FORM 4 – DOCUMENTATION OF QUALITATIVE EFFORTS

This form is required for all Section 3‐triggered projects (over $200,000) and must be submitted with bid or application for funding, as well as with all quarterly or final compliance reports that indicate numeric goals were not met. Please fill out this form completely. Attach additional pages if needed. Instructions to complete this form are included at the end of the form.

*Instructions for Section 3 Coordinator: Review efforts undertaken by the contractor prior to contract execution to bring on subcontractors certifying as Section 3 Businesses. This provides a baseline to track efforts to ensure successful reporting of Section 3 benchmarks. Review qualitative efforts performed on quarterly basis and report within the DRGR QPR. Review final compliance report to summarize qualitative efforts for final QPR in DRGR.*

|  |  |  |  |
| --- | --- | --- | --- |
| Project Name | Contract Execution Date | Construction Start Date | Today’s Date |
|  |  |  |  |

1. Describe all 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, to Section 3 workers. Attach additional pages if needed.

Attach supporting documentation such as:

* + Copies of all publications, notices, pictures of posted notices, and other outreach materials.
  + List of all Section 3 workers that responded to your outreach efforts (e.g., submitted job applications, phone logs, etc.); were any of them hired? If not, please explain why.

1. Describe all efforts made to notify Section 3 businesses of any subcontracting opportunities generated by HUD financial assistance for this project, to the greatest extent feasible. Attach additional pages if needed.

Attach supporting documentation such as:

* + Section 3 Business List used in solicitation. Must have been provided by [Grantee or Subrecipient Name] prior to solicitation and should be no more than 30 days old at the time of solicitation.
  + List of Section 3 business included in solicitation and documentation of efforts (emails, letters, phone, logs, etc.).
  + List of Section 3 businesses that responded to your solicitation and/or outreach efforts; were any of them hired? If not, please explain why.
  + Copies of all publications, notices, pictures of posted notices, and any other outreach material utilized.

FORM 4 – DOCUMENTATION OF QUALITATIVE EFFORTS (CONTINUED)

1. Describe all additional qualitative efforts made to comply with Section 3 requirements. See below for examples. Attach all applicable supporting documentation.
2. If there are employment opportunities associated with your project, include a draft of the proposed signage. Section 3 signage should be posted at the construction site. Signage must be large enough to be visible from the street. The sign must (a) identify the name of the project, (b) state the project is a HUD Section 3 Project, and (c) include the name, phone number and email address of an appropriate point of contact regarding employment opportunities.

Examples of Qualitative Efforts

* Engage in outreach efforts to generate job applicants who are Targeted Section 3 workers
* Provide training or apprenticeship opportunities
* Provide technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)
* Assist or connect Section 3 workers with drafting resumes, preparing for interviews, and finding job opportunities
* Hold one or more job fairs
* Provide or refer Section 3 workers to services supporting work readiness and retention (e.g., work readiness activities, interview clothing, test fees, transportation, childcare)
* Provide assistance to apply for or attend community college, a four‐year educational institution, or vocational/technical training
* Help Section 3 workers to obtain financial literacy training and/or coaching
* Engage in outreach efforts to identify and secure bids from Section 3 business concerns
* Provide technical assistance to help Section 3 business concerns understand and bid on contracts
* Divide contracts into smaller jobs to facilitate participation by Section 3 business concerns
* Provide bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns
* Promote 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
* Other:

**Instructions for completing Form 4 – Qualitative Efforts**

Requirement:

This form is required for all Section 3-triggered projects (over $200,000 provided by HUD financial assistance) and must be submitted with a bid or application for funding. Attach additional pages if needed. The numeric goals for achieving the HUD established benchmark for Section 3 are as follows:

* Section 3 Worker hours = 25 percent of the total of all labor hours performed on the project.
* Targeted Section 3 Workers hours = 5 percent of all labor hours performed on the project.

Contractors and Developers with direct agreements with HCD will submit this form as backup documentation in Grants Network with the required Activity Report. Contractors contracted with HCD’s subrecipient, a local government jurisdiction, will submit required forms to the jurisdiction.

**General Project and Contract Information**

Project Name: Provide the name of the project if applicable and/or indicate the nature of the construction.

Contract Execution Date: Enter the contract execution date for the general/prime contract.

Construction Start Date: Enter the start of construction for the general/prime contract.

Today’s Date: Enter relevant date.

1. Describe all 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, to Section 3 workers. Attach additional pages if needed.

a. A Section 3 Worker is defined in 24 CFR Part 75.5 as:

* Any worker who currently fits or when hired within the past five years fits at least one of the following categories, as documented:
  + The worker’s income for the previous or annualized calendar year is below the income limit established by HUD.
  + The worker is employed by a Section 3 Business Concern, or
  + The worker is a YouthBuild participant.

Note: Targeted Section 3 workers are Section 3 workers meeting the criteria to verify a Section 3 worker or reside in a one-mile radius of the service area or neighborhood of the project.

b. Attach supporting documentation such as:

Copies of all publications, notices, picture of posted notices, and other outreach materials that were used for targeted outreach to provide employment and other economic opportunities to Section 3 workers and Section 3 Business Concerns.

* All completed Section 3 Worker Outreach forms (Form 8) document outreach efforts.

1. Describe all efforts made to notify Section 3 businesses of any subcontracting opportunities generated by HUD financial assistance for this project, to the greatest extent feasible. Attach additional pages if needed.
2. A Section 3 Business Concern is defined as:

* A Business Concern meeting at least one of the following criteria, documented within the last six-month period:
  + It is at least 51 percent owned and controlled by low-or very low-income persons;
  + Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers (see criteria above for Section 3 worker); or
  + It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

1. Attach all supporting documentation such as:

* Section 3 Business List used solicitation (Request assistance from this list from (insert Grantee or Subrecipient).
* Documentation of all efforts (emails, letters, phone logs, etc.)
* List of Section 3 businesses that responded to your solicitation and/or outreach efforts; identify all Section 3 Businesses that were contracted, if you did not contract with them, please explain why.
* Business Outreach forms (Form 7) completed by the potential subcontractor serve as documentation for these outreach efforts.

1. Describe all additional qualitative efforts made to comply with Section 3 requirements. Attach all applicable supporting documentation. Refer to the examples of qualitative efforts listed on the form below:

* Engage in outreach efforts to generate job applicants who are Targeted Section 3 workers
* Provide training or apprenticeship opportunities
* Provide technical assistance to help Section 3 workers compete for jobs (for example, resume assistance, coaching)
* Assist or connect Section 3 workers with drafting resumes, preparing for interviews, and finding job opportunities
* Hold one or more job fairs
* Provide or refer Section 3 workers to services supporting work readiness and retention (for example, work readiness activities, interview clothing, test fees, transportation, childcare)
* Provide assistance to apply for or attend community college, a four-year education institution, or vocational/technical training.
* Help Section 3 workers to obtain financial literacy training and/or coaching.
* Engage in outreach efforts to identify and secure bids from Section 3 Business Concerns.
* Provide bonding assistance, guaranties, or other efforts to support viable bids from Section 3 Business Concerns.
* Promote 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

1. If there are employment opportunities associated with your project, include a draft of the proposed signage.
   1. Section 3 signage should be posted at the construction site. The signage must be large enough to be visible from the street. The sign must:

* Identify the name of the project
* State the project is a HUD Section 3 Project, and
* Include the name, phone number, and email address of an appropriate point of contract regarding employment opportunities.