



**WISCONSIN DEPARTMENT OF
ADMINISTRATION**

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POLICY: ADM 05-2014

TITLE: Section 3 Reporting

EFFECTIVE DATE: Update February 15, 2015
July 1, 2014

OVERVIEW:

Description:

Process for complying with Section 3 reporting for Division of Housing (DOH) grants containing U.S. Department of Housing and Urban Development (HUD) funds. **24 CFR 135**

Purpose:

Establish a consistent process across Division programs to ensure that Section 3 Reporting is received from all appropriate sub-recipients in a timely manner, uniformly reported in compliance with HUD requirements, and documented in the grantee file.

Policy:

Programs Required to File Section 3 Reports:

- HUD Funded Annual Formula Programs: CDBG, HOME, ESG, and HOPWA; and
- HUD Funded Supplemental Allocations or Competitive Awards: CDBG-DR Midwest, CDBG-DR Ike, NSP 1, and NSP 3.

Accomplishment Reporting Period:

- The Section 3 reporting period for all DOH HUD-funded programs coincides with the federal fiscal year of October 1 through September 30.

Section 3 Report Submission Dates to HUD:

- For HUD Funded Annual Formula Programs (CDBG, HOME, ESG, and HOPWA), Section 3 reports will be submitted online to the HUD Office of Fair Housing and Economic Opportunity (FHEO) using Form 60002 by June 15. Annually submitted Section 3 reports cover accomplishments for the previous federal fiscal year (October 1 – September 30).
- For HUD Funded Supplemental Allocations or Competitive Awards (CDBG-DR Midwest, CDBG-DR Ike, NSP 1, and NSP 3), Section 3 reports will be submitted online to the HUD Office of Fair Housing and Economic Opportunity using Form 60002 before January 10. Annually submitted Section 3 reports cover accomplishments for the previous federal fiscal year (October 1 – September 30).

- **Note the submission of a Section 3 Report is required even when activities funded under a HUD program (ESG and HOPWA) do not trigger Section 3 requirements.**

DOH Sub-recipient Reporting:

- A sub-recipient's grant agreement will specify a reporting timeframe, usually either semi-annually or quarterly but never less than semi-annually, for the duration of the agreement.
- The DOH will provide the sub-recipient with a Section 3 Report form to ensure all necessary information is compiled by DOH for the annual report to HUD.
- Regardless of activities or expenditure levels during the reporting period, sub-recipient's will include a completed Section 3 report as a part of every semi-annual or quarterly report.

DOH Grant Representative Responsibilities

- Provide DOH Section 3 report form and training on Section 3 requirements to sub-recipient.
- Provide a list of all open grantees to the Division Section 3 Lead individual.
- A copy of the list is provided to each Bureau Director
- Obtain DOH Section 3 forms from all sub-recipients in accordance with their grant agreement; review reports for completeness, and follow-up on missing, incomplete, or erroneous Reports.
- Email reminders shall be sent to sub-recipients/grantees to submit the required Section 3 form.
- Sub-recipients/grantees failing to submit may cause delay in payment requests.
- Upon Receipt of the Section 3 form, the Grant Representative is responsible for reviewing the information for completeness. Any incomplete forms will be returned to the sub-recipient/grantee for correction.
- Once a fully completed Section 3 form is received, reviewed and accepted, the Program manager will make a copy of the Section 3 report. File the original report in the grantee's file and the copy in the Section 3 report file.
- All correspondence related to the submission to the Section 3 reports shall be placed in the sub-recipients/grantees program file.
- Annually, the grant representative will compile program level reporting data for his/her projects for the previous federal fiscal year (October 1 – September 30). At least 30 days before Section 3 reporting is due to HUD, the grant representative will provide the compiled data along with the copies of the sub-recipients Section 3 reports to the DOH Section 3 Lead.
- The DOH Section 3 lead will check the totals of the respective reports and request a review and sign-off by a bureau Director as to the totals.

DOH Section 3 Report Lead/Submitter Responsibilities:

- Obtain compiled Section 3 data and copies of sub-recipient reports from grant representatives.
- Compile overall program Section 3 data and review with Bureau Director.

- Enter Section 3 data for each HUD program using the HUD's online Section 3 Reporting System (Form 60002) before the HUD deadline. The HUD-FHEO Section 3 reporting tool should be available at:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunity/section3/section3
- Print two copies of the Section 3 report for the program. File one for future reference and monitoring by the WI Legislative Audit Bureau (LAB), HUD, etc., and give one to the Division Budget & Policy Analyst.

Note (July 17, 2014): This policy was based upon the ***Tuesday, Dec 17, 2013 HUD's New Section 3 Reporting System Webcast*** hosted on HUD's Office of Fair Housing and Economic Opportunity website. The same webpage noted that the online "SECTION 3 REPORTING SYSTEM (FORM HUD 60002). At this time, the system for submitting 2013 Section 3 reports are currently unavailable. We are currently addressing several technical issues with the new system and hope to have it back online shortly."