw Request Form)

# Pay Request (Cont.)

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## For Remaining Draws THDA Must Have:

- Mechanics Lien Waivers for all subcontractor expenses representing final payment and;
- AIA inspection report signed by a licensed architect in support of the draw request indicating that all work and materials to be paid for with this disbursement have been furnished in accordance with the plans and specifications.
- **50% Draw** must also have a completed and approved **THDA** Progress Review and passed rough in code inspection reports for all electrical, mechanical and plumbing work.

# Pay Request

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## For Final Draw THDA Must Have:

- Same elements required for the initial and interim draws **plus**;
- Completed and approved THDA Final Progress Review
- Passed final codes inspection reports
- Lead based paint hazard clearance report (if applicable)
- Certificate of Occupancy
- General Contractor's Sworn Construction Statement of completion; (Certification of Completion and Final Inspection) form

# Income Eligibility

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**HOME Rental funds must only benefit households at or below 80% of area median income as adjusted for household size**

See 2023 Income Limits applicable for your county

- [www.thda.org](http://www.thda.org) -> Government & Nonprofit Partners -> HOME -> More Information for Applicants, Grantees, and Grant Administrators (red box at bottom of page)- > Program Limits -> 2023 Income Limits
- HOME income limits **ALWAYS** apply to HOME units regardless of other funding sources

# Affirmative Marketing

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- Required for rental projects of 5 or more units
- The Grantee must establish procedures to inform the public, owners and potential tenants of the availability of the units
- Rental units must be listed on [TNHousingSearch.org](http://TNHousingSearch.org)
- The Grantee must maintain records of efforts to affirmatively market the units



# Income Determination

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## Section 8 Rental Assistance definition is used for the HOME Rental program

- Gross annual income *anticipated* to be received by **all** persons in the *household* during the next 12 months.
- Income must be verified prior to entering a lease and not be older than 6 months.
- Must examine a minimum of 2 months of source documentation for all persons in the household.
- Documentation of income verification and how the income was calculated must be maintained in the project file.
- Household income must be re-verified annually.

# Income Determination

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## Acceptable source documents may include:

- Wage statement for the past 2 months
- Interest statements
- Unemployment compensation statements
- 3<sup>rd</sup> party verification from employer, bank, etc.
- Self-certification is an acceptable form of income verification **ONLY if no other source(s) are possible**

# HOME RENTS

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**Rents are controlled for the entire affordability period and are determined annually by HUD**

See 2023 HOME Rents

- [www.thda.org](http://www.thda.org) → Government & Nonprofit Partners → HOME → More Information for Applicants (Red Box towards bottom of page) → Program Limits area
- Rents for HOME-assisted units may not exceed the published HOME rent limits even if Section 8 rents are higher

# HOME RENT LEVELS

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## High HOME Rents

- Apply to 80% of the HOME units in a project with 5 or more units

## Low HOME Rents

- Apply to 20% of the HOME units in a project with 5 or more units

# HOME Rents

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- Rents are controlled for the entire affordability period and are determined annually by HUD
- Rents for HOME-assisted units may not exceed the published HOME rent limits even if Section 8 rents are higher, but may be less than the HOME limits

# HOME Rents §92.252

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New regulation requires PJ to annually review and approve rents for each HOME-assisted rental project

- Ensures compliance with HOME rent limits
- Prohibits undue rent increases from previous years

# HOME Rents Over Time

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- ✓ HOME rents may increase or decrease over time
- ✓ Owners are not required to charge rents lower than the Low HOME rents that are in effect at initial occupancy
- ✓ If a household's income rises above 80% of area median income, the tenant may stay in the unit, but must pay rent equal to 30% of their *adjusted* gross income

# Tenant Selection

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There must be an objective selection criteria in the Policies and Procedures adopted for your rental program

- Related to program eligibility and applicant's ability to meet lease requirements
- Serve eligible tenants from written waiting list in chronological order, where practical



# Tenant Selection Procedures

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Owners must:

- Identify criteria for selecting tenants
- Describe HOME requirements
- Maintain written waiting lists and applications
- Select tenants as stated in the adopted policies and procedures
- Notify rejected applicants in writing

# Tenant Selection Criteria

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Owners *may* use objective criteria such as:

- Housing history
- Credit history
- Lack of criminal record

The criteria must be applied consistently and included in the adopted policies and procedures

The criteria must also comply with state and local tenant/landlord laws

# TENANT LEASE PROTECTIONS

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Leases should have **one year term**

- Lesser terms are permitted if mutually agreed upon by tenant & landlord.
- There must be **30-day written notice** to tenant to **terminate** a lease

# Utility Allowance §92.252

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HOME regulations require PJs to determine individual utility allowance for each rental project that comes on-line after January 24, 2015 by:

- Using HUD Utility Schedule Model or
- Determining utility allowance for a project based on the specific utilities used at the project

Utility allowances for each project must be updated annually

# UTILITY ALLOWANCES

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If tenants pay their own utilities, a utility allowance must be subtracted from the published rent to determine the maximum rent

Utility allowances are calculated by county and housing type

Utility allowances change annually

# ONLINE UTILITY ALLOWANCES

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Go to [www.thda.org](http://www.thda.org)

Click on Section 8 Rental Assistance

Scroll to bottom of the Section 8 page

Choose county and housing type (house, mobile home or apartment)

Calculate the allowance based on the tenant paid utilities for the unit

# Initial and Long Term Occupancy

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Initial occupancy means the first tenants residing in the unit(s)

Income composition at initial occupancy is based on the number of units in the project

Long-term occupancy requirements become effective once initial occupancy has been met and continues throughout the affordability period

# Initial Occupancy Requirements

% of Area Median income (AMI)	4 or Fewer Units	5 or More Units
≤ 50 % AMI	_____	20% <b>must</b> pay Low HOME Rents
≤ 60% AMI	90% <b>may</b> pay High HOME Rents	70% <b>may</b> pay High HOME rents
≤ 80% AMI	10% <b>may</b> pay High HOME Rents	10% <b>may</b> pay High HOME Rents
≥ 80% AMI	Ineligible	Ineligible



# Long Term Occupancy Requirements

% of Area Median income (AMI)	4 or Fewer Units	5 or More Units
≤ 50 % AMI	_____	20% <b>must</b> pay Low HOME Rents
≤ 60% AMI	_____	_____
≤ 80% AMI	100% <b>may</b> pay High HOME Rents	80% <b>may</b> pay High HOME Rents
≥ 80% AMI	Must pay 30% Adjusted Monthly Gross Income	Must pay 30% Adjusted Monthly Gross Income

# Maintenance

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HOME-assisted rental units must be maintained in compliance with all applicable Federal, State and local housing quality standards throughout the affordability period

In the absence of such standards, the units must at a minimum meet Section 8 Housing Quality Standards

- Effective October, 2024 all HOME units must meet Inspire Standards

# Maintenance

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Owners must conduct routine property inspections

- Quarterly inspections are recommended
- Annual inspections are the minimum

# Replacement Reserves

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Must budget for replacement reserves to cover costs throughout the entire affordability period

Plan for capital improvements

Research specific needs for capital funds

- Look at comparable properties
- Complete a property-specific capital needs assessment every 3-5 years at a minimum
- Can the property survive a modestly adverse event

# Capital Needs Assessment

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Review the property's components and systems:

- Identify installation and replacement dates
- Determine remaining estimated useful life
- Estimate the cost of replacing items in *today's dollars*
- Determine the cost of replacing item(s) at the estimated date(s)

# Funding Capital Repairs

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- HOME funds cannot be used to fund capital repairs
- Must rely on replacement reserves, owner investment or other funding sources
- Property insurance is required

# Long Term Affordability

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The HOME grant is forgiven at the END of the affordability period

There is no reduction or forgiveness feature for HOME rental projects

HOME funds invested in rental units that do not meet the long-term affordability requirements must be repaid to HUD

# Record Retention

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Records must be maintained for 5 years after the HOME Rental affordability period has expired

- **Example**: If project was new construction with HOME Rental funds, project records must be maintained for 25 years following the completion of the project
- Remember, “completion” is based on the date the project is closed in IDIS.
- Project can be completed in IDIS with units marked vacant; however,
- Project cannot be closed-out by THDA until all beneficiary data is entered in IDIS



# Conflict of Interest

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**The HOME Rental Conflict of Interest policy applies to any person who is an employee, agent, consultant, elected or appointed official of THDA, a State Recipient (Grantee) receiving HOME Rental funds.**

No person listed above who exercises or has exercised any function or responsibility with respect to activities assisted with HOME Rental Funds or are in a position to participate in a decision-making process or gain inside information may obtain a financial interest or benefit from any HOME Rental activity or the proceeds of such activity either for themselves or for those who they have business or immediate family ties.

# Conflict of Interest

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Covered familial relationships are limited to immediate family members:

- Immediate family ties include (whether by blood, marriage or adoption) the spouse (including a step-parent), child (including step-child), sister, brother (including step-brother or step-sister), grandparent, grandchild, and in-laws of a covered person

# Appearance of a Conflict of Interest

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- All Grantees must also take steps to avoid the appearance of a conflict of interest.
- Grantees must notify THDA of the Appearance of any Conflict of Interest before taking any action.

# Rehabilitation Issues

# Procurement

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Any contract over \$10,000 must be advertised for bid to ensure an open and competitive process was completed

- Maintain copies of bid advertisements in your files
- There must be at least 3 valid bids
- If less than 3 bids are received, the project must be re-bid
- Grantees **may not** negotiate with the lowest bidder
- If the scope of the project changes, all bidders must be given an opportunity to amend their bid

# Codes

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**All rehabilitation must comply with all applicable federal, state, county, and local codes**

**You must also comply with:**

- Planning and zoning requirements
- Local authorities' rules and regulations
- Federal regulations such as;
  - The Fair Housing Amendment Act of 1988;
  - Section 504 of the Rehabilitation Act of 1973 and;
  - Americans with Disabilities Act of 2010, as amended

# Codes

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In the absence of local codes, the Tennessee State adopted ICC codes and the Existing Building Code as published by the International Code Congress (ICC) and the Uniform Physical Condition Standards (a comprehensive list which can be found on the HUD.Gov website below) shall apply.

[http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_26481.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_26481.pdf)

# Permits

**THDA requires that all applicable permits be obtained by the contractor before performing the work.**

All rehabilitation shall require a permit. All rehabilitation shall also comply with applicable federal, state, county, and local codes, planning and zoning requirements, local authorities' rules and regulations.





# Permits

**THDA requires that all applicable permits be obtained by the contractor before performing the work.**

In the event a project is in an opt out jurisdiction or does not participate in the State Building Codes program the contractor must obtain the proper permits from the State Fire Marshalls Office.



# Lead-Based Paint Hazards

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## For all units that are pre-1978

- All households must receive a copy of LBP-1 (Protect Your Family from Lead in Your Home)
  - The family must sign verifying that they did receive the information
- HUD designates three categories of rehabilitation based on the level of investment in the unit:
  - Less than \$5,000
  - \$5,000 - \$25,000
  - More than \$25,000

**Follow instructions in HOME Rental Manual based on level of investment in the unit**

# Change Orders

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CHANGE ORDERS - In many housing rehabilitation situations, it is not uncommon for a change in the scope of the work to occur. For example, the work write-up may call for replacing the existing wall covering (drywall, paneling, etc.), and it is discovered that the wall studs have severe termite damage which must be replaced. This was not anticipated in the work write-up and a change is now required to correct the unanticipated problem. A change order request (HO-16) would be initiated at this time.

# Change Orders

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Since a change order becomes a binding part of the contract, the owner and contractor must sign it. The Grantee must receive approval from THDA of all change order prior to entering into agreement with contractor.

Any change order that constitutes the deletion of a previously approved line item or any component thereof must be approved by THDA and a change order (HO-16) initiated.

# Change Orders

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All change orders, or deviations from the contract documents must be reviewed and approved by the Grantee. Any work omitted or added outside of the rehabilitation documents are subject to be corrected at the expense to the owner and/ or contractor or the pay application can be rejected.

# Section 3 Final Rule

## Overview

Section 3 applies to all HUD/Federal funded projects at/or above \$200,000 effective November 30, 2020. (The project is defined as the site or sites together with any building(s) and improvements located on the site(s) that are under common ownership, management, and financing. [24 CFR § 75.3\(a\)](#))

July 1, 2021 compliance on the new regulation began.

Section 3 applies to construction, demolition, reconstruction, conversion, or rehabilitation projects. It mainly applies to the general contractor, and all subcontractors.

# Changes Incorporated in the Final Rule

A more sustainable approach to long term employment, labor hours under Section 3 are to be counted as a percentage of the total hours for a project and benchmarks adjusted to be more feasible.

Recognizes the greater value of the permanent job by focusing on labor hours instead of new hires. Therefore, creating an incentive for employers to invest in and retain their newly hired low-income workers



# Section 3 Preference

**Section 3 preference should be given in training and employment opportunities to:**

1. A low or very low-income resident
2. An Employee and/or business that meet the definition of a Section 3 business concern
3. Participant in a YouthBuild program.
4. A resident living within a 1 mile radius of the service area or the neighborhood of the project. If fewer than 5,000 people live within that one-mile radius, the circle may be expanded outward until that population is reached.



## Section 3 worker definitions:

- **Low or very low** (Workers whose income for the previous or annualized calendar year are below the income limits established by HUD)
- **Targeted Section 3 workers** (persons living in public housing, or Section 8 assisted housing, or within a 1 mile radius of the project site.)
- **Workers employed by a Section 3 business concern** (At least 51% owned and controlled by low-or very low-income persons. Businesses where Section 3 workers perform over 75% of the labor hours over a three-month period. At least 51% owned and controlled by current public housing residents.)
- **YouthBuild** (workers between the ages of 16-24 that dropped out of school & receiving education, counseling, and job skill training)

**NOTE:** 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 [§ Reporting 75.31](#).

**Pre-existing office staff will not qualify for Section 3 compliance. This is about the monies spent directly for construction. The only people who are counted are those hired specifically for the construction process by the general contractor and his sub-contractors.**

The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.

# Section 3 Outreach for Safe Harbor

Contractors may notify Section 3 workers and Targeted Section 3 workers and Section 3 business concerns of job opportunities using the following strategies:

1. Add Section 3 language to all RFPs, procurement documents, bid offerings and contracts with the following statement: “The contractor shall follow Federal requirements as set forth in 24 CFR 5.105(a) Nondiscrimination and equal opportunity, including: Section 3 of the Housing & Urban Development Act of 1968 24 CFR 135 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135, as amended.”
2. 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”**.
3. Utilize the Section 3 Opportunity Portal and the Section 3 Business Registry to notify qualified candidates and Section 3 businesses of upcoming bid opportunities.
4. Contact local community organizations and provide them with job postings for Section 3 eligible applicants.

## Section 3 Outreach for Safe Harbor Cont:

5. Coordinating a programmatic ad campaign, which results in widespread job posting across diverse ad networks including:
  - a) Advertising job opportunities via social media, including LinkedIn and Facebook.
  - b) Advertising job opportunities via flyer distributions and mass mailings and posting ads in common areas of housing developments and all public housing management offices.
  - c) Advertising job opportunities via website.
  - d) Send a digital copy of project/job advertisements to THDA for the project to be posted on THDA's website.
  - e) Contacting resident councils, resident management corporations, and neighborhood community organizations to request their assistance in notifying residents of available training and employment opportunities.

# Section 3 Worker Certifications on a Project

For a worker to qualify as a **Section 3 worker**, *one* of the following must be maintained:

1. A worker's self-certification stating that their income is below the income limit from the prior calendar year
2. A worker's self-certification of participation in a means-tested program such as public housing or Section 8-assisted housing
3. A worker's self-certification that the worker is a YouthBuild participant
4. Certification from a PHA, or the owner, or property manager of a Project-Based Section 8-assisted housing, or the administrator of Tenant-Based Section 8-assisted housing that the worker is a participant in one of their programs
5. An employer's certification that the worker's income from that employer is below the income limit, when based on an employer's calculation of what the worker's wage rate would translate to if annualized on a full-time basis
6. An employer's certification that the worker is employed by a Section 3 business concern

# Targeted Section 3 Worker Certifications on a Project

For a worker to qualify as a **Targeted Section 3 worker**, one of the following must be maintained:

1. A worker's self-certification of participation in public housing or Section 8-assisted housing programs
2. Certification from a PHA, or the owner, or property manager of project-based Section 8-assisted housing, or the administrator of tenant-based Section 8-assisted housing that the worker is a participant in one of their programs
3. An employer's confirmation that a worker's residence is 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
4. An employer's certification that the worker is employed by a Section 3 business concern
5. A worker's self-certification that the worker is a YouthBuild participant

<b>Section 3 Worker Self-Certification-Housing and Community Development</b>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Field Policy and Management</b>	<b>HUD FORM 4736C</b> OMB Approval Number 2501-0041 (Exp. 04/30/2025)
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*(In compliance with Section 3 of the HUD Act of 1968 and 24 CFR Part 75)*



Public reporting for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992 (Section 3), and 12 U.S.C. § 1701u ensure that employment and other economic opportunities generated by Federal financial assistance for housing and community development programs are, to the greatest extent feasible, directed toward low- and very low-income persons, particularly those who receive government assistance for housing. The regulations are found at 24 CFR Part 75. This collection of information is required in order to ensure that a worker can be certified as an eligible Section 3 worker as outlined in 24 C.F.R. § 75.31. The information will be used by the Department to ensure compliance with Section 3 of the HUD Act of 1968 employer certification requirements listed in 24 CFR § 75.31, to assess the results of the Department's efforts to meet the statutory objectives of Section 3, to prepare reports to Congress, and by recipients to ensure they are complying with their recordkeeping requirements found in the regulation, and as a self-monitoring tool.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to Anna P. Guido, Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2501-0041. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number. No assurances of confidentiality are provided for this information collection.

## HUD FORM - 4737C

The purpose of this form is to comply with Section 3 of the HUD Act of 1968 employer certification requirements listed in 24 CFR § 75.31. To qualify as a Section 3 worker, any United States legal resident's annual income must not exceed the HUD income limits for the year before the worker was hired, or the individual's current income annualized on a full-time basis for the year must be below the HUD income limit. Additionally, an individual can qualify as a Section 3 worker if they are a YouthBuild participant or employee of a Section 3 Business concern.

Printed Name: \_\_\_\_\_

Street Address (Not a PO Box)                      Apt#                      City                      State                      Zip

Phone #: \_\_\_\_\_ Email: \_\_\_\_\_

To qualify as a Section 3 Worker, you must meet **one** of the following requirements **OR** have your employer certify that you are employed by a Section 3 Business concern:

<ul style="list-style-type: none"><li>• Income for the previous calendar year is below the income limit*</li><li>• A participant in a means-tested program such as public housing or Section 8-assisted housing</li><li>• A YouthBuild Participant*</li></ul>	Income limit \$XX,XXX
---	--------------------------

\*Currently or at the time of hire if hired within the past 5 years

I meet at least one of the requirements in the box above and therefore qualify to be counted as a Section 3 Worker under 24 CFR § 75.

If applicable, please indicate which requirement you meet to be considered a Targeted Section 3 worker in the box below. If you select "Living within the service area or neighborhood of the project," that selection will have to be confirmed by your employer. If you do not meet any of these requirements or do not know if you meet any of the requirements listed below, you may leave this section blank.

- Living within the service area or neighborhood of the project (requires employer confirmation)\*
- YouthBuild participant\*

\*Currently or at the time of hire if hired within the past 5 years

In addition to qualifying as a Section 3 Worker, I meet at least **one** of the requirements in the box above and therefore qualify to be counted as a Targeted Section 3 Worker under 75 CFR § 75.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct and certifies that the worker identified above meets the definition of a Section 3 worker. **WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §§ 3729, 3802)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



HUD FORM - 4737C



*(In compliance with Section 3 of the HUD Act of 1968 and 24 CFR Part 75)*

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The purpose of this form is to comply with Section 3 of the HUD Act of 1968 employer certification requirements listed in 24 CFR § 75.31. To qualify as a Section 3 worker, the United States legal resident's annual income must not exceed the HUD income limits for the year before the worker was hired, or the individual's current income annualized on a full-time basis for the year must be below the HUD income limit. Additionally, an individual can qualify as a Section 3 worker and Targeted Section 3 worker, if an employee of a Section 3 Business Concern. To qualify as a Targeted Section 3 worker, an employer can confirm that the employee lives within the service area or neighborhood of the project.

Please provide the following information about the business/employer:

Name of Business: \_\_\_\_\_

Street Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

HUD FORM - 4736A



Phone #: \_\_\_\_\_ Email: \_\_\_\_\_



Please Provide the following information about the worker/employee:

Printed Name of Worker: \_\_\_\_\_

Street Address (Not a PO Box)                      Apt#                      City                      State                      Zip

Phone #: \_\_\_\_\_ Email: \_\_\_\_\_

Please indicate which of the following is true for the worker listed above: (Select all that apply)

<input type="checkbox"/> Worker's income from your employment is below the income limit based on a calculation of what the worker's wage rate would translate to if annualized on a full-time basis*	Income limit \$XX,XXX
<input type="checkbox"/> Worker is employed by a Section 3 Business Concern (Select if your business qualifies as a Section 3 Business Concern)	
<input type="checkbox"/> Worker's residence is within the service area or neighborhood of the project	

\*Currently or at the time of hire if hired within the past 5 years.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct and certifies that the worker identified above meets the definition of a Section 3 worker. **WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

HUD FORM - 4736A

# Final Rule - Employment Benchmarks

- 25% of all labor hours must be performed by a section 3 worker
  - 5% of all labor hours must be performed by Targeted Section 3 workers
- Benchmark notice should be updated by the Secretary every three years



$$\frac{\text{Section 3 labor hours}}{\text{Total labor hours}} = 25\% \text{ AND } \frac{\text{Targeted Section 3 labor hours}}{\text{Total labor hours}} = 5\%$$

# Safe Harbor Qualitative Efforts :

---

If a recipient agency or contractor does not meet the benchmark requirements but can provide evidence that they have made **qualitative efforts** to assist low- and very low-income persons with employment and training opportunities, the recipient or contractor is considered to be in compliance with Section 3, absent evidence to the contrary (i.e., evidence or findings obtained from a Section 3 compliance review), and no further reporting is required

Recipients will be considered to have complied with the Section 3 requirements and met the safe harbor provisions found at [§ 75.13](#) or [§ 75.23](#), in the absence of evidence to the contrary, if they certify that they have followed the required prioritization of effort and met or exceeded the applicable Section 3 benchmarks.

# Qualitative Reporting

## 24 CFR § 75.15 and 24 CFR § 75.25

If the Section 3 benchmarks are not met, the recipient must report in a form prescribed by HUD on the qualitative nature of its activities and those its contractors and subcontractors pursued. Such qualitative efforts may, for example, include but are not limited to the following:

- Engaged in outreach efforts to generate job applicants who are Targeted Section 3 workers
- Provided training or apprenticeship opportunities
- Provided technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)
- Provided or connected Section 3 workers with assistance in seeking employment including: drafting resumes, preparing for interviews, and finding job opportunities connecting residents to job placement services
- Held one or more job fairs
- Provided or referred Section 3 workers to services supporting work readiness and retention (e.g., work readiness activities, interview clothing, test fees, transportation, childcare)

# Qualitative Reporting Cont.

| [24 CFR § 75.15](#) and [24 CFR § 75.25](#)

- Provided assistance to apply for/or attend community college, a four-year educational institution, or vocational/technical training
- Assisted Section 3 workers to obtain financial literacy training and/or coaching
- Engaged in outreach efforts to identify and secure bids from Section 3 business concerns
- Provided technical assistance to help Section 3 business concerns understand and bid on contracts
- Divided contracts into smaller jobs to facilitate participation by Section 3 business concerns
- Provided bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns
- Promoted use of business registries designed to create opportunities for disadvantaged and small businesses
- Outreach, engagement, or referrals with the state one-stop system as defined in Section 121(e)(2) of the Workforce Innovation and Opportunity Act

# Section 3 Reporting

THDA requires Grantees to submit documentation of Section 3 compliance throughout the various stages of a construction project.

## Pre-Construction

Contractors who are Selected/Awarded bid(s) will submit estimated labor hours for the awarded contract. Estimated labor hours will be broken down by Section 3 workers, Targeted Section 3 workers, and Non-Section 3 workers.

The estimated labor hours for the entire project will be compiled and submitted to THDA with the awarded bids and project budget prior to loan closing.

# Section 3 Reporting Cont.

## During Construction (monthly, quarterly, & annually)

Grantees/General Contractors will collect Labor Hour Certification forms from all Section 3 covered Contracts; along with each invoice and lien waiver for the billing period. These forms will be submitted to THDA regardless of the reimbursement source.

\*Section 3 covered contracts do not include contracts for the purchase of supplies and materials. However, when a contract for materials includes the installation of the materials, the contract constitutes a Section 3 covered contract.

## Post-Construction

Once a project is completed, contractors must submit a final Section 3 cumulative labor hour report for the project. THDA will conduct a final review of the project's overall performance and compliance.

**Section 3 Utilization Tracker: Business Labor Hours**

U.S. Department of Housing and Urban Development  
Office of Field Policy and Management

OMB 2501-0040  
Expiration 04-30-2025  
HUD Form 4737

Public reporting for this collection of information is estimated to average 5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992 (Section 3), and 12 U.S.C. § 1701u ensure that employment and other economic opportunities generated by Federal financial assistance for housing and community development programs are, to the greatest extent feasible, directed toward low- and very low-income persons, particularly those who receive government assistance for housing. The regulations are found at 24 CFR Part 75. This collection of information is required to ensure that Section 3 workers and Section 3 Business concerns participating in Housing and Community Development Projects and Public Housing Assistance Projects with HUD funding are documenting Section 3 labor hours to meet the requirements of Section 3 found in 24 CFR part 75. The information will be used by the Department to monitor program recipient's compliance with Section 3, to assess the results of the Department's efforts to meet the statutory objectives of Section 3, to prepare reports to Congress, and by recipients as a self-monitoring tool.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to Anna P. Guido, Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2501-0040. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number. No assurances of confidentiality are provided for this information collection.

**FORM A: Business Labor Hours Tracking**

Tracking of labor hours occurs throughout the project and is reported no later than the conclusion of the work for the identified business. This form is completed in conjunction with Form B for Section 3 Workers and Section 3 Targeted Workers labor hours. An alternative to this use of this form can be from a business or employer's good faith assessment of the labor hours of a full-time or part-time employee informed by the employer's existing salary or time and attendance based payroll systems, unless the project or activity is otherwise subject to requirements specifying time and attendance reporting.

EXAMPLE	Business Name	Non-Section 3 Business	Section 3 Business (must be verified by recipient/subrecipient before contract is executed)	Total number of Section 3 worker or Section 3 business labor hours worked	Total targeted Section 3 worker labor hours. (Of the total Section 3 worker labor hours reported list total labor hours from Targeted Section 3 workers)	Total number of labor hours worked from non-Section 3 and Section 3 workers/Section 3 businesses	Section 3 Benchmark non-Section 3 businesses calculate column E divided by column G
<b>A. Construction (HCD programs) or Capital Expenses (PHAs)</b> <i>(Enter labor hours for all construction contracts or subcontracts in the project. Note Section 3 requirements do not apply to material supply contracts.)</i>	Optimus General Contractor	x		50	25	500	10.0%
	123 Excavation	x		19		40	47.5%
	XYZ Concrete		x	120	20	120	100.0%
	76 Framers		x	80		80	100.0%
<b>B. Construction subtotal</b> (Add all amounts in column E to display a subtotal for column E; Add all amounts in column G to display subtotal of all labor hours in column G)				269		740	36.4%
<b>C. Professional Services/Recipients</b> Professional Service/recipients Section 3 worker labor hours are only added to the total in column E <i>(Optional reporting, but is encouraged if it is Section 3 Business or Section 3 worker)</i>	Vision Land Surveying		x	10			100.0%
	1+2 Engineering	x					
	Accrued Accountants	x		20			100.0%
	City of Entitlement CDBG	x					
	Helpful NGO Subrecipients LLC	x		10			100.0%
<b>D. Professional Services/Recipient Subtotal</b> (Add all professional service/recipient hours reported in column E to display a subtotal for column E. This subtotal amount is added to the cumulative hours total in column E)				40			
<b>E. Cumulative Project Labor Hours</b>				309		740	41.8%
<b>F. Benchmark met.</b>							



HUD FORM - 4737



**Section 3  
Utilization  
Tracker: Section 3  
Labor Hours**

U.S. Department of Housing  
and Urban Development  
Office of Field Policy and  
Management

OMB 2501-0040  
Expiration 04-30-2025  
HUD Form 4737A



Public reporting for this collection of information is estimated to average 5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

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**FORM B: Section 3 Labor Hours Tracking**

(Reporting for each Section 3 worker can occur throughout the project and as directed by the HUD recipient for the identified business(es). An alternative to this use of this form can be from a business or employer's good faith assessment of the labor hours of a full-time or part-time employee informed by the employer's existing salary or time and attendance based payroll systems, unless the project or activity is otherwise subject to requirements specifying time and attendance reporting.

Name of Business contracted on (Name of Project)	Identification of Section 3 Worker	Identification of Targeted Section 3 Worker	Date of hire or first reporting period	Total labor hours worked on a project per Section 3 Worker (Tracking of hours can be completed in a separate wage reporting system)
<b>EXAMPLE</b>				
	<i>List or identify all Section 3 Workers for each contracted business. Documentation of a Section 3 Worker is completed outside of this form.</i>	<i>Indicate, by marking with an "X" if the worker has been identified as a Targeted Section 3 Worker. Documentation of a Targeted Section 3 Worker is completed outside of this form.</i>	<i>Enter either the date of hire or the date of the first reporting period after hire for each worker.</i>	<i>Enter number of hours worked by the individual employee over the duration of project.</i>
Business Name	Section 3 Worker Name			
Optimus General Contractor	Employee name 1	x	5/16/2021	10
	Employee name 2			
	Employee name 3			
123 Excavation	Employee name 4			
XYZ Concrete	Employee name 5	x		
76 Framers	Employee name 6			
	Employee name 7	x		
AB Drywall				
<b>Cumulative Project Labor Hours</b>				

HUD FORM - 4737A

# Recordkeeping

**24 CFR § 75.31** The final rule requires that HUD shall have access to all records, reports, and other documents or items of the recipient that are maintained to demonstrate compliance with the requirements of **§ 75**, or that are maintained in accordance with the regulations governing the specific HUD program by which the Section 3 project is governed, or the public housing financial assistance is provided or otherwise made available to the recipient, sub-recipient, contractor, or subcontractor.

Recipients must maintain documentation, or ensure that a sub-recipient, contractor, or subcontractor that employs the worker maintains documentation, to ensure that workers meet the definition of a Section 3 worker or Targeted Section 3 worker, at the time of hire or the first reporting period. This documentation must be maintained for the time period required for record retentions in accordance with applicable program regulations and in accordance with **2 CFR § 200**.

# Examples Of Records That Should Maintained

## Employment and Employee Information

- Lists of Section 3 workers and Targeted Section 3 workers employed by contractors during the period under review. This information should include: name of low- or very low-income individual; address; telephone number; date hired; position; and current status (employed or terminated) – {Monthly}
- Evidence that developers, contractors, or subcontractors posted signs regarding job vacancies and/or subcontracting opportunities at the job site – {Quarterly}
- Evidence that developers, contractors, or subcontractors notified local labor unions about their Section 3 obligations – {Annually}
- Correspondence or other records from Section 3 workers and business concerns regarding training, employment or contracting opportunities (including Section 3 grievances), to determine how those inquiries were addressed or resolved – {Quarterly}
- Labor hour records of contractors, and subcontractors to determine the percentage of Section 3 workers and Targeted Section 3 workers in comparison to total labor hours – {Monthly (1<sup>st</sup> 3 months then,) Quarterly}

# Examples Of Records That Should Maintained - cont.

## Business Concern Information

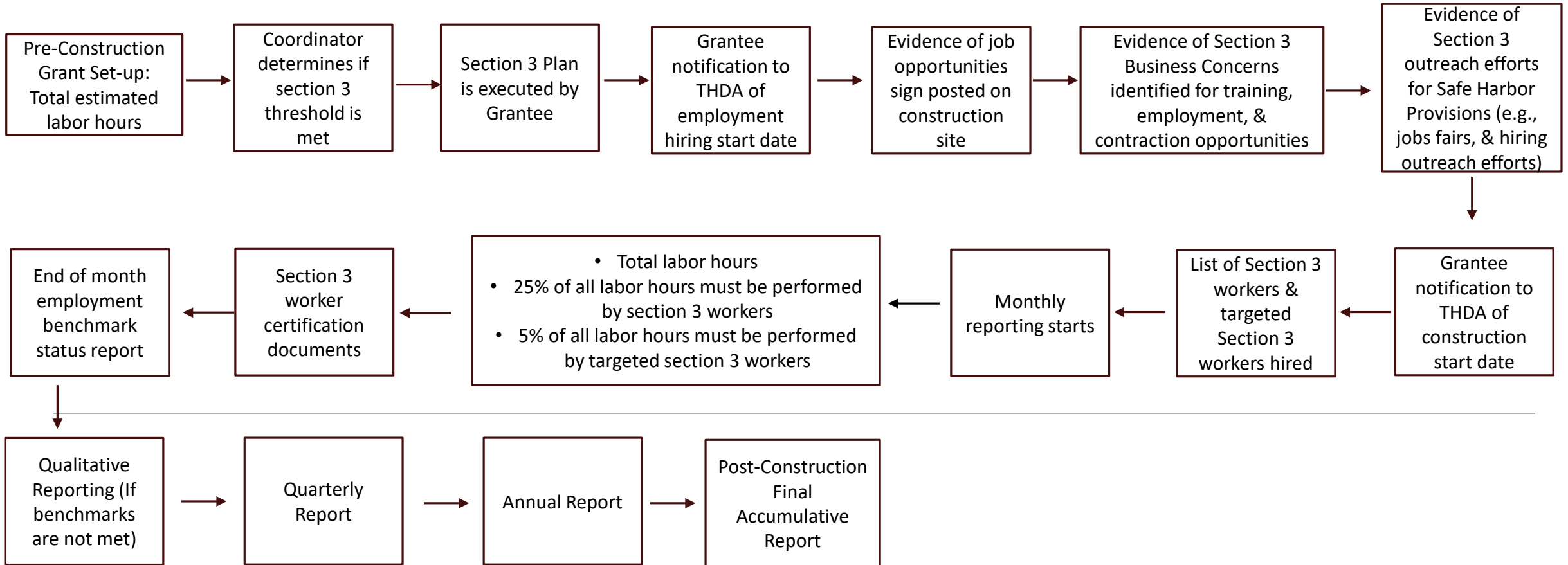
- Lists of Section 3 workers and Section 3 business concerns maintained to determine the extent to which the recipient is attempting to provide economic opportunities to prospective beneficiaries – {Annually}
- Evidence of outreach efforts, to determine how Section 3 workers or Section 3 business concerns were targeted or recruited for employment, training, or contracting opportunities – {Monthly}
- Lists of Section 3 business concerns that received contracts/subcontracts during the period under review. This information should include name of contractor; address; telephone number; email address; contract amount; date awarded; and services provided – {Annually}

# Examples Of Records That Should Be Maintained - cont.

## Contract, Proposal, and Bid Information

- Minutes, sign-in sheets, agendas, or other relevant evidence from pre-construction meetings, to determine if Section 3 requirements were discussed with prospective bidders – {Pre-Construction}
- Plans for meeting or exceeding benchmarks by contractors (i.e., contractors' proposals or business utilization plan)
- Procurement records, to identify the dollar amount of each covered contract awarded during the time span under review – {Annually}
- Copies of bid solicitations, to ensure that Section 3 applicability is referenced – {Annually}
- Contract documents, to ensure that they include provisions that apply Section 3 to the contracts, or subcontracts awarded – {Pre-Construction}
- Other relevant data that may demonstrate Section 3 compliance

# Section 3 Process Flowchart



# Monitoring

HUD will monitor for compliance, the applicable HUD program office will determine appropriate methods by which to oversee Section 3 compliance. HUD may impose appropriate remedies and sanctions in accordance with the laws and regulations for the program under which the violation was found.

## **Contract Clause, Effective July 1, 2021 HUD HUD Section 3 Compliance**

- a. The work to be performed under this Contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (12 USC §1701u) ("Section 3"). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted developments covered by Section 3 shall, to the greatest extent feasible, be directed to low- and very low-income persons, including persons who are recipients of HUD assistance for housing, with a preference for both targeted workers living in the service area or neighborhood of the Development and YouthBuild participants, as defined at 24 CFR Part 75 ("Section 3 Regulations").
- b. The Parties agree to comply with HUD's regulations in Section 3 Regulations, which implement Section 3. As evidenced by their execution of this Contract, the Parties certify that they are under no contractual or other impediments that would prevent them from complying with the Section 3 Regulations.



## **Contract Clause – HUD Section 3 Compliance Cont:**

c. The Award Recipient, Contractor, or Development Owner agrees to send to each labor organization or representative of workers with which the Award Recipient, Contractor, or Development Owner has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the Award Recipient, Contractor, or Development Owner's commitments under this section of the Contract and will post copies of the notice in conspicuous places at the worksite where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference and shall set forth the following: (i) minimum number and job titles subject to hire, (ii) availability of apprenticeship and training positions, (iii) qualifications for each, (iv) name and location of the person(s) taking applications for each of the positions, and (v) the anticipated date the work shall begin.

d. The Award Recipient, Contractor, or Development Owner agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in Section 3 Regulations and agrees to take appropriate action, as provided in an applicable provision of the subcontractor in this Section 3 clause, upon a finding that the subcontractor violates the regulations in Section 3 Regulations. The Award Recipient, Contractor, or Development Owner will not subcontract with any subcontractor where the Award Recipient, Contractor, or Development Owner has notice or knowledge that the subcontractor has been found in violation of the regulations in Section 3 Regulations.

## **Contract Clause – HUD Section 3 Compliance Cont:**

- e. The Award Recipient, Contractor, or Development Owner will certify that any vacant employment positions, including training positions, that are filled (i) after a contractor is selected but before the Contract is executed, and (ii) with persons other than those to whom the regulations of Section 3 Regulations require employment opportunities to be directed, were not filled to circumvent the Award Recipient, Contractor, or Development Owner's obligations under Section 3 Regulations.
  
- f. Noncompliance with HUD's regulations in Section 3 Regulations may result in sanctions, termination of this Contract for default, and debarment or suspension from future HUD- assisted contracts.

# Resources

## Quick Links

- <http://www.hud.gov/section3>
- <http://www.hudexchange.info/section-3>
- <https://www.hudexchange.info/programs/section-3/section-3-guidebook/welcome>
- <https://www.huduser.gov/portal/datasets/il.html> - The most recent HUD income limits
- <https://www.hud.gov/sites/documents/11SECFAQS.PDF>

## CPD Notices

- 21-07 (HOME/HTF)
- 21-09 (OBGA)

## Trainings & Tools

- Searchable FAQs (HUD Exchange)
- Section 3 Opportunity Portal Tutorial (HUD YouTube Channel)
- Section Opportunity Portal: Business Registry Tutorial (HUD YouTube Channel)
- HOME and Section 3 Final Rule Guidance for HOME/HTF Video (HUD Exchange)

# Q & A

# Contacts

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Monica Rutherford, Senior Housing Coordinator

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Allison Moore, Lead Housing Coordinator

- [aemoore@thda.org](mailto:aemoore@thda.org) or (615) 815-2040

Eric Hall, Property Standards Coordinator

- [ehall@thda.org](mailto:ehall@thda.org) or (615) 815-2076

# Contacts

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Aaron Toran, Housing Program Manager

- [atoran@thda.org](mailto:atoran@thda.org) or (615) 815-2037

Bill Lord, Director, Community Housing

- [blord@thda.org](mailto:blord@thda.org) or (615) 815-2018

# Remaining Questions

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