

St. Johns County

Community Development Block Grant — Disaster Recovery

Section 3 Policies and Procedures

February 6, 2019
Revised April 12, 2022



TABLE OF CONTENTS

Overview	3
Version History	3
Version Policy	3
Purpose	3
Section 3 Applicability	4
Section 3 Goals	5
Section 3 Definitions	5
Section 3 Hiring Policy	6
Section 3 Business Opportunity Policy	7
Required Contract Language And Certification of Bidder(s).....	7
Additional Outreach and Training Efforts	7
DOcumenting Section 3 Efforts.....	7
Enforcement – Complaints and Compliance Reviews (Pursuant to Section 135.76).....	8
Scope of Section 3 Policy	8
Appendices	9
Appendix 1 – Sample Section 3 Resident Certification Form	9
Appendix 2 – Sample Certification, Section 3 Business	11
Appendix 3 - Contract Clause for Covered Contracts	12
Appendix 4 – Sample Contractors’ Section 3 Compliance Form	13
Appendix 5 – Section 3 Summary Report	16

OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) allocated Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of Florida to be distributed in federally-declared disaster counties impacted by Hurricanes Hermine and Matthew for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code (U.S.C) 5301 et seq.) and described in the State of Florida Action Plan for Disaster Recovery.

HUD allocated \$89,632,120 in CDBG-DR funding for recovery programs in St. Johns County (SJC). St. Johns County has entered into an agreement with Florida Department of Economic Opportunity (agreement # H2338) to administer these disaster recovery funds.

Allocations, waivers, and alternative requirements applicable to this funding were published in the Federal Register on August 7, 2017 at 82 FR 38812; January 18, 2017 at 82 FR 5591; and November 21, 2016 at 81 FR 83254.

VERSION HISTORY

Version	Date	Page	Description
#1	02/06/2019	NA	NA
#2	09/26/2019	NA	NA
#3	04/12/2022	NA	NA

VERSION POLICY

Version history is tracked in the table above, with notes regarding version changes. The date of each publication is also tracked in this table. The first version of this document is 1.0.

Substantive changes within this document that reflect a policy change will result in the issuance of a new version 2.0, an increase in the primary version number. Future policy changes will result in additional revision and issuance of a new primary version number.

Non-substantive changes within this document that do not affect the interpretation or applicability of the policy (such as minor editing or clarification of existing policy) will be included in minor version updates denoted by a sequential number increase after the primary version number.

PURPOSE

Section 3 of the Housing and Urban Development Act of 1968 is intended to ensure that, to the extent feasible, low- and very low-income persons receive benefit in employment and related economic opportunities when such opportunities are generated by funding from the HUD. It also specifically encourages economic opportunities for households who are recipients of

government assistance for housing. The Section 3 program requires that recipients of HUD CDBG-DR funds, to the greatest extent feasible, provide (a) employment and training, and (b) contracting opportunities for low- or very-low income residents in connection with construction projects in their neighborhoods.

SECTION 3 APPLICABILITY

Projects for which Section 3 Compliance is Required

Section 3 is triggered when the award of CDBG-DR funds for new construction and rehabilitation projects creates the need for new employment, contracting, or training opportunities.

Section 3 requirements that apply to CDBG-DR Programs:

- Section 3 applies to St. Johns County, as a subrecipient of the Florida Department of Economic Opportunity (DEO), as well as to any subrecipients receiving HUD funding exceeding \$200,000. Whenever any portion of HUD funding is invested into projects involving housing construction, demolition, or rehabilitation, commercial/private improvements for economic development, or other public construction (e.g., roads, sewers, community centers, and public facilities), the requirements of Section 3 may apply, based on the guidance provided below.

Section 3 requirements that apply to CDBG-DR Projects:

In conjunction with construction activity, Section 3 applies to projects that are fully or partially funded with CDBG-DR assistance, including projects that are financed in conjunction with state, local or private matching or leveraged funds, provided that the Section 3 monetary threshold requirements are met. In particular:

- In conjunction with construction activities, Section 3 applies to contractors or subcontractors that receive contracts in excess of \$100,000 for Section 3 covered projects/activities. Once it is determined that Section 3 applies to a project, the requirements apply to all contracts for construction work arising in connection with that project exceeding \$100,000, including those not funded with CDBG-DR assistance. Contractors or subcontractors are required to comply with the Section 3 regulations in the same manner as the State; and
- “Section 3 covered contract” includes professional service contracts, provided that the work to be performed is generated by the expenditure of funds in furtherance of Section 3 covered work (e.g., housing construction, housing rehabilitation and other public construction), arising in connection with construction projects. Professional service contracts that may constitute Section 3 “covered contracts” include construction contract oversight, engineering, architectural, environmental, and property evaluation, construction progress and construction draw inspection, and prevailing wage labor compliance.

The regulations should not be construed to mean that recipients are required to hire Section 3 residents or award contracts to Section 3 businesses other than what is needed to complete covered projects and activities. If the expenditure of funding for an otherwise covered project and activity does not result in new employment, contracting, or training opportunities, reporting is still required. Recipients are not required to hire or enter into contracts with Section 3 residents

or business concerns simply to meet the Section 3 goals, as anyone selected for contracting or employment opportunities must meet the qualifications for the job/contract being sought.

The County will apply Section 3 criteria and standards to “covered activities” within the following programs:

- Housing Recovery Program
 - Homeowner Voluntary Buyout and Acquisition
 - Homeowner Repair
 - Homeowner Reconstruction
 - Homeowner Elevation
 - Homeowner MHU Replacement
- State Road 207 Supportive Housing Initiative Planned Unit Development (PUD) Rental Housing Project
- State Road 207 Unified Service Center (Public Facilities)
- Infrastructure Program: Infrastructure Recovery Program

SECTION 3 GOALS

The County will attempt to meet the Section 3 HUD numerical goals found at 24 CFR Part 135.30:

- Thirty percent (30%) of the aggregate number of new hires are Section 3 residents;
- Ten percent (10%) of the total dollar amount of all covered construction contracts are awarded to Section 3 business concerns; and
- Three percent (3%) of the total dollar amount of all covered non-construction contracts are awarded to Section 3 business concerns. Non-construction contracts may include, but not be limited to, accounting, payroll, bookkeeping, purchasing, data processing, marketing, printing, environmental, architectural/engineering, and related.

If the County awards CDBG-DR funds to units of local government, nonprofit organizations, subrecipients, or other funded entities, the County will require that the minimum numerical goals set forth at 24 CFR Part 135.30 be met for all covered projects or programs. The County will inform its subrecipients, contractors, and other funded entities of the requirements of Section 3, assist them and their contractors with achieving compliance, and monitor their performance with respect to the Section 3 objectives and requirements.

SECTION 3 DEFINITIONS

Section 3 Residents

A “Section 3 resident” is: 1) a public housing resident; or 2) a low- or very low-income person, as further defined, residing in the metropolitan statistical area or non-metropolitan county in which federal funds that implicate Section 3 are expended. An individual is eligible to be considered a “Section 3 resident” if the annual wages or salary of the person is at, or under, 80% Area Median Income (“AMI”) for a one-person family for the jurisdiction.

The County recognizes the importance of ensuring that low- and very-low income residents benefit from CDBG-DR projects built in their communities. Therefore, contractors are likewise expected to demonstrate, through their implementation actions, that Section 3-eligible residents are included in their hiring goals and are indeed beneficiaries of hiring policies and practices.

Where possible, preference shall be provided a priority consideration in the following order:

- Section 3 residents who live in the neighborhood of the project;
- Participants in HUD Youthbuild programs; and
- Other Section 3 residents, including residents of the metropolitan area or non-metropolitan county.

Section 3 Business Concerns

A Section 3 eligible business concern is a business that can provide evidence it meets one of the following:

- 51 percent (51%) or more of the business is owned by Section 3 residents; or
- At least thirty percent (30%) of the business's full-time employees include persons who are currently Section 3 residents, or within three (3) years of the date of first employment with the business concern were Section 3 residents; or
- Evidence, as required, of a commitment by the business to subcontract in excess of twenty-five percent (25%) of the dollar award of all subcontracts to be awarded to business concerns that meet the qualifications in the above two paragraphs.

Where possible, priority consideration will be given to the following businesses (in the following order):

- Section 3 business concerns that provide economic opportunities for Section 3 residents in the neighborhood of the project;
- Applicants selected to carry out HUD Youthbuild programs; and
- Other Section 3 businesses.

SECTION 3 HIRING POLICY

Under the County's Section 3 Policy, subrecipients, contractors, and subcontractors are contractually obligated to:

1. Conduct employment outreach to community-based agencies such as community action agencies, and local Housing Authorities for all new hires.
2. Accept and give preferential employment consideration to referred Section 3 eligible residents who are qualified for the positions available.
3. Provide appropriate employment outreach signage at the project site and throughout the project area to inform low- and very-low neighborhood residents of employment opportunities.
4. Distribute employment outreach flyers throughout the project community and with community-based organizations and Housing Authorities regarding employment opportunities.

5. Contact local Workforce Investment Boards (WIB) to market the availability of jobs.

The County, including contractors and subcontractors, must certify low- and very-low income persons as “Section 3 eligible”. “Appendix 1” provides a sample certification form. These requirements will also apply to any funded entities, such as “construction contract managers” who are engaged to oversee and manage any CDBG-DR funded projects that are considered “Section 3 covered contracts.”

SECTION 3 BUSINESS OPPORTUNITY POLICY

The County is committed to ensuring that designated Section 3-eligible business concerns derive economic benefit from HUD-assisted projects built in their communities. Subrecipients, contractors, subcontractors are likewise expected to demonstrate that Section 3 certified business concerns are included in the contracting goals and are economic beneficiaries of business and procurement policies and practices. Section 3 eligible business concerns must be given priority in contracting for appropriate work.

To be eligible for Disadvantaged Business Enterprise (DBE) certification, the business must be a small business as defined by the Small Business Administration standards and be 51% owned and controlled by one or more socially and economically disadvantaged individuals, based on Small Business Administration (SBA) standards and definitions. Further, per U.S. Small Business Administration guidelines, African Americans, Hispanics, Native Americans, Asian-Pacific Islanders, Subcontinent Asian Americans, and women are presumed to be socially and economically disadvantaged.

The County, including contractors and subcontractors, must document outreach efforts related to Section 3-eligible business concerns. The County, including contractors and subcontractors, must also certify businesses/subcontractors as “Section 3 eligible.” See *Appendix 2* for a certification to be submitted by a business indicating its Section 3 status.

REQUIRED CONTRACT LANGUAGE AND CERTIFICATION OF BIDDER(S)

The County and its covered contractors are required to notify potential contractors/subcontractors of the Section 3 requirements, and must incorporate the Section 3 clause in all solicitations and contracts (*Appendix 3*).

ADDITIONAL OUTREACH AND TRAINING EFFORTS

The County also recognizes that outreach, training, and education are critical components of a successful Section 3 strategy.

DOCUMENTING SECTION 3 EFFORTS

The County will complete and submit regular reports in the form and manner required by Florida DEO.

The County will take steps to receive and maintain records to document compliance with the Section 3 program objectives. Such records will include specific information and that a subrecipient, contractor and subcontractor carried out responsibilities properly. The Contracting Compliance Report (*Appendix 4*) is due from each contractor on a monthly basis

and the Section 3 Summary Report is due from main contractors on a quarterly basis (*Appendix 5*).

ENFORCEMENT – COMPLAINTS AND COMPLIANCE REVIEWS (PURSUANT TO SECTION 135.76)

Any Section 3 resident or business may file a complaint alleging noncompliance with Section 3 by a subrecipient, contractors, and subcontractors. Complaints will be investigated by the County; if appropriate, voluntary resolutions will be sought.

The complainant shall have appeal rights to the Secretary of the U.S. Department of Housing and Urban Development concerning any agency decision. Section 3 residents and businesses may also seek judicial relief. Complaints must be submitted to HUD within one hundred and eighty (180) days of the action or omission upon which the complaints based. Complaints are to be filed in writing title the local Fair Housing and Equal Opportunity (FHEO) office or the Assistant Secretary for Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development, 451 Seventh Street, SW, Room 5100, Washington, DC 20410-2000

A written complaint must contain:

- Name and address of the person filing the complaint;
- Name and address of the subject of complaint (HUD Recipient or Contractor);
- Description of acts or omissions in alleged violation of Section 3; and
- Statement of corrective actions sought.

Written complaints should be filed with:

Name: Joe Giammanco
Title: Director, Disaster Recovery and Grants
Address: 500 San Sebastian View
St. Augustine, Florida 32084

Upon receipt of a written complaint, the County will designate person(s) to investigate the specific allegations of the complaint and render a finding. If it is determined that the subrecipient/contractor/subcontractor has functioned in such a manner as to breach the contractual obligations of the approved Section 3 Plan, the County will be notified of such findings and of the corrective measures that will be required. The County will respond to the complainant.

Complaint procedures are included in the County’s Complaint and Appeal Process.

Any Section 3 resident or business may file a complaint alleging noncompliance with Section 3 by a subrecipient, contractor, or subcontractor. Complaints will be investigated by the County.

SCOPE OF SECTION 3 POLICY

This document describes the steps to be taken by the County, in connection with the use of CDBG funds, to comply with Section 3 of the Housing and Community Development Act of 1968 (as amended, 12 U.S.C. 1701u). For purposes of Section 3 compliance, nothing in this document should be construed to neither expand the scope of Section 3 nor constitute an agreement by the County to undertake processes or procedures beyond those required to satisfy Section 3.

APPENDICES

Appendix 1 – Sample Section 3 Resident Certification Form

RESIDENT EMPLOYMENT OPPORTUNITY DATA

Eligibility for Preference

A Section 3 resident seeking the preference in training and employment provided by this part shall certify, or submit evidence to the recipient contractor or subcontractor, if requested, that the person is a Section 3 resident, as defined in 24 CFR Part 135.5. (An example of evidence of eligibility for the preference is evidence of receipt of public assistance, or evidence of participation in a public assistance program.)

Certification for Resident Seeking Section 3 Preference in Training and Employment

I, _____, am a legal resident of the _____
_____ and meet the income eligibility guidelines for a
low- or very-low-income person.

My permanent address is: _____

I have attached the following documentation as evidence of my status:

- | | |
|--|---|
| <input type="checkbox"/> Copy of lease | <input type="checkbox"/> Copy of receipt of public assistance |
| <input type="checkbox"/> Copy of Evidence of participation | <input type="checkbox"/> Other evidence |

(signature)

(Date)

Printed name

Section 3 Resident Certification Page 2

SECTION 3 INCOME LIMITS

All residents of public housing developments of the _____ Housing Authority qualify as Section 3 residents.

Additionally, individuals residing in the _____ (City/County) of _____ who meet the income limits set forth below, can also qualify for Section 3 status.

A picture identification card and proof of current residency is required.

Eligibility Guideline

Number in Household	Very Low Income	Low Income
1 individual		
2 individuals		
3 individuals		
4 individuals		
5 individuals		
6 individuals		
7 individuals		
8 individuals		

Appendix 2 – Sample Certification, Section 3 Business

CERTIFICATION FOR BUSINESS CONCERNS SEEKING SECTION 3 PREFERENCE IN CONTRACTING AND DEMONSTRATION OF CAPABILITY

Name of Business _____

Address of Business _____

Type of Business: Corporation Partnership Sole Proprietorship Joint Venture

Attached is the following documentation as evidence of status:

For Business claiming status as a Section 3 resident-owned enterprise:

- Copy of resident lease Copy of receipt of public assistance
 Copy of evidence of participation in a public assistance program Other evidence

For business entity as applicable:

- Copy of Articles of Incorporation
 Certificate of Good Standing
 Assumed Business Name Certificate
 Partnership Agreement
 List of owners/stockholders and % ownership of each
 Corporation Annual Report
 Latest Board minutes appointing officers
 Organization chart with names and titles and brief function statement
 Additional documentation

For business claiming Section 3 status by subcontracting 25 percent of the dollar awarded to qualified Section 3 business:

- List of subcontracted Section 3 business(es) and subcontract amount

For business claiming Section 3 status, claiming at least 30 percent of their workforce are currently Section 3 residents or were Section 3 eligible residents within 3 years of date of first employment with the business:

- List of all current full-time employees List of employees claiming Section 3 status
 PHA/IHA Residential lease less than 3 years from date of employment Other evidence of Section 3 status less than 3 years from date of employment

Evidence of ability to perform successfully under the terms and conditions of the proposed contract:

- Current financial statement
 Statement of ability to comply with public policy
 List of owned equipment
 List of all contracts for the past two years

(Corporate Seal)

Authorizing Name and Signature

Attested by: _____

Appendix 3 - Contract Clause for Covered Contracts

A. The Work to be performed under this Contract is part of a project assisted under a program providing direct federal financial assistance from the U.S. Department of Housing and Urban Development (HUD) and is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701). Section 3 requires that to the greatest extent feasible, opportunities for training and employment be given to low- and very low-income residents of the project area, and that contracts for work in connection with the project be awarded to business concerns that provide economic opportunities to low- and very low-income persons residing in the metropolitan area in which the project is located.

B. The parties to this Contract agree to comply with the requirements of 24 C.F.R. Part 135, which implement Section 3. As evidenced by their execution of this agreement, the parties certify that they are under no impediment what would prevent them from complying with these requirements.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR Part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR Part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR Part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR Part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR Part 135.

F. Noncompliance with HUD's regulations in 24 CFR Part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD-assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

Appendix 4 – Sample Contractors’ Section 3 Compliance Form



CONTRACTORS’ COMPLIANCE FORM – SECTION 3

Contractor and all subcontractor(s) must sign, date and deliver this form monthly to the project’s Contract Manager.

Project Name _____

Project Location _____

For the Month of _____

I. Hiring

___ I have NOT hired any new employees during the month specified.

___ I have hired ___ Section 3 employees, and/or ___ non-Section 3 employees during the month.

II. Recruitment

___ I have advertised to fill vacancy(ies) at the site(s) where work is taking place, in connection with this project. Below, I have checked the steps I have taken to find Section 3 low-income residents, from the targeted groups and neighborhoods, to fill any vacancies.

___ Placed signs or posters in prominent places at project site(s).

___ Taken photographs of the above item to document that the above step was carried out.

___ Distributed employment flyers to the administrative office of the local Public Housing

Authority.

___ Kept a log of all applicants and indicated reasons why Section 3 residents who applied were not hired.

___ Retained copies of any employment applications completed by Section 3 residents.

III. Verification

___ I have attached proof of all checked items.

I hereby certify that the above information is true and correct.

Date _____

Signature _____

Title _____

Business _____



Florida Department of Economic Opportunity | Caldwell Building |
107 E. Madison Street | Tallahassee, FL 32399
850.245.7105 | www.FloridaJobs.org
www.twitter.com/FLDEO | www.facebook.com/FLDEO

An equal opportunity employer/program. Auxiliary aids and service are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TTD equipment via the Florida Relay Service at 711.



Section 3 Summary Report Part 2

1. Construction Contracts	HUD Amount	Leveraged Amount	Total (HUD Amount + Leveraged Amount)
A. Total dollar amount of construction contracts awarded with covered funds expended during the reporting period			
B. Total dollar amount of contracts awarded to Section 3 businesses during the reporting period			
C. Percentage of the total dollar amount of construction contracts that were awarded to Section 3 businesses during the reporting period (i.e., Item B/ Item A= %)			
D. Total number of Section 3 businesses receiving construction contracts during the reporting period			
2. Non-Construction Contracts			
A. Total dollar amount of non-construction contracts awarded with covered funds expended during the reporting period			
B. Total dollar amount of non-contracts awarded to Section 3 businesses during the reporting period			
C. Percentage of the total dollar amount of non-construction contracts that were awarded to Section 3 businesses during the reporting period (i.e., Item B/ Item A= %)			
D. Total number of Section 3 businesses receiving non-construction contracts during the reporting period			

Section 3 Summary Report Part 3

E. Part III: Summary of Efforts

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low-and very low-income persons, particularly those who are recipients of government assistance for housing. (Check all that apply and maintain copies of all documentation as evidence of the actions checked below)

- Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contracts with the community organizations and public or private agencies operating within the metropolitan area (or nonmetropolitan county) in which the Section 3 covered program or project is located, or similar methods.
- Participated in a HUD program or other program which promotes the training or employment of Section 3 residents.
- Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concerns.
- Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located.
- Entered into "first source" hiring agreements with organizations representing Section 3 residents.
- Established training programs, which are consistent with the requirements of the Department of Labor.
- Posted job postings within public housing developments(s) for employment opportunities available which identify the positions to be filled, the qualifications required, and where to obtain additional information about the application process.
- Advertised and/or issued print or electronic notices of employment opportunities to Section 3 residents.
- Advertised the jobs to be filled through the local media, such as community television networks, newspapers of general circulation, and/or radio advertising.
- Contacted public housing resident councils, resident management corporations, or other resident organizations, to request the assistance of these organizations in notifying Section 3 residents of the training and employment positions to be filled.
- Provided contractors a list of Work force development, social service, community based organizations, etc. that the recipient contacted to assist them with notifying Section 3 residents about employment and training opportunities.
- Initiated targeted community group meetings and mailings to recruit/attract Section 3 residents and Section 3 businesses.
- Conducted speaking presentations and or trainings to Section 3 residents and/or businesses.
- Employed Section 3 residents directly on either a permanent or a temporary basis to perform work generated by Section 3 assistance ("force account labor").
- Maintained a file of eligible qualified Section 3 residents for future employment positions.
- Utilized Payroll Certification, Worker Utilization Forms, and other types of data to identify potential employment and contracting opportunities.
- Maintained documentation of training provided to Section 3 residents.
- Provided contractors a list of Section 3 Residents that applied for jobs that were advertised (name, address and phone numbers).
- Contacted business development agencies, minority contractors associations, chambers of commerce, local Small Business Administration (SBA) and/or other similar community organizations to request their assistance in identifying section 3 businesses to be notified about HUD funded contracts.
- Used HUD's Section 3 Business Registry to locate local Section 3 businesses.
- Advertised and/or issued print or electronic notices of contracting opportunities to prospective Section 3 businesses.
- Provided contractors a list of Section 3 businesses to be notified about subcontracting opportunities (names, address and phone numbers).
- Advertised contracting opportunities by posting notices, which provide general information about the work to be contracted and where to obtain additional information at job sites.
- Initiated targeted community business group meetings and mailings to notify Section 3 business of contracting opportunities.
- Other efforts to achieve compliance (Please describe below).

Describe other Efforts to achieve compliance:

Covered Recipients are required to either meet all three minimum numerical goals for employment and contracting (see below), or provide a description of the steps taken to meet the goals, barriers encountered, and actions that will be taken to address them. If your agency failed to meet all three Section 3 minimum numerical goals, please provide an explanation: