Good Morning Everyone!

ATTENTION
All Participants:
SIGN–IN USING
THE CHAT BOX
PLEASE TYPE YOUR
NAME AND EMAIL
Community Development Block Grant Program

Certified CDBG Administrator Continuing Education Workshop

2021
**TENTATIVE AGENDA**

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
<th>Speaker</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:30 - 8:45</td>
<td>Zoom Chat-box Sign-In (Required for All Participants)</td>
<td>Linda Goode</td>
</tr>
<tr>
<td>8:45</td>
<td>Welcome</td>
<td>Kellon Dixon</td>
</tr>
<tr>
<td>8:45 - 9:00</td>
<td>Update on CDBG-CV</td>
<td>Kellon Dixon</td>
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<tr>
<td>9:00 - 10:00</td>
<td>CDBG Project Management Guide (overview of changes)</td>
<td>Robin Slawson</td>
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<tr>
<td>10:00 - 11:00</td>
<td>New Section 3 Policies &amp; Procedures (overview of policy &amp; required forms)</td>
<td>Robin Slawson</td>
</tr>
<tr>
<td>11:00 - 11:15</td>
<td>Contract Modifications</td>
<td>Christy Davis</td>
</tr>
<tr>
<td>11:15 - 11:30</td>
<td>OK Grants Roles-Status Changes</td>
<td>Christy Davis</td>
</tr>
<tr>
<td>11:30 - 12:30</td>
<td>Q &amp; A – Group Discussion</td>
<td>CD Staff/Planners All Participants</td>
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</tbody>
</table>
CDBG-CV Updates
Applications for Round 3 of CDBG-CV funds are due back by November 1, 2021.

Eligible applicants for Round 3 of the CDBG-CV Program are units of local government (incorporated towns, cities, and counties) that are not participants in the CDBG Entitlement Program. Applicants that received funding in CV Round 1 cannot apply for funds in CV Round 3. Only UGLGs that did not receive funding in either CV Round 1 or CV Round 2 may apply for CV Round 3.

For any unobligated or unspent funds remaining after awards are made in CV Round 3, (ODOC/CD) will recalculate and distribute the allocation at any time to eligible communities that did not receive funding in previous rounds and/or communities that demonstrate a need that exceeds their previous allocation of CDBG-CV funds.
CV Round 3

- Competitive
- Grant Maximum $450,000
- Grant Minimum - $150,000

Eligible activities to include:
- Utility Assistance
- Mortgage/Rental Assistance
- Medical Assistance
- Nutrition Assistance
- Mental Health Assistance
- Daycare or After-School Assistance
- Job Training Assistance
- Rehabilitation Assistance
For questions or comments regarding the CV Grants please contact:
Kellon Dixon
405-215-5626
Kellon.Dixon@okcommerce.gov

Taylor Huizenga
405-308-6691
Taylor.Huizenga@okcommerce.gov

More information can be found on our web page:
https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/
MANAGEMENT GUIDE
UPDATES
RECENT ADDITIONS, DELETIONS, AND REVISIONS

OCTOBER 2021

- Policy 401-2 Included guidance for grantee to request extension of 120-day RROF.
- Policy 401.1 Included guidance for submitting Modification Requests on Grantee Letterhead.
- Policy 401-4.1.7 Included guidance for requesting additional funds to complete an activity.
- Policy 401 – Added the EDIF forms to this section.
- Policy 402 – No changes
- Policy 403-1.2 Included guidance for grantee to request extension of 120-day RROF
- Policy 403-Form 403.1- Updated the RROF and Removal of Contract Conditions Checklist:
  - Exempt:
    - Deleted the Grantee’s SAM.gov check as it is submitted with application.
    - Added Procurement upload of RFF/RFO for service contracts.
  - Added Section 3 Resolution and Plan
  - Deleted Form Compliance Documentation Checklist
  - Deleted Form Noise Abatement and Control (link can be found on worksheet)
  - Deleted Form Environmental Certification
- Policy 404 – Added Section 3 Policies & Procedures, and Forms
- Policy 405 – No Changes
- Policy 406 – Added new requirement for drawing construction funds & supporting documents
- Policy 407 – Revised Attachment 23 Construction Bid Document sample:
  - Notice of Award form – included new statement for section 3
  - Revised the Section 3 information to include current process
  - Revised 407.4 Pre-construction checklist to include Section 3 Notice
- Policy 408 - 2. Pre-construction Conference Checklist; Added 2.58 “Review the Section 3 Reporting Requirements for Reporting Worker Hours and Qualitative & Quantitative Benchmarks”.
  - Added Form 408.6 DOL Supplemental Contract Language
- Policy 409 – Deleted/Replaced Section 3 Reporting form
  - Added 409.3 Section 3 Final Labor Hours Report
  - Revised the Closeout Checklist to include the above 409.3 Report Form
  - Added “a recommendation to submit Project Photos” on Closeout Checklist
Oklahoma Department of Commerce (ODOC) - Community Development Block Grant Program

Request for Release of Funds & Removal of Contract Conditions Checklist:

Initiate & Request for Release of Funds in OKGrants: Prepare Checklist, save as "RROF Checklist, Name Contract Number" & upload (do not erase checklist). Upload all applicable items with supporting documents as individual files using the checklist as a guide into RROF Menu - Uploads change status to submit by the Authorized Official.

<table>
<thead>
<tr>
<th>Submitted Items - Grantee</th>
<th>Reviewed Items - ODOC Only</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

- Determine Level of Environmental Review - Please complete separate environmental forms for each applicable activity & refer to the ODOC Sub-Recipient Management Guide and Forms.

1. Exempt Activity - Complete and Upload Forms into OKGrants
2. Part SB Environmental Review - Exempt Activity (Form 003.31)
3. Contractor Completion/Exclusion Review Cert (Form 007.22) Verify with DUNS II and upload www.sam.gov
4. Procurement - Exempt Activities - Upload RFP/RFQ/Bid Service Contracts

- Categorically Excluded NOT Subject to 58.5
1. Part SB Environmental Review - Exempt CENSIT Form (Form 003.31)
2. Complete and Upload Categorically Excluded "Not Subject to Section 58.5" Form (Pursuant to 29 CFR Part 58.35(b))
3. Categorically Excluded SUBJECT TO 58.5 - Complete All Worksheets


- 1. Export trays
- 2. Coastal Ocean
- 3. Chemical Protection
- 4. Hazardous materials
- 5. Military Protection
- 6. Hazardous substances
- 7. Nuclear Power
- 8. Nuclear Security
- 9. Environmental Justice

Form 403.1 pg 1 2021
### Complete and Upload Categorically Excluded Form:

**Category Excluded under 58.35(b)(CA)(Form 403.1)**

- [ ] Historical Clearance Letter [HIPD & THPO](03 Attachment 25,30,31)
  - https://www.dilators.org/hip/attachment/25
  - https://www.dilators.org/hip/attachment/30
  - [ ] Archaeological Survey Letter - https://www.no.us/arsenarch/cultural-
    resource-management/agencies-and-applicants
  - Did the CE Form 403.1 (categorical checklist) convert the activity to
    exempt at 20.34 (b)(12)?
  - If YES skip to complete from F. RIGOF 2015-15. If NO complete c.d.e.f,
    as applicable to activity: (activity improvements that exceed 20%)
    compliance/mitigation to any related authority.

### Activity located in a Floodplain?

- [ ] Yes
- [ ] No

**FEMA FRMettre Map** (Please provide Panel No. & Date below)

- [ ] Eight Step Analysis (24 CFR Part 55.30)
  - [ ] Upload or place if N/A:
  - [ ] Final Notice (must be published one time, 7 day comment period)

**DIST LIST (see attachment 25)**

- [ ] Distribute the Notice to the appropriate agencies and interested parties in
  relation to the activity and upload with publication

### REQUEST RELEASE OF FUNDS - 2015-15 (Form 403.4)

**OTHER REQUIREMENTS**

- [ ] Leverage/Matching Funds (Form 403.1)
  - [ ] URGENT: Leverage Confirmation & supporting documentation as
    applicable (e.g., funding
  - [ ] Insurance Bonding as applicable (e.g., funding
  - [ ] Evidence of City/County General Liability Insurance coverage
  - [ ] Evidence of City/Court Bonding
  - [ ] Anti-Displacement Plan [03 Attachment 15]
  - [ ] URGENT: Executive Plan
  - [ ] Fair Housing Activity - [03 Attachment 1]
  - [ ] Vendor Agreement
  - [ ] Section 3 - (URGE) Notice & Plan adopted by sub-recipient
  - [ ] Refer to Project Management Guide - Policy 004

### Environmental Assessment (EA) - Complete All Worksheets

Upload individually with supporting documentation [https://www.arsenarch/cultural-
resource-management/agencies-and-applicants](https://www.arsenarch/cultural-
resource-management/agencies-and-applicants)

**Environmental Assessment Checklist (Form 403.1)**

- [ ] Historical Clearance Letter (HIPD & THPO) - [03 Attachment 25, 30, 31]
  - https://www.dilators.org/hip/attachment/25
  - [ ] Archaeological Survey Letter - https://www.no.us/arsenarch/cultural-
    resource-management/agencies-and-applicants
  - Floodplains Management - [https://www.arsenarch/cultural-
    resource-management/agencies-and-applicants](https://www.arsenarch/cultural-
    resource-management/agencies-and-applicants)
    - FEMA FRMettre Map - Please provide Panel No. & Date below

- [ ] Eight Step Analysis (24 CFR Part 55.30):
  - [ ] Upload or place if N/A:
  - [ ] Final Notice (must be published one time, 7 day comment period)
    - [ ] (see attachment 25)

- [ ] Combined Notice (see attachment 25)
  - [ ] (Proof of Publication or Posting)

- [ ] DIST LIST (see attachment 25)
  - [ ] Distribute the Notice to the appropriate agencies and interested parties in
    relation to the activity and upload with publication

- [ ] REQUEST RELEASE OF FUNDS - 2015-15 (Form 403.4)
  - [ ] OTHER REQUIREMENTS
  - [ ] Leverage/Matching Funds (Form 403.1)
    - [ ] URGENT: Leverage Confirmation & supporting documentation as
      applicable (e.g., funding
  - [ ] Insurance Bonding as applicable (e.g., funding
  - [ ] Evidence of City/County General Liability Insurance coverage
  - [ ] Evidence of City/Court Bonding
  - [ ] Anti-Displacement Plan [03 Attachment 15]
  - [ ] URGENT: Executive Plan
  - [ ] Fair Housing Activity - [03 Attachment 1]
  - [ ] Vendor Agreement
  - [ ] Section 3 - (URGE) Notice & Plan adopted by sub-recipient
  - [ ] Refer to Project Management Guide - Policy 004

- [ ] Engineer Acknowledgment (Form 403.5)
  - [ ] URGENT: Executive form
  - [ ] ODOE Permit to Construct - [URGE] for NSM, Contracts & Part I
    Contract conditions as applicable. Letterblank if N/A

**Preparer Name, Title, & Agency (Permit) ODOE Reviewer Name & Title**

- [ ] Date
- [ ] Date

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**Form 403.1 pg. 2 2021**

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**Form 403.1 pg. 3 2021**
REVISED RROF CHECKLIST
ENVIRONMENTAL REVIEW

ITEMS ADDED:

EXEMPT ACTIVITIES:
• PROCUREMENT OF PROFESSIONAL SERVICES AS PER APPLICATION BUDGET
  RFP/RFQ & CONTRACTS UPLOADED

HISTORICAL CLEARANCE:
• LINK TO TRIBAL LISTING AT STATE HISTORIC PRESERVATION OFFICE WEBSITE
• LINK TO ARCHEOLOGICAL WEBSITE

FLOODPLAIN MANAGEMENT:
• AREA TO TYPE IN THE FEMA MAP PANEL NUMBER AND DATE

DISTRIBUTION LIST

ITEMS DELETED:

COMPLIANCE DOCUMENTATION CHECKLIST

NOISE ABATEMENT AND CONTROL FORM

ENVIRONMENTAL CERTIFICATION FORM
REVISED RROF CHECKLIST

CONTRACT CONDITIONS

ITEMS ADDED:

FAIR HOUSING ACTIVITY:
  • UPLOAD ONE (1) ACTIVITY

DEQ PERMIT TO CONSTRUCT:
  • W/S ENGINEERING CONTRACTS & PART II as applicable

NO SIGNATURE REQUIRED ON THE CHECKLIST
  • TYPED PREPARERS NAME AND DATE
  • SAVE FORM AS (RROF Checklist_Name_Contract Number)
  • UPLOAD – DO NOT SCAN

SECTION 3 – ADOPT A RESOLUTION & PLAN
WEEKLY PAYROLL REPORTS

WEEKLY DAVIS-BACON PAYROLL REPORTS WILL BE UPLOADED WITH ALL ADVANCES FOR CONSTRUCTION
WHY?

* REDUCES MONITORING REVIEW TIME

* SUPPORTS BEING PROACTIVE WITH ANY ISSUES OR RESTITUTION IN A TIMELY MANNER
50% CDBG – 50% LEVERAGE

Each of the following CDBG contracts REAP, SMALL CITIES, WATER/WASTEWATER CONSTRUCTION pay advance must be divided in equal funds and noted on the purchase orders.
50% CDBG – 50% LEVERAGE

ELIMINATES A REPAYMENT OF CDBG FUNDS FOR PROJECTS UNDER BUDGET
Section 3 Update

24 CFR part 75

Policies and Procedures will be updated for tracking labor hours and other requirements to ensure compliance with the new rules for projects for which funds are committed on or after July 1, 2021.
Section 3 Business Concern

What Does “Section 3 Business Concern” mean?
A Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:
1. At least 51 percent owned and controlled by low- or very low-income persons;
2. Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
3. A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
Section 3 Business

https://portalapps.hud.gov/Sec3BusReg/BRegistry/AmISection3
The Section 3 Business Registry – HUD’s online database can be used:

- by agencies that receive HUD Funds;
- by Section 3 residents to identify businesses that may have HUD funded employment opportunities;
- as a Searchable Listing of firms that have self-certified;
- as a Tool to assist recipients of HUD funding by enabling grantees to meet their Section 3 obligations by reducing some of the burden associated with locating eligible businesses.

“Service area” or the “neighborhood of the project” means:
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.
Section 3 Workers

What Does “Section 3 Worker” Mean? A Section 3 worker is any worker who currently fits, or when hired within the past five years fit, at least one of the following categories, as documented:

1. The worker’s income for the previous or annualized calendar year is below the income limit established by HUD;
2. The worker is employed by a Section 3 business concern; or
3. The worker is a YouthBuild participant.

A “Section 3 targeted worker” for Community Development (Non-housing) projects is a Section 3 worker who:

1. is employed by a Section 3 business concern; or
2. currently fits or when hired fits at least one of the following categories, as documented within the past five years:
   (i) Living within the service area or the neighborhood of the project, as defined in 24 CFR § 75.5; or
   (ii) A YouthBuild participant
What is YouthBuild?

https://youthbuild.org/our-programs/

Academic and occupational skills training program serving youth ages 16 – 24 who have dropped-out of high school, or previously dropped-out and re-enrolled.

Additional Criteria:

• A member of a low-income family and/or
• A youth in foster care (including youth aging out of foster care) and/or
• A youth or adult offender and/or
• A youth with a disability and/or
• The child of an incarcerated parent and/or
• A migrant youth.

For more information, visit:
https://www.dol.gov/agencies/eta/youth/youthbuild
https://youthbuild.org/our-programs/
A. Service Area = an area within one mile of the Section 3 project

OR

B. If < 5,000 people live within one mile of Section 3 project,

Then, Service Area = an area within a circle centered around the Section 3 project site that encompasses 5,000 people.

*According to the most recent U.S. Census
Certification - Targeted Section 3 Worker

• An employer's confirmation that a worker's residence is within one mile of the work site or, if fewer than 5,000 people live within one mile of a work site, within a circle centered on the work site that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census;

• An employer’s certification that the worker is employed by a Section 3 business concern; or

• A worker’s self-certification of YouthBuild Participant
Sample Section 3 Business and Employment Notice

(Instructions: Publish as a display advertisement in the local paper's non-legal section or post at the local government and other Section 3 area locations.)

(Insert Locality's name) is preparing to carry out the (insert Name of Project) through the use of Community Development Block Grant Funds. In the implementation of this project the following job types may be available:

(Insert List of Job Classifications to be used during project)

All job openings will be posted at (local government office or list other posting locations). To the greatest extent feasible, employment and training positions will be made available to qualified persons who permanently reside in (insert the County's or local municipality name as Section 3 area). Persons qualified for the jobs listed should register at the following location:

(Insert Name and Address of posting locations and/or Other Locations)

Additionally, the following contracts and procurements will/may be made and to the greatest extent feasible, businesses located in and owned by persons residing in (insert the County's name as Section 3 area) will be utilized:

(Insert list of construction, non-construction, and service contracts to be procured during the project. Also, insert list of construction subcontracts, major, specific equipment and general types of materials to be used during the project.)

All above-referenced procurements will be made on a competitive basis. The names of businesses who respond to this notice will be included on procurement lists for this project. Names of job seekers will be given to contractors.

Any person residing or firm located in the above-named areas may request to participate in procurement opportunities associated with this project by contacting (insert local contact information) within ten (10) days of this notice.
An individual who works or seeks to work on a Section 3 project must certify his/her eligibility to be classified as a Section 3 Worker or Targeted Section 3 Worker, as defined in 24 CFR part 75. The status of a Section 3 Worker or Targeted Section 3 Worker shall not be negatively affected by a prior arrest or conviction.

Please select the applicable classification.

I am a worker who currently fits or when hired within the past five years fit one of the following categories, as documented:

**Section 3 Worker**

☐ My income for the previous calendar year is below the income limit established by HUD;

**Targeted Section 3 Worker**

☐ I am a YouthBuild participant;

**Unclassified**

☐ Yes, or No.
<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Work Classification</th>
<th>Section 3 Status</th>
<th>Total Labor Hours</th>
<th>Unclassified Labor Hours</th>
<th>Section 3 Labor Hours</th>
<th>Targeted Section 3 Labor Hours</th>
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TOTAL: 0.00 0.00 0.00 0.00 0.00

CONTRACTOR CERTIFICATION:
I hereby certify the accuracy of the data reported above.

Date: [ ]
Signature: [ ]
Name: [ ]
Phone: [ ]

Submitted with Contractor’s Monthly Pay Estimate & Weekly Payroll
Section 3 Workers
• Search for employment and training opportunities
• Post Resume

Section 3 Recipients and Business Concerns
• Post job and training positions
• Search for job applicants
• Post contract opportunities

Section 3 Business Concerns
• Search for contracts

Opportunity Portal

Employment Opportunities

Section 3 business

Job

Section 3 worker

Employment Opportunities

- Grantee
- Contract
- Section 3 business

Section 3 projects are housing rehabilitation, housing construction, and 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.

For housing and community development financial assistance projects, the benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

The benchmark for Targeted Section 3 workers is set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project. This means that the 5 percent is included as part of the 25 percent threshold.
Safe Harbor Benchmarks

\[
\text{Section 3 labor hours} \quad \frac{\text{Total labor hours}}{} = 25\% \quad \text{AND} \quad \text{Targeted Section 3 labor hours} \quad \frac{\text{Total labor hours}}{} = 5\%
\]
Safe Harbor Compliance Check

What if a recipient can’t meet the quantitative benchmarks + prioritization of effort?

Provide evidence that they have made qualitative efforts to assist low and very low-income persons with employment and training opportunities.
Safe Harbor Compliance Check

Complied with safe harbor if:

Met or exceeded the Section 3 benchmarks  
AND  
Followed the required prioritization of effort

Absent evidence of the contrary
Certification of Prioritization of Effort

Employment & Training

“to the greatest extent feasible”

Section 3 workers residing within the service area or neighborhood of the project

Participants in YouthBuild programs

Consistent with existing Federal, state, and local laws and regulations
Certification of Prioritization of Effort

**Contracting**

"to the greatest extent feasible"

Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the service area or the neighborhood of the project

Participants in YouthBuild programs

Consistent with existing Federal, state, and local laws and regulations
**Oklahoma Department of Commerce - Section 3 Reporting (24 CFR 75.25)**

**CDBG Project Completion - Section 3 Final Closeout Report**

<table>
<thead>
<tr>
<th>Grantee Name</th>
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<tbody>
<tr>
<td>Grant Contract #</td>
<td></td>
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<tr>
<td>Project Activity</td>
<td></td>
</tr>
<tr>
<td>Const. Contractor(s)</td>
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<tr>
<td>Sub Contractor(s)</td>
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</table>

**Enter the Total Labor Hours for the completed project**

**Enter Total Targeted Section 3 Workers Labor Hours**

<table>
<thead>
<tr>
<th>Section 3 Workers Labor Hours</th>
<th>1</th>
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<tbody>
<tr>
<td></td>
<td>0.0% No</td>
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</table>

Benchmarks Safe Harbor Met

https://www.huduser.gov/portal/datasets/1.html

This section below is required if, based on the labor hours reported above, the reporting entity did not meet the safe harbor benchmarks.

Check all that apply. Please attach supporting documentation for each effort performed.

- Outreach efforts to generate job applicants who are Targeted Workers, Workforce or Job Centers
- Direct on the Job training including apprenticeships
- Indirect training such as arranging for contracting for or paying tuition for off-site training
- Provided direct assistance to help Section 3 workers compete for jobs (e.g., resume assistance coaching)
- Outreach efforts to identify and secure bids from Section 3 business concerns
- Provide assistance to help Section 3 business concerns understand and bid on contracts
- Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns
- Residents to jobs
- Held one or more jobs fairs
- Provided or connected residents with supportive services that can provide direct services or referrals
- Transportation
- Assisted residents to apply for or attend community college or a four year educational institution
- Assisted residents to apply for or attend vocational/technical training
- Assisted residents to obtain financial literacy training and/or coaching
- Bonding assistance, guarantees, or other efforts to support viable bids from Section 3 business concerns
- Provided or connected residents with training on computer use or online technologies
- Other Efforts - Specify:

Prepared by:  
Name & Title/Entity

**Section 3 Labor Hours Reporting is required for all construction contracts awarded after 7/1/2021 and exceeds $200,000 in grant funds.**
Grantee Section 3 Review Checklist

NOTE: This form is to only be used for projects with over $200,000 in HUD funding in which assistance or funds are committed on or after July 1, 2021.

- Section 3 FAQ: [https://www.hudexchange.info/section-3/faq/](https://www.hudexchange.info/section-3/faq/)
- Learn about: [https://www.hud.gov/program_offices/field_policy_mgt/section3](https://www.hud.gov/program_offices/field_policy_mgt/section3)
- Section 3 Training: [https://www.hudexchange.info/trainings/section-3/](https://www.hudexchange.info/trainings/section-3/)
- Section 3: [https://www.hudexchange.info/programs/section-3/](https://www.hudexchange.info/programs/section-3/)

At Grant Award or RIOF and Removal of Contract Conditions

- Grantee adopts a resolution and "Attachment A" Section 3 Plan to comply with Section 3 of 24 CFR Part 75. The regulations at 24 CFR Part 75 are applicable to projects for which assistance or funds are committed on or after July 1, 2021.
- Have the Section 3 poster promoting Section 3 Business Registry and the Section Opportunity Portal hanging up at the City or County Building as well as any relevant places in the community (Job centers, etc.).

At the time project goes out to bid

- Bid advertisement contains Section 3 language.
- Bid documents contain Section 3 language under 24 CFR Part 75. This includes a Bidder Intent to Comply with Section 3 that is required to be submitted with bid documents. There is also a FAQ on Section 3 that should be included for bidders.
- Send bid documents to compliance specialist for approval (Ogram Administrator or OGSQ Project Manager).
- The Section 3 contract opportunity has been posted at [https://hudapps.hud.gov/OpportunityPortal](https://hudapps.hud.gov/OpportunityPortal) and documentation of posting has been obtained. An account login will need to be created to post contract opportunities to this website. A print out should be provided for verification to the OKGrants file.

- Provide Section 3 monthly reporting form and explain all information on the form will be required.
- Discuss reporting requirements of Section 3 workers and Targeted Section 3 workers. The total number of labor hours that are worked on the Section 3 project must be reported along with how many hours are completed by Section 3 workers and Targeted Section 3 workers. Note: for those employers who do not track labor hours in detail through a time-and-attendance system, HUD does not require they acquire such a system. Instead, they may provide a good faith assessment of the labor hours for a full- or part-time employee & project can’t be completed until these hours are reported on SOQ.
- If safe harbor benchmarks aren’t met, then the contractor is required to report a number of qualitative efforts to assist low- and very low-income persons with employment and training opportunities. Discuss with the contractor how they plan to meet the qualitative effort portion. Seek help from your OKDSS compliance specialist if needed.

- Certification requirements and documentation of certification must also be present in a recipient’s Section 3 File (OKGrants) for Section 3 Workers and Targeted Section 3 Workers. Explain what documentation is needed to be obtained by the company to verify Section 3 and Targeted Section 3 worker status.

- Note: Recipients may report on Section 3 workers and Targeted Section 3 workers for five years from when their certification as a Section 3 worker or Targeted Section 3 worker is established. Section 3 is no longer tracked by new workers only.

- Inform contractor they will be required to sign a contract with Section 3 requirements. Ensure proper Section 3 language is in contract. See Sample Section 3 Plan for contractors.
Encourage contractors if they are using subcontractors to directly solicit from Section 3, disadvantaged and small businesses. This is one way they can show qualitative efforts to meet Section 3 regulations. Direct solicitation of subcontractors must be documented.

Discuss with company if they provide apprenticeship opportunities, training or education assistance. This is another way to show qualitative efforts to meet Section 3 requirements.

Provide the contractor with the two Section 3 posters. Explain the first poster is to promote the Section 3 Business Registry and the Section Opportunity Portal. It should be hung at the worksite, place of business, and any other relevant places such as job centers. The second poster must be placed at the worksite (labor board area) with a designated Section 3 coordinator. These actions will provide one qualitative effort to meet Section 3 requirements if safe harbor benchmarks are not met. [https://www.hud.gov/program_offices/field_policy_mgt/section3/products](https://www.hud.gov/program/offices/field_policy_mgt/section3/products)

Explain the importance of having a Section 3 coordinator for the project. The Section 3 coordinator for the selected company should be able to answer Section 3 questions or obtain Section 3 information. The Section 3 poster that is required at the job site requires a coordinator and contact information including an email and phone number. This is stated in the bidder intent to comply. All Section 3 inquiries should be documented.

Ensure contractor fully knows Section 3 responsibilities. Explain the business can be prevented from bidding on future Section 3 projects if willful noncompliance is shown.

Ensure documentation requirements of Section 3 are fully understood by contractor.

**Final payment/ Monitoring/ Project Closure**

One of the most important requirements is to keep adequate documentation of Section 3 requirements in grantee’s file and this will be verified at monitoring. Record keeping requirements for recipients are found at 24 CFR § 75.31. Recipients are required to maintain documentation to demonstrate compliance with the regulations and are responsible for requiring their contractors/subcontractors to maintain or provide any documentation that will assist recipients in demonstrating compliance, including documentation that shows hours worked by Section 3 workers, Targeted Section 3 workers, and any qualitative efforts to comply with Section 3. Examples of documentation can be found in 24 CFR § 75.31. Maintain supporting documentation that reflects the recipient’s Section 3 compliance activities, along with affirmative action and equal opportunity efforts in the areas of employment, program benefits, contracting, and housing activities.

Maintain direct solicitation, advertisements, and procurement records. Ensure contractor has Section 3 reporting requirements. Before final payment, it is encouraged to obtain this information.

Section 3 closeout report must be completed for project closeout and submitted to ODOC.

If Section 3 reporting information is not obtained, a project cannot be closed as ODOC is required to report Section 3 information directly to HUD.
Components of a Section 3 Plan

- Policy Statement/Purpose
- Section 3 Applicability
- Section 3 Goals/Safe Harbor Benchmarks
- Recipient and Contractor Responsibilities
- Prioritization and Eligibility Requirements for Workers and Businesses
- Section 3 Certification Procedures for Workers and Businesses
- Reporting Deadlines
- Complaint Procedures
Training and Employment

Section 3 in Action

<table>
<thead>
<tr>
<th>Recruiting</th>
<th>Hiring/Training</th>
<th>Certifying</th>
</tr>
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<tbody>
<tr>
<td>Section 3 Workers and</td>
<td>Eligible and Qualified Workers</td>
<td>Section 3 Workers and</td>
</tr>
<tr>
<td>Targeted Section 3 Workers</td>
<td></td>
<td>Targeted Section 3 Workers</td>
</tr>
</tbody>
</table>

Consider the “order of priority” listed in part 75.9 and 75.19 when providing training and employment to workers.
Section 3 and Professional Services

Professional Service Contracts are NOT REQUIRED to be reported under Section 3:

Professional service contracts for non-construction services that require an advanced degree or professional licensing are not required to be reported as a part of total Section 3 labor hours. However, this exclusion does not cover all non-construction services.
Section 3 Training

https://www.hudexchange.info/trainings/section-3/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=a08777d070-Section-3-Online-Training-Available_6%2F17%2F2020&utm_medium=email&utm_term=0_f32b935a5f-a08777d070-18480169

F A Q guidance

https://www.hud.gov/sites/dfiles/FPM/documents/Section-3-FAQs.pdf
"Understanding Section 3" Training Curriculum

Each year the U.S. Department of Housing and Urban Development (HUD) invests billions of federal dollars into distressed communities across the country for projects that build and rehabilitate housing, improve a variety of infrastructures, build community centers, and help families achieve stability and advancement. One way that HUD achieves these objectives is through the promotion and administration of Section 3. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u.

Per this statutory language, recipients of HUD funds (i.e. grantees and contractors) ensure that "to the greatest extent feasible," when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very-low income people and to businesses that are owned by low- and very-low income persons or businesses that hire them. These opportunities are both gender and race neutral.

In order to bolster the capacity of HUD's funding recipients and Section 3 businesses regarding the Section 3 provision, HUD has developed the Understanding Section 3 training curriculum. The overall objective of the training curriculum is to provide participants with the tools and resources necessary to become well-versed and knowledgeable in this provision of the Housing and Urban Development Act of 1968 and its implementing regulations.

This online, self-directed training curriculum consists of eight modules that cover a variety of Section 3 relevant topics. These modules are designed to assist the user in better understanding the definition of Section 3 and how to comply with its requirements. The Understanding Section 3 training curriculum includes the following eight modules:

1. Understanding Section 3
2. Implementation of Section 3 Requirements
3. Procurement Requirements of Section 3
4. Grantee Oversight Responsibilities and SPEARS
5. Compliance and Monitoring
6. HUD Programs Covered by Section 3
7. Best Practices
8. Opportunity Portal

Upon completion of the training modules, the user should have a better understanding of the provision and be better positioned to comply with Section 3 requirements and guidance.

Launch the Section 3 Training  Provide Feedback
What are the Low-Income & Very Low-Income Limits?

- Defined at Section 3(b)(2) of the Housing Act of 1937
- Determined annually by HUD
- Section 8 income limits are used to determine eligibility
- Limits are typically established at 80 percent and 50 percent of the area median individual income

HUD income limits found at:
https://www.huduser.gov/portal/datasets/il.htm
MODIFICATIONS
REQUEST & APPROVALS
Approval letters will be sent out for the following requests:

- Contract Extensions
- Budget Modifications
- Single Bid
- 120 day “RROF” Extensions
- Change of Scope
• All requests other than Budget and Contract modifications must be submitted via email to both Christy and Robin for processing

* Remember to upload or attach supporting documentation pertaining to the individual requests

* Reminder to Change status to submit modifications in OKGrants
Project Manager receives the modification request and processes in OKGrants with a response letter uploaded.

*or if request is received by email -

A response letter will be emailed back to the Authorized Official and the Grant Administrator and uploaded in monitoring section.
POLICY 401 PROJECT AND BUDGET MODIFICATIONS

Effective October 1, 2021, see Policy 401 Program Management for full details.

- REQUEST FOR ADDITIONAL FUNDS – CONSTRUCTION ONLY – ONE-TIME INCREASE
  - Grantee Letterhead / Authorized Official
  - OKGrants Modification

- BIDS RECEIVED WERE OVER PROPOSED PROJECT BUDGET
  - First bid?
  - Alternatives Discussed for re-bid?

- PROCUREMENT REQUIREMENTS MET
  - Adequate Solicitation, Bid Ads, Plan Rooms, Bid Sheet & Tabulation

- ODOC REVIEW COMMITTEE
  - The ODOC Review Committee will review and consider request
    - Division Director, Director of Programs-Planning, Director of Programs-Monitoring, Program Planner, Project Manager, Budget Officer
OKGrants
Roles & Status Pushes
Assisting Communities with Current Contact Information

It is important that the contact information in OKGrants be as up-to-date as possible

- Changes in elected officials or staff at the local level
- ODOC correspondence – we use OKGrants to send correspondence
- ODOC Technical Assistance Training – we use OKGrants upon contract award for invites to training
- Assist communities with roles in OKGrants
Agency Administrator
- Creates new user roles for their organization
- The only role with access to My Organization links
- Has access to view all applications for the organization
- Is linked to all project numbers associated with the organization
Authorized Official
- Is the only role that can submit an Application, Closeout
- Is linked to all project numbers associated with the organization
- Executes Contracts and submits RROF
- Full Permissions
Financial Officer

- Has access to view & write in the application
- Is linked to all project numbers associated with the organization
- Access to view, edit, and submit pay advance requests & expenditure reports, modifications, audits
**Writer**
- Can initiate, edit/write and cancel an Application
- Access to upload supporting documents
- Is linked to all project numbers associated with the organization
**Viewer**
- Has access to view the application and all uploads
- Linked to all project numbers associated with the organization
- Cannot Edit or Save
- Role Used for Auditors
Current CDBG Staff & Roles
ALICIA

- Leadership
  - Excellence in providing staff with program guidance and positivity
ROBIN

- Project Management
  - Small Cities Contracts
    - contract award to closeout
  - All Environmental Reviews (RROF)
    - except CIP
  - Wage Rates and 10-day calls
  - Notice of Contract Awards
  - Technical Assistance/Training
  - Project Management Guide Updates
CHRISTY

- Project Management
  - after ROF - except for CIP and Small Cities
- Monitoring
- Closeout
- Technical Assistance/Trainings
- Project Management Guide Updates
LINDA

- Administrative Assistance
  - Letters
  - Trainings
CDBG Monitoring

Alicia Hibbets, Director of Programs (405) 815-5385
Christy Davis, Project Manager (405) 215-5395
Robin Slawson, Senior Program Monitor (405) 881-3044
Linda Goode, Administrative (405) 815-5351
THANK YOU FOR ATTENDING!

TAKE CARE!