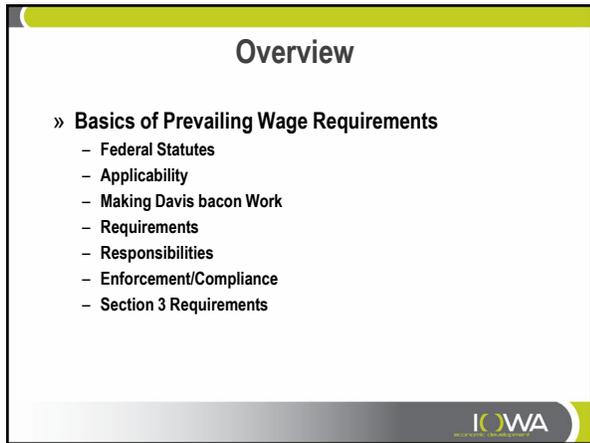


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3

Major Federal Laws

- » Davis-Bacon and Related Acts (DBRA)
- » Copeland Act (Anti-Kickback Act)
- » Contract Work Hours and Safety Standards Act (CWHSSA)
- » Fair Labor Standards Act (FLSA)



4

Davis-Bacon Act (DBA)

- » Enacted in 1931, amended in 1935 & 1964
- » Federal construction contracts over \$2,000
- » Applies to construction, alteration and/or repair including painting & decorating of public buildings or public works contracts
- » Requires pay of prevailing wages to all laborers and mechanics employed on site – regardless of any alleged contractual relationship



5

Davis Bacon Act (DBA)

- » Requires weekly pay to mechanic and laborers
- » Requires posting of applicable wage decision
- » Defines prevailing wage to include fringe benefits
- » Permits withholdings from contractors' payments for wages due



6

Davis Bacon Act (DBA)

- » Permits payment of wage restitution from withheld amounts
- » Permits contract termination – contractor underpays mechanic and laborers.
- » Permits debarment of persons or firms
 - Disregard for obligations to employees and subcontractors
- » Usually applied through the “Related acts”



7

Davis Bacon and Related Acts (DBRA)

- » The Davis Bacon Act is applicable to HUD programs by statutory provisions in HUD related Acts, known as Davis Bacon Related Acts (DBRA)
 - The National Housing Act
 - U.S. Housing Act of 1937, as amended
 - The Housing and Community Development Act of 1974, as amended
 - The National Affordable Housing Act of 1990



8

Copeland Anti-Kickback Act

- » Enacted in 1934
- » Makes it a criminal offense for contractors to demand workers give up any part of earned wages
- » Requires the submission of:
 - Weekly Certified Payrolls
 - Statement of compliance (with each payroll)
- » Allows for civil or criminal prosecution for the “willful” falsification of payrolls
- » Regulates payroll deductions from wages



9

Contract Works Hours and Safety Standards Act (CWHSSA)

- » Enacted in 1962
- » Applies to contracts of over \$100,000
 - Contract Amount - Prime Contractor
- » Overtime provision - work in excess of 40 hours per week for covered project
- » Liquidated damages - \$25 per day, per worker, per violation

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Fair Labor Standards Act (FLSA)

- » Sets the Federal minimum wage and additional overtime requirements
- » Overtime applies to mechanical and laborers working in excess of 40 hours per week.
 - If CWHSSA does not apply, FLSA does
 - DOL enforces FLSA and investigates any violations

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Implementing the Basics

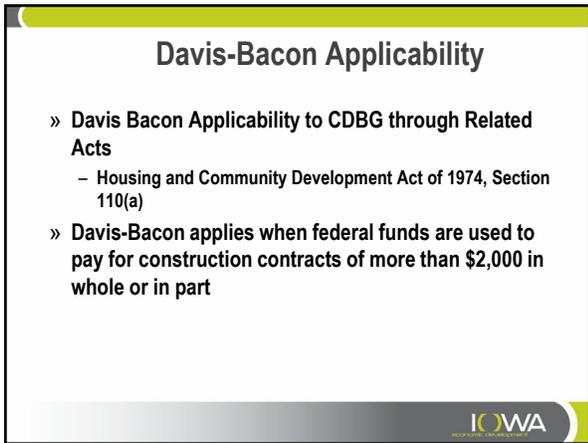
Developing and/or implementing strategies and programs to avoid payment of prevailing wages is prohibited.

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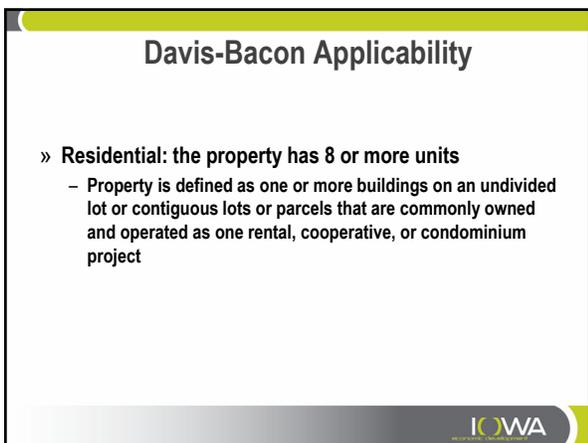
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Davis-Bacon Applicability

- » Residential examples – CDBG, NSP, Disaster Recovery
 - Multi-family property has 8 units
 - Davis-Bacon applies to rehabilitation - contracts of \$2,000 or more



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Exceptions - CDBG

- » In certain cases, Grantee can pay for non-construction costs without triggering Davis-Bacon
- » Demolition, except:
 - If subsequent construction on site is planned as part of the same contract
 - If subsequent construction is contemplated as part of a future construction project under another eligible activity



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Exceptions - CDBG

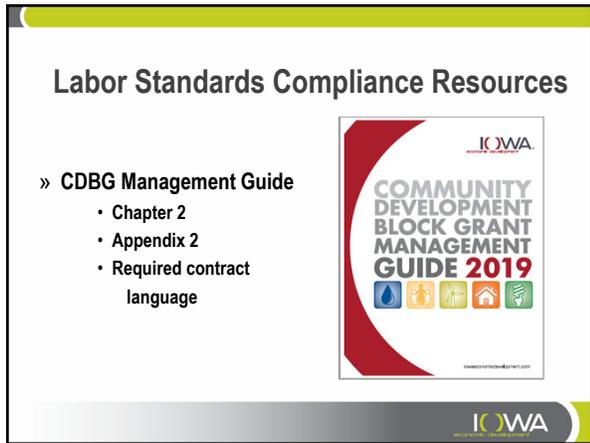
- » Volunteer labor
 - Specific record keeping and tracking required
 - the name and address of the agency sponsoring the project
 - a description of the project
 - the number of volunteers
 - the names of the volunteers
 - the hours of work they performed
 - the type of work performed by the volunteers.
- » Employees of local grantee
 - Force account labor



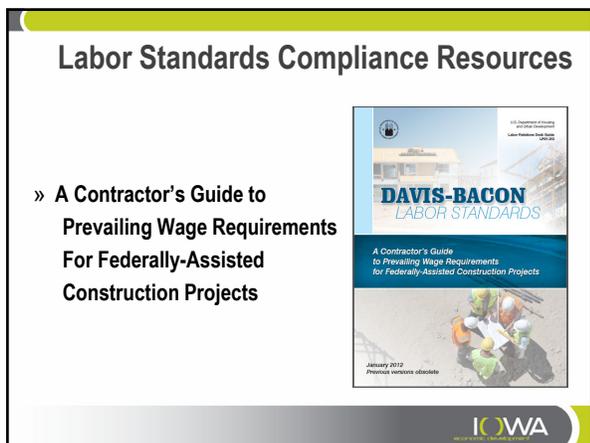
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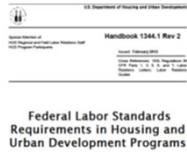
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Labor Standards Compliance Resources

- » HUD Handbook 1344.1 Rev.2



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- » **Talk to engineer/architect early**
 - Ensure that bid documents contain proper wage determination
 - Bid notice should include reference to federal prevailing wage requirements
- » Talk with your Project Manager

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Making Davis Bacon Work

- » Job Sites – Safety, Required Postings
- » Interviews (on-site workers) – HUD Form 11
- » Review of Certified Payrolls – Receive weekly
- » Statement of Compliance – all blocks must be completed
- » Required Reporting – Enforcement Reports
- » Networks – Who are the problems?

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Making Davis Bacon Work

- » Designate an individual for compliance monitoring
 - Grant recipient is ultimately responsible overall compliance
 - Prime/general contractor is responsible for full compliance of all subcontractors and lower-tier contracts



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Grantee Responsibilities

- » Before Construction
 - Procurement, bonding, debarment verification, contracting, pre-construction conference
- » During Construction
 - Employee field interviews, collection and review of weekly CPR's, identification of underpayments, restitution payments and restitution CPR's
- » After Construction
 - Ensure files are in order
- » Maintain all information/files for 5 years



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Grantee Responsibilities

- » Project Files
 - Labor Compliance Administration File
 - Procurement
 - Wage determination, additional classification, lock-in
 - Bonding
 - Contract award documentation
 - Construction contract
 - Pre-construction conference minutes
 - Notice to proceed
 - Correspondence
 - Notice of completion



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Grantee Responsibilities

- » Ensure bid documents, contract and sub contracts contain Federal Labor Standards Provisions (HUD-4010)
- » Ensure bid documents, contract and sub contracts contain applicable wage determination
- » Review certified payroll reports (CPR's) and confirm discrepancies through employee field interviews



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Obtain A Wage Determination

- » Request at least 30 days prior to bid advertising date
- » Submit request in IowaGrants
- » Contact IDED for modifications to wage determination
 - at least 10 working days prior to bid opening
 - Do **not** submit a request for 10-day check in IowaGrants system
- » Wage determination must be included in all bid documents



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Wage Rates

To obtain a wage determination for your project, please visit the Department of Labor's (DOL) Wage Determinations Online gov web site at <http://www.wdol.gov/iba.aspx>. Using the dropdown lists, select State, County, and Construction Type. After selecting the construction type, the "W/D Number" will automatically populate. Click search and the current wage determination number will appear.

Construction Type definitions: (Final determination of construction type will be made by IEDA)

- **RESIDENTIAL:** Includes the construction, rehabilitation and repair of single family houses, townhouses, and apartment buildings of no more than four (4) stories in height.
- **HIGHWAY:** Includes the construction, alteration, and repair of roads, streets, highways, runways, parking areas and most other paving work not incidental to building or nearby construction.
- **TREATMENT:** Construction of, or improvements to, water and sewage treatment facilities.
- **HEAVY:** A "catch-all" category which includes those projects which cannot be classified as Building, Residential, Highway or Treatment. Heavy construction is often further distinguished on the basis of the characteristics of particular projects such as dredging, water and sewer lines, dams, major bridges and flood control projects.
- **BUILDING:** Includes the construction, rehabilitation and repair of sheltered enclosures with walk-in access for the purpose of housing persons, machinery, equipment, or supplies.

Once you have obtained the wage determination from the DOL website, complete this form. Once you have entered the data, click Add to upload the wage determination you received from the DOL web site. Once you have uploaded the document, please e-mail Dan Harber, letting him know the file has been added. You will receive notification upon IEDA review and concurrence of the correct wage determination. You may then provide the wage determination to the project engineer or architect. Based on the "Bid Date" provided, the notification will include a date for the "10-day verification" check to ensure that the wage determination has not been modified. Please be aware that if the "bid date" changes the "10-day verification" date will also be affected.



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Date Requested: 06/08/2017

10-day Check for Modification: 07/07/2017

Date Wage Rate Rechecked: 07/06/2017

County where work to be performed: Jones County

Construction Value: \$1,900,000.00

Work Type: Treatment

Estimated Dates: 06/15/2017, 07/18/2017, 07/17, 08/01/2017

Decision 1: IA17004 Mod 1

Does this wage determination request involve constructing new or existing components of a water/wastewater system, including Regenerators or mechanical treatment plant?

Construction Status: % Engineering Completed 0%, % Construction Complete 0%, Ant. Construction Start Date

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Notes:

07/06/2017 Wage determination IA17004 Mod 1 is correct for this project. This wage determination modified on 6/30/17 so original upload, IA17004 Mod 0, has been replaced. Based on the estimated bid opening

07/06/2017 date of 7/18/17, the 10-day check date would be 7/7/17. This wage determination is not on the list of scheduled modifications for 7/7/17, so this approval can also serve as the 10-day check.

Wage Rate Supporting Documents

Document Name/Description	File
Anamosa Wage Rate Determination	Wage Determination IA17004 Mod 1.pdf

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General Decision Number: IA190028 01/04/2019 IA28

Superseded General Decision Number: IA20180029

State: Iowa

Construction Types: Heavy and Highway

Counties: Adair, Adams, Allamakee, Appanoose, Audubon, Benton, Black Hawk, Boone, Bremer, Buchanan, Buena Vista, Butler, Calhoun, Carroll, Cass, Cedar, Cerro Gordo, Cherokee, Chickasaw, Clarke, Clay, Clayton, Clinton, Crawford, Dallas, Davis, Decatur, Delaware, Des Moines, Dickinson, Dubuque, Emmet, Fayette, Floyd, Franklin, Fremont, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Harrison, Henry, Howard, Humboldt, Ida, Iowa, Jackson, Jasper, Jefferson, Johnson, Jones, Keokuk, Kosuth, Lee, Linn, Louisa, Lucas, Lyon, Madison, Mahaska, Marion, Marshall, Mills, Mitchell, Monona, Monroe, Montgomery, Muscatine, O'Brien, Osceola, Page, Palo Alto, Plymouth, Pocahontas, Polk, Pottawattamie, Poweshiek, Ringgold, Sac, Shelby, Sioux, Story, Tama, Taylor, Union, Van Buren, Wapello, Warren, Washington, Wayne, Webster, Winnebago, Wineshiek, Woodbury, Worth and Wright Counties in Iowa.

EXCLUDES SCOTT COUNTY

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	Modification Number	Publication Date
	0	01/04/2019
	* SUIA2018-001 10/18/2017	
	Rates	Fringes
Carpenter & Piledrivermen		
ZONE 1.....	\$ 27.47	12.58
ZONE 2.....	\$ 25.48	12.63
ZONE 3.....	\$ 25.48	12.63
ZONE 4.....	\$ 24.85	10.20
ZONE 5.....	\$ 23.85	8.70
CONCRETE FINISHER		
ZONE 1.....	\$ 26.50	7.10
ZONE 2.....	\$ 26.50	7.10
ZONE 3.....	\$ 26.50	7.10
ZONE 4.....	\$ 23.55	6.10
ZONE 5.....	\$ 22.50	6.10

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	Rates	Fringes
Carpenter & Piledrivermen		
ZONE 1.....	\$ 27.47	12.58
ZONE 2.....	\$ 25.48	12.63
ZONE 3.....	\$ 25.48	12.63
ZONE 4.....	\$ 24.85	10.20
ZONE 5.....	\$ 23.85	8.70
CONCRETE FINISHER		
ZONE 1.....	\$ 26.50	7.10
ZONE 2.....	\$ 26.50	7.10
ZONE 3.....	\$ 26.50	7.10
ZONE 4.....	\$ 23.55	6.10
ZONE 5.....	\$ 22.50	6.10
ELECTRICIAN (STREET AND HIGHWAY LIGHTING AND TRAFFIC SIGNALS)		
ZONE 1, 2, AND 3.....	\$ 24.00	6.10
ZONE 4.....	\$ 22.70	6.10
ZONE 5.....	\$ 20.55	6.10
IRONWORKER (SETTING OF STRUCTURAL STEEL)		
ZONE 1.....	\$ 30.05	10.00
ZONE 2.....	\$ 27.96	10.00
ZONE 3.....	\$ 27.96	10.30
ZONE 4.....	\$ 25.90	9.00
ZONE 5.....	\$ 23.95	8.55

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 ZONE DEFINITIONS

ZONE 1 The Counties of Polk, Warren, and Dallas for all Crafts, and Linn County Carpenters only.

ZONE 2 The Counties of Dubuque for all Crafts and Linn County for all Crafts except Carpenters.

ZONE 3 The Cities of Burlington, Clinton, Fort Madison, Keokuk, and Muscatine (and abutting municipalities of any such cities).

ZONE 4 Story, Black Hawk, Cedar, Jasper, Jones, Jackson, Louisa, Madison, and Marion Counties; Clinton County (except the City of Clinton), Johnson County, Muscatine County (except the City of Muscatine), the City of Council Bluffs, Lee County and Des Moines County.

ZONE 5 All areas of the state not listed above.

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tunnel laborer; asbestos abatement worker (Zones 4 and 5), sign erector.

GROUP B - Air, gas, electric tool operator; barco hammer; carpenter tender; caulker; chain sawman; compressor (under 400 cfm); concrete finisher tender; concrete processing materials and monitors; cutting torch on demolition; drill tender; dumpmen; electric drills; fence erectors; form line expansion joint assembler; form tamper; general laborer; grade checker; handling and placing metal mesh, dowel bars, reinforcing bars and chairs; hot asphalt laborer; installing temporary traffic control devices; jackhammerman; mechanical grouter; painter (all except strippers); paving breaker; planting trees, shrubs and flowers; power broom (not self-propelled); power buggyman; rakers; rodman (tying reinforcing steel); sandblaster; seeding and mulching; sewer utility topman/bottom man; spaders; stressor or stretcherman on pre or post tensioned concrete; stringman on re/surfacing/no grade control; swinging stage, tagline, or block and tackle; tampers; timberman; tool room men and checkers; tree climber; tree groundman; underpinning and shoring caissons over twelve feet deep; vibrators; walk behind trencher; walk behind paint strippers; walk behind vibrating compactor; water pumps (under three inch); work from bosun chair.

GROUP C - Scale weigh person; traffic control/flagger, surveillance or monitor; water carrier.



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Contractor Eligibility

After bid letting:

- » **Verify eligibility status of contractors**
 - Debarred/Suspended List
 - www.sam.gov
 - Contractor registration number
 - <http://www.iowadivisionoflabor.gov/contractor-registration>
- » **Inform contractor of his/her responsibilities**
- » **Required contract language in all contracts**
- » **Request additional classifications**



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Additional Classifications

- » **Classification not found on wage determination**
- » **Complete form with contractor's proposed rate of pay**
- » **Department of Labor makes final decision**
- » **All Agency Memorandum (AAA No. 213)**
- » **Proposed rates must bear a "Reasonable Relationship"**



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Additional Work Classification(s)
 Add as many new work classifications as necessary

Work classification*

Basic Wage Requested

Fringe Benefit(s) (if any) Requested

Internal Use Only
 Below are the Wage Rate and Fringe Benefits as approved by DOL

Basic Wage Approved from DOL

Fringe Benefit(s) (if any) Approved from DOL

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Examine Weekly Payrolls

- » Proper classification, including group letter (when applicable)
- » Proper wage for work performed
- » Check calculations
- » Verify method of payment for fringe benefits
- » All forms must be certified (signed)
- » You should receive original signed payroll reports

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On-site Interviews

- » Form HUD-11
- » Ensure proper classification
- » Observe duties on-site – must match classification
- » Verify the stated wage conforms to weekly payroll form

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Implementing the Basics

- » **Develop an effective compliance management system**
 - Processes and procedures
 - Overlaps with procurement
 - Coordination



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Enforcement and Compliance

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Required Job Site Postings

- » **Davis Bacon Poster**
 - Obtain English and Spanish versions
 - Post signs so that all can see
 - Include Authority's compliance officer's contact information in the contact block of these posters
 - Post in a highly visible area protected from the weather elements that is easily accessible and traveled by most workers working at the job site
- » **Whose name is added to the poster as the compliance officer for reporting violations?**



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Enforcement

- Same hours, same rate of pay, same gross, same net
- Non-allowable deductions
- "Other" deductions listed but no authorization
- » **Ensure restitution, if any, is paid timely**
- » **Pursue debarment, if necessary**
 - Debar locally – (are there local policies?)
 - Refer to HUD for debarment and or restrictions
- » **Determine other action, if necessary**



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Employer Complaints

Employer:

Project Number:

Referred to HUD Labor Relations for investigation?

Referred to HUD Labor Relations for S.11 hearing?

Referred to the Department of Labor(DOL) for investigation?

Referred to Department of Labor (DOL) for S.11 hearing?

Number of workers for whom wage restitution was collected/disbursed: Report only zeros. If you previously reported workers for whom restitution was collected, do not report the same workers when funds are disbursed. Include workers to whom restitution was paid directly by the employer.

Total amount of straight time wage restitution collected/disbursed during this period: Report only zeros. If you report funds collected, do not report the disbursement. Include restitution amounts paid directly by the employer as reported in correction certified payrolls.

Total amount of CWRHSA overtime wage restitution collected/disbursed during this period: Report only zeros. If you report funds collected, do not report the disbursement. Include restitution amounts paid directly by the employer as reported in correction certified payrolls.

Total amount of liquidated damages collected:

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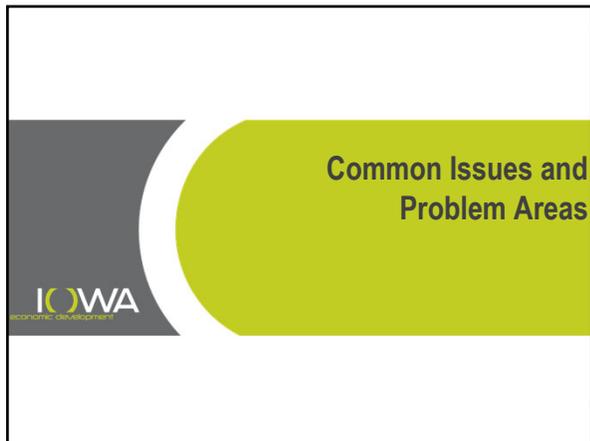
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Conformance / Additional Classifications

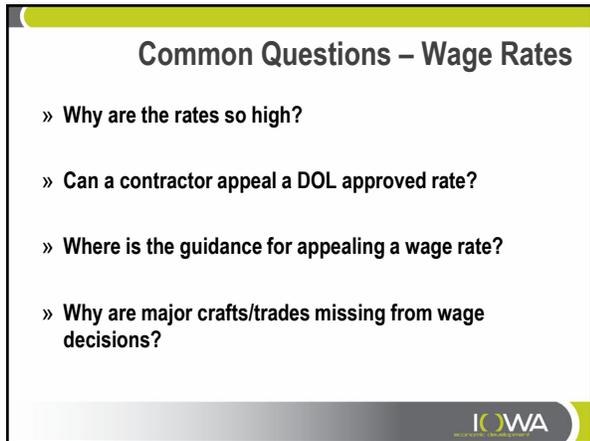
- » **This process can now be completed in IowaGrants system**
- » **The proposed rate, including bona fide fringe benefits, bears a reasonable relationship to the wage rates contained in the wage decision**
 - All Agency Memorandum No. 213



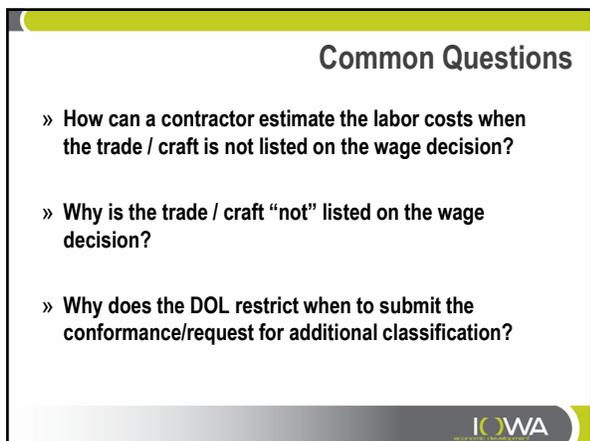
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Self-employed Owners – The Rule

- » Owners of a subcontractor firm who are themselves performing work of laborers and mechanics are entitled to the applicable prevailing wage rate for the classification of the work performed
- » HUD Office of Labor Relations Letter (LR-96-01)

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Self-employed Owners

- » Include in the sub-contract:
 - the total hourly prevailing wage rate for the trade, and
 - The estimated number of hours for job completion
- » Develop a system for tracking dates and hours worked on the prevailing wage project for these mechanics and laborers

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Self-employed Owners

- » Payroll Report
 - Carried on the responsible employer's weekly payroll
 - Must include name, work classification, actual hour of work, effective hourly rate, and amount paid
- » Owners Working with Their Crew
 - Can certify payroll report
 - Must include name, work classification including "owner" and daily and total hours worked
 - Do not need to list a rate of pay or amounts earned

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Payroll Issues – Red Flags

» **Apprentices**

- You notice the following:
 - Workers classified as apprentices with a rate of pay lower than the prevailing wage rate
- On the apprenticeship information you notice:
 - One worker's beginning date is after the start of his work on the prevailing wage project
 - Another worker's ending date is before the start of his work on the prevailing wage project
 - No information submitted for one apprentice

» **What do you do?**



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Payroll Issues – Apprentices

» **Require the following:**

- Individual registration for the apprentice
- Relevant pages from DOL approved apprenticeship program
 - Title page (shows name of the program)
 - Page reflecting ratio of apprentices to journeyman
 - Page reflecting pay scale for apprentices
 - Includes apprenticeship level and percentage of journeyman's rate for each level
 - Page reflecting fringe benefits
 - If silent on fringe benefits, pay full amount of fringe benefit stated on the wage decision
 - Signatory page (reflects signatories to agreement)

» **Absent this information, pay full journeyman's rate**



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Statement of Compliance

» **Contractor failed to include all required information**

- No information in block 1
- No sub-block of 4 (regarding fringe benefit payment) checked, or wrong block checked
- No original signature
- Payroll clerk signed the statement of compliance



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DOL All Agency Memorandum (AAM)

- » **Conformance / Additional Classification Requests**
 - AAM 213– March 2013
 - Proposed rate must bear a reasonable relationship to all wage rates in the decision (skilled to skilled; laborer to laborer)
- » **Surveyors – DBA applicability**
 - AAM 214 – March 2013
 - DBA applies if done immediately before or during construction in support of construction crews



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Resources

- » **CDBG Management Guide**
- » **A Contractor’s Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects**
 - Labor Relations Desk Guide LR01.DG
- » **Federal Labor Standards Requirements in Housing and Urban Development Programs (1344.1 Rev. 2)**
 - http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/sech/13441
- » **Wage Determinations Online Website**
 - <https://beta.sam.gov/>



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Section 3 Requirements

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Section 3 Overview/Changes

» Overview

- » Section 3 is HUD's legislative directive for providing preference to public housing residents and low-income residents of the local community (regardless of race or gender), and the businesses that substantially employ these persons, for new employment, training and contracting opportunities resulting from HUD-funded projects
- » ensure that public housing residents and low- and very low- income persons, and the businesses that employ these individuals, are notified about the expenditure of HUD funds in their community and encouraged to seek opportunities, if created

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Section 3 Overview/Changes

» A Section 3 resident is:

- a public housing resident OR
- a low- or very low income person residing in the metropolitan area or non-metropolitan county where the Section 3 covered assistance is expended

» A Section 3 business is:

- That is 51 percent or more owned by section 3 residents; or
- 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 business concern were section 3 residents; or
- That provides evidence of a commitment to subcontract in excess of 25 percent of the dollar award of all subcontracts to be awarded to business concerns that meet the qualifications set forth in paragraphs (1) or (2) in this definition of "section 3 business concern."

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Section 3 Overview/Changes

» When Section 3 Applies

- Section 3 applies to projects/activities involving housing (construction, demolition, rehabilitation) or other public construction—i.e. roads, sewers, community centers, etc.

Section 3 applies to CDBG projects when:

- The recipient's CDBG contract with the State of Iowa exceeds \$200,000, and involves housing and/or public construction.
 - The recipient has contracted with subcontractors for services and the contract amount is over \$100,000.
- If no individual subcontract for activities exceeds \$100,000, responsibility for complying with Section 3 only applies to the recipient (City/County and the State)

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Section 3 Overview/Changes

- » Please note that while Section 3 applies to projects and contracts described above, the Section 3 requirements are only triggered when the normal completion of construction and rehabilitation projects creates the need for *new* employment, contracting or training opportunities.
- » **Compliance with Section 3**
 - Each recipient has the responsibility to comply with Section 3 in its own operations, and ensure compliance in the operations of its contractors/ subcontractors.



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Section 3 Overview/Changes

- » **Procurement & Bid Documents**
 - CDBG recipients must include Section 3 language in all procurement and bid documents. The required language to be included in these documents can be found in the appendix to this chapter of the CDBG Management Guide. In addition to the required language, recipients must include the "Intent to Comply with Section 3" form with all RFPs.



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Section 3 Overview/Changes

- » **Selecting Contractors with Section 3**
 - Section 3 requires recipients make an effort to the "greatest extent feasible" to facilitate contracts to Section 3 businesses
 - recipients may give preference to Section 3 businesses as a means of evaluation criteria for professional services contracts where proposals are solicited
 - to give preference to Section 3 businesses during the contract awarding process, recipients must ask the contractor to certify whether or not they are a Section 3 business when soliciting for proposals
 - "Intent to Comply With Section 3" form that will be provided with procurement documents and submitted by bidders



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Section 3 Overview/Changes

» **Hiring & Training with Section 3**

- Recipients and their contractors/subcontractors are required to give hiring and training preference to Section 3 residents, to the greatest extent feasible, when new employment opportunities result from a CDBG funded project.
- Notices of employment/training opportunities must be sent to the Iowa Chapter of the National Association of Housing and Redevelopment Officials (NAHRO)

» **Goals under Section 3**

- Federal regulations establish numerical goals for employment/training for Section 3 residents and contracts to Section 3 businesses
- A recipient that has not met the numerical goals must explain why it was not feasible to meet the established numerical goals
- **Note:** It is important to document efforts made to comply with Section 3. Recipient files should contain any memos, correspondence, advertisements, etc. illustrating attempts to meet Section 3 goals



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Section 3 Overview/Changes

» **Penalties for Non-Compliance**

- Communities and contractors found in violation of Section 3 requirements may result in:
 - Sanctions from HUD
 - Termination of contract for CDBG funds
 - Debarment or suspension from future HUD assisted (CDBG) contracts
- Non-compliance with Section 3 can impact a community's ability to receive CDBG funding in the future.



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Section 3 Overview/Changes

» **Reporting Requirements & Forms**

- If the expenditure of CDBG funds does not result in new employment, contracting, or training opportunities, the requirements of Section 3 have not been triggered. However, even if the CDBG-funded/ Section 3 covered project did not create new employment opportunities, this information must be reported to IEDA.
- To report Section 3 data to IEDA, recipients will report annually to IEDA. This report will be submitted through lowagrants.gov and will be due by **December 31st** of each year.
- Recipients will need to report Section 3 accomplishments and/or provide a detailed explanation of why Section 3 goals were not met.

» **Section 3 Business Registry**

- HUDS' online database



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Questions?

- » **Contact Your Project Manager**
- » **Contact Me**
Dan Narber
515.348-6214
dan.narber@iowaeda.com

THANK YOU!



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