

**DETROIT HOUSING COMMISSION**  
**HOUSING CHOICE VOUCHER PROGRAM/PROJECT BASED VOUCHER(S)**  
**NON-COMPETITIVE AWARD APPLICATION FORM(S)**

The DHC's Assisted Housing Department is responsible for administering the Commission's Housing Choice Voucher Program; comprised of Tenant and or Project Based Vouchers. Any business concern seeking Project Based Voucher's shall complete the appropriate application/certification forms and provide adequate documentation as evidence of eligibility for participation under the Housing Choice Voucher Program. For additional info on the programs see: [https://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_9157.pdf](https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_9157.pdf) and or: <https://portal.hud.gov/hudportal/documents/huddoc?id=983.pdf> for program regulations.

Joy Flood  
DHC Assisted Housing Department Director  
313-877-8730, Floodj@dhcmi.org; [www.dhcmi.org](http://www.dhcmi.org)

All applicants seeking the award of Project Based Voucher(s) PBV's must complete and submit the attached Housing Choice Voucher Program-Project Based Voucher(s), pages 1-3. Additionally, select one (1) of the following categories your organization seeking vouchers or the project/site qualifies for and complete the required forms and submit additional information as requested on adjoining page for the associated category.

**PLEASE CHECK ONE:**

1. If your company is seeking **PBV(s) for Newly Constructed Housing** \*, then complete only the following forms:

- **This page pages 2-4 and provides responses to all items on page 5.**

**OR**

2. If your company is seeking **PBV(s) for Rehabilitated Housing**\*, then complete only the following forms:

- **This page pages 2, 3, and 6 and provides responses to all items on page 7.**

**OR**

3. If your company is seeking **-PBV(s) for Existing Housing**, then complete only the following forms:

- **This page pages 2, 3 and 8 and provides responses to all items on page 9.**

DHC has developed this application for the purpose of inviting interested Owner/Developers ("Proposers") to submit qualifications and other requirements to use Project Based Vouchers ("PBVs") for their rental units to support the preservation or creation of affordable supportive housing that substantially exceeds the HCVP Housing Quality Standards (HQS) for working families, families that live and/or work in the neighborhood of the property. Project-Based Vouchers will /may be awarded on noncompetitive basis, first come first served, however all/any award will require meeting HUD standards for such awards and in accordance DHC Administration Plan requirements for the Housing Choice Voucher Program. An overview of these requirements is attached for you reference. Please answer all questions and sign the forms.

Please return to the DHC Assisted Housing Department at 2211 Orleans Detroit, MI 48207 or fax to 313-877-7843

I have read and understand the above instructions and checked the appropriate category of PBV(s) option for my organization.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**DETROIT HOUSING COMMISSION**  
**HOUSING CHOICE VOUCHER PRG-PROJECT BASED VOUCHER(S) APPLICATION**  
**LETTER OF INTENT**

Business Name: \_\_\_\_\_

Address: \_\_\_\_\_  
City State Zip

Business Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_ Business Website: \_\_\_\_\_ Employer ID Number \_\_\_\_\_

Owners Social Security Number (if no EIN): \_\_\_\_\_ Date Business Established: \_\_\_\_\_

Contact Person & Title: \_\_\_\_\_ Contact Phone: \_\_\_\_\_

COMPETITIVE PROPOSAL	AWARD DATE
HOME	
LIHTC	
OTHER	

Please attach a copy of the competitive award letter (example: LIHTC reservation or HOME award letter)

Type of Project

Acquisition/Rehab     New Construction     Existing     Section 236     Section 515  
 Family     Senior/Elderly     HOME     LIHTC     NSP2

Note: Existing housing units are defined as units that already exist on the proposal selection date and that substantially comply with HUD's Housing Quality Standards on the application/proposal submittal date.

**Please indicate the # of vouchers requested by type and/or project/site: New: \_\_\_\_\_; Rehab: \_\_\_\_\_; Existing: \_\_\_\_\_**

**Project Based Units – Proposed Rent**

Unit Type Apt/SF/TH/Duplex	# of Units	Square Footage	# bedrooms	# baths	Monthly Contract Rent	Estimated Cost of Tenant Paid Utilities	Proposed Gross Rent	504 Compliant (Yes/No)

**Eligible PBV Participant** – is defined as a household having a qualifying income at or below 30% of area median income (AMI) for the county in which the development is located.

Additionally the development may serve a target population, such as

- Special Needs
- Senior/Elderly
- Homeless
- o Individual or family who lacks fixed regular and adequate night time residence
- o Individual or family who will imminently lose their primary night time residence
- o Unaccompanied youth under 25 years of age
- o Any individual who is fleeing or is attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous situations

(Please highlight all target populations above who will be served within this development)

Type of Business Entity (check one): Provide a copy of current Business Entity Documents.

Corporation Partnership Sole Proprietorship  Limited Liability Corp (LLC) Limited Liability Partnership (LLP)

Joint Venture Other (describe): \_\_\_\_\_

**I certify that the information provided is true and accurate and agree to provide upon request, documents verifying the information submitted to qualify as a Housing Choice Voucher Program-Project Based Voucher(s) award.**

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**Print Name**

**Date**

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**Signature**

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If you have any questions regarding the DHC/PBV program or the proposal process please contact:

Submit to :

DHC Assited Housing Department

Attention : Joy Flood; [Floodj@dhcmi.org](mailto:Floodj@dhcmi.org) .

When submitting via email please follow-up with the original in the mail.



**DETROIT HOUSING COMMISSION'S HOUSING CHOICE VOUCHER PROGRAM  
PROJECT BASED VOUCHER (PBV)  
PROJECT PROPOSAL  
NEW CONSTRUCTION HOUSING**

Newly Constructed housing; housing units which do not exist on the proposal selection date and are to be developed after the date of selection pursuant to an Agreement (AHAP) between the PHA and owner for use under the DHC PBV Program

<b>Development Name</b>	
<b>Development Address</b>	
<b>Owner Name</b>	
<b>Owner Address</b>	
<b>Contact Phone Number</b>	
<b>Contract Email</b>	
<b>Date</b>	

**PROPOSALS MUST INCLUDE THE FOLLOWING INFORMATION AND MEET THE STANDARD CRITERIA FOR NEW CONSTRUCTED HOUSING AS FOLLOWS:**

1. 25% CAP Information: No more than 25% of the units in a development can received PBVs unless the units are in a single-family building (1-4 Units); multifamily units which house elderly or disabled families, or family units where supportive services with be provided. Please provide the following information
  - a. Total number of units in the development: \_\_\_\_\_.
  - b. Total number of DHC/PBV units: \_\_\_\_\_.
  - c. Total number of units receiving supportive services: \_\_\_\_\_.
  - d. Is this an Elderly/Disabled development? Yes\_\_\_ No \_\_\_
  
2. Accessible Units – PBV triggers Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Action of 1988. Please provide the following
  - a. Total number of accessible (mobility and hearing/visual) units in the development \_\_\_\_\_
  - b. Total number of DHC/PBV accessible units in the development \_\_\_\_\_

NOTE: In the event there are no accessible units; documentation must be provided that has been approved by DHC’s Legal Staff to support undue financial and/or administrative burden for development constructed prior to June 2, 1988.

## **DHC MUST CONSIDER THE FOLLOWING PBV SITE SELECTION CRITERIA (24 CFR 983.57)**

DHC may not select a proposal for new constructed housing on a site or enter into an Agreement (AHAP) or HAP Contract for units on the site unless the PHA has determined the selected site is consistent with HUD statutory requirement of the deconcentrating of poverty and the expanding housing and economic opportunities. DHC will limit approval of sites for PBV housing to census tracts that have poverty concentrations of 20% or less. DHC will grant exceptions to the 20% standards where DHC determine the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20%.

Provide a narrative for each item listed below. Attached source documentation when necessary to support the response provided. If an item does not apply indicate with N/A and provide a brief explanation.

3. Is the census tract where the proposed Development/Units will be located; in or adjacent to a HUD- designated Enterprise Zone, Economic Community, or Renewal Community?
4. Are the PBV Development/units located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition?
5. Is the census tract where the proposed PBV development/units is located; undergoing significant revitalization? If so explain.
6. Will state, local, or federal dollars be invested in the area that has assisted in achievement of the statutory requirement in the deconcentration of poverty by the expansion of housing and economic opportunities?
7. Is there new market rate units being developed within the same neighborhood as the PBV development/units? Is so what is the likelihood that such market rate units will positively impact the poverty rate in the area?
8. Is the poverty rate in the area where the proposed PBV development/units will be located greater than 20%? (<http://quickfacts.census.gov/qfd/states/26000.html>). If so has there been a decline in the overall poverty rate in the census tract in the last five years?
9. Will there be meaningful opportunities within the census tract which will provide educational and economic advancement of the low income and target populations residing in the PBV units?
10. Is the site adequate in size, exposure and contour to accommodate the number and type of units proposed? Is there adequate utilities (water, sewer, gas, and electricity) and streets available to service the site?
11. Is the site so located that travel time and cost via public transportation or private automobile, from the neighborhood to a place of employment providing a range of jobs for lower-income persons, is not excessive?
12. Provide a location map outlining accessibility to social, recreational, educational, commercial, health facilities, and municipal facilities that provide services and employment opportunities to the low income residents.
13. **NOTE: DHC/HUD subsidy layering review is required for New Construction Developments**



**DETROIT HOUSING COMMISSION’S HOUSING CHOICE VOUCHER PROGRAM**  
**PROJECT BASED VOUCHER (PBV)**  
**PROJECT PROPOSAL-**  
**REHABILITATED HOUSING**

Rehabilitated housing is defined as housing units that exist on the PBV proposal selection date, but do not substantially comply with the Housing Quality Standards on the submittal or proposed award date.

<b>Development Name</b>	
<b>Development Address</b>	
<b>Owner Name</b>	
<b>Owner Address</b>	
<b>Contact Phone Number</b>	
<b>Contract Email</b>	
<b>Date</b>	

**APPLICATIONS/PROPOSALS MUST INCLUDE THE FOLLOWING INFORMATION AND MEET THE STANDARD CRITERIA FOR REHABILITATED HOUSING AS FOLLOWS:**

1. 25% CAP Information: No more than 25% of the units in a development can received PBVs unless the units are in a single-family building (1-4 Units); multifamily units which house elderly or disabled families, or family units where supportive services with be provided. Please provide the following information
  - a. Total number of units in the development: \_\_\_\_\_.
  - b. Total number of DHC/PBV units: \_\_\_\_\_.
  - c. Total number of units receiving supportive services: \_\_\_\_\_.
  - d. Is this an Elderly/Disabled development? Yes\_\_\_ No \_\_\_
  
2. Accessible Units – PBV triggers Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Action of 1988. Please provide the following
  - a. Total number of accessible (mobility and hearing/visual) units in the development \_\_\_\_
  - b. Total number of DHC/PBV accessible units in the development \_\_\_\_

NOTE: In the event there are no accessible units; documentation must be provided that has been approved by DHC’s Legal Staff to support undue financial and/or administrative burden for development constructed prior to June 2, 1988.

## **DHC MUST CONSIDER THE FOLLOWING PBV SITE SELECTION CRITERIA (24 CFR 983.57)**

DHC may not select a proposal for rehabilitated housing on a site or enter into an Agreement (AHAP) or HAP Contract for units on the site unless the PHA has determined the selected site is consistent with HUD statutory requirement of the deconcentrating of poverty and the expanding housing and economic opportunities. DHC will limit approval of sites for PBV housing to census tracts that have poverty concentrations of 20% or less. DHC will grant exceptions to the 20% standards where DHC determine the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20%.

Provide a narrative for each item listed below. Attached source documentation when necessary to support the response provided. If an item does not apply indicate with N/A and provide a brief explanation.

3. Is the census tract where the proposed Development/Units will be located; in or adjacent to a HUD- designated Enterprise Zone, Economic Community, or Renewal Community?
4. Are the PBV Development/units located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition?
5. Is the census tract where the proposed PBV development/units is located; undergoing significant revitalization? If so explain.
6. Will state, local, or federal dollars be invested in the area that has assisted in achievement of the statutory requirement in the deconcentration of poverty by the expansion of housing and economic opportunities?
7. Is there new market rate units being developed within the same neighborhood as the PBV development/units? Is so what is the likelihood that such market rate units will positively impact the poverty rate in the area?
8. Is the poverty rate in the area where the proposed PBV development/units will be located greater than 20%? (<http://quickfacts.census.gov/qfd/states/26000.html>). If so has there been a decline in the overall poverty rate in the census tract in the last five years?
9. Will there be meaningful opportunities within the census tract which will provide educational and economic advancement of the low income and target populations residing in the PBV units?
10. Is the site adequate in size, exposure and contour to accommodate the number and type of units proposed? Is there adequate utilities (water, sewer, gas, and electricity) and streets available to service the site?
11. Is the site so located that travel time and cost via public transportation or private automobile, from the neighborhood to a place of employment providing a range of jobs for lower-income persons, is not excessive?
12. Provide a location map outlining accessibility to social, recreational, educational, commercial, health facilities, and municipal facilities that provide services and employment opportunities to the low income residents.

**NOTE: DHC/HUD subsidy layering review is required for Rehabilitation Developments**



**DETROIT HOUSING COMMISSION’S HOUSING CHOICE VOUCHER PROGRAM**  
**PROJECT BASED VOUCHER (PBV)**  
**PROJECT PROPOSAL**  
**EXISTING HOUSING**

Existing Housing units are defined as units which already exist on the proposal selection date and that substantially comply with the Housing Quality Standards (HQS) on the proposal date. Existing units must fully comply with HQS before the execution of the HAP Contract

<b>Development Name</b>	
<b>Development Address</b>	
<b>Owner Name</b>	
<b>Owner Address</b>	
<b>Contact Phone Number</b>	
<b>Contract Email</b>	
<b>Date</b>	

**PROPOSALS MUST INCLUDE THE FOLLOWING INFORMATION AND MEET THE STANDARD CRITERIA FOR EXISTING HOUSING AS FOLLOWS:**

1. 25% CAP Information: No more than 25% of the units in a development can receive PBVs unless the units are in a single-family building (1-4 Units); multifamily units which house elderly or disabled families, or family units where supportive services will be provided. Please provide the following information
  - a. Total number of units in the development: \_\_\_\_\_.
  - b. Total number of DHC/PBV units: \_\_\_\_\_.
  - c. Total number of units receiving supportive services: \_\_\_\_\_.
  - d. Is this an Elderly/Disabled development? Yes \_\_\_ No \_\_\_
  
2. Accessible Units – PBV triggers Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act of 1988. Please provide the following
  - a. Total number of accessible (mobility and hearing/visual) units in the development \_\_\_\_ .
  - b. Total number of DHC/PBV accessible units in the development \_\_\_\_.

NOTE: In the event there are no accessible units; documentation must be provided that has been approved by DHC’s Legal Staff to support undue financial and/or administrative burden for development constructed prior to June 2, 1988.



**DHC PHA MUST CONSIDER THE FOLLOWING PBV SITE SELECTION CRITERIA (24 CFR 983.57)**

The PHS may not select a proposal for existing housing on a site or enter into an Agreement (AHAP) or HAP Contract for units on the site unless the PHA has determined the selected site is consistent with HUD statutory requirement of the deconcentrating of poverty and the expanding housing and economic opportunities. DHC will limit approval of sites for PBV housing to census tracts that have poverty concentrations of 20% or less. DHC will grant exceptions to the 20% standards where DHC determine the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20%.

Provide a narrative for each item listed below. Attached source documentation when necessary to support the response provided. If an item does not apply indicate with N/A and provide a brief explanation.

3. Is the census tract where the proposed Development/Units will be located; in or adjacent to a HUD- designated Enterprise Zone, Economic Community, or Renewal Community?
4. Are the PBV Development/units located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition?
5. Is the census tract where the proposed PBV development/units is located; undergoing significant revitalization? If so explain.
6. Will state, local, or federal dollars be invested in the area that has assisted in achievement of the statutory requirement in the deconcentration of poverty by the expansion of housing and economic opportunities?
7. Is there new market rate units being developed within the same neighborhood as the PBV development/units? If so what is the likelihood that such market rate units will positively impact the poverty rate in the area?
8. Is the poverty rate in the area where the proposed PBV development/units will be located greater than 20%? (<http://quickfacts.census.gov/qfd/states/26000.html>). If so has there been a decline in the overall poverty rate in the census tract in the last five years?
9. Will there be meaningful opportunities within the census tract which will provide educational and economic advancement of the low income and target populations residing in the PBV units?
10. Is the site adequate in size, exposure and contour to accommodate the number and type of units proposed? Is there adequate utilities (water, sewer, gas, and electricity) and streets available to service the site?
11. Is the site so located that travel time and cost via public transportation or private automobile, from the neighborhood to a place of employment providing a range of jobs for lower-income persons, is not excessive?
12. Provide a location map outlining accessibility to social, recreational, educational, commercial, health facilities, and municipal facilities that provide services and employment opportunities to the low income residents.

**NOTE: DHC/HUD subsidy layering is not required for Existing Developments**



## **Housing Choice Voucher (HCV) Project Based Voucher (PBV) Program**

### **DHC Selection and Award Overview:**

The Project Based Voucher (PBV) program is a component of the Detroit Housing Commission's (DHC) Housing Choice Voucher (HCV) Program. The HCV program is federally funded by the United States Department of Housing and Urban Development (HUD) Public and Indian Housing (PIH) Project based rental assistance is attached to specific housing units which are determined to be decent, safe and sanitary the Housing Quality Standards Inspection. Project-Based contracts are awarded to owners and developers of properties through an owner proposal selection process.

PBV's may be awarded to multiple eligible proposers/applicants/sites. DHC is making available approximately 300 Project Based Vouchers. *DHC is responsible for determining the amount of budget authority that is available for PBV's and ensuring the amount of assistance attached to units is within the amounts available under its ACC with HUD for this program.*

The DHC PBV program will evaluate the applications/proposals on their merits using the principle criteria the development or project furthers DHC's goals of de-concentrating poverty and expanding housing and economic opportunities. These criteria will include:

1. Whether the proposal is increasing the overall number of affordable units in a development or five block area;
2. The proponent's experience, qualifications and capability to manage and build housing as specified; If the development substantially exceeds Housing Quality Standards; and
3. If the development is suitable form the standpoint of facilitating and further full compliance with applicable civil rights laws.

*DHC will not award Project Based Vouchers to supplant the number of affordable units previously committed by the developer.*

### **Should DHC receive multiple applications within a three month period, preference or order of award will be:**

- 1) For those whose units will become available at the earliest date;
- 2) For those with on-site supportive services;
- 3) For those with units designed with two or more bedrooms to service families;
- 4) For those developments located in the lower poverty rates in the city of Detroit, Wayne County, Oakland County, Macomb County, Lapeer County and St. Clair County.
- 5)

**Developments who have received a 9% tax credit award will be limited to less than 25% of the total units as Project Based Vouchers. Developments who have received a 4% tax credit award will not be limited to 25% of the total units as Project Based Vouchers For proposals which exceed 25% an information regarding resident population to be housed and service plans must be provided.**

**Step One:** The owner/sponsor must have received financing for the development via a competitive process such as LIHTC, HOME, State (MSHDA) financing, or other qualified programs, within the last three years. This award must have been provided with no consideration the project would receive project-based vouchers.

**Step Two:** The owner/sponsor must submit the **DHC/PBV 100** (Letter of Intent) to the designated DHC staff. Attach a copy of the LIHTC Reservation.

**Step Three:** Designated DHC staff will contact the owner/sponsor to discuss the project and recommend the appropriate proposal to be submitted for the development. Proposal types include: Existing, Substantial Rehabilitation or Newly Constructed.

**Step Four:** Once the proposal is reviewed and approved, a PBV Preliminary Award Letter will be issued. The letter will outline the following conditions to be met prior to signing the Agreement to enter into a Housing Assistance Payment Contract (AHAP) or Housing Assistance Payment Contract (HAP), see below.

**Step Five:** Immediately following the issuance of the Preliminary Award letter and prior to the commencement of any construction work; DHC/PHA must enter into an Agreement to Enter Into Housing Assistance Payments (AHAP) Contract for new construction and rehabilitation projects; or the Housing Assistance Payment (HAP) Contract for existing projects meeting HQS Standards. It must be further noted the HUD Subsidy Layering and Environmental Requirements at a minimum must be met prior to the execution of these documents.

- Agreement to Enter Into Housing Assistance Payments Contracts (AHAP)
  - New Construction or Rehabilitation Part 1 (HUD 52531a) Part 2 ( HUD 52531b)
- Housing Assistance Payment Contract
  - New Construction or Rehabilitation Part 1 (HUD 52530a-1) Part 2 (HUD 52530a-2)
- Housing Assistance Payment Contract
  - Existing Part 1 (HUD 52530b-1) Part 2 (HUD 52530b-

**The UNIFORM RELOCATION ACT: Requirements:** apply to the HCV Project Based Voucher Program per **24 CFR 983.7**. The requirements and overview is provided on HUD's website.

- The Uniform Act, passed by Congress in 1970, is federal law which establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses or farms. The Uniforms Act's protections and assistance apply to the acquisition, rehabilitation or demolition of real property for federal or federally funded projects.

## OVERVIEW OF PRELIMINARY AWARD LETTER CONDITIONS

### TO BE MET PRIOR TO THE EXECUTION OF THE PBV – AHAP

1. **Subsidy Layering:** HUD subsidy layering process must be complete per 24 CFR 983.55
2. **Environmental Review:** Procedures per 24 CFR 58 must be completed to include HUD's approval of the environmental certification and request for release of funds,
3. **DHC/HUD Section 3 Plan:** The plan must be submitted along with the application.
4. **Equal Employment Opportunity and Labor Standards:** EEO requirements will apply to all projects requesting PBVs. Labor Standards are triggered if the project has **nine (9) or more PBV units**.
5. **Relocation Assistance (URA) 24 CFR 983.7 Uniform Relocation Act** – if URA is triggered, the owner must submit a certification that all URA requirements have been complied with.
6. **Work write- up (Rehabilitation Project) and/or work description (Newly Constructed Project) specifications and drawings** must be submitted for review and compliance with the design and construction requirements of the Fair Housing Act and implementing regulations at 24 CFR 100.205. The accessibility requirements under section 504 of the Rehabilitation Act of 1973 and implementation regulations at 24 CF 8.22 and 8.23 will also be reviewed.

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### TO BE MET PRIOR TO THE EXECUTION OF THE PBV/HAP CONTRACT

1. **Certifications and additional information addressed with the AHAP:**
  - a. Section 1.8 Work Completion (AHAP Part 1 page 5)
  - b. Section 1.13 Uniform Relocation Act (AHAP Part 1 page 7)
  - c. Section 1.24 Lobbying Certifications (AHAP Part 1 page 13).
2. **Inspections:** All units must be physically inspected by DHC and meet HUD Housing Quality Standards (HQS) before the required Housing Assistance Payment (HAP) Contract is signed by both parties.
3. **Rents to Owner:** Contract rents must be finalized per 24 CFR 983 Subpart G and documented in the development file to ensure rent reasonableness

## TO BE MET AFTER EXECUTION OF THE PBV/HAP CONTRACT

1. **Income Eligibility:** At initial admission to the DHC HCV/PBV Program, all participants must meet the DHC HCV/PBV Program income eligibility requirement of being at or below 30% of the area median income based on family size.
2. **Waiting List:** The property waiting list will be managed by DHC
3. **PBV Requirements:** Participants/tenants must meet all DHC PBV requirements to continue to occupy the PBV unit
4. **PBV Units:** All PBV units must be occupied by eligible PBV participants throughout the term of the HAP contract. If DHC finds that these units are not occupied by eligible households the unit(s) may be deleted from the HAP contract and not re-instated.

### **PBV Voucher Award**

DHC shall review all applications for completeness and compliance with the guidelines and requirements of the application. Without limitation and at its sole option, DHC reserves the right to accept or reject any or all proposals, to take exception to these application requirements, to negotiate with applicants, or to waive any informalities. Firms may be excluded from further consideration for failure to fully comply with the requirements of the application process. DHC may decide to reject all application and/or to reissue the application package with modifications.

DHC will not award vouchers to applicants that are debarred, suspended or otherwise determined ineligible by HUD or other government agencies, or to applicants that DHC has determined to be non-responsible. Prior to execution of HAP or AHAP contract, DHC shall establish contractor responsibility by review of a proposed applicant's ability and competence to perform the contract successfully, and to ensure that they have a satisfactory record of performance and integrity. A determination of non-responsibility may be based on, without limitation, unsatisfactory performance on other contracts with DHC or another Housing Authority, or on other contracts of a similar nature.

**Applications will be reviewed on a first come first served basis.** *However, Applicant's selected for the award may be chosen on the basis of an assessment of the greatest benefit to the DHC, not necessarily on the order in which responses were received.* DHC also reserves the right to negotiate and award any element of the Project Based Voucher Program, make multiple awards, reject any or all proposals or waive any minor irregularities or technicalities in proposals received as the best interest of DHC may require.

Applicant's that meet all prerequisite requirement for eligibility will be conditionally awarded project-based vouchers up to the amount requested on the proposal. After awarding the initial application(s), DHC may conditionally award the next highest ranking applications with project-based vouchers up to the amount requested until all vouchers available for the program have been assigned. If DHC determines that an application is eligible for PBV funding but cannot be fully funded at the amount requested by the owner/developer, the owner will be given the opportunity to receive partial funding.



## PROJECT BASED VOUCHER (PBV) PROGRAM PROCEDURES FOR DETERMINING RENTS TO OWNER

### **A. When are initial rent to owner determined?**

The initial rent to the owner is established at the beginning of the HAP contract term in accordance with Section 983.301 (a) (2). In the case of new construction or rehabilitated housing, the Agreement to Enter A Housing Assistance Payment Contract (AHAP) states the estimated initial rent to owner, but the actual initial rent to owner is established at the beginning of the HAP contract term.

DHC must use the published FMRs in effect and the DHC utility allowance schedule in effect at the time the HAP contract is executed as required by Section 983.301 (f). However, DHC, at its discretion pursuant to Section 983.301 (f) may use the FMRs and utility allowances in effect during the 30-day period immediately before the beginning date of the HAP contract.

### **B. Determine if the PBV property is or will be located in a qualified census tract:**

The procedure for establishing the initial rent to owner varies based on whether or not the property is located in a qualified census tract.

A “qualified census tract: for purposes of determining the initial rent to owner, is defined as any census tract (or equivalent geographic area defined by the Bureau of the Census) in which:

1. at least 50 percent of the households have an income of less than 60 percent of the Area Median Gross Income; or
2. where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.

### **C. Other subsidy: effect on rent to owner**

In addition to the rent limits established in accordance with 983.301 and 24 CFR 982.302, the following restrictions apply to certain units.

1. HOME, for units assisted under the HOME Program, rents may not exceed rent limits as required by the HOME program (24 CFR 92.252)
2. Subsidized projects – the following applies to any contract units in any of the following types of federally subsidized project:
  - a. An insured or non-insured Section 236 project;
  - b. A formerly insured or non-insured Section 236 project which continues to receive Interest Reduction Payments following a decoupling action;
  - c. A Section 212 (d)(3) below market interest rate (BMIR) project;
  - d. A Section 515 project of the Rural Housing Service;
  - e. Any other type of federally subsidized project specified by HUD.

The rent to owner may not exceed the subsidized rent (basic rent) as determined in accordance with requirements for applicable federal program listed in paragraph (c)(1) of this section.

3. Combining subsidy. Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements. See 983.55.
4. Other subsidy: PHA discretion to reduce rent. At its discretion, a PHA may reduce the initial rent to owner because of other governmental subsidies, including tax credit or tax exemption, grants, or other subsidized financing.
5. Prohibition of other subsidy. For provision that prohibit PBV assistance to units in certain types of subsidized housing, see 983.54.

**D. Determining rents for comparable unassisted units;**

When determining comparable rents for unassisted units, DHC shall not use other tax credit units in the property as comparables. Tax credit units are considered assisted or subsidized units per PIH Notice 2002-22.

**E. Redetermination of Rent to Owner**

DHC must redetermine the rent to the owner as follows, see 983.302

- Upon the owner's request, or
- When there is a 5% or greater decrease in the published FMRs.

**F. Establishing the Initial and Redetermined Rent to the Owner for:**

PBV units that do not have LIHTC, or

PBV units with LIHTC where the property is located in a qualified census tract, or

PBV units with LIHTC where the property is not located in a qualified census tract and where the rents do not exceed 110% of the published FMRs (Fair Market Rents).

In the above cases the initial rent to owner must not exceed the lowest of:

An amount determined by DHC, which does not exceed 110% of the published FMRs for unit bedroom size minus the applicable tenant paid utility allowance;

The reasonable rent; or

The rent requested by the owner.

**G. Establishing the Initial and Redetermined Rent to Owner for PBV units with LIHTC when the property is not located in a qualified census tract and the LIHTC rents exceed 110% of the FMRs.**

These provisions apply to PBV units with LIHTC where the property is not located in a qualified census tract if:

- In the same property, there are comparable tax credit units of the same unit bedroom size as the the contract unit and the comparable tax credit units do not have any form or rental assistance other than tax credit; and
- The tax credit exceeds 110% of the published FMRs

In such cases the initial rent to owner must not exceed the lowest of:

- The tax credit rent minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

NOTE – the tax credit rent is the rent charged for comparable units of the same bedroom size in the property that also received the low-income housing tax credit but do not have any additional rental assistance (such as tenant based vouchers)



## DETROIT HOUSING COMMISSION'S (DHC) PROJECT BASED VOUCHER (PBV) OVERVIEW OF FEDERAL REGULATIONS

This is a federal program the following HUD regulations (Title 24 Housing and Urban Development Part 983 Project Based Voucher (PBV) Program) must be followed when applicable. The following sections are provided for your initial review; it is strongly recommended you review the PBV regulations at the following link prior to submitting the PBV Owner Proposal. <http://www.ecfr.gov/cgi>.

If you have any questions please contact **Joy Flood** or email [Floodj@dhcmi.org](mailto:Floodj@dhcmi.org) and/or [WalkerA@dhcmi.org](mailto:WalkerA@dhcmi.org),

### **24 CFR 983.4 Cross-reference to other Federal requirements**

The following provisions may apply to assistance under the PBV program.

**Civil money penalty** – Penalty for owner breach of HAP contract. See 24 CFR 30.68

**Debarment** – Prohibition on use of debarred, suspended, or ineligible contractors. See 24 CFR 5.105 © and 2 CFR part 2424

**Definitions** – see 24 CFR part 5, subpart D

**Disclosure and verification of income information** – see 24 CFR part 5, subpart B

**Environmental review** – see 24 CFR parts 50 and 58 ( see also provisions on PBV environmental review at 24 CFR 983.58

**Fair Housing, Nondiscrimination and equal opportunity** – see 24 CFR 5.105 (a) and section 504 of the Rehabilitation Act

**Fair Market Rents** – see 24 CFR part 888, subpart A

**Fraud** – see 24 CFR part 792, PHA retention of recovered funds

**Funds** – see 24 CFR part 791. HUD allocation of voucehr funds

**Income and family payment** – see 24 CFR part 5, subpart F (especially 5.603 (definitions), 5.609 (annual income), 5.611 (adjusted income), 5.628 (total tenant payment), 5..630 (minimum rent), 5.603 (utility allowance), 5.603 (utilitey reimbursements) , and 5.661 (section 8 project-based assistance programs: approval for police or other security persooneel to live in project).

**Labor standards** – Regulations implementing the Davis-Bacon Act, Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708), 29 CFR part 5, and other federal laws and regualtions pertaining to labor standards applicable to development (including rehabilitation) of a project comprising nine or more assisted units.

**Lead-based paint** – Regulations implemetnating the Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846) and the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856) see 24 CFR part 35, subparts A,B, H and R.



**Lobbying restrictions** – Restrictions on use of funds for lobbying, see 24 CFR 5.105(b)

**Noncitizens** – Restriction on assistance , see 24 CFR part 5, subpart E

**Program accessibility** – Regulations implementing Section 504 of the Rehabilitation Act of 1973 (29 U.S.C 794) see 24 CFR parts 8 and 0

**Protection for victims of domestic violence, dating violence and stalking** – see 24 CFR part 5, subpart L

**Relocation Assistance** – Regulations implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U.S.C. 4201-4655. See 24 CFR 135

**Section 3** – Training, employment and contracting opportunities in development. Regulations implementing Section 3 of the Housing and Urban Development Act of 1968 (12 U.S. C. 1701u). see 24 CFR part 135

**Uniform financial reporting standards** – see 24 CFR part 5, subpart H

**Waiver of HUD rules** – see 24 CR 5.110

### **983.53 Prohibition of assistance for ineligible units**

Ineligible unit. The PHA may not attach or pay PBV assistance for units of the following types of housing:

- Shared housing;
- Units on the grounds of a penal, reformatory, medical, mental, or similar public or private institution;
- Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care. However, the PHA may attach PBV assistance for a dwelling unit in an assisted living facility that provides home health care services such as nursing and therapy for residents of the housing;
- Units owned or controlled by an educational institution or its affiliate and are designated for occupancy by students of the institution;
- Manufactured homes; and
- Transitional housing.

**Prohibition against assistance of owner –occupied unit.** The PHA may not attach or pay PBV assistance for a unit occupied by an owner of the housing. A member of a cooperative who owns shares in the project assisted under the PBV program shall not be considered an owner for the purpose of participation in the PBV program.

**Prohibition against selecting unit occupied by an ineligible family.** Before a PHA selects a specific unit to which assistance is to be attached, the PHA must determine whether the unit is occupied and, if occupied, whether the unit's occupants are eligible for assistance. The PHA must not select or enter into an Agreement or HAP contract for a unit occupied by a family ineligible for participation in the PBV program.

**Prohibition against assistance for units for which commencement of construction or rehabilitation occurred prior to AHAP.** The PHA may not attach or pay PBV assistance for units for which construction or rehabilitation has commenced as defined in 983.152 after the proposal submission and prior to the execution of an AHAP.

DHC may use high-rise elevator buildings for families with children if it determines that there is no practical alternative and HUD approved DHC's determination.

### **983.54 Prohibition of assistance for units in subsidized housing**

A PHA may not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing dwelling unit;
- A unit subsidized with any other form of Section 8 assistance (tenant-based or project-based);
- A unit subsidized with any governmental rent subsidy (a subsidy that pays all or any part of the rent);
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the the housing;
- A unit subsidized with Section 236 rental assistance payments (12 U.S.C. 1715z-1). However, the PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments;
- A unit subsidized with with rental assistance payments under Section 521 of the Housing Act of 1949, 42 U.S.C. 1490a (a Rural Housing Service Program). However, the PHA may attach assistance for a unit subsidized with Section 515 interest reduction payments (42 U.S.C. 1485);
- A Section 202 project for non-elderly persons with disabilities (assistance under Section 162 of the Housing and Community Development Act of 1987, 12 U.S.C 1701q note);
- Section 811 project- based supportive housing for persons with disabilities (42 U.S.C. 8013);
- Section 202 supportive housing for the elderly (12 U.S.C. 1701q)
- Section 101 rent supplement project (12 U.S.C. 1701s);
- A unit subsidized with any form of tenant-based rental assistance (as defined at 24 CFR 982.1 (b)(2)) (e.g., a unit subsidized with tenant-based rental assistance under the HOME program, 42 U.S.C. 12701 et seq.);
- A unit with any other duplicative deferral, state, or local housing subsidy, as determined by HUD or by the PHA in accordance with HUD requirements. For this purpose, " housing subsidy" does not include the housing component of a welfare payment; a social security payment; or a federal, state, or local tax concession (such as relief from local real property taxes).

### **983.55 Prohibition of excess public assistance**

Subsidy layering requirements – The PHA may provide PBV assistance only in accordance with HUD subsidy layering regulations (24 CFR 4.13) and other requirements. The subsidy layering review is intended to prevent excessive public assistance for the housing by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits. The subsidy layering requirements are not applicable to existing housing. A further subsidy layering review is not required for housing selected as new construction or rehabilitation of housing, if HUD's designee has conducted a review, which included a review of PBV assistance, in accordance with HUD's PBV subsidy layering review guidelines.

### **983.56 CAP on number of PBV units in each project/development**

25 % per project CAP. Except as provided in the paragraph below the PHA may not select a proposal to provide PBV assistance for units in a project or enter into an Agreement of HAP Contract to provide PBV assistance for units in a project , if the total number of dwelling units in the project which will receive PBV assistance during the term of the PBV HAP Contract is more than 25 % of the number of dwelling units (assisted or unassisted) in the project/development.

Exception to the 25% CAP – When PBV units are not counted against the CAP , the following cases:

- Units in a single-family building;
- Excepted units in a multifamily project because they are specifically made available for elderly or disabled families.

**DETROIT HOUSING COMMISSION  
ECONOMIC OPPORTUNITIES FOR LOW AND  
VERY LOW-INCOME PERSONS**

**SECTION 3 CLAUSE/REQUIREMENTS**

**I. OVERVIEW**

As an entity that receives funding from HUD, DHC is obligated to comply with Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (section 3) as implemented through 24 CFR Part 135. The purpose of Section 3 is to ensure employment and other economic opportunities generated by HUD assistance shall, to the greatest extent feasible, be directed to Low and Very-Low Income Persons, particularly those who are recipients of HUD housing assistance. The complete DHC Section 3 Policy may be obtained by contacting the Detroit Housing Commission's Procurement Department at 1301 E. Jefferson, Detroit, Michigan 48207, Telephone (313) 877-8643.

Every applicant, recipient, contracting party, contractor, and subcontractor shall incorporate, or cause to be incorporated, in all contracts for work in connection with a Section 3 covered project, the following clause (referred to as a Section 3 clause):

**II. MANDATORY SECTION 3 CLAUSE FOR ALL CONTRACTS**

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

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

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an appropriate action, as provided in an applicable provision of the subcontract or in this section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with section 3 covered Indian housing assistance, section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (I) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of section 3 and section 7(b) agree to comply with section 3 to the maximum extent feasible, but not in derogation of compliance with section 7(b).

### **III. Implementation Plan for Compliance with Section 3 Requirements**

Contractors shall demonstrate compliance with the "greatest extent feasible" requirement of Section 3 by selecting one of the following:

- ▶ Meeting the numerical goals set forth in this section for providing training or employment opportunities to residents of public housing or other low income persons (section 3 residents);
  - ▶ Subcontracting work for the covered contract to a Section 3 Certified Business Concern(s);
  - ▶ Provide other economic opportunities to low income persons;
- or
- ▶ Becoming a Section 3 Certified Business Concern

Each proposal must provide an implementation plan in narrative form that identifies the chosen method of compliance and the supporting evidence for that compliance method as outlined below.

#### **A. The Hiring and Training Method of Compliance**

Every contractor and subcontractor, in order to comply with Section 3, must commit, in writing, to the following:

1. When additional personnel are needed to complete the contract work, 30% of all new hires will be Section 3 residents. If the contractor hires only one employee, that employee will be a Section 3 resident.
2. Order of preference for Section 3 hires are as follows:
  - a. Residents of the housing development(s) for which the Sections 3 covered assistance is

- expended (category 1 residents);
  - b. Residents of other housing developments managed by DHC (category 2 residents);
  - c. Participants in HUD Youthbuild programs being carried out in the Detroit metropolitan area;
  - d. Other Section 3 residents.
3. The contractor shall maintain all records, reports and other documents to demonstrate compliance with the Section 3 requirements.
4. Implementation of Section 3 by the contractor may be accomplished using the following examples. The examples provided are not all inclusive. Additional examples of efforts to offer training and employment opportunities to Section 3 Residents may be found in the Appendix to 24 CFR part 135 Appendix 1.
- a. Advertising any training and employment positions by distributing flyers which identify the positions to be filled, the qualifications required, and where to obtain additional information about the application process to every occupied dwelling unit in the housing development or developments where category 1 or category 2 persons reside.
  - b. Contacting agencies administering HUD Youthbuild programs, and requesting their assistance in recruiting HUD Youthbuild program participants for the contractor's training and employment positions.
  - c. Consulting with State and local agencies administering training programs funded through JTPA or JOBS, probation and parole agencies, unemployment compensation programs, community organizations and other officials or organizations to assist with recruiting Section 3 residents for the contractor's training and employment positions.
  - d. Advertising the positions to be filled through the local media, such as community televised networks, newspapers or general circulation, and radio advertising.

If this compliance method is chosen, offeror **must** provide its Section 3 Hiring and Training Implementation Plan and supporting documentation demonstrating compliance with the Section 3 requirements

#### **B. The Subcontracting Method of Compliance**

A Contractor for building trades work for maintenance, repair, modernization or development or for building trades work arising in connection with housing rehabilitation, housing construction and other public construction will subcontract at least 10% of the dollar value of the contract to Section 3 Business Concerns. A Contractor may satisfy this goal through contracts awarded by its Subcontractors.

A Contractor for other types of work will subcontract at least 3% of the dollar value of the contract to Section 3 Business Concerns. A Contractor may satisfy this goal through contracts awarded by its Subcontractors

If this compliance method is chosen, each offeror **must** provide its Section 3 Subcontracting Implementation Plan and supporting documentation demonstrating compliance with the Section 3 requirements.

### **C. The Other Economic Opportunities Method of Compliance**

Contractors and Subcontractors will undertake efforts to provide economic opportunities other than training, employment and contract awards to Section 3 residents

Other economic opportunities to train and employ Section 3 residents include, but need not be limited to, use of “upward mobility”, “bridge”, and hiring Section 3 residents in part-time positions.

A Contractor or Subcontractor may provide economic opportunities to establish stabilize or expand Section 3 Business Concerns, including micro-enterprises. Such opportunities may include, but are not limited to, the formation of Section 3 joint ventures, financial support for affiliating with franchise development, use of labor only contracts for building trades, or purchase of supplies and materials from Category 1, 2 or 4 Section 3 Certified Business Concerns. Contractors and Subcontractors may utilize these methods directly or may provide financial incentives to non-Section 3 business concerns to provide economic opportunities to Section 3 residents.

If this compliance method is chosen, each offeror **must** provide its Section 3 “Other Economic Opportunities” Implementation Plan and supporting documentation demonstrating compliance with the Section 3 requirements.

### **D. The Education/Training Fund Method of Compliance**

A Contractor may satisfy its Section 3 goal by contributing an amount equivalent to 2% of the dollar value of the contract to a DHC approved education and/or training fund that provides assistance to Section 3 residents.

If this compliance method is chosen, each offeror **must** provide its Education/Training Fund contribution commitment statement demonstrating compliance with the Section 3 requirements.

### **E. The Section 3 Certified Business Concern Method of Compliance**

Contractors and Subcontractors may demonstrate compliance by becoming a certified Section 3 Business Concern. Section 3 Business concerns are defined as follows:

1. Category 1 Businesses – Section 3 Business Concerns that are 51% or more owned by residents of the DHC housing development(s) for which the contract is expended or whose full-time, permanent workforce includes 30% or these persons as employees.
2. Category 2 Businesses – Section 3 Business Concerns that are 51% or more owned by residents of other DHC housing developments or housing developments managed by DHC or whose full-time, permanent workforce includes 30% of these persons as employees.
3. Category 3 Businesses – HUD Youthbuild programs being carried out in the Detroit metropolitan area in which the contract is expended.
4. Category 4 Businesses – Section 3 Business Concerns that are 51% or more owned by Section 3 residents or whose full-time, permanent workforce includes no less than 30% Section 3 residents or that subcontract in excess of 25% of the total amount of subcontracts to Category 1 or Category 2 business concerns.

If this compliance method is chosen, a Contractor or Subcontractor seeking to become a Section 3 Certified Business concern shall submit such evidence, as may be reasonably required by DHC that the Contractor or Subcontractor qualifies as a Section 3 Business Concern in one of the 4 categories outlined above. Such evidence may include, but is not limited to, a DHC lease agreement; an affidavit certifying that 30% of the subject Contractor or Subcontractors employees are low-income as defined by federal guidelines; a list of employees and the household income of each employee, etc.

Also, a Section 3 Business Concern seeking a contract or subcontract shall submit such evidence, as may be reasonably required, sufficient to demonstrate to DHC that the Section 3 Business Concern is responsible and has the ability to perform successfully under the terms and conditions of the proposed contract.

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**DETROIT HOUSING COMMISSION  
SECTION 3 COMPLIANCE PLAN  
CONTRACTOR'S ACKNOWLEDGMENT AND AGREEMENT**

Name of Company: \_\_\_\_\_

Description of Services or Work: New Construction\_\_\_\_; Rehabilitation\_\_\_\_; Existing Housing \_\_\_\_\_. \_\_\_\_

Please indicate your firm's proposed methodology for compliance with Section 3; you may select one or more methods of compliance.

1.  Meeting the numerical goals set forth in this section for providing training or employment opportunities to residents of public housing or other low income persons (section 3 residents);
2.  Subcontracting work for the covered contract to a Section 3 Certified Business Concern(s);
3.  Provide other economic opportunities to low income persons;
4.  Becoming a Section 3 Certified Business Concern

**THIS IS A REQUIRED DOCUMENT FOR ALL DHC PROCUREMENTS EXCEPT CONTRACTS FOR SUPPLIES AND MATERIALS.**

Each application **must** provide an implementation plan in narrative form that identifies the chosen method of compliance and the supporting evidence for that compliance method. Additional guidance and documents for each method can be found at [www.dhcmi.org](http://www.dhcmi.org). or by calling the DHC Procurement Department at 313-877- 8643

- Specific Implementation plan is attached (see attached form for guidance). Additional sheets may be included as necessary). Applications submitted without an implementation plan may be considered non-responsive and may be rejected).

**DETROIT HOUSING COMMISSION**  
**EFFORTS TO COMPLY WITH SECTION 3**  
**HIRING AND CONTRACTING GOALS NARRATIVE**

Please describe in a narrative the efforts you plan to make in order to comply with Section 3 Hiring and Subcontracting goals: \_\_\_\_\_

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**YOUR COMPANY'S SECTION 3**  
**NARRATIVE SHOULD BE PROVIDED**  
**TO DHC ON YOUR COMPANY'S**  
**LETTERHEAD AND EXECUTED BY**  
**AUTHORIZED REPRESENTATIVE OR**  
**OFFICER OF THE COMPANY AS**  
**INDICATED IN VENDOR FORMS**  
**SUBMITTED ALONG WITH YOUR**  
**SUBMISSION.**

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**Non-Discrimination.**

In accordance with the U.S. Constitution and all federal legislation and regulations governing fair employment practices and equal employment opportunity including, but not limited to Title VI (42 USC 2000d, et seq.) and Title VII (42 USC 2000e, et seq.) of the Civil Rights Act of 1964 (P.L. 88-352, 78 Stat. 241) and the U.S. Department of Justice regulations (28 CFR Part 42, et seq.) and the U.S. Department of Labor regulations (29 CFR Part 1601, et seq.) issued pursuant to those Titles, Executive Order 11246 (September 24, 1965) as amended, the Michigan Constitution and all state laws and regulations governing fair employment practices and equal employment opportunity, including but not limited to the Michigan Civil Rights Act (P.A. 1976 No. 453) and the Michigan Handicappers Civil Rights Act (P.A. 1976 No. 220), the Contractor agrees that it shall not discriminate against any employee or applicant for employment with respect to hire, tenure, terms, conditions or privileges of employment because of religion, race, color, national origin, age, sex, sexual orientation, height, weight, marital status or handicap that is unrelated to the individual's ability to perform the duties of a particular assignment or position. The Contractor hereby recognizes the right of the United States and the State of Michigan to seek judicial enforcement of the foregoing covenant against discrimination, against itself or its subcontractors connected directly or indirectly with the performance of this Contract.

In addition, the Contractor shall take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, religion, sex, sexual orientation or national origin. Such action shall include, but not be limited to employment, upgrading, demotion, transfer, recruitment, layoff or termination, rates of pay or other forms of compensation, and selection for training including apprenticeship.