

Unlocking Economic Opportunities Through Boston Housing Authority's Section 3 Policy



Produced by the Massachusetts Law Reform Institute
with the Boston Resident Training Institute and
the Boston Housing Authority

November 1, 2012

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This publication has been authored by Annette Duke at Massachusetts Law Reform Institute in collaboration with the Boston Resident Training Institute and Boston Housing Authority. MLRI wishes to thank BRTI Board members and staff who helped shape the content of this booklet, and BHA staff who reviewed and added to its content. We also thank Mac McCreight from Greater Boston Legal Services for reviewing the rent section, Margaret Monsell at Massachusetts Law Reform Institute and Pauline Quirion from Greater Boston Legal Services for reviewing CORI section, and Iris Gomez at Massachusetts Law Reform for reviewing the immigration section..

Table of Contents

Section 3 5

1. What is Section 3? 5
2. What are Section 3's minimum requirements? 5
3. Why is it important to know BHA's Section 3 Policy? 6
4. Am I a Section 3 Resident? 6

Training..... 7

5. What types of job training have been available through BHA?..... 7
6. How do I find out about job training programs? 8
7. Does BHA provide financial assistance for jobs training? 9
8. What other training resources are available in Boston?..... 9

Jobs 10

9. Does Section 3 require that jobs go to BHA residents? 10
10. When is Section 3 hiring triggered?..... 10
11. What kinds of jobs have been available to Section 3 Residents? 10
12. If I am a Section 3 Resident, what kind of priority do I get? 11
13. What is BHA's Section 3 Tenant Coordinator Program?..... 11
14. Can a Tenant Coordinator be on the LTO Board?..... 11
15. How does BHA notify BHA residents about jobs? 12
16. Does BHA provide financial help for work-related expenses? 12
17. What if I have a Section 3 job and I move out of BHA housing? 13

Contracts 14

18. What is BHA's contracting responsibility under Section 3? 14
19. What is a Section 3 Business?..... 14
20. How do Section 3 Businesses get contracts? 14
21. Hoes does a Section 3 Business get notice about contracts? 14

BHA's Database..... 16

22. What is BHA's Section 3 Database? 16
23. How do I get a BHA Section 3 Resident Application?..... 16
24. How do I get a BHA Section 3 Business Concerns Form? 16

Rents..... 17

- 25. How is my rent affected by education, training programs, or work? 17
- 26. If I go to work, when can my rent be frozen?..... 17

Immigration..... 20

- 27. Can my immigration status prevent me from applying for a job?.... 20

CORI..... 20

- 28. Can I be asked about criminal records when I apply for a job? 20
- 29. When can an employer ask for criminal record information? 20
- 30. Can an employer ask me to get my CORI for them?..... 20
- 31. If I have a CORI, can I still qualify for a construction job? 21
- 32. Where can I get more information about CORI?..... 21

Enforcement..... 21

- 33. How does BHA monitor compliance with Section 3?..... 21
- 34. Can I file a complaint about Section 3? 22
- 35. How do I file a complaint with BHA? 23
- 36. How do I file a complaint with HUD?..... 23
- 37. How can I get more information about BHA’s Section 3 Program? 23

Section 3

1. What is Section 3?

Section 3 is a law that Congress created to ensure that funding for housing is also used to create meaningful economic opportunities for low income people.¹ Section 3 is a federal law and applies to any entity that receives federal housing funds.

Under Section 3, Boston Housing Authority (BHA) must meet minimum requirements and provide BHA residents and low income people in the Boston area with training, jobs, and contracting opportunities to the “greatest extent feasible.” These requirements are spelled out in the next questions.

Section 3 also requires that **any entity** that receives federal housing dollars through BHA meet minimum requirements. For example, contractors, sub-contractors, businesses, developers, suppliers, service providers, and any public or private organizations that receive federal housing dollars through BHA must comply with Section 3.

In addition, BHA adopted its own Section 3 Policy. This policy spells out in more detail how BHA and its contractors must comply with the law.²

2. What are Section 3’s minimum requirements?

Section 3 requires that:

- At least 30% of all new hiring and all training opportunities be directed to SECTION 3 RESIDENTS;
- At least 10% of the total dollar amount of construction contracts be awarded to SECTION 3 BUSINESS CONCERNS (see Question 19); and
- At least 3% of the total dollar value of non-construction contracts be awarded to SECTION 3 BUSINESS CONCERNS (see Question 19).

This means that in any year, BHA and entities that receive BHA federal funds must meet these minimum goals to the “greatest extent feasible.”

3. Why is it important to know BHA's Section 3 Policy?

If you know about BHA's Section 3 Policy, you are in a better position to:

- Get notices about job training and employment.
- Participate in job training.
- Position yourself for a job.
- Position yourself for contracts, if you have a qualified business.
- Advocate for yourself.

4. Am I a Section 3 Resident?

Qualified Section 3 Residents get priority for jobs and training opportunities. You are a Section 3 Resident if you are at least 18 and:

- You live in a development owned, operated, or funded in part by BHA. This includes if you have been temporarily relocated from a federally funded BHA development because it is going through revitalization. It also includes if you live in a public housing unit in a federally funded mixed finance development.
- You are BHA leased housing participant. This means that you have a mobile Section 8 voucher, or a project-based Section 8 voucher or other federal or state rental assistance through BHA.
- You live in the Boston Metro area and are low income. This applies to residents in BHA subsidized and non-subsidized housing. For example, residents who are not public housing residents or leased housing participants who live at mixed-finance developments would be, in many instances, eligible based on their income. Low income is defined by household income and size.³ In 2012, for a family of three low-income was defined as \$58,500. For Income Limits see www.HUDuser.org.)

If you are a Section 3 Resident and you meet the minimum qualifications for a NEW HIRE, you get priority for that position. You also get priority for training opportunities that come out of any activity that is federally funded. For more about what the priorities are, see Question 12.

Training

5. What types of job training have been available through BHA?

Building Pathways

In 2011, BHA, with the Boston Building Trades Council, established a new training program called Building Pathways. Building Pathways is a pre-apprenticeship program specifically for Section 3 residents. The first class was held in the fall of 2011, the second in the fall of 2012. A third class has been recruited. Thus far, 30 Section 3 Residents have participated in a 7-week intensive classroom and hands-on learning program to prepare them for an apprenticeship in the building and construction trades. For example, a BHA Resident said she worked in low-paying office jobs and realized at 32 that she wanted to do more. She is now pursuing an apprenticeship with Sheet Metal Workers Local 17.

Green Jobs Training

BHA also established a new partnership with the Asian American Civic Association through its Green Jobs Training Program called BEEMS – Building Energy Efficiency Maintenance Skills. The BEEMS Program is a 22-week long program that trains participants for a career as a maintenance worker. It teaches the fundamentals of carpentry, plumbing, painting, electricity, appliance repair, and cleaning plus English, math, and basic computers. The course includes a five-week internship.

Resident Health Advocate Training Program

In 2001, the BHA through its Partners in Health & Housing Prevention Research Center launched this 10-12 week community health worker training program. Residents of the BHA's Family Public Housing Developments are eligible to apply for this program. Each session focuses on a specific health topic and graduates of the in-class training program are eligible to apply for a limited number of paid internship, which last approximately 6 months.

6. **How do I find out about job training programs?**

BHA and its contractors must notify BHA residents about training opportunities. There are a number of ways that BHA notifies residents:

- **Section 3 Resident Application**
If you have completed a Section 3 Resident Application and express interested in specific types of training, BHA will contact you when a match comes up. For example, if you say that you are interested in construction training and a construction training opportunity comes up, BHA will contact you. For more about the Resident Section 3 Resident Application see Question 23.
- **BHA Staff and Local Tenant Organizations**
BHA Resident Service Coordinators, Family Self-Sufficiency Coordinators, Managers of BHA properties, and Local Tenant Organization Presidents receive notices about training opportunities from BHA's Community Services Department and are asked to post and distribute these notices.
- **Email**
BHA's Community Services Department has an Employment, Skills Training & Education email listserve that notifies BHA staff and residents about training opportunities. To get on this listserve contact Rachel.Goodman@bostonhousing.org. You can also email Azell Martin at Azell.Martin@bostonhousing.org for information about construction related training.
- **Direct Mail**
BHA sends mail directly to all public housing households for certain opportunities. For example, BHA sent a letter and a flyer about the Building Pathways Program.
- **Information Sessions and Door Knocking**
BHA holds information sessions and conducts door knocking at specific developments prior to the start of large scale new construction or renovation projects. For example, this year at the Bromley Health development, BHA conducted more than six information sessions and hired three resident outreach workers to recruit for Section 3 opportunities related to the construction of a new day care facility.

7. Does BHA provide financial assistance for jobs training?

BHA's Section 3 Policy is seeking to establish a Section 3 Training Fund. When there are funds available, BHA could use this to provide financial help to BHA public housing residents and BHA leased housing participants for training related expenses. For more information contact: Azell Martin at BHA's Office of Civil Rights at 617-988-4091.

8. What other training resources are available in Boston?

Boston's One-Stop Career Centers offer workshops and assistance in helping residents apply for a wide range of skill training programs. Each career center has a specific schedule for orientation and information sessions so it is recommended that residents contact each center directly. Below is the listing of these centers.

Boston Career Link

1010 Harrison Avenue

Boston, MA 02119

Voice: 617.536.1888

Fax: 617-536-1987

www.bostoncareerlink.org

JobNet

210 South Street

Boston, MA 02111

Voice: 617.338.0809

Fax: 617-338-2050

www.jobnetboston.org

The Work Place

29 Winter Street, 4th Floor

Boston, MA 02108

Voice: 617.737.0093

Fax: 617-428-0380

www.theworkplace.org

The Job Training Alliance (JTA) is a network of greater Boston community-based workforce development organizations, of which the BHA is a member. The JTA utilizes the combined power of member agencies to maximize and advocate for employment opportunities for low-income residents through sustained funding for workforce development. Training information can be accessed through their new website: www.jobtrainingalliance.org.

Jobs

9. Does Section 3 require that jobs go to BHA residents?

It depends. Section 3 applies only if there are NEW HIRES. If there are no NEW HIRES, BHA or a contractor does not have to create new jobs in order to comply with Section 3.

If there are NEW HIRES, Section 3 requires that BHA and its contractors meet minimum employment goals to the “greatest extent feasible.” That means that BHA and contractors must reach out to the BHA resident community and encourage residents to apply for NEW HIRES. But if no BHA resident applies or a BHA resident who applies is not qualified then BHA or its contractor can hire a qualified low-income person who is not a BHA resident.

10. When is Section 3 hiring triggered?

Any time there is a NEW HIRE. There are two ways for residents to get priority for jobs:

- When BHA has a NEW HIRE, and
- When one of BHA’s contractors has a NEW HIRE.

In both cases, if a Section 3 Resident meets the qualifications set out in the job description, they get a priority under Section 3.

In its Section 3 Policy, BHA recognizes that many of its projects require NEW HIRES.⁴ For this reason, it closely monitors projects that do not demonstrate new hiring in order to make sure that no NEW HIRES are brought on just prior to a contract or come on in the middle of projects without being made available to residents.

11. What kinds of jobs have been available to Section 3 Residents?

BHA reported in its most recent Section 3 Reports to HUD that out of the 1,274 new hires, 472 new hires were Section 3 Residents (about 37%).⁵ Jobs included skilled and unskilled laborers, service workers, professionals, office and clerical workers, and tenant coordinators.

12. If I am a Section 3 Resident, what kind of priority do I get?

When BHA or any of its contractors have new hires for projects funded with federal housing funds, they must hire qualified Section 3 Residents in the following order of priority:

1. Residents of the BHA development where the work is being done.
2. Residents of other BHA developments.
3. Participants in HUD's YouthBuild Programs in Metro Boston.
4. Participants in BHA's leased housing programs.
5. Other low-income residents living in the Boston Metropolitan Area.

13. What is BHA's Section 3 Tenant Coordinator Program?

When BHA is contracting to make improvements to its properties, it anticipates that the contractor will hire at least one Tenant Coordinator for the duration of the project. The Tenant Coordinator acts as a point person between the tenants in the building and the contractor.

In 2011, approximately 97 Tenant Coordinators were hired. These are all short-term jobs and tenants in both state and federal developments have access to these jobs. When these jobs are in a development that is receiving federal funds, they count as Section 3 jobs.

14. Can a Tenant Coordinator be on the LTO Board?

If you or a member of your household is applying for a Tenant Coordinator position in your development and you are on the LTO Board, you must step off the LTO Board to take the Tenant Coordinator Position.⁶ It does not matter whether you are an officer or not. You must resign from the LTO Board. This is because the LTO Board has a role to play in publicizing the position and in reviewing, approving, and ranking applications for the Tenant Coordinator position. It would be a conflict of interest for you to review your own application or a household member's application.

But if you or a member of your household are applying for a Tenant Coordinator position that is not in you development, you can be on an LTO Board. BHA has determined that there would be no conflict of interest.

15. **How does BHA notify BHA residents about jobs?**

BHA must notify BHA residents about job opportunities. There are a number of ways that BHA notifies residents about job opportunities:

- **Website**
BHA's jobs opening are posted on its website. If you want to be on an email list to receive information about job opportunities go to BHA's website at www.bostonhousing.org and click on "Job Opportunities.

- **Resident Section 3 Application**
If you have completed a Resident Section 3 Application and have expressed interested in certain types of jobs, BHA will contact you when a match to your interest up.

- **Posting Notices**
Managers of BHA properties post notices about BHA jobs on bulletin boards in the manager's office. Local Tenant Organizations also receive notice of employment opportunities and Tenant Coordinator Positions.

Flyers & Community Newspapers

BHA requires contractors to post flyers and some times to put advertisements in local media when there are job opportunities.

- **Email**
BHA's Community Services Department has an email listserve that notifies people about different jobs beyond those covered by Section 3. You can also email Azell Martin at Azell.Martin@bostonhousing.org for information about construction related training.

16. **Does BHA provide financial help for work-related expenses?**

BHA's Section 3 Policy is seeking to establish a Section 3 Training Fund. When there are funds available, BHA could use this to provide financial help to BHA public housing residents and BHA leased housing participants for work-related expenses. For more information contact: Azell Martin at BHA's Office of Civil Rights at 617-988-4091.

**17. What if I have a Section 3 job
and I move out of BHA housing?**

If you have been hired for a job by BHA or one of BHA's contractors and you move out of your development, you do not lose your job just because you no longer live in BHA housing.

Contracts

18. What is BHA's contracting responsibility under Section 3?

When BHA awards construction and non-construction contracts:

- At least 10% of the total dollar amount of construction contracts must be awarded to SECTION 3 BUSINESS CONCERNS; and
- At least 3% of the total dollar value of non-construction contracts must be awarded to SECTION 3 BUSINESS CONCERNS.

This means that in any year, these minimum goals must be met to the "greatest extent feasible."

19. What is a Section 3 Business?

A Section 3 Business is a business that employs or is owned by Section 3 Residents. Section 3 rules define a Section 3 Business very specifically as:

- A business which is 51% or more owned by Section 3 Residents, or
- A business where at least 30% of the full-time, permanent employees are currently or were within the past three years Section 3 Residents, or
- A business that proves that it will subcontract more than 25% of the dollar amount awarded for all subcontracts to a businesses that meets the above qualifications.

20. How do Section 3 Businesses get contracts?

Section 3 applies to all federally funded contracts regardless of the type of contract or the dollar amount. BHA continually reaches out to local businesses and has developed a list Section 3 Businesses that meet the definition in Question 19. These businesses include construction related-businesses, site security, carpentry, and architecture.

21. Hoes does a Section 3 Business get notice about contracts?

A Section 3 Business must complete a Section 3 Business Concern Self-Certification Application. If you have a business you must declare whether it fits into any of the definitions in Question 19. The form also requires a

description of the business, proof of ownership of the business, and other information such as certifications, as applicable.

BHA compiles a list of these Section 3 Businesses and provides it to contractors, who are responsible for verifying that it is in fact a Section 3 Business as described in Question 19.

BHA's Database

22. What is BHA's Section 3 Database?

BHA's Office of Civil Rights has a computer database that it keeps of Section 3 Resident Applications and Section 3 Businesses. The purpose of the database is to notify residents when training and job opportunities come up. If you complete these forms, the information may be shared with contractors and developers. This is very important way that you can position yourself for jobs or contracts.

23. How do I get a BHA Section 3 Resident Application?

You can get a BHA Section 3 Resident Application from either BHA's Office of Civil Rights or on BHA's website. Go to the Office of Civil Rights and look for Section 3. You can also call Azell Martin at BHA's Office of Civil Rights at 617-988-4091.

24. How do I get a BHA Section 3 Business Concerns Form?

You can get a BHA Section 3 Business Concern Self-Certification Application from either BHA's Office of Civil Rights or on BHA's website. Go to the Office of Civil Rights and look for Section 3. You can also call Azell Martin at BHA's Office of Civil Rights at 617-988-4091.

Rents

25. **How is my rent affected by education, training programs, or work?**

If you are going to school, participating in training program, or you get a job, your rent may be affected. What income is counted or not counted in your rent calculation will depend upon what type of housing you live in. The rules vary. Also, people have different situations so while one tenant may be eligible for a certain rent deduction, another tenant may not be.

The important thing to know is if you go to work, you could qualify for a **rent freeze**. That means that all or some of your increased income from work would not be counted for a period of time. You may also be entitled to deduct certain expenses before your rent is calculated. For example, you may be able to deduct child care payments if a family member is employed, looking for employment, or is in school.

For specific questions about your rent and the treatment of income and expenses related to work, training, or education, public housing residents should speak with property managers and Section 8 voucher holders should speak with their Leasing Officer.

26. **If I go to work, when can my rent be frozen?**

Federal Public Housing

If you live in BHA federal public housing and you are on a flat rent, your rent does not change when you go to work.

If you are paying 30% of your income on rent and you get a job, but were previously not working, you may be eligible for a program that “freezes” your rent at the pre-job amount. This is called an earned income disregard because the increase in income is disregarded for a period of time. This benefit applies to both part-time and full-time work. You can get the rent freeze for a 24-month period if you:

- Were unemployed for one or more years before you got your job; or
- Earned less than \$4,000 over the 12 months prior to getting your job,⁷ or
- Received public assistance or participated in a welfare-to-work program within 6 months before getting your job, or
- Got your job while you were in any job training or self-sufficiency program.⁸

To qualify for a rent freeze, it is acceptable to show that you meet only one of the categories above. It is not necessary that you meet all of them.

When you get a rent freeze, for the first 12 months after you start working, all increased income related to your job cannot be counted towards your rent. In the second 12 months, BHA can count only half of the increase in your income stemming from work earnings towards rent.⁹

You must use your 24 months within 48 months (4 years) of becoming employed. If at some point you become unemployed, the clock stops. Once you start work again, the clock restarts and you get whatever time was left of the 24-month period, as long as it is still within 4 years of when you first became employed.

Example: If you worked for 12 months, then got laid off for 6 months, and then worked for 12 months, all of the increased employment income for the first 12 months would not be counted when setting your rent; 50% of the increased employment income would not be counted for the second 12-month period. But keep in mind, if you receive any unemployment income while you are not working, this will be counted when calculating your rent.

State Public Housing¹⁰

If you live in state public housing, you can get a rent freeze or earned income exclusion if:

- Before you got your job you received any of the following for 12 months in a row immediately prior to beginning your job: TAFDC (Transitional Aid to Families with Dependent Children), EAEDC (Emergency Aid to Elders, Disabled and Children), SSI (Supplemental Security Income), or SSDI (Social Security Disability Insurance); and
- Once you started working, your government cash benefit assistance decreased.

With this exclusion, for 12 months, all increased income related to your job cannot be counted towards your rent. In other words, your rent will stay the same. You can qualify for this benefit only once while living in state public housing.¹¹

If you or another household member are 62 years or older, working and living in state public housing, the housing authority must exclude a portion of your income when determining your rent. The portion that is excluded cannot

exceed an amount that equals 20 hours per week at minimum wage (approximately \$135 per week).¹²

Section 8 Mobile Voucher

If you have a BHA Section 8 voucher and an adult member of your household is going to work, you only qualify for a rent freeze if that person has a disability.¹³ Persons with disabilities are those:

- Receiving SSI or SSDI disability benefits or you are eligible for SSI or SSDI, but not currently receiving cash benefits because of employment, or,
- Receiving services for the Department of Mental Health, Department of Developmental Services, or the Massachusetts Rehabilitation Commission.

People who begin to work who were previously not working, may be eligible for a rent freeze. This benefit applies to both part-time and full-time work. You can get the rent freeze for a 24-month period if you:

- Were unemployed for one or more years before you got your job; or
- Earned less than \$3,375 over the 12 months prior to getting your job, or
- Received welfare benefits or participated in a welfare-to-work program within 6 months before getting your job, or
- Got your job while you were in a job training or self-sufficiency program.¹⁴

It is acceptable to show that you meet only one of the criteria listed above. It is not necessary to show that you meet all of them. When you get a rent freeze, for the first 12 months after you start working, all increased income related to your job cannot be counted towards your rent, so your rent stays the same. In the second 12 months, BHA can count only half of the increase in your total work earnings towards rent.¹⁵

You must use your 24 months within 48 months (4 years) of becoming employed. If at some point you become unemployed, the clock stops. Once you start work again, the clock restarts and you get whatever time was left of the 24-month period, as long as it is still within 4 years of when you first became employed.

Immigration

27. Can my immigration status prevent me from applying for a job?

To work you will be required to show your new employer certain documents showing that you are authorized to work. For example, you could present the employer with a Social Security Number card plus a state driver's license or with an Employment Authorization Card issued by U.S. Citizenship and Immigration Services. These are some options. For more information about these requirements, see the USCIS Handbook for Employers at: <http://www.uscis.gov/files/form/m-274.pdf>.

CORI

28. Can I be asked about criminal records when I apply for a job?

No. In Massachusetts there is a new law called "Ban the Box Law" which makes it illegal for most employers to ask about your convictions on a job application in the first stage of hiring.

29. When can an employer ask for criminal record information?

An employer can ask your permission to get a copy of your CORI when you get interviewed for a job. An employer can only check your criminal record history if you sign an acknowledgement form that says you know the employer is requesting your CORI or a criminal background check. This form will ask for personal information, such as your full name, your date and place of birth, your mother's maiden name and father's name, and your Social Security number to make sure it is your CORI the employer will receive.

30. Can an employer ask me to get my CORI for them?

No. It is against the law for employers to ask you to get a copy of your CORI for them. A CORI that you get on your own also will list ALL of your cases, including cases that ended in your favor such as dismissed cases or cases where you were found not guilty. This is more information than most employers can get under the law. Most employers only get CORI about cases that ended in a conviction and open cases.

31. If I have a CORI, can I still qualify for a construction job?

It depends. To get into an apprentice program, CORI, in general, is not a barrier to enter into a building trades training program. Once you finish your entrance exams and you are accepted into a building trade union, then the question will be what is the nature of the job and what is in your CORI. For example, if the job is in a building where there are residents, your CORI may prevent you from working there. On the other hand, if it is new construction and no one is living there, you could be considered for the job.

32. Where can I get more information about CORI?

For more information about CORI go to www.MassLegalHelp.org.

Enforcement

33. How does BHA monitor compliance with Section 3?

Section 3 is the law and compliance is not an option. BHA is required to report its compliance and the compliance of their contractors to the U.S. Department of Housing and Urban Development (HUD). These yearly reports must document to what extent federal housing funds have leveraged trainings, jobs and contracts for BHA Section 3 residents.

In 2012, BHA also conducted a comprehensive audit of every federal construction contract. The audits resulted in numerous notices of non-compliance with Section 3 reporting requirements and resulted in a higher rate of reporting and documentation of new hires.

Here are some of the ways that BHA monitors Section 3 compliance:

- BHA does not accept bids or proposals that fail to submit required Section 3 forms or fail to adequately include Section 3 requirements.
- BHA requires that recipients state in advance what a project's Section 3 hiring, training, and contracting opportunities will be.
- BHA requires that contractors are responsible for the compliance of subcontractors.
- BHA requires contractors with contracts over \$100,000 to submit a Section 3 Compliance Plan with specific methods that the contractor will undertake to comply with Section 3.

- On a monthly basis BHA requires contractors for certain projects to provide Section 3 numbers with payroll documents to certify that there were no new hires. Failures to submit a monthly report may result in sanctions or withholding of payment until report is in.
- At the completion of a contract, contractors must submit the HUD Section 3 reporting form summarizing its Section 3 activities. BHA determines whether a recipient has met minimum numeric goals. If these goals are not met, the recipient must show why it was not feasible. For example, they must show evidence (documentation) of all attempts made to notify, encourage and facilitate job and contracting opportunities to Section 3 residents and businesses
- For serious and repeated violations of Section 3, BHA can impose sanctions which include: monetary sanctions, withholding of payment, contract terminations, and/or refusal of future contracts.

34. Can I file a complaint about Section 3?

In an effort to learn about non-compliance of Section 3 by BHA or its contractors, BHA encourages residents and Section 3 Businesses to submit complaints to BHA.

BHA's Section 3 Policy provides a two step process:

- You can file a complaint with BHA, and/or
- You can file a complaint with HUD.

The factual issue will be whether you are qualified for the job or contract. This can be very subjective. For this reason, it is very important to understand before filing a complaint exactly what the qualifications for the job are and how they match up to your qualifications.

35. How do I file a complaint with BHA?

Within 30 days of becoming aware of a possible Section 3 violation, you can submit a written complaint to BHA describing the violation. The complaint must go to both:

BHA
Office of Civil Rights
Chief of Staff
52 Chauncy Street
Boston, MA 02111

BHA
Legal Department
General Council
52 Chauncy Street
Boston, MA 02111

BHA will conduct an informal investigation and give all parties the opportunity to submit testimony and evidence related to the complaint. Within 30 days, BHA will then issue a letter detailing its findings.

36. How do I file a complaint with HUD?

You can also file a complaint with the U.S. Department of Housing and Urban Development (HUD). To get a copy of HUD's complaint form you can go to HUD's website at www.HUD.gov and type in Section 3. That will bring you to a page which has a new Section 3 Complaint form (HUD Form 958).

The direct link to the complaint form is:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equality/section3/section3

You must file a complaint within 180 days from the date of the action or inaction upon which the complaint is based. If you miss this deadline you could request that the deadline be extended for good cause.

HUD investigates complaints and if appropriate, seeks voluntary agreement. A complaint that cannot be resolved voluntarily may result in an administrative hearing and if an investigation shows that the complaint has merit sanctions.

37. How can I get more information about BHA's Section 3 Program?

Azell Martin, BHA Section 3 Coordinator
Office of Civil Rights, 52 Chauncy Street
617-988-4091

ENDNOTES

- ¹ Section 3 of the Housing and Urban Development Act of 1868, as amended, 12 United States Code 1701u.
- ² Boston Housing Authority Section 3 Policy: Economic Opportunities for BHA Residents and Other Low- and Very-Low Income Persons, Adopted May 2012.
- ³ The Boston Metropolitan Statistical Area (MSA) is very large and includes: Norfolk, Plymouth, Suffolk, Middlesex, Essex, Rockingham, New Hampshire, and Stratford, New Hampshire. When BHA sought HUD guidance on this question of Boston's MSA, HUD responded that all low-income resident of Boston's MSA count as Section 3 residents for BHA.
- ⁴ BHA Section 3 Policy, Section IV(A), third paragraph on page 5.
- ⁵ Cumulative data from BHA's Section 3 Summary Reports from the Fourth Quarter of Fiscal Year 2011.
- ⁶ BHA Section 3 Policy, Section V(3) on page 10 and Tenant Participation Policy states in Section 18.3.5.
- ⁷ 24 CFR § 960.255(a)(i) cover families living in public housing whose annual income increases as a result of employment of a family member who was unemployed for one or more years previous to employment. Under 24 CFR § 960.255(a), previously unemployed includes a person who has earned, in the twelve months previous to employment, no more than 10 hours of work per week for 50 weeks at minimum wage, which in Massachusetts is currently \$8.00.
- ⁸ 24 C.F.R. § 960.255(a). "Economic self-sufficiency" program is defined as any program designed to assist tenant in gaining financial independence. Programs include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant for work (including substance abuse or mental health treatment programs) 24 CR 5.603(b)
- ⁹ 24 C.F.R. § 960.255(b).
- ¹⁰ 760 C.M.R. § 6.05(3)(i)
- ¹¹ 760 C.M.R. § 6.05(3)(i).
- ¹² G.L. c. 121B, § 32; 760 C.M.R. § 6.05(3)(p).
- ¹³ 24 C.F.R. § 5.617
- ¹⁴ 24 C.F.R. § 5.617
- ¹⁵ 24 C.F.R. § 5.617.