



SECTION 3 PLAN

Revised: March, 2017
Initially Prepared: March, 2010

Summary of Changes reflected in March 2017 version:

1. Differentiated between Policy and Procedure
2. Simplified language
3. Identified Director of Human Resources as Section 3 Coordinator
4. Added outreach suggestions with regard to increasing S3 resident participation in Employment and Training
5. Added outreach suggestions with regard to increasing selection of Section 3 Business Concerns and the hiring of S3 residents by Contractors – including circulation of bi-lingual S3 brochure
6. Added waiver and penalty
7. Adopted S3 self-certification for residents
8. Adopted S3 self-certification for business concerns
9. Incorporated language in all PHA job vacancy announcements indicating the opportunity for applicants to self-certify as a S3 resident and thereby take advantage of S3 hiring preference
10. Reformatted Plan into five sections (1) Introduction, (2) Employment and Training, (3) Contracting, (4) Reporting, (5) Compliance
11. Reviewed the HUD S3 Proposed New Rule and inserted language where proposed new rule is more stringent than current policy to stay one-step ahead

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I. INTRODUCTION

Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that promotes local economic development, neighborhood economic improvement, and individual self-sufficiency.

Section 3 is designed to ensure that Housing Authorities have a policy in place that ensures employment and other economic opportunities are, to the greatest extent feasible, made available to low income people, especially those residing in public housing. It requires that provisions be established whereby Housing Authorities train or employ a specific number of residents (where feasible) each fiscal year.

The Section 3 program requires that the Providence Housing Authority (PHA) provides job training, employment, and contract opportunities for Section 3 eligible persons in connection with projects and activities at its properties. Further, it is the policy of the PHA to prioritize Section 3 eligible persons and businesses in contracts partially or wholly funded with monies from the Department of HUD.

HUD financial assistance that applies to Section 3 includes, but not limited to, public housing operating, development and modernization funds, HOPE IV funds, economic stimulus funds, ROSS and FSS grant funds.

WHO ARE SECTION 3 RESIDENTS?

Section 3 is race and gender neutral. The preference is based solely on income and location. HUD defines Section 3 residents as:

- Residents of public housing; or
- Low-income (annual income of 0 to 80% AMI) persons residing in the metropolitan area.

WHAT IS A SECTION 3 BUSINESS?

HUD defines a Section 3 Business Concern as:

- One that is fifty-one percent (51%) or more owned by Section 3 residents; or
- Whose permanent, full-time employees include persons, at least 30% of whom are currently Section 3 residents; or
- One that contracts in excess of 25% of subcontracts to such Section 3 businesses.¹

¹ **Proposed New Rule:** Section 3 business includes on that sponsored a minimum of 10% of its current Section 3 employees to attend registered apprenticeship or registered pre-apprenticeship training program that meets the requirements outlined in DOL's Employment Training Administration Training and Employment Notice, OR 10% of the employees of the business are participants or graduates of a YouthBuild program

WHO IS THE SECTION 3 COORDINATOR FOR THE PHA?

The PHA has designated the Director of Human Resources to serve as the agency's Section 3 Coordinator. This may be modified at any time by the Executive Director.

II. EMPLOYMENT & TRAINING

A. Employment and Training Policy

Providence Housing has established employment and training goals that comply with Section 3 requirements. This is important as penalties for non-compliance include debarment, suspension and limited denial of participation in HUD programs.

To comply with Section 3, the PHA must:

- Notify Section 3 residents of employment opportunities within the PHA;
- Advertise and coordinate or directly provide employment training for Section 3 residents;
- Document actions taken to comply with this requirement and results of actions and impediments, if any.

PRIORITIZATION

Housing Authorities are required to provide equal opportunity employment to all employees and applicants for employment without regard to race, color, religion, sex, national origin, or disability. This ensures both applicants and existing employees are given fair and equal treatment. **Within this standard training and employment opportunities for Section 3 residents will be made in the following order of priority:**

- Residents of the housing development for which the Section 3 covered assistance is expended
- Residents of other housing developments managed by the PHA for which the Section 3 covered assistance is expended
- Participants in HUD YouthBuild programs carried out in the metropolitan area in which the Section 3 covered assistance is expended
- Other Section 3 residents

NUMERICAL GOALS

Housing Authorities may demonstrate compliance with “to the greatest extent feasible” the requirement of Section 3 by meeting numerical goals for providing

training, and employment to Section 3 residents. These goals apply to new hires. Efforts to employ Section 3 residents should be made at all job levels.

Recipients of Section 3 covered public housing assistance may demonstrate compliance by committing to employ 30% of the aggregate number of new hires for a 1-year period.

A Section 3 resident who has been employed for 3 years may no longer be counted towards meeting the 30% requirement.

B. Employment and Training Procedures

PROMOTION

The PHA will actively promote training and employment opportunities to Section 3 program participants. At a minimum, the following actions will be taken:

- Flyer distribution to all public housing and scattered site households, and posting information in common areas of the housing developments as well as all PHA public housing management offices
- Inform resident associations/councils as well as neighborhood community organizations regarding available training and employment opportunities
- Use of social media and PHA website to post information
- Job Fairs
- Use of monitors located in public housing common areas to promote information
- Include opportunities in housing development newsletters
- Provide targeted and repeat communications to all persons enrolled in PHA's FOC, FSS, Jobs Plus, and other workforce development programs
- Distribute information in electronic and paper format to landlords and property management companies who manage affordable housing in Providence

RESIDENT CERTIFICATION

The PHA allows residents to self-certify that they meet the definition of low-income and are eligible to receive Section 3 preference in employment and

training. The certification remains valid for one-year, at which time the individual must re-certify, if applicable. Certifications will be maintained by the Director of Human Resources. The PHA will regularly verify the income of a sample of self-certified Section 3 residents to confirm low-income. See Appendix for Resident Self-Certification form.

The following language is inserted in all PHA job vacancy announcements:

The Providence Housing Authority follows the HUD Section 3 policy. This policy ensures employment and other economic opportunities are, to the greatest extent feasible, made available to low income people, especially those residing in public housing.

If you live in a PHA public housing apartment or an apartment in Providence with a PHA rental vouchers, or if you are low-income and live in Providence you are qualified to self-certify as a Section 3 resident. Self-certification is simple and confidential. To request a self-certification form, please call or email Kimberly Dawley, Director of Human Resources at 401-751-6400 x1151 or kimberlyd@pha-providence.com

III. CONTRACTING

A. Contracting Policy

Section 3 requirements apply to all contractors and subcontractors performing work in connection with projects and activities funded by HUD which triggers Section 3 regardless of the amount of the contract. Section 3 contracts do not include supplies and materials unless the contract includes the installation of the materials.

A business seeking to qualify for a Section 3 contracting preference must submit evidence that they qualify as a Section 3 business.

All contractors and sub-contractors who respond to a PHA request to bid, regardless if they qualify as Section 3 business, must demonstrate compliance to the “greatest extent feasible” with requirements to hire Section 3 residents to fill jobs created through the contract.

It is the responsibility of contractors and sub-contactors to implement progressive efforts to attain Section 3 compliance. Any contractor that does not meet the Section 3 numerical goal must demonstrate why meeting the goal was not feasible. All contractors submitting bids or proposals to the PHA are required to certify that they will comply with the requirements of Section 3.

Section 3 does not require hiring/contracting unless it is necessary to complete the project. It is not intended for contractors and subcontractors to terminate existing employees, but to make every effort feasible to employ Section 3 residents before any other person, when hiring additional employees needed to complete proposed work to be performed with HUD funds.

PRIORITIZATION

All contractors and subcontractors, regardless of whether they are certified as a Section 3 business concern, are required to follow this prioritization:

- Low-income residents of the housing development or developments for which the Contract shall be expended
- Low-income residents of other PHA housing developments
- Low-income residents of PHA’s scatted site Section 8 properties in Providence

- Low-income participants in HUD Youthbuild program being carried out in the project boundary area
- Low-income residents in Providence

WAIVER

If a contractor has been awarded based upon a commitment to hire Section 3 residents and this commitment is subsequently unachievable, the Contractor may, after exercising all reasonable good faith efforts, submit a written request to the PHA for relief from fulfillment of their Section 3 contract obligation.

PENALTY

In the event a contractor fails to fulfill their contract obligations and is not granted a waiver from those obligations, a notation will be made with the PHA's Procurement Office noting their past performance which will be taken into consideration for future contracting opportunities.

B. Contracting Procedures

CONTRACTOR CERTIFICATION

All contractors/businesses seeking Section 3 preference must, before submitting bids/proposals to the PHA, complete a Section 3 Business Concern Self-Certification via HUD website at <https://portalapps.hud.gov/Sec3BusReg/BRegistry/RegisterBusiness>. See Appendix for Business Concern Self-Certification instructions.

PROMOTION

The PHA will notify Section 3 business concerns when contracting opportunities exist.

- Advertise contracting opportunities via newspaper, mailings, posting notices that provide general information about the work to be contracted and where to obtain additional information.
- Provide written notice of contracting opportunities to all known Section 3 business concerns. The written notice will be provided in sufficient time to enable business concerns the opportunity to respond to the bid invitation.
- Coordinate pre-bid meetings at which the Section 3 business concerns would be informed of upcoming contracting opportunities in advance.
- Conduct workshops on PHA contracting procedures to include bonding, insurance, and other pertinent requirements, in a timely manner in an

effort to allow Section 3 business concerns the opportunity to take advantage of any upcoming contracting opportunities.

- Contact Providence's First Source office and Workforce Solutions of Providence and Cranston to inform them of contracting opportunities and to request their assistance in identifying Section 3 businesses.
- Establish relationships with the Small Business Administration, RI's office of Minority and Women's Business Enterprise, Community Development Corporations, and other sources as necessary to assist PHA with educating and mentoring residents with a desire to start their own businesses.

PHA TECHNICAL ASSISTANCE

The PHA will assist contractors with little or no experience in achieving Section 3 hiring and contracting goals by:

- Widely posting job opening for Section 3 employment opportunities throughout PHA projects, as well as with community-based partners.
- Providing the contractor with a list of Section 3 businesses interested and qualified for construction and applicable non-construction projects.
- Maintain file of resumes and completed employment applications for Section 3 residents interested and qualified for construction and applicable non-construction projects.
- Reviewing the new hire clause with contractors and subcontractors to ensure that the requirement is understood.
- Introducing contractors and subcontractors to the State Apprenticeship Agency of Rhode Island Department of Labor & Training so that they may develop Registered Apprenticeship to achieve Section 3 goal.
- Facilitating the placement of Section 3 pre-apprentices into Registered Apprenticeships with contractors and subcontractors.

CONTRACT DOCUMENTS

The Section 3 Compliance Clause specifies the requirements for contractors hired for Section 3 covered projects. This Section 3 Clause must be included in all Section 3 covered projects.

If new hires are required to fulfill the contract, the specific number of Section 3 residents to be employed by the contractor will be incorporated into the proposal and ultimate work contract.

Along with a contractor's monthly requisition for payment, the contractor must submit their corresponding monthly employment report with payroll data (see Appendix for sample report) as evidence of achieving numerical goals of Section 3 resident employment.

NUMERICAL GOALS

The PHA has adopted the following objectives for resident hiring that is to be used on all construction contracts, service contracts and professional service contracts that contain a labor component. ²

TOTAL LABOR DOLLARS USE TOTAL RESIDENT AS % OF TOTAL CONTRACT AMOUNT FOR SERVICE LABOR DOLLARS CONTRACTS	
Labor dollars \$25,000 but less than \$100,000	10% of the labor dollars
\$100,000, but less than \$200,000	9% of the labor dollars
At least \$200,000, but less than \$300,000	8% of the labor dollars
At least \$300,000, but less than \$400,000	7% of the labor dollars
At least \$400,000, but less than \$500,000	6% of the labor dollars
At least \$500,000, but less than \$1 million	5% of the labor dollars
At least \$1 million, but less than \$2 million	4% of the labor dollars
At least \$2 million, but less than \$4 million	3% of the labor dollars
At least \$4 million, but less than \$7 million	2% of the labor dollars
\$7 million or more	1-½% of the labor dollars

² Proposed New Rule: Redefine a Section 3 new hire for contractors or subcontractors as a person who works a minimum of 50 percent of the average staff hours worked for the job category for which the person was hired throughout the duration of time that the work is performed on the covered project. For example, if a Section 3 resident is hired as a painter, and painters typically work 40 hours each week, the Section 3 resident must work a minimum of 20 hours each week during their employment on the project in order to be counted towards the recipient's minimum numerical goal for employment.

Proposed New Rule: 10 percent of the total dollar amount of all covered contracts to Section 3 businesses, regardless of the type of contract or its dollar amount, will create more contracting opportunities for them.

Proposed New Rule: Section 3 requirements would apply to recipients of housing and community development financial assistance that plan to obligate or commit an aggregate amount of \$400,000 or more in Section 3 covered financial assistance to projects involving housing rehabilitation, housing construction, demolition, or other public construction during a given annual reporting period.

IV. REPORTING

HUD requires the all recipients of federal funding to submit a report to HUD's Economic Opportunity Division annually. Section 3 Annual Reports are intended to measure each Housing Authority's efforts to comply with the statutory and regulatory requirements of Section 3 in its own operations AND those of contractors, subcontractors, and sub-recipients. Reports must include the following:

- The total dollar amount of HUD funding that was received by the PHA during the specified reporting period.
- The total number of new employees that were hired by the PHA or its contractors, subcontractors, and sub-recipients.
- The amount of new employees that were hired by the PHA or its contractors, subcontractors, and sub-recipients, that met the definition of a Section 3 resident.
- The total number of man hours worked on covered projects (optional).
- The aggregate number of hours worked by Section 3 residents on covered projects (optional).
- The total number of Section 3 residents that participated in training opportunities that were made available by the PHA, its contractors, sub-recipients, or other local community resource agencies.
- The total dollar amount of construction and/or non-construction contracts (or subcontracts) that were awarded with HUD funding received by the PHA.
- The dollar amount of the PHA's construction or non-construction contracts (or subcontracts) that were awarded to Section 3 business concerns.

Detailed narrative identifying the specific actions taken by the Housing Authority, contractors, subcontractors and/or sub-recipients must accompany each report when the Housing Authority failed to meet the minimum numeric goals for employment and contracting opportunities.

HUD requires Annual Section 3 Reports to be submitted electronically on the HUD website (www.hud.gov/section3) via SPEARS (Section 3 Performance Evaluation and Registry System).

V. COMPLIANCE

In an effort to resolve complaints generated due to non-compliance through an internal process, the PHA encourages complaints be directed to the Section 3 Coordinator.

- Complaints of non-compliance should be filed in writing and must contain the name of the complainant and brief description of the alleged violation.
- Complaints must be filed within thirty days after the complainant becomes aware of the alleged violation.
- An investigation will be conducted if complaint is found to be valid. The Section 3 Coordinator will conduct an informal, but thorough investigation affording all interested parties, if any, an opportunity to submit testimony and/or evidence pertinent to the complaint.
- The Section 3 Coordinator will provide written documentation detailing the findings to the Executive Director. The PHA will review the findings for accuracy and completeness before it is released to complainants. The findings will be made available no later than thirty days after the filing of complaint.

If complainants wish to have their concerns considered outside of the PHA, a complaint may be filed with:

Assistant Secretary for Fair Housing and Equal Opportunity
US Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

The 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.

FY 2016 Income Limits

FY 2016 Income Limit Area	Median Income	FY 2016 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Providence city	\$72,800	Very Low (50%) Income Limits (\$)	\$25,500	\$29,150	\$32,800	\$36,400	\$39,350	\$42,250	\$45,150	\$48,050
		Extremely Low Income Limits (\$)*	\$15,300	\$17,500	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$40,890
		Low (80%) Income Limits (\$)	\$40,800	\$46,600	\$52,450	\$58,250	\$62,950	\$67,600	\$72,250	\$76,900

SECTION 3 RESIDENT SELF CERTIFICATION

PART 1 Resident Information:

Name	_____
Home Address	_____
Email	_____ _____
Telephone #	_____

Employment Experience, Training and/or Job Skills in the following areas:

Clerical _____
 Laborer _____
 Craft or Trade (please specify) _____

PART 2 Income Survey:

<i>How many persons live in your home?</i>	_____ persons
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<i>What is the total yearly income of ALL persons, 18 years and older, living in your</i>	\$ _____ total yearly household income
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Note: Total yearly income means all funds (salaries, dividends, interest, etc.) received during the

Please note, in order to qualify as a Section 3 Resident the total yearly household income must be less than 80% of AMI. See the current year HUD Income Limits sheet in this manual.

PART 3 Resident Certification: This certification is valid for a period of 3 years (PLEASE READ CAREFULLY)

I authorize the information above to be added to a database of Section 3 Residents that will enable me to receive notice of employment opportunities with the Providence Housing Authority (PHA) and with future Section 3 covered projects. I understand the Section 3 Resident list may provide additional employment opportunities, however inclusion on that list does not guarantee employment. I further understand that this list may be accessed by PHA staff, developers and contractors working on Section 3 covered projects for the PHA; however, no personal information will be made available to the developers, contractors, or public.

Yes No

Under penalty of perjury I certify that I, _____ (print name), am a legal resident of Providence, Rhode Island and qualify as a Section 3 Resident because I meet the income limits as published on this form OR I am a Providence Housing Authority resident. I agree to furnish to PHA any requested documentation in support of verification of this self-certification.

Printed Name _____ **Signature** _____
Date _____

HUD's Section 3 Business Registry

Go to <https://portalapps.hud.gov/Sec3BusReg/BRegistry/RegisterBusiness>

Complete the SIMPLE on-line self-certification registration.

Am I a Section 3 Business?

This feature allows businesses that potentially meet one of the three regulatory definitions of a Section 3 Business Concern to determine whether they meet one (or more) of the qualifications.

Option 1: Determine if the Business Meets the Definition of a Section 3 Business Based on Ownership

1. Enter the Number of Owners that Meet the Definition of a Section 3 Resident
2. Enter the Total Number of All Other Owners of the Business
3. Percentage is Automatically Calculated

If percentage is less than 51% the business does not meet the definition of a Section 3 Business

Option 2: Determine if the Business Meets the Definition of a Section 3 Business Based Percentage of Full Time Employees

1. Enter the Total Number of Full-Time Employees in all Job Categories
2. Enter the Number of Full-Time Employees that Currently Meet the Definition of a Section 3 Resident
3. Enter the Number of Full-Time Employees that Met the Definition of a Section 3 Resident Within Three Years From the Date of First Employment with the Business
4. Percentage is Automatically Calculated

If percentage is less than 30% the business does not meet the definition of a Section 3 Business

Option 3: Determine if the Business Meets the Definition of a Section 3 Business Based the Award of Subcontracts to Businesses that Meet the Requirements of Option 2 or 3 Above.

1. Enter the Total Dollar Amount of Sub-Contracts to Be Awarded on Covered Activities
2. Enter the Total Dollar Amount of Sub-Contracts to be Awarded to Businesses that Meet One of the Definitions of a Section 3 Business that will Receive Contracts for Covered Activities
3. Percentage is Automatically Calculated

If percentage is less than 25% the business does not meet the definition of a Section 3 Business

Businesses that meet one of the preceding definitions of a Section 3 Business may proceed to self-certify their eligibility to HUD and HUD-funded grant.

SECTION 3 CLAUSE

All Section 3 covered contracts shall include the following clause (referred to as the “Section 3 Clause”):

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, [12 U.S.C. 1701u](#) (section 3). The purpose of section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR Part 135, which implement section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.

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 by 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 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).



Section 3 Summary Report

Economic Opportunities for Low- and Very Low-Income Persons

U.S. Department of Housing and Urban Development

Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0043
(exp. 11/30/2018)

Disbursement Agency
PROVIDENCE H A
100 BROAD ST, PROVIDENCE, RI 02903
05-6000193

Reporting Entity
PROVIDENCE H A
100 BROAD ST, PROVIDENCE, RI 02903

Dollar Amount	\$14,868,331.00
Contact Person	Kimberly Dawley
Date Report Submitted	01/09/2017

Reporting Period		Program Area Code	Program Area Name
From	To		
01/01/2016	12/31/2016	OFND	Operating Fund

Part I: Employment and Training

Job Category	Number of New Hires	Number of New Hires that Are Sec. 3 Residents	Aggregate Number of Staff Hours Worked	Total Staff Hours for Section 3 Employees	Number of Section 3 Trainees
Administrative	3	0	0	0	0
Case Management	1	0	0	0	0
Facilities /Maintenance	10	8	0	0	0
Security	2	0	0	0	0
Painter	2	0	0	0	13
Professional	6	0	0	0	0
Technical (Bookkeeping, IT, etc)	1	0	0	0	0
Employment Skills Training	0	0	0	0	30
Homeownership Training	0	0	0	0	16

Total New Hires	25
Section 3 New Hires	8
Percent Section 3 New Hires	32.0%
Total Section 3 Trainees	59
The minimum numerical goal for Section 3 new hires is 30%.	

Part II: Contracts Awarded

Construction Contracts	
Total dollar amount of construction contracts awarded	\$54,948.00
Total dollar amount of contracts awarded to Section 3 businesses	\$46,173.70
Percentage of the total dollar amount that was awarded to Section 3 businesses	84.03%
Total number of Section 3 businesses receiving construction contracts	2
The minimum numerical goal for Section 3 construction opportunities is 10%.	

Non-Construction Contracts	
Total dollar amount of all non-construction contracts awarded	\$261,500.00
Total dollar amount of non-construction contracts awarded to Section 3 businesses	\$0.00
Percentage of the total dollar amount that was awarded to Section 3 businesses	0.0%
Total number of Section 3 businesses receiving non-construction contracts	0
The minimum numerical goal for Section 3 non-construction opportunities is 3%.	

Part III: Summary

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.	
Yes	Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contacts with 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.
Yes	Participated in a HUD program or other program which promotes the training or employment of Section 3 residents.
Yes	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.
No	Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located.
No	Other; describe below.

The Providence Housing Authority maintains an active database of qualified Section 3 applicants to be hired by the Housing Authority and to be referred to contractors for hire. Section 3 residents are notified of available positions and training opportunities in the following ways:

- o Resident Bulletin Boards/Kiosks
- o Resident Advisory Board Members
- o Community Outreach
- o Housing Authority Events/Job Fairs
- o Housing Authority Staff (Workforce Education/Employment Specialist/FSS Coordinators /Resident Service Coordinators, etc...)
- o Family Success Center
- o Resident Services Programs
- o Looping Video's in all Management Offices
- o Posters / Brochures

Numerous training opportunities are made available to Section 3 tenants including:

- o Sherman Williams Painter Training Program
- o ESL/GED Classes
- o Adult Basic Education
- o Computer Literacy
- o Financial Literacy
- o Homeownership Training
- o Employment Counseling/Skills Training
- o Youth Leadership/Youth Police Initiative

All bid documents contain information on Section 3 preferences. The Section 3 preference is explained in detail during pre-bid conferences. A Section 3 Clause has been incorporated into each contract entered into with the Housing Authority and is reiterated during contract signing and pre-construction meetings. All vendors are informed of the Housing Authority's database of Section 3 qualified residents.