

**Summary of Voluntary Compliance Agreement provisions  
and upcoming deadlines as of 3/31/2015**

(VCA effective date of 8/8/2014)

Area	Action	Deadline and Status
<b>Internal Training</b>	HACM must hold an internal information session on the provisions of this agreement with its key managers and staff	Within 30 days – <b>Completed</b> Meetings held on 8/25 and 9/3/14. 211 HACM employees attended.
<b>Section 3 Oversight/Administration</b>	Hire Section 3 Coordinator to oversee and manage compliance. The Coordinator will report quarterly to HACM Executive Director in person and in writing, on progress and issues related to Section 3.	Within 90 days – <b>Completed</b> --Section 3 Coordinator (Evans Gant) hired as of 1/2/2014. Section 3 Coordinator meets with Tony Perez on a quarterly basis, starting November 2014.
<b>Develop a Section 3 plan</b>	Develop a draft Section 3 plan as well as Section 3 training and outreach materials for HUD review and approval. The Section 3 Plan will establish policies, procedures, and practices to ensure all activities comply with the provisions of the VCA and Section 3 regulations. HACM must also provide a 30 day period for public written comments and, with 15 days of advance notice, must provide a public hearing for the public to receive information on the plan and allow them to comment on it. Within 30 days after the end of the public comment period, HACM shall prepare and publish on its website a summary of comments and HACM responses to comments.	Within 180 days - <b>Completed</b> HACM hired a contractor with extensive Section 3 experience, Motivations, Inc. (Keith Swiney) of Atlanta to provide technical assistance on the Section 3 plan.  Draft plan: 12/2/2014 Public comment sessions: 12/16 to 12/18/14 Final submitted to HUD: 2/4/2015 Tom Nelson of HUD recommended approval of HUD plan on 7/24/2015.
<b>Internal Hiring</b>	Within 30 days after HUD has approved the Section 3 plan, HACM must submit a revised internal hiring policy that implements the terms of Section 3 regulations as well as the VCA.	HUD approved plan - <b>Completed</b>
<b>Section 3 Business Concern Registry</b>	HACM and/or partner (City of Milwaukee) will maintain a Section 3 Business Concern registry.	Within 180 days - <b>Completed</b> --Utilizing the City of Milwaukee Office of Small Business Development online registry and HACM will work with them to promote and improve. One proposed improvement is to add "public housing resident-owned" as a field.

Area	Action	Deadline and Status
<b>Section 3 Resident Listing</b>	HACM will build, maintain and expand its database of Section 3 residents and their job qualification information. The database must be searchable and accessible by the public.	Within 365 days - <b>Completed</b> HACM IT developed online Section 3 Resident Registry and issued it on its website in early August 2015.
<b>Review of all existing Section 3 covered contracts</b>	<ol style="list-style-type: none"> <li>1. HACM must perform a review of all Section 3 covered contracts, including property management contracts, and identify to HUD those contracts that will last 2 years or longer after the effective date of the VCA or those contracts that are \$3 million or more in size.</li> <li>2. HACM must identify to HUD all current contracts identified above that are not in compliance with the contracting/subcontracting goals of Section 3 and with the terms of this agreement.</li> </ol>	<p>Within 120 days (by 12/6/2014)—<b>Completed</b> and sent to HUD by due date. Answered all questions by HUD.</p> <p>Within 180 days (by 2/4/2015)—<b>Completed</b> and sent to HUD on 2/4/2015. Answered all questions by HUD.</p>
<b>Section 3 training and Outreach</b>	HACM will submit a draft of Section 3 training and outreach materials to HUD along with the Section 3 plan. HUD will approve no later than 120 days after submission. HACM will then implement outreach efforts for businesses and residents.	Within 180 days— <b>Completed and ongoing</b> HACM submitted materials on 2/4/15 and Tom Nelson of HUD recommended approval on 7/24/2015. One outreach to businesses done with HUD and SBA in May 2015.
<b>Section 3 fund</b>	HACM to establish a Section 3 fund as an alternative for contractors or subcontractors that can demonstrate and document the infeasibility of meeting the Section 3 goals.	Within 180 days— <b>Completed and ongoing</b> HACM has established fund with initial amount of \$50,000. Procedures for use are set forth in Section 3 plan.
<b>Monitoring</b>	HACM shall implement procedures to properly monitor contracting and hiring.	Within 180 days— <b>Completed and ongoing</b> Put in Section 3 Plan and now approved by HUD.
<b>Reporting</b>	HACM shall submit semi-annual reports to HUD on compliance.	<b>Ongoing</b> - Semi-annual reports for periods ended 9/30/14 and 3/31/15 have been submitted on time to HUD.