Section 3 and Minority and Women Business Enterprise (MWBE) Compliance Regulation

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Purpose of Training
To Ensure That Every Subgrantee:

- Understands Section 3 and Minority and Women Business Enterprise (MWBE) Compliance Regulation requirements;
- Understands how to collect Section 3 and MWBE Compliance Regulation data;
- Is familiar with the relevant federal non-discrimination statutes, executive orders and regulations;
- Understands how to complete and submit Section 3 and MWBE Compliance Regulation summary reports to DCA.
Part I: Section 3 Chapters

1. History and Thresholds
2. Section 3 Definitions and Terms
3. Responsibilities of Subgrantees
4. Reporting Requirements
5. Non-Compliance and Complaints
Applicable Statutes

- Statutes that led to the creation of Section 3

Applicable Regulations

- Regulations that define Section 3
Title VI of the Civil Rights Act of 1964

Prohibits discrimination on the basis of race, color, creed or national origin in programs and activities receiving federal financial assistance.
Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u (statute) and 24 CFR Part 135 (regulations))

- Provides preference for low- and very low-income residents and businesses, including new employment, training and contracting opportunities.
Section 109 of Title 1 of the Housing and Community Development Act of 1974

Prohibits discrimination on the basis of race, color, national origin, sex or religion in CDBG funding.
24 CFR Part 135

Defines Section 3 and its requirements

- 24 CFR Part 135.30 – Defines Section 3 compliance
- 24 CFR Part 135.38 – Required Section 3 Clause for solicitations and contracts
- 24 CFR Part 135.90 – Section 3 Annual Summary Reports
24 CFR Part 85

Defines federal requirements for procurement and contracting

24 CFR Part 85.36 – encourages the use of MWBEs and Section 3 businesses
Definitions of Section 3

- What is the intent of Section 3?
- What was Section 3 designed to do?
- What are the requirements of Section 3?
Definitions of Section 3

A provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood improvement, and self-sufficiency for low income persons.

- Both race and gender neutral

- Preferences based on income level and location
What is the intent of Section 3?

Section 3 regulations were designed to encourage recipients of HUD funding to direct new employment and contracting opportunities to low- and very low-income persons and businesses (regardless of race or gender) through projects created within their communities or neighborhoods.
What are the requirements of Section 3?

- Encourages subgrantees to provide job training, employment, and contracting opportunities for low- or very low-income persons and business owners.
- Compliance with Section 3 is a contractual requirement for subgrantees of DCA funding.
Which funds?

What are the funding thresholds?
Which programs are covered by Section 3?

If your agency receives CDBG, Disaster Recovery, NSP or other HUD funds from DCA, then Section 3 applies to you and DCA refers to your agency as a “subgrantee.” Subgrantees that are public housing authorities may already be familiar with Section 3 requirements for programs such as HOPE VI, Capital Fund Program, FSS and ROSS.
Which program funds are covered by Section 3?

Section 3 only applies to the portion of covered funding that were used for projects involving housing construction, rehabilitation, demolition, or other public construction.

It does not apply to administrative fees.
What are Section 3 Funding Thresholds?

Section 3 funding thresholds are the minimum dollar amounts that trigger Section 3 requirements.
What are the Section 3 Funding Thresholds?

For subgrantees that receive $200,000 or more of DCA assistance and all contractors (or subcontractors) receiving contracts valued at $100,000 or more to complete projects involving housing construction, rehabilitation, or other public construction are required to comply with the requirements of Section 3.
What are the Section 3 Funding Thresholds?

Subgrantees of funds that invest $200,000 or more into projects or activities involving housing construction, rehabilitation, or other public constructions.

There are no thresholds for Public Housing Authorities (PHA).
What is a Section 3 Subgrantee?
A Section 3 Subgrantee refers to any entity that receives Section 3 covered financial assistance directly from DCA and includes:

- States; Units of Local Government; Native American Tribes; or other Public Bodies
- Public or Private Nonprofit Organizations
- Private Agencies or Institutions
What is a Section 3 project?

What is a Section 3 resident?
  What are the income levels?

What is a Section 3 business concern?
Section 3 projects are:

- Projects that involve Housing or Community Development.
  - Examples include residential and commercial construction, street repairs, repair or installation of sewage lines, updates to building facades, or lead paint abatement.
Section 3 Residents are:

1. Residents of Public and Indian Housing; or
2. Individuals that reside in the metropolitan area or nonmetropolitan county where Section 3 covered assistance is expended and whose income does not exceed the local HUD income limits set for low- and very low-income households.
Section 3 Income Levels are:

- **Low income** – total household income at 80 percent or below the median income of that area

- **Very Low Income** – total household income at 50 percent or below the median income of that area
Section 3 Business Concerns are:

1. Businesses that are 51 percent or more owned by Section 3 residents; or
Section 3 Business Concerns are:

2. Businesses whose permanent, full-time employees include persons, at least 30 percent of whom are currently Section 3 residents or within three years of the date of first employment with the firm were Section 3 residents; or
3. Businesses that provide evidence of a commitment to subcontract with Section 3 business concerns and 25 percent or more of the dollar amount of the contract is awarded to the business.
What triggers the requirements of Section 3?
Section 3 is triggered when new construction and rehabilitation projects create the need for new employment, contracting, or job training opportunities and funding threshold limits are met.
**New employment** – any new position created to complete the work.

**New contract** – any new contracting opportunity created to complete the work.

**New job training** – any new training opportunity created as a result of the new project.
Subgrantees, contractors and subcontractors are only required to hire Section 3 residents or award contracts to Section 3 businesses for work that is needed to complete the project.

If the expenditure of covered funding does not result in new employment, contracting or training opportunities, the requirements of Section 3 have not been triggered. *However, each agency must still submit Section 3 annual reports indicating this information.*
What are Section 3 economic opportunities?

- Definition of economic opportunities
- Examples of economic opportunities
What are Section 3 economic opportunities?

- Job training and employment

- Employment as a result of these expenditures, including administration, management, clerical support, and construction is subject to compliance with Section 3.
Examples include:

- Appliance repair
- Appraiser
- Bricklaying
- Carpentry
- Carpet Installation
- Cement/Masonry
- Clerical
- Demolition
- Drywall
- Electrical
- Janitorial
- General Contractor
- Iron Works
- Landscaping
- Painting
- Accounting
- Payroll
- Photography
- Plumbing
- Realtor
- Surveyor
- Transportation
What is a new hire?
A new hire is a full-time employee for a new permanent, temporary, or seasonal position that is created as a result of the DCA funded project.
A Section 3 service area is the geographical area in which the persons benefitting from the Section 3 covered project reside. The Section 3 service area shall not extend beyond the unit of local government where Section 3 covered financial assistance is expended.
What is required to comply with Section 3?
1. Subgrantees must meet the minimum numerical goals:
   
a. 30 percent of the aggregate number of new hires are Section 3 residents;
   
b. 10 percent of all covered construction contracts are awarded to Section 3 business concerns; and
   
c. 3 percent of all covered non-construction contracts are awarded to Section 3 business concerns.
2. Subgrantees that fail to meet the numerical goals of the Section 3 program bear the burden of demonstrating why it was not possible. Such justifications shall describe the efforts that were taken, barriers encountered, and other relevant information that will allow DCA to make a determination regarding compliance.
Subgrantee Responsibilities

What are subgrantee responsibilities?
Each Subgrantee and their covered contractors, subcontractors or subrecipients are required to comply with the requirements of Section 3 for new employment, training or contracting opportunities resulting from DCA funded projects.
1. Implementing procedures to notify Section 3 residents and business concerns about training, employment, and contracting opportunities.
2. Incorporating the Section 3 clause into all covered solicitations and contracts (see 24 CFR Part 135.38)

3. Notifying potential contractors working on Section 3 covered projects of their responsibilities;
4. Facilitating the training and employment of Section 3 residents and the award of contracts to Section 3 business concerns;

5. Assisting and actively cooperating with HUD and DCA in assuring contractors and subcontractors comply;
6. Refraining from entering into contracts with contractors that have violated Section 3 regulation;

7. Document actions taken to comply with Section 3; and
8. Submitting Section 3 Annual Summary Report (form HUD-60002) to DCA.
Subgrantees must attempt to reach the minimum goals set forth in their agreement with DCA.
Subgrantees must also:

1. Inform contractors about the requirements of Section 3;

2. Assist contractors and their subcontractors with achieving compliance.
3. Monitor contractors’ performance in meeting the requirements of Section 3; and

4. Report to DCA on Section 3 compliance for projects on an annual basis.
Residents and business concerns seeking Section 3 preference shall certify, or submit evidence to the recipient, contractor, subcontractor or subrecipient (if requested) verifying that they meet the definition of a Section 3 resident or business concern.
Who receives priority under Section 3?
Who receives priority under Section 3?

For Training and Employment:

- Persons in public and assisted housing
- Persons residing in the area of the HUD or DCA funded project
- Participants in HUD Youthbuild programs
- Homeless persons
For Contracting:

Businesses that meet the definition of a Section 3 business concern.
How to find prospective Section 3 employees
Subgrantees and contractors can recruit prospective Section 3 employees in the following locations:

- In public housing developments and

- In the neighborhoods surrounding the site where the HUD or DCA funded project is located.
Subgrantees and contractors may inform residents about available training and job opportunities by:

- Contacting public housing resident organizations, local community development and employment agencies
- Distributing flyers
How to find Section 3 employees (cont’d)

- **Posting signs**
- **Placing ads in local newspapers**
What reports need to be filed?
Each subgrantee is required to submit a report that summarizes their efforts to comply with the requirements of Section 3.

- Collect information from contractors and sub-contractors
- Summarize the collected information on form HUD-60002
Section 3 Summary reports should be submitted to DCA once a year:

- By July 31st of each year
How do I collect the data?
Subgrantees can collect Section 3 data with the following sample forms:

- Section 3 Man Hour Report
- Contracting Compliance Monthly Report
- Contractor Monthly Report
- Section 3/MWBE Compliance Report
- Form 347 – Sample Payroll Form
Contracting Compliance Report:

- Tracks contracts awarded and their dollar amounts for Section 3 and MWBE business concerns
- Collected on a monthly basis
Section 3 Man Hour Report:

- Tracks hours worked by Section 3 employees

- Collected on a monthly basis
Section 3 and MWBE Compliance Report:

- **Tracks contracts awarded and their dollar amounts for Section 3 business concerns and MWBE**

- **Tracks the number of jobs created by project**

- **Tracks the number of Section 3 jobs created**
MWBE and Section 3 Summary Compliance Report:

- **Collected on a monthly basis**
  - *Cumulative* – summarizes all activity to date

- **Submitted to DCA as supporting documentation for annual reports**
Form 347 – Sample Payroll Form:

- Tracks hours worked by employees
- Created by the U.S. Department of Labor
- Collected on a weekly basis by contractors and subcontractors
- Submitted to subgrantee monthly
Contractor Monthly Report:

- A written narrative of contractors’ efforts to comply with contract requirements for Section 3 and MWBE
- Update on project progress and activities
- Collected on a monthly basis
Why is it necessary to collect this data?

It serves as documentation for form HUD-60002

The sample forms and instructions for completion are provided in the workbook.
Form
HUD-60002
Form HUD-60002 is used to report each subgrantee's efforts to comply with the requirements of Section 3 AND those of its contractors, subcontractors, and subgrantees.
Each submission of form HUD-60002 should indicate the following:

1. Total dollar amount of DCA funding that was received by the recipient for covered projects/activities during the specified reporting period
2. The total number of new employees that were hired by the recipient and/or its covered contractors, subcontractors, and subgrantees, as a result of performing or completing covered projects or activities.
3. The number of new employees that were hired by the subgrantee (or its covered contractors, subcontractors, and subgrantees), as a result of covered projects or activities, that met the definition of a Section 3 residents.

4. The total number of man hours worked on covered projects (optional).
5. The aggregate number of hours worked by Section 3 residents on covered projects (optional)

6. The total number of Section 3 residents that participated in training opportunities that were made available by the subgrantee, its contractors, subgrantees, or other local community resource agencies.
7. The total dollar amount of construction and/or non-construction contracts (or subcontracts) that were awarded with covered funding.

8. The dollar amount of the recipient’s construction or non-construction contracts (or subcontracts) that were awarded to Section 3 business concerns.
9. Detailed narrative descriptions of the specific actions that were taken by the Subgrantee (or its covered contractors, subcontractors, subgrantees, or others) to comply with the requirements of Section 3 and/or meet the minimum numerical goals for employment and contracting opportunities.
Each direct recipient of DCA funding, or subgrantee, is required to submit form \textbf{HUD-60002} to DCA at the following email address:

cdbg@dca.state.fl.us
What if an entity does not comply?
Subgrantees that fail to meet the numerical goals of the Section 3 program bear the burden of demonstrating to DCA why goals were not achieved.

Subgrantees must submit documentation or justification that describe efforts that were taken by contractors and/or subcontractors, barriers encountered, and other relevant information that supports the subgrantee’s good faith efforts to achieve the numerical goals.
Section 3 residents, businesses, or a representative for either group may file a complaint with HUD if it seems a subgrantee is violating Section 3 requirements of a HUD funded project.

Section 3 complaints are filed at the local HUD Office.
What if an entity does not comply with Section 3?

DCA takes non-compliance very seriously

- Cure period for compliance
- Subgrantee may lose funding
- Complaints are reviewed on a case-by-case basis
Executive Order 12432

Provides guidelines for federal agencies to promote and increase the utilization of Minority and Women Business Enterprises (MWBE).

Established in 1983 with the goal to increase contract opportunities available to minority owned firms.
Assisted in making federal government agencies accountable in promoting and utilizing minority owned firms.

Increased usage of MWBE Development Plans.
Development plans provide guidance and encourage utilization of minority business firms.

These plans flow through to the grant recipient and apply to subgrantees.
Provides administrative guidance for State, Local and Federally Recognized Indian Tribal Governments that have been awarded Grants and Cooperative Agreements through purchasing/procurement.

All subgrantees must adhere to regulations regarding procurement and purchasing of goods and services under federal and state guidelines.
DCA is a HUD funded recipient and must comply with 24 CFR 85.36.

DCA monitors purchase orders and selected contracts to ensure compliance with all required federal contract clauses.

All subgrantees must adhere to regulations regarding procurement and purchasing of goods and services under federal and state guidelines.
Grantee and subgrantee purchasing and procurement must conform to applicable federal law and state standards.

Grantees and subgrantees must maintain a contract administration system which ensures contractors adhere to contract requirements and terms.
Grantees and subgrantees must maintain standards of conduct which govern performance of employees, officers or agents of the grantee or subgrantee. There must be no conflicts of interest.

To the extent permitted by State or local law or regulations, standards of conduct shall provide for penalties or sanctions.
Grantee and subgrantees may set minimum rules when a financial interest is not substantial or when a gift is an unsolicited item of nominal intrinsic value.
Grantee and subgrantee procedures shall provide for a review of proposed procurements to avoid purchase of unnecessary or duplicative items.

Consideration should be given to consolidating or breaking out procurements if the process will result in a more economical purchase.
To foster greater economy and efficiency, grantees and subgrantees are encouraged to enter into state and local intergovernmental agreements in procurement or use of common goods and services.
Grantees and subgrantees are encouraged to use federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
Grantees and subgrantees are encouraged to use value engineering clauses in contracts for some construction projects to offer reasonable opportunities for cost reductions.

Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.
Grantees and subgrantees shall make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement.
Grantees and subgrantees shall maintain records sufficient enough to detail the significant history of a procurement.

Records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
Grantees and subgrantees will seek time and material type contracts only:

- After a determination that no other contract is suitable, and

- If the contract includes a ceiling price that the contractor exceeds at its own risk.
Grantees and subgrantees shall be responsible for the settlement of all contractual and administrative issues arising out of procurements.

Violations of law must be referred to the local, state, or federal authority having proper jurisdiction.
Grantees and subgrantees shall have protest procedures to handle and resolve disputes relating to their procurements.

Grantees and subgrantees shall in all instances disclose information regarding the protest to the awarding agency.
Reviews of protests by the federal agency will be limited to:

- Violations of federal law or regulations and
- Violations of the grantee's or subgrantee's protest procedures for failure to review a complaint or protest.

Violations of state or local law will be under the jurisdiction of state or local authorities.
All procurement transactions shall be conducted in a manner providing full and open competition consistent with the standards of Sec. 85.36.

Grantees shall have written selection procedures for procurement transactions. These procedures will ensure that all solicitations:
Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold fixed at 41 U.S.C. 403(11) (currently set at $100,000*).

*When local policies have lower thresholds, then local policy must be adhered to in those instances.

When small purchase procedures are used, price or rate quotations shall be obtained from an adequate number of qualified sources.
Sealed bids are formally advertised bids that are publicly solicited.

Typically a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforms with all the material terms and conditions of the invitation for bids, is the lowest in price.

The sealed bid method is the preferred method for procuring construction.
Sealed bids have specific requirements:

- Bids shall be publicly advertised and solicited.

- All bids shall be publicly opened at the time and place prescribed in the invitation for bids.

- Any or all bids may be rejected if there is a sound documented reason.

- A firm fixed-price contract award shall be made in writing to the lowest responsive and responsible bidder.
The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded.

This method is used when conditions are not appropriate for the use of sealed bids.
Proposals will be publicly advertised and shall be solicited from an adequate number of known suppliers.

All bids will be publicly opened at a designated time and place identified in the bid document.
Grantees and subgrantees shall have a method for conducting technical evaluations of the proposals and for selecting awardees.

Awards shall be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.
Noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.
Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies:
The item is available only from a single source;

The public emergency for the requirement will not permit a delay resulting from competitive solicitation;

The awarding agency authorizes noncompetitive proposals; or

After solicitation of a number of sources, competition is determined inadequate.
Requirements for all methods of procurement include: cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits.
Grantees and subgrantees may be required to submit the proposed procurement to the awarding agency for pre-award review.
The grantee and subgrantee will take all necessary affirmative steps to assure that minority firms, women business enterprises, and labor surplus area firms are used when possible.
Affirmative steps shall include:

- Placing qualified MWBEs on solicitation lists;
- Assuring that MWBEs are solicited whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by MWBEs.
Grantees and subgrantees must perform a cost or price analysis in connection with every procurement action including contract modifications.

A cost analysis will be necessary when adequate price competition is lacking, and for sole source procurements, including contract modifications or change orders, under certain circumstances.
A cost analysis must be performed when the offeror is required to submit the elements of his estimated cost, e.g., under professional, consulting, and architectural engineering services contracts.
Grantees and subgrantees will negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed.
A fair and reasonable profit is determined by consideration of the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.
Costs or prices based on estimated costs for contracts under grants will be allowable only to the extent that costs incurred or cost estimates included in negotiated prices are consistent with Federal cost principles (see Sec. 85.22). Grantees may reference their own cost principles that comply with the applicable Federal cost principles.
The cost plus a percentage of cost and percentage of construction cost methods of contracting shall not be used!
Grantees and subgrantees must make all documents available for review by the awarding agency.
For construction or facility improvement contracts the awarding agency may accept the bonding policy and requirements of the grantee or subgrantee.

If such a determination has not been made, minimum requirements are necessary:
A bid guarantee from each bidder equivalent to five percent of the bid price.

The “bid guarantee” shall consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of his bid, execute such contractual documents as may be required within the time specified.
A performance bond on the part of the contractor for 100 percent of the contract price.

A “performance bond” is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.
A payment bond on the part of the contractor for 100 percent of the contract price.

A “payment bond” is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.
Federal agencies are permitted to require changes, remedies, changed conditions, access and records retention, suspension of work, and other clauses approved by the Office of Federal Procurement Policy.
Administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms.

Termination for cause and for convenience by the grantee or subgrantee.


Compliance with the Copeland “Anti-Kickback” Act.
Compliance with the Davis-Bacon Act.

Compliance with Sections 103 and 107 of the Contract Work Hours and Safety Standards Act.

Notice of awarding agency requirements and regulations pertaining to reporting.

Notice of awarding agency requirements and regulations pertaining to patent rights.

Awarding agency requirements and regulations pertaining to copyrights and rights in data.
Access by the grantee, the subgrantee, the Federal grantor..or any duly authorized representatives to documentation of the contractor.

Retention of all required records for three years after grantees or subgrantees make final payments.

Compliance with all applicable standards, orders, or requirements issued under Section 306 of the Clean Air Act.

Mandatory standards and policies relating to energy efficiency.
Florida Administrative Code Section 9B-43 addresses the Florida Small Cities Community Development Block Grant (CDBG) Program.

Each subgrantee should have written procurement procedures that have been adopted by the subgrantee and address section 287.055, F.S. (Consultants Competitive Negotiation Act.)

Section 9B-43 addresses the requirements for the procuring of commodities and services by subgrantees.
Specific guidelines exist for subgrantees when procuring commodities and professional service.

A procurement which requires public notice in a newspaper based on the local CDBG procurement policy shall be published in a nearby MSA newspaper.
A local government may substitute such notice with any solicitation procedure which generates at least three responsible and responsive bids or proposals which can be considered.

Such procedure shall allow at least 12 days for receipt of the proposals or bids.
The DCA must provide written approval prior to the grantee awarding any contract exceeding $25,000 procured as a result of inadequate competition, a sole source, or a non-competitive procurement.

For contracts below $25,000, the grantee’s files must document the justification for the procurement.
All contracts for professional services shall conform to the following if the contract includes more than one service:

- Proposals may be submitted for one or more of the services;
- Qualifications and proposals shall be separately stated for each service; and
- The evaluation of the proposals shall be separate for each service.
The Office of Supplier Diversity (OSD) within the Department of Management Services, is responsible for administration of the State of Florida Minority and Women Business Enterprise Program.

It is advisable to utilize businesses that are certified by The State of Florida, Office of Supplier Diversity (OSD) when seeking to verify proof of MWBE status.
It is important that each subgrantee verify the MWBE certification status prior to completing and submitting reports.

The OSD maintains a directory of certified business enterprises online and it can be utilized to verify certification status.

If a MWBE firm is not certified by OSD, request a copy of the firm’s proof of certification.
Registered as a vendor at: My Florida Market Place (http://dms.myflorida.com)

A small business independently owned and operated, with a net worth of not more than $5 million that employs 200 or fewer full-time permanent employees or is recognized as a certified business by the federal government.

For CDBG projects, federal guidelines must be followed, even when local governments utilize a lower threshold for defining a certified “small business.”
51 percent owned, managed and controlled by: African-American, Hispanic-American, Asian-American, Native-American, American Woman or Service-Disabled Veteran (minimum 10% disability) who are citizens of the United States and permanent residents of Florida.

- Engaged in commercial transactions.
- Operates a business in Florida.
HUD Form 2516 is a required subgrantee data reporting form.

To assist in facilitating data collection, the form can be provided to developers, sponsors, builders, agencies, and/or project owners for reporting contract and subcontract activities of $10,000 or more.
HUD form 2516 is set up to allow subgrantees to include Section 3 contract data from HUD Form 60002.
This form is to be completed and submitted to the Florida Department of Community Affairs twice a year:

- **April 1 - September 30**
  *Due October 15th*

- **October 1 - March 31**
  *Due April 15th*
Mail the completed form to:

Florida Department of Community Affairs
2555 Shummard Oak Boulevard
Tallahassee, Florida 32399-2100