



Columbia
Housing Authority

SECTION 3

**IMPLEMENTATION PLAN
AND
ADMINISTRATIVE GUIDE**

INTRODUCTION

The Housing Authority of the City of Columbia, Missouri is pleased to present its Section 3 Plan, which will assist staff, contractors and developers in complying with the requirements of Section 3 of the HUD Act of 1968, as amended in 1994. This program will ensure that employment, training, and other economic opportunities generated by HUD financial assistance provided to the CHA shall, to the greatest extent feasible, be directed to low and very-low income persons, particularly those who are public housing residents and to businesses which provide economic opportunities to low and very-low income persons.

Columbia Housing Authority has established goals for both hiring and contracting that, when met, will demonstrate satisfactory efforts to comply with Section 3.

The Housing Authority of the City of Columbia, Missouri by this program affirms its commitment to maximize, to the greatest extent feasible, the creation of employment, training, and contracting opportunities for low and very-low income persons.

The Housing Authority of the City of Columbia, Missouri also commits to providing contractors and developers with procedural assistance on all matters relating to this program, as needed, to achieve the program's goal.

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DEFINITIONS

Core Employee - The core employee is an individual who is a bonafide employee of the contractor at the time the contract is awarded, and was employed by the contractor not less than 120 days prior to the contract award or worked not less than 350 hours during the 120 days preceding the contract award. The contractor is responsible for verifying that core employees are defined by and meet the criteria of the Housing Authority.

New Hires – Full-time employees for permanent, temporary, or seasonal employment opportunities.

Low Income Persons - Families (including single persons) whose incomes do not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that the HUD Secretary may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of the HUD's finding that such variations are necessary because of prevailing levels of construction costs or unusually high or low-income families.

Very-Low Income Persons - Families (including single persons) whose incomes do not exceed 30 percent of the median family income for the area, as determined by the HUD with adjustment for smaller and larger families, except that the HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of the HUD's findings that such variations are necessary because of unusually high or low family incomes.

Qualified Section 3 Resident - Any individual who meets the low income or very low-income criteria, who is 18 years of age or older, who is a resident in good standing of public housing, whose name appears on the lease, or who is a resident of the Boone County metropolitan statistical area (MSA). Qualified Section 3 residents will receive recruiting and hiring priority in the following order:

- CHA public housing residents
- YouthBuild participants
- CHA Section 8 participants
- Other low- or very low-income residents in the Boone County MSA.

HUD YouthBuild - HUD YouthBuild programs are programs that receive assistance under subtitle D of Title IV of the National Affordable Housing Act, as amended, and provide disadvantaged youth with opportunities for employment, education, leadership development, and training in the construction or rehabilitation of housing for homeless individuals and members of low- and very low-income families. (Columbia Builds Youth)

30% of New Hires/Employees - 30% of new hires/employees is calculated by dividing the total hours worked by all new hires into the total hours worked by Section 3 new hires. The result must be greater than or equal to 30% for compliance.

Section 3 Coordinator – an employee of the CHA who works with all CHA internal departments, contractors, Section 3 business owners, members of the community, residents and resident councils to coordinate and monitor all activities that contribute to Section 3 compliance.

Modernization Coordinator - This is an advanced technical position which serves as the CHA's job site representative in coordination and inspection of new construction and major repair of CHA owned structures, grounds and public areas.

EXECUTIVE SUMMARY

The Housing Authority of the City of Columbia, Missouri (CHA) is committed to helping the residents of its public housing communities achieve their goals of self-sufficiency by providing opportunities for training and employment. CHA provides employment opportunities on construction projects by encouraging its contractors to hire qualified residents of CHA communities, connecting residents to job training and placement activities, and providing program coordination that facilitates economic opportunities to residents. CHA also provides employment opportunities by hiring qualified residents of CHA communities for available CHA positions.

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1994, requires that, to the greatest extent feasible, employment and other economic opportunities generated by HUD funds be directed to low- and very low-income residents. 24 CFR Part 135 establishes the standards and procedures to be followed by Public Housing Authorities in order to ensure that the requirements of Section 3 are met.

In order to be considered by HUD to be in compliance with the provisions of 24 CFR Section 135, CHA will take four concurrent courses of action. These actions are as follows:

1. CHA will formalize recruiting and hiring policies and practices to the greatest extent feasible to provide opportunities to ensure that 30% of the aggregate number of new hires each year at CHA to be qualifying public housing residents or other low income metropolitan statistical area (MSA) residents.
2. CHA will establish a goal that all contractors and subcontractors, to the greatest extent feasible provide opportunities for training and employment for qualifying Section 3 residents for a least 30% of the new positions created as a result of contracts with CHA.
3. CHA will establish a goal that it will make best efforts to ensure that 10% of the total dollar amount of contracts for construction, repair and rehabilitation be awarded to the greatest extent feasible to qualifying Section 3 business concerns and to the greatest extent feasible make best efforts that 3% of the total dollar amount of all other CHA contracts are awarded to qualifying Section 3 business concerns.
4. CHA to the greatest extent feasible will make best efforts to implement programs to ensure that there is a ready pool of public housing residents trained to fill the positions offered by the CHA, its contractors or subcontractors. Such programs will be geared to ensure that residents will meet the minimum requirements, i.e. valid driving license, high school diploma or equivalent, drug-free workplace requirement, and criminal background checks, for CHA and contractor employment positions. CHA will make best efforts to assist those residents with obtaining adequate support services such as day care and transportation. It will also ensure, the greatest extent feasible that residents of CHA communities are aware of opportunities as they become available and that contractors know how to reach the ready pool of potential employees from CHA communities.

II. SECTION 3 OF THE HOUSING AND URBAN DEVELOPMENT ACT OF 1968

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1994, requires that, to the greatest extent feasible, employment and other economic opportunities generated by HUD funds be directed to low- and very low-income residents. 24 CFR Part 135 establishes the standards and procedures to be followed to ensure that the objectives of Section 3 are met. It is included in this Implementation Plan and Administrative Guide as Appendix A. The terms used in this Implementation Plan are as defined in 24 CFR Part 135.

24 CFR Part 135 requires that the CHA make best efforts to ensure that 30% of new hires of the CHA and of its contractors funded through development assistance, operating assistance or modernization assistance from HUD be residents of CHA communities. Furthermore, it requires that best efforts be made to ensure that 10% of all construction or repair related contracts and 3% of all other contracts be awarded to Section 3 business concerns. A Section 3 business concern is defined as a business concern that is 51% owned by a Section 3 residents, or 30% of whose permanent full time employees are Section 3 residents or have been within the past three years.

In order to comply with 24 CFR Part 135, CHA is required to establish programs and procedures that facilitate the training and employment of any client of CHA receiving housing assistance by undertaking activities such as:

1. Publicizing the availability of positions with CHA or its contractors or subcontractors.
2. Providing assistance and counseling in job placement, job interviews, and job applications.
3. Maintaining current lists of available and qualified residents and making them available to contractors.
4. Providing job training, either independently or in conjunction with existing institutions.
5. Including negotiated provisions in all contracts specifying the number of Section 3 residents that the contractor will hire.
6. Maintaining lists of Section 3 business concerns and their specialties.

III. OUTREACH AND RECRUITMENT OF QUALIFIED RESIDENTS AND BUSINESSES

Outreach and recruitment of qualified residents and businesses for Section 3 employment or contracting opportunities is a three-stage process that includes:

1. Recruiting residents to participate in employment training programs provided by the CHA and its partners;
2. Notifying qualified residents of positions as they become available; and
3. Providing residents with the support necessary to successfully apply and interview for the job.

Resident Services Responsibilities

CHA's Resident Services Department will conduct Section 3 outreach and referrals to housing authority residents. Outreach efforts will include knocking on doors, job fairs, and information sessions. The Resident Services Department and Section 3 Coordinator will work with Housing Management to develop Section 3 mailings to be included in monthly newsletters. Section 3 program information will also be presented during each resident's annual re-certification.

CHA's Resident Services will build and maintain a database of residents by conducting an agency-wide survey to collect the following information:

- Employment status
- Income and income source
- Educational level
- Self description of skills
- Job training completed, including type of training and name of organization that provided the training
- Requests for training and support services

Resident Services will work with housing management to update the database during annual re-certifications.

In addition to the goal of hiring residents at CHA and through CHA contractors, CHA will also make best efforts to use resident-owned Section 3 businesses in its contracting, subcontracting and procurement, as is feasible. It is the responsibility of the Section 3 Coordinator to:

1. Ensure that all public housing residents are aware of CHA's program of support for resident owned businesses, in part by annually presenting the program to the Resident Advisory Board and the Public Housing Resident Associations.
2. Maintain a current and complete list of public housing resident owned businesses & Section 8 resident owned businesses and provide it to all contractors as part of the bid document package.
3. To the greatest extent feasible ensure that all Section 3 businesses are registered with the Finance Department.
4. Ensure all CHA issued Requests for Proposals or Invitations for Bids are sent to all Section 3 businesses registered with CHA.

IV. SELF-SUFFICIENCY/EMPLOYMENT TRAINING OPPORTUNITIES AT THE HOUSING AUTHORITY OF THE CITY OF COLUMBIA

Jobs for residents of CHA communities, created through the Section 3 program are just one component of a successful resident employment initiative at CHA. Section 3 applies only to new hires, and the majority of the contracting jobs created as a result of Section 3 are construction-related and thus not long term at any one site. Therefore, to maximize the benefits of its Section 3 program, CHA will employ the following techniques:

- Utilize the Section 3 Program as only one of several opportunities to provide jobs for residents that are successful participants in its self-sufficiency programs.
- Provide supportive services to help ensure the success of residents employed as a result of the provisions of Section 3.

V. PROCUREMENT AND CONTRACTING

The Division of Asset Management will develop, implement and monitor procurement and contracting policies and procedures to:

- Ensure that CHA contractors and subcontractors to the greatest extent feasible maximize hiring of residents of CHA communities, and
- Facilitate contracting with resident-owned business enterprises, to the greatest extent feasible.

To accomplish these goals, the Division of Asset Management will employ a series of strategies, which include, but are not limited to, the following:

1. CHA will establish standards for structuring and awarding contracts that provide incentives for full participation in the provisions of Section 3 and for enforcing the Section 3 contract provisions, which may include 15% of points awarded on RFP/RFQ or X factor determination on sealed bids.
2. All Section 3 covered contracts will include the "Section 3 clause" as required by 24 CFR 134.38. (For text of the required clause see Appendix A of this document).
3. When contracts are less than \$100,000 in value and the list of certified resident owned businesses and previous contracting experience indicates that qualified resident owned businesses are available to successfully complete the contract, the Contracting Officer may limit the invitation for bids to certified, qualified resident owned businesses according to the provisions of 24 CFR Part 963.
4. When goods and/or services to be contracted for are less than \$100,000 and the contract was procured through solicitation or sealed bids, the Contracting Officer may award the contract to a responding qualified, certified resident owned business if the quotation from the business under consideration is no more than 10% greater than the lowest responsive offer.

Compliance

The CHA will monitor contractor compliance over the life of the contract as follows:

1. Review compliance monthly and cumulatively.
2. Monitor contractor response to deficiencies in compliance.

The contractor shall provide a status report identifying its progress in meeting the Section 3 goals, as established, on a monthly basis throughout the contract period. The monthly status report shall be submitted no later than 15 days after the end of each calendar month of the contract (e.g. April 15 for March). For any goal not met, the report shall identify any other economic opportunities, which the contractor has provided or intends to provide to CHA residents. This report will provide the CHA with all information required to monitor compliance with its Section 3 plan including, but not limited to, new hires, core employees, certified payroll, workforce utilization and other relevant data to be specified.

The contractor and sub-contractors will be required to be in compliance with the Owner's Section 3 Plan throughout the duration of the contract.

Alternative Compliance

Contractors may demonstrate compliance with Section 3 by committing to employ Section 3 residents as 30% of the aggregate number of new hires for the duration of the contract.

Section 3 Requirements for the Competitive Proposal Method of Procurement

1. For CHA contracts and subcontracts awarded under the competitive proposal method of procurement, a Request for Proposals (RFP) or a Request for Qualifications (RFQ) shall identify all evaluation factors to be used to rate proposals.
2. All CHA RFP/RFQ's shall contain Section 3 evaluation factors. The evaluation factors shall address both the preference for Section 3 business concerns. These factors shall be at least 15 percent of the total number of available points to be set aside for the evaluation.
3. The evaluation committee shall provide a written summary explaining its scoring rationale for each of the evaluative factors.

VI. MONITORING AND COMPLIANCE

The Section 3 Coordinator, will monitor the contractor's and subcontractor's outreach and hiring practices and gauge them against Schedule A – Workforce and Hiring Projection; the negotiated resident hiring provisions of the contract; and the finalized Section 3 Opportunities Plan. The Modernization Coordinator, in conjunction with the general contractor, will review the subcontracts to determine the dollar value awarded to Section 3 concerns.

All contracts will be evaluated at closing for compliance with the Section 3 program. The contractor's compliance with the program may be used to determine contractor responsibility and bid responsiveness on future contracting opportunities with the Housing Authority of the City of Columbia.

The contractor will provide the following reports to facilitate monitoring Section 3 hiring and contracting activity, compliance with Davis-Bacon Wage Rate requirements and the provision of economic opportunities for women and minorities.

1. Report on interview and evaluation of each CHA resident referred by the CHA that is not hired, with a written copy to the Section 3 Coordinator when the decision is made and the resident notified.
2. A biweekly certified list of all new hires for each contractor and subcontractor will be submitted with payroll. The certified lists will include: name, address, trade, section category, gender and ethnic group or race, date hired, indication of how contact was made (CHA referral, walk-in, resident council referral, etc.)
3. A biweekly certified payroll for each contractor and subcontractor. The certified payroll will indicate: trade and status (i.e., apprentice, journeyman, master, foreman, superintendent, etc.), wage rate and hours worked each day, whether claimed as Section 3 employee, name and address of each employee.
4. A copy of each subcontract when executed, with cover sheet indicating dollar value of contract and gender and race or ethnicity of 51% owner and whether or not the business is a certified Section 3 business.

The contractor will submit the above to the Modernization Coordinator, who will maintain a checklist of items received and forward them to the Section 3 Coordinator. If, in consultation with the Section 3 Coordinator, the Modernization Coordinator determines that the required monthly submissions are not complete, s/he will withhold approval of payment of the monthly draw.

The contractor shall maintain at an office on the construction site, documentation of Section 3 outreach and recruitment activities available for review by the Section 3 Coordinator. Items to be made available for review include:

- Walk-in applicant list indicating which job applicants were residents of CHA communities and status of their application/employment;
- List of applicants and their application or employment status;
- Equal Employment Opportunity Policy;
- Sexual Harassment Policy; and
- Certification of non-segregated facilities.

The contractor will notify the Section 3 Coordinator in writing of any walk-in applicants or applicants recruited or interviewed through any source other than the Section 3 Coordinator. Further, in order to maximize Qualified Section 3 resident hiring, the contractor will interview and hire according to the following order of priority:

- CHA public housing residents referred through the Resident Services Department
- YouthBuild participants referred through CHA apprenticeship training programs
- CHA Section 8 participants referred through Section 8 Administration
- Any low or very-low income applicants from Boone County.

Each month, the Section 3 Coordinator will interview a sampling of the residents hired to meet Section 3 goals, including those residents who were referred, but were not hired and those residents who resigned, were terminated or laid off. These interviews, along with the employment interview reports provided by the contractor, will be included in the Section 3 compliance file and in the resident's career file at the corresponding referring office. The interviews will be structured to determine the training needs of the resident, job site problems that could be resolved to make employment more productive for other employees and compliance with basic work place policies.

The Section 3 Coordinator, working in conjunction with modernization coordinator, contractor(s) and the various Resident Services programs, will assure that Section 3 employees receive regular evaluations of their work and fair, appropriate disciplinary treatment as follows:

- Evaluation: The contractor will conduct an evaluation meeting with CHA new employees every other month to acknowledge good performance and to discuss areas for improvement. A written evaluation will be provided to the employee and the appropriate CHA department, signed by the superintendent or project manager and the employee. If an employee is laid off or terminated, an exit interview will be conducted.
- Discipline: The contractor will notify CHA in writing of any disciplinary action involving a Section 3 employee.

The Section 3 Opportunity Plan, which is required to be prepared by the contractor and included in its final negotiated form in the contract documents, will have a projected monthly hiring schedule. Compliance with the plan will be determined at the end of the contract prior to substantial completion. At that time, the Section 3 Coordinator will evaluate resident hiring and retention and Section 3 business subcontracting.

The Section 3 Coordinator will be responsible for preparing the annual report to HUD on Economic Opportunities for Low-Income Persons in conjunction with Assisted Projects. (Form HUD 60002), by January 10.

VII. PROTEST AND COMPLAINT PROCESSING

Definitions

Complaint: An allegation of noncompliance with regulations

Complainant: The party, which files a complaint with the Assistant Secretary, alleging that a recipient or contractor has failed or refused to comply with the regulations.

Noncompliance with Section 3: Failure by the CHA or contractor to comply with the requirements.

Respondent: The CHA or contractor against which a complaint of has been filed.

Cooperation in Achieving Compliance

The CHA recognizes that the success of ensuring that Section 3 residents and Section 3 business concerns have the opportunity to apply for jobs and to bid for contracts generated by covered HUD financial assistance depends upon the cooperation and assistance of the housing authority, the contractors, and subcontractors.

All recipients shall cooperate fully and promptly with HUD in Section 3 compliance reviews, in investigations of allegations of noncompliance made, and with the distribution and collection of data and information.

The CHA shall refrain from entering into a contract with any contractor after notification to the recipient by HUD that the contractor has been found in violation of the Section 3 regulations. The provisions of 24 CFR part 24 apply to the employment, engagement of services, awarding of contracts or funding of any contractors or subcontractors during any period of debarment, suspension, or otherwise ineligible status.

Filing and Processing Complaints

Who may file a complaint? The following individuals and business concerns may, personally or through an authorized representative, file with HUD a complaint alleging noncompliance with Section 3 regulations:

1. Any Section 3 resident on behalf of himself or herself, or as a representative of persons similarly situated, seeking employment, training or other economic opportunities, or by a representative who is not a Section 3 resident but who represents one or more Section 3 residents;
2. Any Section 3 business concern on behalf of itself or as a representative of other Section 3 business concerns similarly situated, seeking contract opportunities generated from the expenditure of Section 3 assistance from a recipient or contractor, or by an individual representative of Section 3 business concerns.

Where to file a complaint. A complaint must be filed with the Assistant Secretary for Fair Housing and Equal Opportunity, Department of Housing and Urban Development, Washington, DC 20410.

Time of Filing

1. A complaint must be received not later than 180 days from the date of the action or omission upon which the complaint is based, unless the time for filing is extended by the Assistant Secretary for good cause shown.
2. Where a complaint alleges noncompliance with Section 3 and the regulations of this part that is continuing, as manifested in a number of incidents of noncompliance, the complaint will be timely if filed within 180 days of the last alleged occurrence of noncompliance.
3. Where a complaint contains incomplete information, the Assistant Secretary shall request the needed information from the complainant. In the event this information is not furnished to the Assistant Secretary within sixty (60) days of the date of the request, the complaint may be closed.

Contents of Complaint

Written complaints: Each complaint must be in writing, signed by the complainant, and shall include:

- Name and address of the complainant;
- The name and address of the respondent;
- A description of the acts or omissions by the CHA that is sufficient to inform the Assistant Secretary of the nature and date of the alleged non-compliance; and
- A complainant may provide information to be contained in a complaint by telephone to HUD.

Amendment of Complaint

Complaints may be reasonably and fairly amended at any time. Such amendments may include, but are not limited to, amendments to cure technical defects or omissions, including failure to sign or affirm a complaint, to clarify or amplify the allegations in a complaint, or to join additional or substitute respondents. Except for the purposes of notifying respondents, amended complaints will be considered as having been made as of the original filing date.

Resolution of complaint by the CHA

1. Within ten (10) days of a timely filing of a complaint, that contains complete information, HUD shall determine whether the complainant alleges an action or omission by a recipient or the recipient's contractor that if proven qualifies as noncompliance with Section 3. If a determination is made that there is an allegation of noncompliance with Section 3, the complaint shall be sent to the recipient for resolution.
2. If the CHA believes that the complaint lacks merit, the CHA must notify the Assistant Secretary, in writing, of this recommendation with supporting reasons, within thirty (30) days of the date of receipt of the complaint. The determination that a complaint lacks merit is reserved to the Assistant Secretary.

3. If the CHA determines that there is merit to the complaint, the CHA will have sixty (60) days from the date of receipt of the complaint to resolve the matter with the complainant. At the expiration of the sixty (60) day period, the CHA must notify the Assistant Secretary in writing whether a resolution of the complaint has been reached. If resolution has been reached, the notification must be signed by both the CHA and the complainant, and must summarize the terms of the resolution reached between the two parties.
4. Any request for an extension of the sixty (60) day period by the recipient must be submitted in writing to the Assistant Secretary, and must include a statement explaining the need for the extension.
5. If the recipient is unable to resolve the complaint within the sixty (60) day period (or more if extended by the Assistant Secretary), the complaint shall be referred to the Assistant Secretary for handling.

Judicial relief: Nothing in this procedure precludes a Section 3 resident or Section 3 business concerning from exercising the right, which may otherwise be available, to seek redress directly through judicial procedures.

VIII. DEPARTMENTAL RESPONSIBILITIES

Every CHA department has a role and responsibilities in ensuring that these courses of action are successfully pursued. The Resident Services department will have the lead responsibility for this effort. The Executive Administration, Human Resources, Division of Asset Management and Modernization Coordinator personnel also have key functions in implementing the Section 3 Plan at CHA.

Chief Executive Officer

Duties and Responsibilities:

- Require each CHA department to submit a Section 3 hiring and training projection from each department supervisor with annual budget. Projections will indicate the number of new CHA and contract positions that are anticipated to be made available to qualified Section 3 residents during the fiscal year.
- Monitor CHA department compliance with Section 3 goals and objectives.

Human Resources

Duties and Responsibilities:

- Implement procedures designed to notify resident's employment opportunities within the CHA.
- Document Section 3 hiring within the CHA.
- Incorporate Section 3 hiring goals and procedures into the CHA Personnel Policy.
- Notify various departments working with resident initiatives of vacant positions within the CHA.
- Provide to the Section 3 Coordinator a monthly list of positions filled and indicate which of the new hires are residents of CHA public housing communities.

Division of Asset Management

Duties and Responsibilities:

- Ensure every invitation for Bid or Request for Proposal or Request for Qualifications includes compliant Section 3 notification language.
- To the greatest extent feasible ensure qualified Section 3 businesses are aware of the requirement that they be certified prior to their signing of a contract with the CHA. The Finance Department maintains a current list of certified Section 3 businesses and their capabilities.

- Provide every potential CHA contractor a current list of Section 3 businesses and is aware of the systems that CHA has in place to facilitate the hiring of qualified Section 3 residents (as defined in 24 CFR, Part 135).
- In evaluating bids and proposals, ensure that the lead contractor made best efforts to include qualified Section 3 businesses for at least 10% (for building related contracts) or 3% (all other contracts) of the dollar amount of the contract
- Immediately upon execution of the contracts in excess of \$25,000, require the contractor to submit a schedule of expected new hires for each project to the Section 3 Coordinator.
- Require every contractor to submit accurate biweekly reports on new hires and certified payrolls once the contracted scope is underway to the Modernization Coordinator.
- Ensure files and data are maintained to document CHA compliance with Section 3 requirements in contracting and employment, and the required annual performance reports are submitted to HUD.
- Prepare and submit Annual construction activity projections and regular updates to Resident Services so that a sufficient pool of residents can be trained and prepared for the projected contracting vacancies.
- Ensure construction draws are not approved unless all biweekly hiring reports and payrolls are submitted and complete.

Resident Services

Duties and Responsibilities:

- Conduct outreach and recruiting efforts that refer residents to the Section 3 Coordinator.
- Provide ongoing training and assessments for residents in the areas of projected hiring needs to qualify residents to fill projected CHA vacancies.
- Maintain postings of all vacancy announcements at multiple locations, including every CHA public housing community and all CHA sponsored training sites.
- Coordinate outreach activities, such as job fairs, to promote awareness of Section 3 opportunities.
- Provide technical support to residents through a planned process of providing job training opportunities and/or referrals.
- Work with Section 3 clients in enrolling in classroom and on-the-job training programs in a variety of construction related training and apprenticeship programs.

- Lead the CHA's effort to foster and strengthen partnerships with outside agencies for collaborative efforts to maximize training, employment, and business development opportunities for public housing residents.
- Coordinate efforts to remove barriers to employment faced by public housing residents in areas of day care, transportation, education, and employability skills development.

Section 3 Coordinator Responsibilities

The Section 3 Coordinator will work with all CHA internal departments, contractors, Section 3 business owners, members of the community, residents and resident councils to coordinate and monitor all activities that contribute to Section 3 compliance. The Section 3 Coordinator will:

1. Ensure compliance with Section 3 based on Columbia Housing Authority Section 3 Policy and HUD regulations.
2. Prepare and submit to HUD the Section 3 Annual Summary Report (Form HUD60002) in a timely manner and maintain all copies of submissions and supporting documents for audit purposes.
3. Monitor and evaluate resident, contractor and subcontractor on their Section 3 efforts, and work to ensure contractors meet the contract Section 3 compliance goals.
4. Assist contractors, managers and public officials as required with Section 3 Program efforts.
5. Research, prepare and coordinate all responses to outside independent auditors on the Section 3 initiatives and reports.
6. Develop and monitor implementation procedures to maintain required compliance with CHA policies and other applicable rules and regulations.
7. Attend technical workshops and other sessions and provide summaries, updates, suggestions and procedural changes for new regulations.
8. Develop and maintain the reference library for compliance with Section 3 Program regulations.
9. Day to day management of activities associated with the Section 3 program to include meetings with modernization coordinator and contractors about performance under the Policy and residents about program participation.
10. Research Section 3 best practices and make recommendations regarding procedures and activities.
11. Document all activities undertaken by the CHA to further its Section 3 Policy and maintain such documentation for audit purposes.

12. When feasible require “first source” hiring agreements with all CHA contractors where the hiring of Section 3 Residents will serve as the first source to fill available positions.
13. Coordinate all departmental efforts to establish one point of contact and responsibility for the Section 3 program.
14. Review and approve Section 3 good faith compliance plan submitted by contractors prior to contract award