

SECTION 3 SUB REPORTING FORM & GREATEST EXTENT FEASIBLE EFFORTS CHECKLIST

This document is a tool for the contractors and subcontractors (together, “Subs”) working on a Section 3 Project to report their Section 3 activity. Awardees of HUD funding through New York State Homes & Community Renewal (NYSHCR) (e.g., Developer/Owners, Municipalities or Non-Profit Local Administrators of HUD funds) must ensure that all Subs on a Section 3 Project complete this form each bi-annual reporting period. Awardee will then consolidate these Sub Reporting Forms in their mandatory bi-annual Section 3 reports to NYSHCR. *Supporting documentation for the Greatest Extent Feasible (GEF) Efforts must be provided along with the form.*

Policy Manuals, training and forms are available here: <https://hcr.ny.gov/section-3-compliance>
For further questions: Dinorah Santiago - Section3MWBE@nyshcr.org

Section 3 Goals and Benchmarks:

To comply with Section 3 of the Housing and Urban Development (HUD) Act of 1968, HUD-funded construction & rehab housing projects as well as public construction projects must, *to the greatest extent feasible*, and consistent with federal, state and local laws and regulations, provide hiring and training priorities to low-income persons.

The Section 3 Hiring Benchmark Goals are:

- **25%** of total labor hours for all work on the Project (including by employees of contractors and subcontractors) to be performed by “**Section 3 Workers,**” including;
- **5%** of total labor hours worked by “**Targeted Section 3 Workers.**”

Section 3 Worker:

An individual employed by Awardee or its Subs who works on the Section 3 Project and who currently fits, or when hired within the past 5 years fit, at least one of the following criteria, as documented:

- Their income for the previous or annualized calendar year is categorized as low-income (80% AMI or less per the HUD dataset: <https://www.huduser.gov/portal/datasets/il.html>);
 - NOTE: Residents/recipients of the following benefits are likely to meet the low-income criteria: Medicaid, Public Assistance/TANF, SNAP/Food Stamps, Section 8-assisted housing, Public Housing.
- They are employed by a Section 3 Business (these are also Targeted Section 3 Workers); or
- They are a YouthBuild participant (these are also Targeted Section 3 Workers).

Targeted Section 3 Worker:

A Section 3 Worker who:

- Is employed by a Section 3 Business; or
- Currently fits or when hired within the last 5 years fit at least one of the following categories:
 - Lives within 1 mile of the Project or in areas where there are fewer than 5,000 people within 1 mile, an expanded circle around that Project that encompasses at least 5,000 people; or
 - A YouthBuild participant.

Section 3 Business:

A business that meets at least one of the following criteria, documented within the last 6-month period:

- At least 51 percent owned and controlled by 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; or
- At least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

Total Labor Hours: The number of paid hours worked by persons on a Section 3 Project, including any of the Company’s Subs. Total Labor Hours do not include Professional Services labor hours, which are non-construction services that require an advanced degree of progression licensing including, for example, legal services, financial



consulting, accounting services, environmental assessments, architectural and engineering services. However, Professional Services labor hours can count toward the number of labor hours performed by Section 3/Targeted Section 3 Workers, thereby increasing the percentage of Section/Targeted Section 3 Workers accomplished by the Project.

An NYSHCR-provided Hiring Form and Section 3 Business Certification Form should be used by Awardee and its Subs for all Section 3 hiring and contracting completed on this Project to assist in determining which individuals are Section 3 Workers and businesses are Section 3 Businesses. Forms are available here:

<https://hcr.ny.gov/section-3-compliance#forms---documents>

Section 1: PROJECT AND COMPANY INFORMATION

DATE THIS FORM WAS COMPLETED: [Click here to enter text](#)

1. REPORTING PERIOD: (Check which period this report covers, as communicated to you by your contracting entity):

- Through June 30th of the current year (Mid-year reporting)
- Through December 31 of the prior year (Year-end reporting)
- End of Project
- Other. Explain. [Click here to enter text](#)

NOTE: All reports are cumulative from the commencement of when the Company entered into a contract to begin work on the project or if not available, when the Company began work on the Project.

2. Date this Company Commenced Work on the Project: [Click here to enter text.](#)

3. Project Name: [Click here to enter text](#)

Project Address: [Click here to enter text.](#)

4. Company Filling Out this Form: [Click here to enter text.](#)

Name of Contact & Title of Person: [Click here to enter text.](#)

Address: [Click here to enter text.](#)

Phone Number: [Click here to enter text.](#)

Email Address: [Click here to enter text.](#)

5. This Company is the (check all that apply) of the Project:

<input type="checkbox"/> Developer	<input type="checkbox"/> Professional Services Provider (e.g. civil engineer, architect, financial consultant, accountant, lawyer, environmental assessment or other services that require advanced degree or professional license. (See Note in definition, above, about Professional Services Labor Hours)
<input type="checkbox"/> Owner	
<input type="checkbox"/> General Contractor	
<input type="checkbox"/> Subcontractor	

6. Type of Work Performed on the Project: [Click here to enter text.](#)

7. Section 3 Coordinator for Company:

Name of Contact & Title: [Click here to enter text.](#)

Company: [Click here to enter text.](#)

Address: [Click here to enter text.](#)

Phone Number: [Click here to enter text.](#)

Email Address: [Click here to enter text.](#)

8. Are you a Section 3 Business? [Click here to enter text.](#)

If YES, provide a Section 3 Business Certification Form, available here: <https://hcr.ny.gov/S3BusinessSelfCert>

9. Section 3 Businesses: List the Name, Location, Contact Information, Date of Contract and Type of Work performed



for any Section 3 Business your Company or any of your Subs contracted with during the Reporting Period.
[Click here to enter text.](#)

Space for Explanation (if necessary):
[Click here to enter text.](#)

Section 2: SECTION 3 UTILIZATION REPORTING

Since the Company's work commenced on the Project and through the Reporting Date communicated to you (either mid-year, year-end or Project Completion), complete the following (SEE DEFINITIONS, ABOVE):

- A. Total Paid Labor Hours worked by Company's staff on the Project:** [Click here to enter text.](#)
(Note: Does not include Professional Services Labor Hours)
- B. Total Section 3 Worker Hours: (Goal of 25% of amount in A):** [Click here to enter text.](#)
(Note: May include Professional Services Labor Hours that are Section 3 Worker Hours)
- C. Total Targeted Section 3 Worker Hours (Goal of 5% of amount in A):** [Click here to enter text.](#)
(Note: The 5% in item C is part of the 25% in item B)

Section 3: MANDATORY MINIMUM REQUIRED SECTION 3 EFFORTS

The following items are required for all Projects, Awardees and Subs on Section 3 Projects. Completion of these efforts are minimum mandatory efforts and do not, by themselves, meet the "Greatest Extent Feasible Efforts" for the Section 3 standard.

Confirm (by checking boxes) that each of these are completed and include a narrative in the additional space for anything not completed. Include documentation verifying these efforts.

- A. Company has assigned a Section 3 Coordinator who is be responsible for reporting and documenting the total labor hours, Section 3 labor hours and greatest extent feasible efforts undertaken by Company and its Subs (if any).
- B. All hiring and contracting includes prioritization for Section 3 Workers and Section 3 Businesses, consistent with other state and federal laws.
- C. The Section 3 Contract Clause is used in all contracts for construction work on the Project.
- D. All Companies' Subs (if any) working on the Project completed Section 3 "Sub-Reporting and Greatest Extent Feasible Checklist" form (which this form now consolidates).
- E. Company and Subs completed and collected verification of Section 3 Worker status using the HCR Hiring Form, available here: <https://hcr.ny.gov/section-3-compliance#forms---documents>.
- F. Company and Subs collected Business Certification forms for Section 3 Businesses that it contracted with. Form available here: <https://hcr.ny.gov/S3BusinessSelfCert>
- G. All solicitations/requests for contractors and subcontractors by Company includes this language: "This is a HUD Section 3 Project with contracting priorities for businesses that are hired or owned by low-income persons."
- H. All job descriptions and job postings for work to be done on the Project by Company and its Subs includes this language, "This is a HUD Section 3 Project with hiring priorities for low-income persons."
- I. Contracting opportunities for work to be done on the Project by Company were posted on the New York State Contract Reporter here: <https://www.nyscr.ny.gov/advertise.cfm>
- J. All job descriptions and job postings for work to be done on the Project by Company were posted on the New York State Job Bank here: <https://newyork.usnlx.com/>

K. Company contacted NYS Department of Labor Career Center(s) for the region in which the Project is located to notify them about the Project, the jobs that are made available and a contact person at the Project in charge of hiring. A list of Career Centers can be found here: <https://dol.ny.gov/career-centers>. Describe, list dates and provide documentation.

1. _____ 2. _____

L. Company contacted the closest YouthBuild organization(s) with job availabilities for the Project. YouthBuild programs found here: <https://youthbuild.org/our-programs/#map>. Describe, list dates and provide documentation.

1. _____ 2. _____

M. Company contacted local Public Housing Authorities and/or Section 8 programs located in project area to post work opportunities on community bulletin boards and newsletters. Local PHAs are listed here: https://www.hud.gov/program_offices/public_indian_housing/pha/contacts. Describe, list dates and provide documentation

1. _____ 3. _____
2. _____ 4. _____

N. Project has a sign visible from the street that identifies the name of the project, provides the contractor and/or Section 3 Coordinators contact information and states: "This is a HUD Section 3 Project with hiring and contracting priorities for low-income persons and business that hire or are owned by them.

O. Staff at Company that are in charge in hiring and contracting for the Project reviewed the NYSHCR Section 3 Policy Manual, attended a training by HCR or HUD on Section 3 prior to the commencement of construction and attended additional trainings provided by NYSHCR that were advertised to Section 3 Projects. HUD Section 3 training module available here: <https://www.hudexchange.info/trainings/section-3/>. NYSHCR training available here: <https://hcr.ny.gov/section-3-compliance#training>

P. Company has a policy of retaining records related to Section 3 performance and greatest extent feasible efforts, including the Section 3 Hiring Forms for itself and its Subs, for as long as program regulations (e.g. CDBG regulations) require, or where silent, for 3 years after completion of the Project.

ROOM FOR ADDITIONAL EXPLANATION (if necessary):

[Click here to enter text.](#)

Section 4: HIRING EFFORTS

In addition to the mandatory minimum requirements in Section 3, Companies must describe the Greatest Extent Feasible Efforts undertaken by the Company to provide economic opportunities to low-income individuals and the companies that hire or are owned by them.

Examples of Greatest Extent Feasible Efforts for hiring practices include, but are not limited to, the following (Check all that apply and include supporting documentation):

A. Engaged in outreach efforts to generate job applicants who are potential Section 3 Workers and Targeted Section 3 Workers. These efforts can include, but are not limited to, the following:

A.1. Advertised job and training opportunities in local community papers, local media and job boards specifying Section 3 prioritization for low-income individuals. Describe, list dates and provide documentation.

i. _____ iii. _____
ii. _____ iv. _____



A.2. Advertise(d) job and training opportunities on social media specifying Section 3 applicability and tagging local organizations, agencies and elected officials near the project. Describe, list dates and provide documentation (screenshots).

- i. _____ iii. _____
- ii. _____ iv. _____

A.3. Contact(ed) various local community organizations and public or private agencies that serve low-income individuals regarding job and training opportunities (e.g. faith-based organizations, community centers, workforce development agencies, probations/parole agencies, job placement agencies, organizations that serve adult special needs population, homeless shelters, etc.) and provided them with job postings. Describe, list dates and provide documentation (use additional sheets as necessary).

- i. _____ iv. _____
- ii. _____ v. _____
- iii. _____ vi. _____

A.4. Enter(ed) into "first source" or other referral arrangements with agencies and organizations that serve and/or train low-income individuals. Describe, list dates and provide documentation

- i. _____ iii. _____
- ii. _____ iv. _____

A.5. Distributed flyers on job and training opportunities to residents of affordable/public/subsidized housing developments in or near the project. Describe, list dates and provide documentation

- i. _____ iii. _____
- ii. _____ iv. _____

A.6. Contacted resident councils, management companies or other resident organizations of affordable/public/subsidized housing developments in or near the project to notify them of job and training opportunities and seek their help in distributing. Describe, list dates and provide documentation

- i. _____ iii. _____
- ii. _____ iv. _____

A.7. Advertised job and training opportunities by posting in lobbies, doorways and common areas in affordable/public/ subsidized housing developments in or near the project. Describe, list dates and provide documentation.

- i. _____ iii. _____
- ii. _____ iv. _____

A.8. Received applications and/or conducted interviews in affordable/public/subsidized housing developments in or near the project. Describe, list dates and provide documentation.

- i. _____ iii. _____
- ii. _____ iv. _____

A.9. Reached out to local elected officials and community boards with available job and training opportunities to seek their help in distributing job postings. Describe, list dates and provide documentation.

- i. _____ iii. _____



ii. _____ _____	iv. _____ _____
<input type="checkbox"/> A.10. Created an account on HUD’s FHEO Section 3 Opportunity Portal at: https://hudapps.hud.gov/OpportunityPortal and posted hiring opportunities. List positions posted, dates and submit screen shots.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
Quick Guide is available here : https://www.hud.gov/sites/dfiles/FPM/documents/SPEARS-Opportunity-Portal-Quick-Guide-Business.pdf	
<input type="checkbox"/> B. Provided direct on-the-job training or apprenticeship opportunities to low-income individuals/workers. Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> C. Provided indirect training such as arranging for, contracting for or paying tuition for offsite training for low-income workers. Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> D. Provided technical assistance to help Section 3 Workers compete for jobs (e.g. resume assistance, coaching). Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> E. Provided or connected potential Section 3 workers with assistance in seeking employment including: drafting resumes, preparing for interviews, and finding job opportunities connecting public housing/Section 8 residents to job placement services. Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> F. Held or attended as an employer one or more job fairs. Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> G. Provided or connected potential Section 3 Workers to supportive services that can provide direct services or referrals. Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____
<input type="checkbox"/> H. Provided or connected potential Section 3 Workers to services supporting work readiness and retention (e.g., work readiness health screenings, interview clothing, uniforms, test fees, transportation). Describe, list dates and provide documentation.	
1. _____ _____	3. _____ _____
2. _____ _____	4. _____ _____

I. Assisted low-income workers in finding/paying for childcare. Describe and provide documentation.

1. _____ 3. _____
 2. _____ 4. _____

J. Provided assistance to apply for/or attend community college or a four-year educational institution. Describe, list dates and provide documentation.

1. _____ 3. _____
 2. _____ 4. _____

K. Provided assistance to apply for/or attend vocational or technical training. Describe, list dates and provide documentation.

1. _____ 3. _____
 2. _____ 4. _____

L. Assisted Section 3 Workers to obtain financial literacy training and/or coaching. Describe, list dates and provide documentation.

1. _____ 3. _____
 2. _____ 4. _____

M. Provided or connected potential Section 3 Workers with training on computer use or online technologies.

1. _____ 3. _____
 2. _____ 4. _____

N. Other Greatest Extent Feasible Efforts in hiring (describe, list dates and provide documentation):

1. _____ 3. _____
 2. _____ 4. _____

Section 5: CONTRACTING EFFORTS

Examples of Greatest Extent Feasible Efforts for contracting practices include, but are not limited to, the following (Check all that apply and include supporting documentation):

A. Engaged in outreach efforts to identify and secure bids from Section 3 Businesses. Describe, list dates and provide documentation. These efforts can include, but are not limited to the following:

A.1. Advertised contracting opportunities specifying a Section 3 preference via trade association papers & websites, social media, newspaper, mailings, and/or posting notices that provide general information about the work to be contracted and where to obtain additional information. Describe, list dates and provide documentation.

i. _____ iii. _____
 ii. _____ iv. _____

A.2. Establish(ed) relationships with the United States Small Business Administration (SBA), Community Development Corporations, and other sources as necessary to assist with educating and mentoring residents with a desire to start their own businesses (include documentation). Describe, list dates and provide documentation.

i. _____ iii. _____



ii. _____ <input type="checkbox"/> A.3. Contacted local trade associations, unions, public housing authorities or Chambers of Commerce near project in an effort to identify Section 3 Businesses, and had these organizations inform their residents/members of contracting opportunities. Describe, list dates and provide documentation. i. _____ ii. _____	iv. _____ iii. _____ iv. _____
<input type="checkbox"/> B. Provided technical assistance to help Section 3 Businesses understand and bid on contracts. Describe, list dates and provide documentation. 1. _____ 3. _____ 2. _____ 4. _____	
<input type="checkbox"/> C. Divided contracts into smaller jobs to facilitate participation by Section 3 Businesses. Describe, list dates and provide documentation. 1. _____ 3. _____ 2. _____ 4. _____	
<input type="checkbox"/> D. Provided bonding assistance, guaranties, training and technical assistance on contracting procedures or other efforts to support viable bids from Section 3 Businesses. Describe, list dates and provide documentation. 1. _____ 3. _____ 2. _____ 4. _____	
E. Promoted use of and/or utilized business registries designed to create opportunities for disadvantaged and small businesses. These efforts can include, but are not limited to, the following:	
<input type="checkbox"/> E.1. Searched HUD’s Section 3 Business Registry at https://hudapps.hud.gov/OpportunityPortal/searchBusiness.action to locate Section 3 Businesses in regions throughout New York State. Describe, list dates and provide documentation. 1. _____ 3. _____ 2. _____ 4. _____	
<input type="checkbox"/> E.2. Created an account on HUD’s FHEO Section 3 Opportunity Portal at: https://hudapps.hud.gov/OpportunityPortal and posted contracting opportunities. List contracts posted, dates and submit screen shots. 1. _____ 3. _____ 2. _____ 4. _____	
Quick Guide is available here: https://www.hud.gov/sites/dfiles/FPM/documents/SPEARS-Opportunity-Portal-Quick-Guide-Business.pdf	
<input type="checkbox"/> E.3. Reviewed lists of certified Minority and Women-Owned Business Entities (MWBEs) and Service-Disabled Veteran-Owned Business Enterprises (SDVOBs) and contacted businesses that may qualify as Section 3 Business Concerns with opportunities. A list of MWBE firms on HCR projects is available here: https://hcr.ny.gov/certified-mwbes-hcr-projects . The NY SDVOB Directory here: https://online.ogs.ny.gov/SDVOB/search . Describe, list dates and provide documentation. 1. _____ 3. _____ 2. _____ 4. _____	



F. Developed resources or sought out training to assist low-income/Section 3 Workers such as public/Section 8 housing residents interested in starting their own businesses to learn to prepare contracts, prepare taxes, and obtain licenses, bonding, and insurance. Describe, list dates and provide documentation.

- | | |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

G. Other/Additional Information (include documentation):