

### **SECTION 3 PLAN**

# ECONOMIC OPPORTUNITY FOR LOW AND VERY LOW INCOME PERSONS

July 1, 2021

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#### **SECTION 3 PLAN**

#### I. General Policy Statement

It is the policy of the County of Ventura, County Executive Office (CEO), Community Development Department to require its Subrecipients to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

This Section 3 Plan is designed to result in success in the recruitment, employment, and utilization of Section 3 Business Concerns and Section 3 Workers hired for projects and programs partially or wholly funded with the United States Department of Housing and Urban Development (HUD) monies. The CEO, Community Development Department shall examine and consider a Subrecipient's potential for success in implementing Section 3 requirements prior to entering into an agreement for funding.

#### II. Purpose

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992 (12 U.S.C. 1701u) (Section 3), contributes to the establishment of stronger, more sustainable communities by ensuring that employment and other economic opportunities generated by Federal financial assistance for housing and community development programs are, to the greatest extent feasible, directed toward low- and very low-income persons, particularly those who receive government assistance for housing.

Section 3 is the legal basis for providing jobs for residents and awarding contracts to businesses in areas where a project involving construction, demolition, or rehabilitation receives HUD financial assistance in excess of \$200,000 (aggregate of all awards) from the Community Development Block Grant (CDBG) Program, HOME Program, Emergency Solutions Grant (ESG), Community Development Block Grant — Multifamily Housing Program, Neighborhood Stabilization Program (NSP) or other federal funding that requires compliance with Section 3. Section 3 requirements apply to an entire Section 3 Project, regardless of whether the project is fully or partially assisted under HUD programs that provide Housing and Community Development Financial Assistance.

In the event that a Section 3 Project generates economic opportunities (training, employment or contracts), these opportunities **must** be directed toward Section 3 Workers **and/or** Section 3 Business Concerns, as defined below. The purpose of Section 3 preferences is to be results oriented by: 1) encouraging business concerns that are not major sources of employment for low-income persons to increase their employment of these persons when economic opportunities arise from HUD financed construction related projects; and 2) promoting the growth of "profit-making" enterprises owned by low-income persons that substantially employ low-income persons with Section 3 contract awards.

Title 24 CFR Part 75 - Economic Opportunities for Low- and Very Low-Income Persons ("Final Rule") establishes the requirements to be followed to ensure the objectives of Section 3 are met, and is what this Section 3 Plan is based upon. The full regulation may be found at https://www.ecfr.gov/cgi-bin/text-idx?SID=8bad10ac17bc38fff3da0e4bd40211d2&mc=true&tpl=/ecfrbrowse/Title24/24cfr75\_main\_02.tpl

#### III. Definitions

1937 Act - the United States Housing Act of 1937, 42 U.S.C. 1437 et seq.

**Area Median Income (AMI)** – income limits set annually by the Department of Housing and Urban Development (HUD) to determine eligibility for HUD-funded programs, including Housing and Community Development Financial Assistance subject to this Plan.

**Contractor** - any entity entering into a contract with: (1) the County; (2) a Subrecipient for work in connection with a Section 3 Project.

**Employment Opportunities** - with respect to Section 3 covered Housing and Community Development Financial Assistance, this term means **all** employment opportunities arising in connection with the Section 3 Project **including** management and administrative jobs. Sample job categories and descriptions are listed in **Attachment J**.

**Full Time** - a position that is temporary, seasonal, or permanent that requires at least 1,750 hours of employment on an annual basis.

**Housing and Community Development Financial Assistance** – housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide financial assistance (including but not limited to Community Development Block Grant and HOME Investment Partnerships Program) when the **total amount** of assistance to the project from all federal sources exceeds a threshold of \$200,000.

**Labor Hours** - the number of paid hours worked by persons on a Section 3 Project or by persons employed with funds that include Public Housing Financial Assistance.

**Lowest Responsive Bid** - an acceptable bid with the lowest price that meets the minimum requirements and specifications.

**Low-Income** - families (including single persons) whose income does not exceed 80% of the (adjusted) median family income of the Primary Metropolitan Statistical Area. See **Attachment F**.

**Material Supply Contracts** - contracts for the purchase of products and materials, including, but not limited to, lumber, drywall, wiring, concrete, pipes, toilets, sinks, carpets, and office supplies.

**Primary Metropolitan Statistical Area (PMSA)** - As established by the Office of Management and Budget, the <u>entire geographic area encompassed by the political boundaries of the County of Ventura has been defined as the PMSA for this Section 3 Plan.</u>

**Professional Services** - non-construction services that require an advanced degree or professional licensing, including, but not limited to, contracts for legal services, financial consulting, accounting services, environmental assessment, architectural services, and civil engineering services.

#### **Public Housing Financial Assistance** – means

- 1. Development assistance provided pursuant to section 5 of the 1937 Act;
- 2. Operations and management assistance provided pursuant to section 9(e) of the 1937 Act (Operating

- Fund and Capital Fund assistance);
- 3. Development, modernization, and management assistance provided pursuant to section 9(d) of the 1937 Act; and
- 4. The entirety of a mixed-finance development project as described in 24 CFR 905.604, regardless of whether the project is fully or partially assisted with public housing financial assistance as defined above.

Responsible Bidder - a bidder who, at the minimum, is licensed, bonded, insured, capable and reliable.

Section 3 - Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

#### Section 3 Business Concern - means:

- (1) A business concern meeting at least one of the following criteria, documented within the last six-month period:
  - (i) It is at least 51 percent owned and controlled by low- or very low-income persons;
- (ii) Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
- (iii) 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.
- (2) The status of a Section 3 business concern shall not be negatively affected by a prior arrest or conviction of its owner(s) or employees.
- (3) Nothing in this part shall be construed to require the contracting or subcontracting of a Section 3 Business Concern. Section 3 Business Concerns are not exempt from meeting the specifications of the contract.

**Section 3 Contract** - a contract or subcontract (including contracts for Professional Services) awarded by the County of Ventura or a Subrecipient/Contractor/Subcontractor for work generated by the expenditure of Housing and Community Development Financial Assistance, or for work arising in connection with a Section 3 Project. This definition does not include contracts for the purchase of supplies and materials. However, whenever a contract for materials includes the installation of the materials, that contract constitutes a Section 3 Contract.

**Section 3 Project** - a project, as defined in § 75.3(a)(2) of the Final Rule, consisting of housing rehabilitation, housing construction, or other public construction projects assisted under HUD programs that provide Housing and Community Development Financial Assistance when the total amount of assistance to the project exceeds a threshold of \$200,000.

#### Section 3 Worker - means:

- (1) Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
- (i) The worker's income in the year in which they qualified as a Section 3 Worker is below the income limit established by HUD (80% AMI for CDBG and HOME-assisted projects).
  - (ii) The worker is employed by a Section 3 Business Concern.
  - (iii) The worker is a YouthBuild participant.
- (2) The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.
- (3) Nothing in this part shall be construed to require the employment of someone who meets this definition of a Section 3 worker. Section 3 workers are not exempt from meeting the qualifications of the position to be filled.

**Service Area or the Neighborhood of the Project** - an area within one mile of the Section 3 Project or, if fewer than 5,000 people live within one mile of a Section 3 Project, within a circle centered on the Section 3 Project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

**Subcontractor** - any entity that has a contract with a Contractor to undertake a portion of the Contractor's obligation to perform work in connection with a Section 3 Project.

**Subrecipient** – means, as defined in the applicable program regulations or in 2 CFR 200.93, a non-federal entity that receives an award of CDBG or HOME funds from the County to carry out a Section 3 Project. A Subrecipient may also be a recipient of other federal awards directly from another agency or federal awarding agency.

**Targeted Section 3 Worker** has the meanings provided in §§ 75.11, 75.21, or 75.29 of the Final Rule, and does not exclude an individual that has a prior arrest or conviction. Targeted Section 3 Worker is a subcategory of a Section 3 Worker. References to Section 3 Workers within this Section 3 Plan are inclusive of Targeted Section 3 Workers unless it is specifically stated otherwise.

For Public Housing Financial Assistance means a Section 3 Worker who is:

- 1. A worker employed by a Section 3 Business Concern; or
- 2. A worker who currently fits or when hired fit at least one of the following categories, as documented within the last five years:
  - (i) A resident of public housing or Section 8-assisted housing;
  - (ii) A resident of other public housing projects or Section 8-assisted housing managed by the PHA that is providing the assistance; or
  - (iii) A YouthBuild participant.

For Housing and Community Development Financial Assistance, means a Section 3 Worker who is:

- 1. A worker employed by a Section 3 Business Concern; or
- 2. A worker who currently fits or when hired fit at least one of the following categories, as documented within the last five years:
  - (i) Living within the Service Area of the Neighborhood of the Project; or
  - (ii) A YouthBuild participant.

If a housing rehabilitation, housing construction or other public construction project is subject to Section 3 pursuant to Public Housing Financial Assistance <u>and</u> Housing and Community Development Financial Assistance, the Subrecipient must follow and report to the local housing authority according to subpart B of Part 75 – Economic Opportunities for Low- and Very Low-Income Persons for the Public Housing Financial Assistance and must follow and report to the County in accordance with subpart C of Part 75 – Economic Opportunities for Low- and Very Low-Income Persons for the Housing and Community Development Financial Assistance (24 CFR 75). For such a project, the following applies:

(1) For Housing and Community Development Financial assistance, a Targeted Section 3 worker is any worker who meets the definition of a Targeted Section 3 worker as defined for either Public Housing Financial Assistance or Housing and/or Community Development Financial Assistance; and

If a housing rehabilitation, housing construction, or other public construction project

is subject to Section 3 because the Section 3 Project is assisted with funding from multiple sources of Housing and Community Development Financial Assistance that exceed the thresholds defined above, the Subrecipient must follow the requirements for Housing and Community Development Financial Assistance and report to all applicable agencies providing funds, including the County.

**Very Low-Income** - families (including single persons) whose income does not exceed 50% of the area (adjusted) median family income. See **Attachment F**.

**YouthBuild Programs** - programs receiving assistance under the Workforce Innovation and Opportunity Act (29 U.S.C. 3226).

#### IV. Section 3 Implementation

Subrecipients and Contractors/Subcontractors working on Section 3 Projects must "to the greatest extent feasible" ensure that employment and training opportunities and contracts for work awarded in connection with Section 3 Projects are provided to Section 3 Workers and Section 3 Business Concerns that provide economic opportunities to Section 3 Workers in the Service Area or Neighborhood of the Project.

All Subrecipients will be required to prepare and implement the Section 3 Strategy with the intent of meeting the Benchmarks set forth in Section V of this Section 3 Plan. Subrecipients will also be required to incorporate a Section 3 Economic Opportunity Plan and utilize the Section 3 Clause in all contracts and subcontracts.

#### A. Section 3 Strategy

Subrecipients must prepare and implement a demonstrated strategy, which shall be incorporated into all contracts/subcontracts for work related to the Section 3 Project and be approved in advance by the County. The Strategy shall be designed to give priority in contracting with the following:

- 1. Section 3 Business Concerns that provide economic opportunities to Section 3 Workers living in the Service Area or Neighborhood of the Project; and
- 2. YouthBuild participants.

Strategies should include, at a minimum, the following actions:

- 1. A detailed description of all efforts planned to outreach to and generate job applicants who qualify as Section 3 Workers;
- 2. A detailed description of Technical Assistance planned to help Section 3 Workers apply for jobs;
- 3. A detailed description of all efforts planned to outreach to, identify and secure bids from Section 3 Business Concerns, complying at a *minimum* with the requirements of this Section 3 Plan;
- 4. A detailed description of Technical Assistance planned to help Section 3 Business Concerns understand and bid on the Section 3 Project;
- A detailed description of any assistance made available to Section 3 Business Concerns for bonding, guaranties and other efforts to support viable bids from Section 3 Business Concerns; and
- 6. Identification of business registries and other resources utilized to identify Section 3 Business Concerns.

Other suggested actions to incorporate in the Section 3 Strategy may include:

1. Planned training and apprenticeship opportunities to be provided to Section 3 Workers;

- 2. Planned job fairs to be held with the goal of identifying and hiring Section 3 Workers; and
- 3. Plans to divide contracts into smaller jobs to facilitate participation by Section 3 Business Concerns.

Each Subrecipient's Section 3 Strategy must be submitted to the County at least 30 calendar days prior to the start of bidding on a Section 3 Project. Project bidding may not begin until the County has approved the strategy, or the 30-day review period has lapsed, whichever occurs first.

Documentation that the Subrecipient implemented their Section 3 Strategy throughout the project may be required.

#### B. Section 3 Economic Opportunity Plan (EOP)

Subrecipients must require all bidders for contracts on Section 3 Projects to complete the Section 3 Economic Opportunity Plan (EOP) (Attachment A) and return it with the project bid. The Section 3 EOP requires all bidders to complete a preliminary statement of their workforce needs for the Section 3 Project, broken out by trade for all skilled, semi-skilled, and unskilled labor and trainee categories. The statement should include the anticipated workforce needs of any subcontractors to be hired where this is known.

In order to assist with meeting the required benchmarks, Contractors/ Subcontractors may wish to consider using the employment/job development services of the agencies listed in Attachment K as well as other agencies and centers that serve the economically disadvantaged within the project area.

#### C. Subrecipient Requirements

Subrecipients must require that the attached Section 3 clause (Attachment B) is inserted in all Section 3 Project contracts and subcontracts. This clause commits the Contractor/Subcontractor to provide, to the greatest extent feasible, training and employment opportunities to Section 3 Workers and Section 3 Business Concerns. Subrecipients must also require that Contractors/Subcontractors that are awarded a Section 3 Project contract give notice to all labor organizations of their commitment to hiring Section 3 Workers and Section 3 Business Concerns. This notice should also be posted at the Contractor/Subcontractors place of business and at the job site. A sample notice of this type is provided for reference (Attachment C).

In connection with each bid for work under a Section 3 Project, Subrecipients shall require each bidder to complete and return the following forms:

- Compliance Bidder's Certification Form (Attachment D) stating that each bidder understands this Section 3 requirement. This form must be completed by each Contractor/Subcontractor, signed by an authorized representative of the company and returned with their bid for work on the Section 3 Project; and
- 2. Certification for Business Concerns Seeking Section 3 Preference in Contracting and Demonstration of Capability (Attachment E), if applicable.

#### V. Section 3 Benchmarks

Subrecipients, Contractors and Subcontractors shall make every good faith effort to achieve the following benchmarks in association with the Section 3 Project:

- 1. Section 3 Workers will make up 25% of the total number of labor hours worked by all workers, exclusive of the labor hours worked by Targeted Section 3 Workers; and
- 2. Targeted Section 3 Workers will make up 5% of the total number of labor hours worked by all

workers.

These benchmarks shall be updated every three years by the U.S. Department of Housing and Urban Development. The current benchmarks are expected to be applicable until 6/30/2024; however the County reserves the right to adjust these benchmarks if HUD releases updated benchmarks before this date.

#### VI. Required Documentation and Reporting

Prior to the start of bidding for a Contractor/Subcontractor, Subrecipients must provide the following documentation to the County:

1. Section 3 Strategy in accordance with Section IV(A) of this Section 3 Plan (30 calendar days before bidding begins).

For each bidder awarded work all following documentation must be provided to the County within 10 days of selection of Contractors/Subcontractors:

- 1. Section 3 Economic Opportunity Plan (Attachment A);
- 2. Certification signed by the Subrecipient that all contracts/subcontracts for work include the required Section 3 Clause and copies of each contract with the clause highlighted;
- 3. Notice(s) given by Contractors/Subcontractors to all labor organizations indicating their commitment to hire Section 3 Workers (Attachment C);
- 4. Section 3 Compliance Bidder's Certification for selected Contractors/Subcontractors (Attachment D); and
- 5. Certification of Business Concerns Seeking Section 3 Preference in Contracting and Demonstration of Capability (Attachment D), if applicable.

Reporting will be required at the request of the County based upon HUD-required reporting. Subrecipients must report the following data to the County for each Section 3 Project:

- 1. Total number of labor hours worked;
- 2. Total number of labor hours worked by Section 3 Workers (exclusive of hours worked by Targeted Section 3 Workers) with documentation as described in Section VII of this Plan; and
- 3. Total number of labor hours worked by Targeted Section 3 Workers with documentation as described in Section VII of this Plan.

Section 3 Workers' and Targeted Section 3 Workers' labor hours may be counted for five years from when their status as a Section 3 Worker or Targeted Section 3 Worker is established.

Labor hours worked by people in Professional Services may be counted in the above reporting of total labor hours worked and total labor hours worked by Section 3 Workers and Targeted Section 3 Workers.

If a Contractor or Subcontractor does not track labor hours, the Subrecipient may request that the Contractor/Subcontractors "good faith assessment" of labor hours of full-time or part-time employees be accepted. The County will only accept "good faith assessment" on Section 3 Projects that have requested, and had their request approved by the County, to utilize this method.

The benchmarks for the minimum percentage of labor hours worked by Section 3 Workers and Targeted Section 3 Workers represent **minimum** targets for a Section 3 Project. The benchmarks are not set-asides

and quotas but instead establish a "safe harbor" for Subrecipients, Contractors and Subcontractors on the matter of compliance with Section 3. In the absence of evidence to the contrary, a Subrecipient, Contractor or Subcontractor that meets the minimum benchmarks for a Section 3 Worker/Targeted Section 3 Worker labor hours will be considered to have met Section 3 requirements under this Section 3 Plan.

If, at the conclusion of the contracting period for the Section 3 Project, the above priorities and benchmarks are not met, the Subrecipient bears the burden of demonstrating why it was not feasible to comply with this Section 3 Plan. The subrecipient must provide detailed information on their efforts to comply with this Section 3 Plan, including the outcome of all efforts originally identified in the Subrecipient's Section 3 Strategy.

#### VII. Qualification of Section 3 Workers and Section 3 Business Concerns

#### A. Section 3 Workers

A Section 3 Worker shall certify or submit evidence demonstrating their eligibility as a Section 3 Worker to the Subrecipient, Contractor or Subcontractor as appropriate. **Attachment F** (or a similar form) must be filled out by Section 3 Workers.

This self-certification will be one of the methods used by County, Subrecipient, Contractors, and Subcontractors to confirm the percentage of labor hours worked by Section 3 Workers. Should said certification come into question or not be appropriate, County, Subrecipient and Contractors/Subcontractors may request other evidence of eligibility.

Please note that nothing in the Section 3 Plan shall be construed to require the employment of a Section 3 Worker who does not meet the background and qualifications of the position to be filled.

#### **B. Section 3 Business Concerns**

If a bidding contractor is seeking preference under Section 3, the form provided as **Attachment E** must be filled out and submitted by the **bid deadline**. Businesses seeking to qualify for a Section 3 contracting preference shall certify that the business is a Section 3 Business Concern and provide appropriate documentation with the certification. Should said certification come into question, County and Contractors/Subcontractors may request other evidence of eligibility for the Section 3 preference. Self-certifications from business owners may be accepted by the County at its sole discretion.

A Section 3 Business Concern seeking a contract or a subcontract must demonstrate to the satisfaction of the party awarding the contract or subcontract that the business concern is responsible and has the ability to perform successfully under the terms and conditions of the proposed contract or subcontract. The ability to perform successfully under the terms and conditions of all proposed contracts and subcontracts is required of all Contractors and Subcontractors subject to Section 3 requirements.

## VIII. County of Ventura Preference Procedures for Section 3 Business Concerns under Procurement by Sealed Bids (Invitations for Bids)

This section provides a framework for awarding Section 3 Project contracts to Contractors and

Subcontractors under Procurement by Sealed Bids (Invitation for Bids).

Bids shall be solicited from both Section 3 Business Concerns and Non-Section 3 Business Concerns. An award shall be made to the qualified Section 3 Business Concern with the lowest responsive bid if the bid from the Section 3 Business Concern is within the percentage of the lowest responsive bid defined below.

| When the lowest responsive bid is:             | Threshold for Award to Section 3 Business Concern                              |
|--|--|
| At least \$100,000 but less than \$199,999     | Not more than 9% higher than the lowest responsive bid                         |
| At least \$200,000 but less than \$299,999     | Not more than 8% higher than the lowest responsive bid                         |
| At least \$300,000 but less than \$399,999     | Not more than 7% higher than the lowest responsive bid                         |
| At least \$400,000 but less than \$499,999     | Not more than 6% higher than the lowest responsive bid                         |
| At least \$500,000 but less than \$999,999     | Not more than 5% higher than the the lowest responsive bid                     |
| At least \$1 million but less than \$1,999,999 | Not more than 4% higher than the lowest responsive bid                         |
| At least \$2 million but less than \$3,999,999 | Not more than 3% higher than the lowest responsive bid                         |
| At least \$4 million but less than \$6,999,999 | Not more than 2% higher than the lowest responsive bid                         |
| \$7 million or more                            | Not more than 1.5% higher than the lowest responsive bid, with no dollar limit |

If the selection of one or more Section 3 Business Concerns for work on a Section 3 Project creates a financial hardship (e.g. increases the total budget for the Section 3 Project beyond the available sources of funding), a request for a waiver may be submitted, however approval of such waiver is in the County's sole discretion. Waiver requests must provide detailed information on reason the waiver is requested, including the original budget for the Section 3 Project, a description of why contracting with the Section 3 Business Concern(s) increases the budget beyond the available sources, a description of all efforts made to close the gap, and a description of whether or not the project will meet Section 3 Benchmarks if the waiver is approved.

The County encourages Subrecipients to utilize additional preferences in the award of Section 3 covered contracts under a sealed bid process. For example, Subrecipients may award points to bidders who are qualified Section 3 Business Concerns or who commit to contract with a specific number of Section 3 Business Concerns.

#### IX. Section 3 Contract Compliance

Minimum compliance with Section 3 is determined by documentation of all of the following:

- 1. Creation and implementation of an acceptable Section 3 Strategy for meeting Section 3 Priorities;
- 2. Demonstration of inclusion of the required Section 3 language in all subcontracts/contracts for work associated with the Section 3 Project; and
- 3. Demonstration that the Section 3 Benchmarks were met.

Subrecipients who do not demonstrate compliance during implementation of a Section 3 Project may be

assessed negative points on future funding cycles for CDBG and HOME awards.

The written records of Section 3 Project Contractors and Subcontractors will be reviewed by the County as a means of establishing <u>compliance</u> or <u>non-compliance</u> with Section 3 requirements. Contractors and Subcontractors who receive Section 3 contracts found to be in non-compliance will be deemed to be **ineligible** for future Section 3 covered projects for a minimum period of **24** months from the date deemed to be in noncompliance. **Attachment G** shall be used by Contractors and Subcontractors to provide information and data regarding **actual** contracts/subcontracts awarded. **Attachment H** identifies a form that is required for **actual** labor hours worked in connection with assisted Section 3 Projects. Satisfactory submission of **Attachment F** and/or **G** with each request for payment is a **prerequisite** in order for County to authorize payment on a Section 3 covered project.

**Attachment I** identifies acceptable methods that, when documented, demonstrate compliance with Section 3. **Attachment C** identifies a sample notice for project area resident employment commitment. **Attachment J** provides a sample description of job categories connected with Section 3 covered projects.

The following records must be maintained:

- Worker's self-certification that their income is below the income limit from the prior calendar year.
- Worker's self-certification of participation in public housing or Section 8.
- Certification from a PHA or Section 8 program manager that a worker is a participant in their program.
- Employer's certification that the worker's income from that employer is below the income limit.
- Employer's certification that the worker is employed by a Section 3 Business Concern.
- Worker's certification that the worker is a YouthBuild Participant.

If the Section 3 Benchmarks are NOT met, documentation of compliance with the Section 3 Strategy evidencing the efforts made to meet these goals must be provided. Examples of documentation of efforts to comply will be based upon the Section 3 Strategy and may include:

- Copies of direct mail solicitation and e-mail/Internet outreach;
- Formal advertisements;
- Flyers/brochures advertising meetings;
- Sign-in lists from job fairs and other public meetings;
- Agendas and/or meeting notes from meetings with interested parties and Contractors.

The County of Ventura and HUD reserve the right to inspect Subrecipient records related to this Section 3 Plan with 48 hours notice.

#### X. Complaint Procedure

A complaint may be filed alleging a violation of Section 3 requirements. They may be filed by Section 3 Workers or Section 3 Business Concerns. Complaints are to be addressed to the County of Ventura at the address below. If the complaint cannot be resolved by the County, grievances may be submitted to and investigated by HUD. Those grievances that are not resolved voluntarily can result in an administrative hearing.

A complaint must be written and include:

- Name and address of grievant

- Name and address of Contractor/Subcontractor
- Description of acts or omission
- Corrective action sought

Complaints should be filed with the County of Ventura and, if warranted, may be appealed to the Area Office of HUD (LA Area) and HUD in Washington, D.C., at the addresses below.

#### Community Development Department County Executive Office County of Ventura 800 South Victoria Avenue Ventura, CA 93009-1940 (805) 654-2679; FAX (805) 654-5106

## HUD LA Area Office, Region IX Director, Fair Housing and Equal Opportunity U.S. Dept. of Housing and Urban Development 611 West Sixth St., Suite 1000-9DD L.A., Ca. 90017-3101 (213/534-2572) (FAX: 213/894-4321)

# HUD Washington Assistant Secretary, Fair Housing and Equal Opportunity Office of Economic Opportunity Room 5100, Dept. of HUD 451 Seventh St., S.W. Washington, D.C. 20410-2000 (202/708-1112)

#### XI. Attachments and Required Actions

| Attachment | Title  | Required Action   |
|------------|--|---|
| А          | Section 3 Economic Opportunity Plan  | Submit with Bid   |
| В          | Section 3 Clause   | Must be included in every contract and subcontract.   |
| С          | Sample Notice for Project Area Resident Employment<br>Commitment   | Must be posted at the project site.   |
| D          | Section 3 Compliance Bidder's Certification  | Submit with Bid.  |
| E          | Certification of Business Concerns Seeking Section 3 Preference in Contracting and Demonstration of Capability | To be completed by the Contractor and Subcontractors. Submit with Bid and prior to any subcontracts with Section 3 Business Concerns. |
| F          | Section 3 Eligibly Certification   |   |
| G          | Actual Subcontracts and Suppliers for Section 3 Compliance (awarded for covered projects)                      | Must be submitted with requests for payment   |

| Н | Actual Labor Hours Worked for Contractor or<br>Subcontractor Economic Opportunities for Low and Very<br>Low Income Persons in Connection with Assisted Section 3<br>Projects | Must be submitted with requests for payment |
|---|--|---|
| I | Section 3 Compliance – Suggested Examples (of Efforts to offer Training and Employment Opportunities to Section 3 Residents  |   |
| J | Sample Description of Job Categories for Section 3 Plan  | Information                                 |
| К | Apprenticeship Program Information and Resources   | Information                                 |

#### Attachment A - Section 3 Economic Opportunity Plan

(SUBMIT WITH BID)

| Project Name:   | Date:   |  |  |
|---|---|--|--|
| Project Address:<br>Project City/County:  |   |  |  |
| Name of Bidder/Organization:  |   |  |  |
| Contact Person and Title:   |   |  |  |
| Telephone Number:   | email:  |  |  |
| Address of Bidder:  |   |  |  |
| Description of Service Area or Neigl<br>map)  | nborhood of the Section 3 Project, bordering streets, etc. (or attach   |  |  |
|   |   |  |  |
| <ul><li>A. Economic Opportunities for S</li><li>1. List of all subcontractors and c</li></ul> | ection 3 Business Concerns construction related vendors you plan to use regardless of contract al sheets to complete this section if necessary. |  |  |
| Name:<br>Address:   | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No  |  |  |
| Name:<br>Address:   | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No  |  |  |
| Name:<br>Address:   | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No  |  |  |

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| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
|-------------------|--|
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |
| Name:<br>Address: | Amount: Contact: Phone Number: License Number: Section 3 Business Concern: Yes or No |

(page 3)

| 3. | Detailed description of: 1) all efforts planned to outreach to, identify and secure bids from Section 3 Business Concerns; 2) all Technical Assistance planned to help Section 3 Business Concerns understand and bid on the Section 3 Project; and 3) any assistance made available to Section 3 Business Concerns in bonding, guaranties, or other efforts to support viable bids. |
|----|--|
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |
| 4. | List of sources and methods of identifying and soliciting Section 3 Business Concerns for this project.  |
|    |  |
|    |  |
|    |  |
|    |  |
|    |  |

(page 4)

B. Economic Opportunities for Section 3 Workers

| 1. | List of Sources and Methods of Recruitment of Section 3 Workers.              |
|----|---|
|    |   |
|    |   |
| 2. | List State approved apprenticeship programs to be utilized, if any.           |
|    |   |
| 3. | List any Job Training Partnership Act (JTPA) programs to be utilized, if any. |
|    |   |
|    |   |

Detailed description of: 1) all efforts planned to outreach to and generate job applicants who qualify
as Section 3 Workers; and 2) all planned Technical Assistance to help Section 3 Workers apply for
jobs.

5. List other methods utilized to provide economic opportunities and comply with Section 3 requirements (use additional sheets if necessary).

(page 5)

#### **C. Preliminary Statement of Workforce Needs**

1. Complete the following table for the project. Depending upon the magnitude of the project, you may wish to prepare a table for you and each subcontractor.

| Occupations  | Total Labor Hours<br>Estimated to be<br>Worked by all<br>Workers | Total Labor<br>Hours Estimated<br>to be Worked<br>by Section 3<br>Workers | Total Labor Hours<br>Estimated to be<br>Worked by Targeted<br>Section 3 Workers | Vacancies to Fill |
|--|--|---|---|-------------------|
| Skilled Trades   |  |   |   |                   |
| Semi-skilled   |  |   |   |                   |
| Unskilled Labor  |  |   |   |                   |
| Trainees/ Apprentices                                    |  |   |   |                   |
| Professional Services (architectural, engineering, etc.) |  |   |   |                   |
| Other:   |  |   |   |                   |
| Other:   |  |   |   |                   |
| Other:   |  |   |   |                   |
| Totals   |  |   |   |                   |

| <b>Total Goal for Section 3 Workers</b> (Total Labor Hours Estimated to |   |
|---|---|
| be Worked by Section 3 Workers Divided by Total Labor Hours             |   |
| Estimated to be Worked by al Workers)                                   | 1 |
| Total Goal for Targeted Section 3 Workers (Total Labor Hours            |   |
| Estimated to be Worked by Targeted Section 3 Workers Divided            | l |
| by Total Labor Hours Estimated to be Worked by al Workers)              |   |

Section 3 Benchmarks require that Subrecipients, Contractors and Subcontractors make every effort to meet the following benchmarks:

- Section 3 Workers will make up 25% of the total number of labor hours worked by all workers, exclusive of the labor hours worked by Targeted Section 3 Workers; and
- Targeted Section 3 Workers will make up 5% of the total number of labor hours worked by all workers.

## SUBMIT WITH BID AND PRIOR TO ANY SUBCONTRACTS WITH SECTION 3 BUSINESS CONCERNS

## Attachment B - Section 3 Clause 24 CFR 75

(to be inserted into every contract/subcontract for work)

- A. The work to be performed under this contract is on a project assisted under a program providing direct federal financial assistance from the Department of Housing and Urban Development and is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u, as amended in the Section 3 Final Rule on September 29, 2020 (the Final Rule). Section 3 requires that to the greatest extent feasible, opportunities for training and employment be given to lower income residents of the project area and contracts for work in connection with the project be awarded to business concerns which are located in, or owned in substantial part by persons residing in the area of the project.
- B. The parties to this contract will comply with the provisions of said Section 3 and the regulations issued pursuant thereto by the Secretary of Housing and Urban Development set forth in 24 CFR 75 and all applicable rules and orders of the Department issued thereunder prior to the execution of this contract. The parties to this contract certify and agree that they are under no contractual or other disability which would prevent them from complying with these requirements.
- C. The contractor will send to each labor organization or representative of workers with which he has a collective bargaining agreement or other contract or understanding, if any, a notice advising the said labor organization or worker's representative of his commitments under this Section 3 clause and shall post copies of the notice in conspicuous places available to employees and applicants for employment or training.
- D. The contractor will include this Section 3 clause in every subcontract for work in connection with the project and will, at the direction of the applicant for or recipient of Federal financial assistance, take appropriate action pursuant to the subcontract upon a finding that the subcontractor is in violation of regulations issued by the Secretary of Housing and Urban Development, 24 CFR 75. The contractor will not subcontract with any subcontractor where it has notice or knowledge that the latter has been found in violation of regulations under 24 CFR 75 and will not let any subcontract unless the subcontractor has first provided it with a preliminary statement of ability to comply with the requirements of these regulations.
- E. Compliance with the provisions of Section 3, the regulations set forth in 24 CFR 75, and all applicable rules and orders of the Department issued thereunder prior to the execution of the contract, shall be a condition of the federal financial assistance provided to the project, binding upon the applicant or recipient for such assistance, its successors, and assigns. Failure to fulfill these requirements shall subject the applicant or recipient, its contractors and subcontractors, its successors, and assigns to those sanctions specified by the grant or loan agreement or contract through which federal assistance is provided, and to such sanctions as are specified by 24 CFR 75.

#### Attachment C - Sample Notice of Project Service Area or Neighborhood of Project Employment Commitments

#### **INSTRUCTIONS**

The County of Ventura's Section 3 Plan requires that a notice similar to this sample be sent by all firms awarded or contracting for work on a Section 3 Project funded by the County with federal funds to any labor organizations with which the firm has a collective bargaining agreement or other agreement or understanding. If awarded a contract, you will be required to submit a notice of this type and to post it in a prominent place available to your employees. This notice should be provided on your company's letterhead.

#### SAMPLE

#### TO WHOM IT MAY CONCERN:

The (Insert Name of Company) has entered into an agreement with the County of Ventura for work to be performed at (Insert Project Name and Location). This project is funded in part by the U.S. Department of Housing and Urban Development (HUD) and as such is subject to the terms of Section 3 of the Housing and Urban Development Act of 1968, 12 USC 1701 u, as amended in the Section 3 Final Rule on September 29, 2020 (the Final Rule). As a contractor or subcontractor on this project, and pursuant to the provisions of Section 3, the (Insert Name of Company) is committed to utilizing Section 3 Workers/Targeted Section 3 Workers residing within the Service Area or Neighborhood of the Project as employees and trainees to the greatest extent feasible. In addition, the (Insert Name of Company) will utilize to the greatest extent feasible, Section 3 Business Concerns located in or owned in substantial part by residents of the Section 3 Service Area or Neighborhood of the Project.

The Service Area or Neighborhood of the Project is defined as follows:

#### (insert description)

It is the intention of the (Insert Name of Company) to fulfill its obligations under Section 3.

[Signature of Authorized Company Representative]

#### **Attachment D - Section 3 Compliance Bidder's Certification**

| Name of Company:  |   |
|---|---|
| Address:  |   |
| Project Title & Address:  |   |
| The undersigned does hereby certify that he/she Ventura's Section 3 Plan and requirements that requirements being known as the Section 3 Clause f 3 Final Rule on September 29, 2020 (the Final Rule) are under any contractual restrictions or other disfrom complying with said requirements. | at apply to the above cited project, said ound in 24 CFR 75, as amended in the Section and that neither the project nor the company |
| Signature of Company Officer:   |   |
| Title of Officer:   | Date:   |

## Attachment E - Certification for Business Concerns Seeking Section 3 Preference in Contracting and Demonstration of Capability

| Business Name:  |  | Contractor's Lic. #   |
|---|--|---|
| Address:  |  |   |
| Type of Business:   | <ul><li>□ Corporation</li><li>□ Sole Proprietorsh</li></ul>  | □ Partnership hip □ Joint Venture   |
| The above-referenced its status as a Section                        | -  | g preference in selection for a Section 3 Project based upon  |
| The above-reference   | d business is claiming s   | tatus as a Section 3 Business Concern as follows:   |
| persons (≤ 80  □ Copy of Section □ List of all own household income | % AMI). The following on 3 Business Registry whers of the business e, demonstrating that a             | was more than 51% owned and controlled by low-income documentation is attached.  and signed self-certifications for each certifying the total t least 51% of the owners are within the 80% AMI limit.   |
| three-month attached.  □ List of all curre Section 3 Workers.       | period were performed nt employees, with doc   | 6 of the labor hours performed for the business over the prior d by Section 3 Workers. The following documentation is cumentation of the number of hours worked and identifying   |
| housing resided documentation of Section 1.                         | ents or residents who<br>on is attached for at leas<br>f residency in public ho<br>ction 8 assistance. | was more than 51% owned and controlled by current public currently live in Section 8-assisted housing. The following st 51% of the owners. using from the local housing authority.  t the owner is currently living in public housing or Section 8- |
| □ Copy of Articles o  | •  | nentation is attached, as applicable:  Organization chart with names and titles Additional documentation  |
| •   | perform successfully u   | nder the terms and conditions of the proposed contract ( <u>all</u>   |
| required):  □ Current Financial                                     | Statement  | ☐ Statement of ability to comply with   |
| Signature:  |  | Date:   |
| Print Name:   |  | Title:  |
| Talanhana   |  |   |

#### Attachment F - Section 3 Worker/Targeted Section 3 Worker Certification

| Project Title and Address:   | ?d       |
|--|----------|
| I, the undersigned, understand that the aforementioned project is subject to the County of Ventura Section 3 Plan which warrants that employment and other economic opportunities generated by certain U.S. Department of Housing and Urban Development (HUD) financial assistance shall, to the greates extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed the low-and very-low income persons, particularly those who are recipients of assistance for housing. | in<br>st |
| In reliance of that said warranty, and in reliance upon the income schedules and project service are designation attached hereto and made part of this certification by this reference, I hereby certify that qualify as a Section 3 Worker/Targeted Section 3 Worker by virtue of the statements I make by selectinary of the following as applicable to me:  | tΙ       |
| Section 3 Worker (select as many as apply, one is required to qualify as a Section 3 Worker)   |          |
| The total household income for my family for the previous or annualized calendar year is below th<br>income limit established by HUD for low-income households (80% AMI); or   | ıe       |
| □ I am employed by a Section 3 Business Concern; or  |          |
| □ I am a Youthbuild participant.   |          |
| Targeted Section 3 Worker  |          |
| The total household income for my family for the previous or annualized calendar year is below th  | ıe       |
| income limit established by HUD for low-income households (80% AMI).   |          |
| □ I am employed by a Section 3 Business Concern; and   |          |
| Check one:   |          |
| $\hfill\Box$ I live within the Service Area or Neighborhood of the Section 3 Project, as defined above; or $\hfill\Box$ I am a YouthBuild participant.   |          |
| My permanent address is:   |          |
|  |          |
| I have attached the following documentation as evidence:   |          |
| □ Copy of lease/mortgage statement or driver's license with my home address  |          |
| □ Copy of evidence of participation in a Youthbuild program  |          |
| □ Copy of evidence of employment with a Section 3 Business Concern   |          |
| Other evidence   |          |
| I, the undersigned, swear that the foregoing statements are true and correct and I understand that fals statements may initiate action under Federal or State laws concerning false statements.  | se       |
| Signature:Date:  |          |
|  |          |
| Print Name:Telephone:  |          |
| Print Name:Telephone:  |          |

(page 2 of 2)

#### **SECTION 3 RESIDENT FAMILY INCOME LIMITS**

#### Ventura County

2021 Median Family Income = \$98,800 (4-person household)

As of June 1, 2021

|  | HOUSEHOLD SIZE |              |              |              |              |              |              |              |
|--|----------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
|  | 1 person       | 2<br>persons | 3<br>persons | 4<br>persons | 5<br>persons | 5<br>persons | 7<br>persons | 8<br>persons |
| 50%<br>Median:<br>(Very<br>Low-<br>Income) | \$39,250       | \$44,850     | \$50,450     | \$56,050     | \$60,550     | \$65,050     | \$69,550     | \$74,000     |
| 80%<br>Median:<br>(Low-<br>Income)         | \$62,800       | \$71,800     | \$80,750     | \$89,700     | \$96,900     | \$104,100    | \$111,250    | \$118,450    |

These figures are updated annually by HUD.

Prior to utilizing the above figures, please contact the County Executive Office to verify these are the most recent income limits issued by HUD.

#### Attachment G - Actual Subcontracts and Suppliers for Section 3 Compliance

(To be submitted with each payment request.)

| NAME OF PROJECT:  | DATE: |
|-------------------|-------|
| INAME OF FROJECT. | DAIL. |

| SUBCONTRACTOR'S NAME, ADDRESS, PHONE NUMBER, LICENSE NUMBER                      | TYPE OF<br>WORK<br>(TRADE) | CONTRACT<br>AMOUNT | SECTION 3<br>BUSINESS<br>CONCERN<br>YES OR NO |
|--|----------------------------|--------------------|---|
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |
| SUPPLIER'S NAME, ADDRESS AND PHONE NUMBER (IF INSTALLATION INCLUDED IN CONTRACT) | TYPE OF<br>SUPPLIES        | CONTRACT<br>AMOUNT | SECTION 3<br>BUSINESS<br>CONCERN<br>YES OR NO |
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |
|  |                            |                    |   |

## Attachment H - Actual Labor Hours Worked for Contractor or Subcontractor Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Section 3 Projects

| ame of Project:  |   | Proje                              | ect Loca        | tion:  |   |  |  |
|--|---|------------------------------------|-----------------|--|---|--|--|
|  |   |                                    |                 |  |   |  |  |
| Contractor/subcontractor Name & Address:<br>(Street, City, State, Zip) |   |                                    | License         | Number:  | Dollar Amount of Contract:                                    |  |  |
|  |   |                                    | Contact Person: |  | Phone: (Include Area Code)                                    |  |  |
|  |   |                                    |                 | uction Reporting Period:   | Date Report Submitted:  |  |  |
| Part I: Employment and   | d Training                              |                                    |                 |  |   |  |  |
| A<br>Job Category  | B<br>Number of<br>Labor Hours<br>Worked | C<br>Number of So<br>Labor Hours V |                 | D<br>% of Labor Hours<br>Worked by Section 3<br>Workers (Column C/B) | E<br>Number of<br>Targeted Section<br>3 Labor Hours<br>Worked | F<br>% of Labor<br>Hours Worked<br>by Targeted<br>Section 3<br>Workers<br>(Column E/B) |  |
| Professionals  |   |                                    |                 |  |   |  |  |
| Technicians  |   |                                    |                 |  |   |  |  |
| Office/Clerical  |   |                                    |                 |  |   |  |  |
| Construction by<br>Trade (List)  |   |                                    |                 |  |   |  |  |
| Trade:   |   |                                    |                 |  |   |  |  |
| Trade:   |   |                                    |                 |  |   |  |  |
| Trade:   |   |                                    |                 |  |   |  |  |
| Trade:   |   |                                    |                 |  |   |  |  |
| Trade:   |   |                                    |                 |  |   |  |  |
| Other: (List)  |   |                                    |                 |  |   |  |  |
|  |   |                                    |                 |  |   |  |  |
|  |   |                                    |                 |  |   |  |  |
|  |   |                                    |                 |  |   |  |  |
|  |   |                                    |                 |  |   |  |  |
|  |   |                                    |                 |  |   |  |  |
| TOTAL  |   |                                    |                 |  |   |  |  |

#### **Attachment I - Section 3 Compliance - Suggested Examples**

Following are acceptable methods that, **when documented**, may help demonstrate compliance with Section 3:

- 1. Consulting with State and local agencies administering training programs funded through JTPA or JOBS, probation and parole agencies, unemployment compensation programs, community organizations and other officials or organizations to assist with recruiting Section 3 Workers for a contractor's or subcontractor's training and employment positions.
- 2. Advertising the jobs to be filled through the local media, mail and e-mail and posting in the Service Area or the Neighborhood of the Project.
- 3. Employing a job coordinator, or contracting with a business concern that is licensed in the field of job placement (preferably a Section 3 Business Concern) that will undertake efforts to match eligible and qualified Section 3 Workers with the training and employment positions that the contractor intends to fill.
- 4. Establishing training programs, which are consistent with the requirements of the Department of Labor, for public housing residents and other Section 3 Workers in the building trades.
- 5. Advertising the training and employment positions by distributing flyers (which identify the positions to be filled, the qualifications required, and where to obtain additional information about the application process) to housing developments where there are Section 3 Workers.
- 6. Entering into "first source" hiring agreements with organizations representing Section 3 Workers.
- 7. Contacting resident councils, resident management corporations, or other resident organizations in the housing developments where there are Section 3 Workers, to request the assistance of those organizations in notifying residents of the training and employment positions to be filled.
- 8. Sponsoring a job informational meeting to be conducted at a location in the housing developments where there are Section 3 Workers or in the Service Area or Neighborhood of the Project.
- Arranging assistance in conducting job interviews and completing job applications for residents of the housing developments where there are Section 3 Workers and in the Service Area or Neighborhood of the Project.
- 10. Arranging for a location in the housing developments where there are Section 3 Workers, or the neighborhood or service area of the project, where job applications may be delivered and collected or where job interviews can be conducted.
- 11. Where there are more qualified Section 3 Workers than there are positions to be filled, maintaining a file of eligible qualified Section 3 Workers for future employment positions.
- 12. Undertaking such continued job training efforts as may be necessary to ensure the continued employment of Section 3 Workers previously hired for employment opportunities.

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#### Efforts to Award Contracts to Section 3 Business Concerns:

- 1. In determining responsibility of potential subcontractors, consider their record of Section 3 compliance as evidenced by past actions and their current plans for the pending subcontract.
- Contacting business assistance agencies, minority contractors' associations and community
  organizations to inform them of contracting opportunities and request their assistance in
  identifying Section 3 Business Concerns which may solicit bids or proposals for contracts for
  work in connection with Section 3 Projects.
- 3. Providing written notice to all known Section 3 Business Concerns of the contracting opportunities. This notice should be in sufficient time to allow the Section 3 Business Concerns to respond to the bid invitations or request for proposals.
- Following up with Section 3 Business Concerns that have expressed interest in the contracting opportunities by contacting them to provide additional information on the contracting opportunities.
- 5. Coordinating pre-bid meetings at which Section 3 Business Concerns could be informed of upcoming contracting and subcontracting opportunities.
- 6. Advising Section 3 Business Concerns as to where they may seek assistance to overcome limitations such as inability to obtain bonding, lines of credit, financing, or insurance.
- 7. Arranging solicitations, times for presentations of subcontract bids, quantities, specifications, and delivery schedules in ways to facilitate the participation of Section 3 Business Concerns.
- 8. Where appropriate, breaking out subcontract work items into economically feasible units to facilitate participation by Section 3 Business Concerns.
- 9. Advertising subcontracting opportunities through trade association papers and newsletters, and through other local media, such as newspapers of general circulation.
- 10. Developing a list of eligible Section 3 Business Concerns.

#### Providing Other Economic Opportunities

Contractors and subcontractors are encouraged to undertake efforts to provide to low-income persons economic opportunities other than training, employment, and contract awards, in connection with Section 3 Projects.

Other Training and Employment Related Opportunities: These include, but need not be limited to, use of trainee positions to fill vacancies; and hiring Section 3 Workers in part-time positions.

Other Business Related Economic Opportunities include, but are not limited to, the formation of Section 3 joint ventures, financial support for affiliating with franchise development, use of labor only contracts for building trades, purchase of supplies and materials from Housing Authority resident-owned businesses or Public Housing Authority resident-owned businesses.

#### **Attachment J - Sample Description of Section 3 Job Categories**

<u>Officials/Managers</u> - Occupations requiring administrative personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of a firm's operation. Includes: officials, executives, middle management, plant managers, superintendents, salaried forepersons.

<u>Professionals</u> - Occupations requiring either college graduation or experience of such kind that provides a comparable background. Includes: accountants, chemists, architects, engineers, personnel workers, registered nurses, teachers, lawyers, auditors, researchers, property managers.

<u>Technicians (Para-professionals)</u> - Workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work which can be obtained through about two years of post-high school education or through equivalent on-the-job training (e.g., computer programmers, draft persons, engineering aides, junior engineers, nurses, nurse's aides, assistants, surveyors, buyers).

<u>Sales</u> - Occupations engaging wholly or primarily in direct selling (e.g., advertising agents, brokers, sales clerks).

<u>Office/Clerical</u> - Includes all clerical-type work regardless of level of difficulty (e.g., bookkeepers, office clerks, typists, telephone operators, non-management).

<u>Skilled Craft Workers</u> - Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work (e.g., auto attendants, laundry operators, truck drivers).

<u>Operatives (Semi-skilled workers)</u> - Workers who operate machines or processing equipment or perform other factory-type building trades, truck drivers).

<u>Laborers (Unskilled workers)</u> - Workers in manual occupations which generally require no special training (e.g., laborers, helpers, car washers, gardeners, elevator operators).

<u>Apprentices/Trainees</u> - Persons employed in a program including work training and related instruction to learn a trade or craft which is traditionally considered an apprenticeship, regardless of whether the program is registered with a Federal or State agency).

Service Workers - Workers in both protective and non-protective service occupations

ADP/computer Guards Police
Air conditioning repair Handyworker Porters
Appliance repair Janitorial Printers
Carpet Consultants Landscaping Suppliers

Catering Lead Based Paint Remover Transportation providers

Engineers Manufacturing Vendors

Firefighters Marketing Waiters/Waitresses

Florists Photography

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#### <u>Construction Workers</u> - Include but are not limited to the following categories:

Architecture

Asbestos Removal

Bricklaying

Carpentry

Cement/Masonry

Communications & Systems

Demolition

Drywall

Electrical

**Elevator Construction** 

Fencing

Glazing

Heating

Insulators

Iron works

Laborers

Lathers

Latileis

Marble and Tile

**Machine Operators** 

**Painters** 

Parking Lot Striping

**Plastering** 

Plumbing

**Power Equipment Operators** 

Refrigeration/Conditioning

Roofing

**Sheet Metal** 

Soft Floor Layer

Sprinkler Fitter

Stone Mason/Bricklayer

Surveying

Terrazzo

Tile Setting

Truck Driver

#### I. Attachment K - Apprenticeship Program Information and Resources

Building California Construction Careers conducts outreach programs which are designed to educate the public about construction career opportunities and apprenticeship. Their website is full of information regarding various union apprenticeship programs throughout the central coast. Their website is <a href="https://buildcalifornia.com/">https://buildcalifornia.com/</a>.

TRI COUNTIES BUILDING AND CONSTRUCTION TRADES COUNCIL, AFL-CIO, represents Craft Unions in Ventura, Santa Barbara and San Luis Obispo Counties.

3994 East Main Street Ventura, CA 93006 (805) 794-4274

In addition, the following labor unions may also be a source for potential employees and many have apprenticeship programs.

#### **ASBESTOS WORKERS 5**

670 E. Foothill, suite 2 Azusa, Ca. 91702 Phone: 626-815-9794 E-Mail: fredawl5@aol.com Website: www.awlocal5.com

#### **BAC LOCAL 4 (Bricklayers)**

BAC 4 (Ventura Office) 270 South Joanne Ave. Ventura, California 93003 Phone: 805-658-4883 Phone: 800-972-3338

E-Mail: mcrespi@sbcglobal.net E-Mail: bac4ca@aol.com Website: www.bac4ca.org

#### **BOILERMAKERS 92**

2260 Riverside Ave. Bloomington, California 92316 Phone: 909-877-9382

website: www.boilermakerslocal92.com

#### **CEMENT MASONS 600**

2299 East Main Street, Suite 9 Ventura, California 93001 Phone: 805-653-5919

#### **ELECTRICAL WORKERS LOCAL 952**

3994 E. Main St. Ventura, CA 93006 (805) 642-2149

#### **ELEVATOR CONSTRUCTORS LOCAL 18**

100 South Mentor Ave. Pasadena, California 91106 Phone: 626-449-1869

E-Mail: gazzat18@sbcglobal.net Website: <a href="https://www.iueclocal18.otg">www.iueclocal18.otg</a>

#### **FLOORLAYERS 1247**

8051 Pioneer Blvd. Whitter, California 90606 Phone: 562-695-7402

#### **GLAZIERS LOCAL 636**

2333 North Lake Avenue, Unit F Altadena, CA 91001 (626) 448-1565

E-Mail: lu636@dc36.org

#### **GOLD COAST OF D.C. OF CARPENTERS LOCAL 805**

412 Dawson Drive Camarillo, CA 93010 (805) 482-1905

#### **HEAT AND FROST LOCAL 5**

3833 Ebony St Ontario, CA 91761 909-390-7002

#### **IBEW 952**

3994 East Main Street Ventura, California 93006

Business Manager: Shane Werner

Business Agent: Jeff Bode

Phone: 805-642-2149 Fax: 805-658-7507

E-Mail: shane@ibew952.org Website: www.ibewlu952.org

#### IRONWORKERS LOCAL 416 (Reinforced)

PO Box 1166

Norwalk, California 90651 Phone: 562-868-1251

E-Mail: hart@irownworkers416.org E-Mail: robert@ironworkers416.org

Website: www.reinforcingironworkerslocal416.org

#### **IRONWORKERS LOCAL 433** (Structural)

17495 Hurley Street East City of Industry, CA 91744 (626) 964-2500

#### **IRONWORKERS LOCAL 509** (Shopmen & Ornamental)

13830 San Antonio Dr. Norwalk, CA 90651 (323) 262-9653

#### **LABORERS LOCAL 585**

21 South Dos Caminos Ave.

Ventura, CA 93003 Phone: 805-643-5487

E-Mail: dvalenzuela@sbcglobal.net

#### LABORERS 1184

1074 East La Cadena Drive, Suite 4

Riverside, California 92501 Phone: 951-680-1292

Website: www.laborers1184.com

#### **MILLWRIGHTS LOCAL 1607**

932 S. Gerhart Ave., #200 Los Angeles, CA 90022 (323) 724-0178

#### **OPERATING ENGINEERS LOCAL 12**

1094 E. Main St. Ventura, CA 93001 (805) 643-8740

#### **PAINTERS DISTRICT COUNCIL 36**

2333 North Lake Ave., Unit "H" Altadena, California 91001 Phone: 626-584-9925

E-Mail: mike.gutierrez@dc36.org

Website: www.dc36.org

#### **PAINTERS & TAPERS LOCAL 52**

26 Bernard Street, Room 20 Bakersfield, CA 93305 (805) 325-1825

E-Mail: lu52@sbcglobal.net

#### **PLASTERERS 200**

1610 West Holt Ave. Pomona, California 91768 Phone: 909-865-2240

E-Mail: bobp.local200@verizon.net WEbsite: www.plastererslocal200.org

#### **PILEDRIVERS LOCAL 2375**

728 N. Lagoon Ave. Wilmington, CA 90744 (310) 830-5300

#### **PLUMBERS & PIPEFITTERS LOCAL 484**

1955 N. Ventura Ave. Ventura, CA 93001 (805) 643-6345

#### **ROOFERS LOCAL 36**

5380 Poplar Blvd. Los Angeles, CA 90032 Phone: 323-222-0251 E-Mail: oj36@sbcglobal.net

#### **SHEET METAL WORKERS LOCAL 273**

1794 Goodyear Ventura, CA 93003 (805) 658-0053

E-Mail: smwlocal273@aol.com

E-Mail: smworkerslocal273@yahoo.com

#### SO CA D.C. OF LABORERS

4399 Santa Anita Avenue Suite 204 El Monte, CA 91731 (626) 350-6900

#### **TEAMSTERS LOCAL 186**

1534 Eastman Avenue, Suite B Ventura, CA 93003 (805) 644-0070

#### **TEAMSTERS 381**

115 West Bunny Ave. Santa Maria, California 93454

Phone: 805-922-7876

E-Mail: lswenson@teamsters381.org Website: www.teamsters381.org

#### **TILE, MARBLE & TERRAZZO LOCAL 18**

9732 E. Garvey Avenue South El Monte, CA 91733

(626) 329-0369

E-Mail: chad@tileunion.org E-Mail: pete@tileunion.org Website: www.tileunion.org

#### TRI COUNTIES BUILDING & CONSTRUCTION TRADES COUNCIL

3994 East Main Street Ventura, California 93006 Phone: (805) 794-4274

Website: http://buildingtradescouncil.org/

#### **UA DISTRICT COUNCIL 16**

501 Shatto Place, Suite 400 Los Angeles, California 90020

Phone: 213-487-4262 Website: www.dc16.org

#### **U.A. LOCAL 250** (Refrigeration/Steamfitters)

18355 S. Figueroa St. Los Angeles, CA 90248

(310) 660-0035

Website: www.ua250.org

#### <u>U.A. LOCAL 345</u> (Plumbing & Pipefitting)

1430 Huntington Drive Duarte, CA 91010 Phone: 626-301-0531 E-Mail: kauhi49@aol.com

#### **UA 484**

1955 North Ventura Ave. Ventura, California 93001 Phone: 805-643-6345

E-Mail: local484@sbcglobal.net

## UA 669 (Sprinkler Fitters) PO Box 1894

Oakhurst, California 93644 Phone: 559-642-2224

E-Mail: kwatsonba27@sti.net

Website: www.sprinklerfitters669.org

#### U.A. LOCAL 709 (Fire Sprinkler Fitters)

12140 Rivera Road Whittier, CA 90606 Phone: 562-698-9909

E-Mail: michaelh@sprinklerfitters709.org Website: www.sprinklerfitters709.org

#### **Additional Resources**

HUD Section 3 Business Registry https://portalapps.hud.gov/Sec3BusReg/BRegistry/BRegistryHome

County of Ventura Human Services Agency (HSA) Employment Assistance: America's Job Center (multiple locations)

Cal Jobs

https://www.caljobs.ca.gov/vosnet/Default.aspx

State Employment Development Department (EDD) https://edd.ca.gov/

#### **Housing Authorities**

Area Housing Authority of Ventura County
Oxnard Housing Authority
Port Hueneme Housing Authority
Santa Paula Housing Authority
Housing Authority of the City of San Buenaventura

<u>Small Business Development Center.</u> The Small Business Development Center may be able to provide technical assistance to potential Section 3 Business Concerns.

<u>Women's Economic Ventures</u> Women's Economic Ventures is dedicated to creating an equitable and just society through the economic empowerment of women.

<u>Ventura County Economic Development Council</u> (VCEDA), the Economic Development Collaborative of Ventura County (EDC-VC), and Chambers of Commerce may be able to provide names of potential Section 3 Business Concerns.