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DCA Scoring Guidance on Scoring Section VIII. Transformational Communities

I. Introduction

The Georgia Department of Community Affairs (DCA) is issuing this scoring Guidance for Applicants seeking points under Appendix II, Section VIII Transformational Communities of the 2017 Georgia Qualified Allocation Plan (QAP) in the upcoming 9% competitive round. This Guidance is issued pursuant to the following section of the 2017 Core:

"The complex nature of the program may require DCA to interpret or provide guidance on provisions of the Qualified Allocation Plan. This additional guidance may be in the form of answers to both general and specific questions, technical memos, or written guidance published on the DCA website. DCA will rely on this guidance and interpretations in the analysis of submitted Applications" (Core, p. 14-15 of 45).

This Guidance will be used by DCA in determining whether the Applicant is entitled to any of the allowable points in this Section.

Applicants should be cognizant of the fact that in January 2017, the United States Department of Treasury issued Notice 2016-77 that reminds taxpayers that a project is not described in § 42(m)(1)(B)(ii)(III) of the Internal Revenue Code (IRC) unless its development contributes to a concerted community revitalization plan. That section of the IRC requires that the QAP give "preference in allocating housing credit dollar amounts among selected projects to ... projects which are located in qualified census tracts ... and the development of which contributes to a concerted community revitalization plan...." Section 42(m)(1)(B)(ii)(III) (emphasis added). Placing Housing Credit properties in qualified census tracts risks exacerbating concentrations of poverty. Therefore, § 42(m)(1)(B)(ii)(III) grants a preference to that placement only when there is an added benefit to the neighborhood in the form of the project's contribution to a concerted community revitalization plan. Although the Department of the Treasury and the Internal Revenue Service (the Service) have not issued guidance defining the term "concerted community revitalization plan," the preference fails to apply unless, not later than the allocation, a plan exists that contains more components than the Housing Credit property itself. The Notice solicits comments on the definition of "concerted" revitalization Plan. If further guidance is issued related to the definition of "concerted," DCA may amend the 2017 QAP to meet the new program definition.

II. Overall Scoring Strategies for Transformational Communities

A. Claiming Points under Stable Communities (Scoring Section VII) and Transformational Communities (Scoring Section VIII)

An Applicant is ineligible to claim points in Scoring Section VIII. Transformational Communities if the Applicant is eligible for two (2) or more points under Scoring Section VII. Stable Communities. Applicants should refer to the Administrative Amendment to the 2017 QAP signed by Commissioner Knowles on February 28th for additional information.

B. Summary of Point Categories in Transformational Communities (Section VIII)

- A. Community Revitalization Plan (up to 2 points)
 - Proposed development is in the Targeted Area of a submitted Community Revitalization Plan that meets DCA requirements (1 point)
 - Proposed development is also in a Qualified Census Tract (+1 point)

OR

B. Community Transformation Plan (up to 6 points)

Project Team. Applicants may receive up to 2 points for meeting DCA requirements as a Community-Based Developer (1 point) and/or partnering with a Community Quarterback (1 point). An Applicant may partner with a Community Quarterback without meeting DCA requirements as a Community-Based Developer.

<u>Quality Plan</u>. Applicants receiving at least one Project Team point described above may submit a Community Transformation Plan for a Defined Neighborhood surrounding the Proposed Development (4 points).

AND

C. Community Investment (up to 4 points). Only Applicants claiming points under A or B can claim points under this sub-section.

OR

D. Community Designations (10 points). Applicants claiming points in this sub-section cannot claim points in A, B, or C.

C. DCA Overall Scoring Strategies for Section VIII. Transformational Communities

Based upon the higher level of difficulty, Applicants who submit a Community Transformation Plan are eligible for more points under this Scoring Section than those Applicants who submit a Community Revitalization Plan. Applicants must choose to claim points in sub-section A or B as laid out in the previous summary. An Applicant who claims but is not awarded Community Transformation Plan points will not receive points for an existing Community Revitalization Plan.

Any Applicant submitting a Community Transformation Plan referencing an existing Community Revitalization Plan must demonstrate that the referenced Community Revitalization Plan meets the QAP requirements for Community Revitalization Plans. The Applicant must submit a copy of **both** the Community Revitalization Plan and the Community Transformation Plan, as well as all associated documentation for both plans, in the "Transformational Communities" tab of the Application.

A Community Transformation Plan cannot be inconsistent with an existing Community Revitalization Plan that overlays the Defined Neighborhood for the Community Transformation Plan.

DCA will not infer or search for the required elements of Plans. The Applicant must clearly state the basis for the claim of points (including a detailed discussion of each required element) in the new "Justification" section of the Core application. It is not sufficient to "refer" to supporting documents.

It is the Applicants' responsibility to provide sufficient information and documentation in the submitted Application for DCA to reasonably conclude that a submitted Plan meets all of the requirements of the QAP.

Note: Applicants must discuss each of the required components of a Plan in the Justification section.

III. Community Revitalization Plan Requirements

The following Guidance summarizes the requirements set forth by the 2017 QAP and the minimum standards that will be used by DCA in reviewing each of the required components of a submitted Community Revitalization Plan.

A. Clearly delineate a Targeted Area that includes the proposed site but does not encompass the entire surrounding city, municipality, or county.

An eligible Community Revitalization Plan is a community document that communicates a concerted revitalization effort. The Plan itself may discuss large areas of the community but must target at least one distinct sub-area within which the Local Government, municipality, or county's revitalization resources will be focused (the Targeted Area). The proposed project site must be located in the Targeted Area.

A Plan that does not initially include the proposed site may be amended, but the Applicant will need to submit documentation of public input and engagement on the proposed amendment as well as the public input and engagement for the original plan, unless the original plan clearly delineates a process for modifying the targeted area to add additional land. In that case, documentation that the modification process has been followed should be included.

B. Public input and engagement during the planning stages

Public input and engagement must take place **prior to the time** that the Community Revitalization Plan is submitted to a government board or entity for approval, as final approval does not fall within "the planning stages." Opening a meeting for public comment immediately prior to adoption does not constitute public input.

"Public input and engagement during the planning stages" may be accomplished through neighborhood and community planning meetings (such as a charrette) or by a more formal public meeting or public hearing.

Documentation of how the public was made aware of the opportunity for input and engagement should be included in the Application. The public notice should include the subject of the meeting as well as the place and time of the meeting. Public notices are often found as advertisements placed in the local newspaper, community newsletters or on local government websites.

Documentation that the meeting was held and that the community made a concerted effort to solicit public input on the proposed Plan should be included in the Application. Examples of documents include dated agendas, a sign-in sheet or list of attendees, meeting minutes, photographs of the meeting, an office summary of public input, and/or notes of public comments. The documentation should include a sufficient basis for DCA to conclude that public input and engagement took place and that the meeting was more than a presentation of a completed Plan.

Amending an existing plan to include the proposed project site without seeking further public input and engagement on the additional area would not meet this requirement unless the Plan already contained specific provisions for amending the targeted area without additional public input. Additionally, the renewal or re-adoption of a Community Revitalization Plan constitutes a substantial change to the Revitalization Plan and thus necessitates renewed community input and engagement during the new planning stage

C. Call for rehabilitation or production of affordable rental housing as a policy goal for the community

In order to receive points as a qualified Community Revitalization Plan, the document must explicitly call out affordable rental housing and give clear reference to the production or rehabilitation of affordable rental housing as a solution to the challenges identified in the Targeted Area.

It is not sufficient for the Plan to state that the community will simply expand its housing stock, nor to note that any rehabilitated or newly built housing will target a diversity of residents.

A strong Plan will clearly define affordable as properties for workforce housing or those that target "low-income" citizens or citizens with incomes at or below 60% of AMI (Area Median Income).

D. Discuss implementation measures along with specific timeframes for the achievement of such policies and housing activities. The timeframes and implementation measures must be current and ongoing. The Plan must also include a discussion of resources that will be utilized to implement the Plan.

"Implementation measures" are the specific actions a community will undertake to make the identified goals of the Community Revitalization Plan a reality. They can be physical in nature, such as eradicating blight or constructing homes, or administrative in nature, such as applying for public funds for a particular purpose. Examples of implementation measures might include enforcing building codes for blighted properties; seeking infrastructure improvements, tax incentives, or changes in local zoning laws; undertaking partnership initiatives; or acquiring blighted properties.

"Timeframes" must be "specific" as marked by actual dates in quarters or months and years (e.g. Q1 2019 or May-July 2020)—it is not sufficient to simply state "current and ongoing" as a timeframe within the Community Revitalization Plan.

"Current and ongoing" will be reviewed in terms of whether there have been documented actions taken within the last year to further the goals of the Community Revitalization Plan.

The Plan must include a discussion of resources that will be or continue to be utilized to implement the relevant goals and implementation measures. If resources include applying for specific grants or funds, a discussion of what those funds will be used for and when the application will be submitted should be included.

E. The Plan must be adopted by a Local Government. The Plan is ineligible if it is outdated and does not reflect current conditions.

DCA will determine eligibility based on: 1) the age of the document and 2) how well the plan reflects current neighborhood conditions.

The 2017 application deadline is May 25, 2017. Community Revitalization Plans considered current are those that are adopted on or after May 25, 2014 but no later than November 25, 2016. A plan "more than three (3) years old will be presumed outdated," and "plans that are less than six months old at the time of Application Submission will not be considered." Plans may, however, be renewed or re-adopted within six months of Application Submission.

The 2017 QAP states that those Community Revitalization Plans more than three years old will be presumed outdated unless "documentation regarding the continued viability of the plan from the Local Government is submitted with the Application." In determining whether a plan that was initially adopted prior to May 25, 2014 is eligible for points, DCA will consider the following:

- Evidence of re-adoption or renewal by Local Government (including updated public input) demonstrating the plan is active.
- A letter from an official community representative certifying that the plan is current and ongoing. This letter must include an updated list of funding sources, implementation measures, and timeframes that meet the requirements listed in the previous section of this Guidance.

Any planning document older than three years that has not been updated to reflect "current neighborhood conditions" will not be eligible for consideration as a Plan. If contained in the original Plan, the following elements must be updated in the renewed or re-adopted Plan:

- Assessment of existing physical structures and infrastructure of the Targeted Area.
- Sociodemographic data describing the Targeted Area.

IV. Community Transformation Plan Requirements

The QAP provides that a "Community Transformation Plan is not a substitute for a Community Revitalization Plan." Instead it "builds on an existing Community Revitalization Plan or similar analysis." While an underlying Community Revitalization Plan is not a requirement for points under this sub-section, Applicants should consider the following:

- If a Community Revitalization Plan exists, the Community Transformation Plan should build on the goals and priorities set forth in this document, which prioritizes the goals of the Local Government.
- If there is no Community Revitalization Plan, the Applicant should note that:
 - The Community Transformation Plan must still contain an assessment of other existing and/or past strategies directly affecting the Defined Neighborhood.
 - ODCA requires similar components in both Community Revitalization Plans and Community Transformation Plans. Both require a targeted area, public input and engagement during the planning process, language calling for the rehabilitation and/or production of affordable rental housing, and discussion of implementation measures. A successful Community Transformation Plan, however, represents a more in-depth planning and outreach strategy met through a collaborative effort from the Applicant and community partners.

The following Guidance should be used to assist Applicants in completing each step of a successful Transformation Plan.

A. Formation of the Transformation Team

Applicants must receive at least one point under "Community-Based Team" to be eligible to receive up to four points for a "Quality Transformation Plan." A Transformation Team is composed of a Community-Based Developer and/or a Community Quarterback. Assembling a complete Transformation Team allows Applicants to apply for a maximum of two points under "Community-Based Team" (p. 19 of 44). Applicants may choose to only pursue one of those two points. For example, if no entity on the Project Team is eligible for consideration as a Community-Based Developer, the Applicant may still partner with a Community Quarterback and be eligible for Community Transformation Plan points.

Note that where this Guidance refers to Community Transformation Plans, "Applicant" may be used interchangeably with "Transformation Team."

1. Community-Based Developer (CBD)

The Community-Based Developer ("CBD") is the Developer Entity on the Project Team. In order to be considered a CBD, the QAP gives Applicants two options for meeting the requirement for points.

The first option requires an Applicant to meet at least two of the below requirements:

| | Requirements (2 of 3) | Geographic Focus Area | Timeframe |
|------|--------------------------------|----------------------------------|-------------|
| i. | Successful partnership with at | Defined Neighborhood | In the last |
| | least two (2) community | OR | two (2) |
| | organizations | Targeted area surrounding their | years |
| | | development elsewhere in Georgia | |
| ii. | Leading or participating in | Defined Neighborhood | In the last |
| | philanthropic activity | OR | three (3) |
| | | Targeted area surrounding their | years |
| | | development elsewhere in Georgia | |
| iii. | Selection by Local | Local Government area in which | Current |
| | Government in community- | proposed development is located | |
| | driven initiative | | |

The second option is as follows:

iv. The Project Team has an initial designation as a CHDO for a HOME loan for the proposed property.

The following Guidance interprets each of these options as set forth in the 2017 QAP.

i. Successful partnership with at least two (2) established community organizations that serve the area around their development in the last two years and can document that these partnerships have measurably improved community or resident outcomes.

"Community organizations" are non-profit entities 1) that serve the geographic focus area noted above; and 2) whose stated mission is to increase residents' access to education, health, employment, or transportation. A Community Organization is not a Local Government entity.

If these partnerships were formed to support community development around the Applicant's development existing in another Georgia community, the Applicant must provide significant documentation of how these partnerships will be replicated in the Defined Neighborhood.

"Successful" partnerships are those that result in replicable, measurable improvement in residents' access to education, health, employment, and/or transportation services as a result of the partnership. Documentation includes:

- Quantitative/numerical data evidencing that the joint effort between partners has measurably improved residents' access to education, health, employment, and/or transportation services.
- Examples of measurable improvement, which might include the following: increased attendance and/or student performance, increased number of books available to children, higher rates of community members reporting employment, and/or improved community health indicators (e.g., higher rates of community members reporting that they have visited a primary care physician in the previous year, lower rates of disease).
- Discussion in the Community Transformation Plan Certificate form, demonstrating how these partnerships will be continued or are replicable in the Defined Neighborhood.
- ii. In the last three years, the CBD has participated or led philanthropic activities benefitting either 1) the Defined Neighborhood or 2) a targeted area surrounding their development in another Georgia community.

For purposes of scoring this section, DCA will consider the following:

- A "philanthropic activity" is the strategic charitable donation of goods, inkind services, or cash on a consistent and ongoing basis.
- The donation must not be an isolated event or a "one-off": it must have occurred more than once between 5/25/14 and 5/25/17.
- The recipient of "philanthropic activities" may be more than one individual or nonprofit, including grant-making entities.
- Funds dedicated to support services required at a DCA-funded property are not considered.
- This donation must have been made or fundraised by the Developer Entity.
- DCA considers these "local philanthropic activities" fully substantiated if reflected on the Developer Entity's IRS tax returns as a charitable donation and/or reflected in "grant statements, press releases, letters, or other documentation."
- iii. The CBD has been selected as a result of a community-driven initiative by the local government in a Request for Proposal or similar bid process.

Documentation includes:

- A copy of the Request for Proposals (RFP) that the Local Government has issued to select the Community-Based Developer; or
- In the absence of formal documents soliciting developers, the Local Government may issue a letter to the Applicant describing the process used to select the CBD.

- iv. The Project Team received a HOME consent for the proposed property and was designated as a CHDO.
 - Minimum Documentation is a letter from DCA certifying that the Project Team received a HOME consent and was designated as a CHDO for the proposed project requesting an allocation of credits.

2. Community Quarterback

A Community Quarterback ("CQB") is a local community-based organization *not* on the Project Team. The CQB may also not have an identity of interest with or be related in any way to any entity on the Project Team.

The CQB is generally a local nonprofit organization already anchored in the community. An example might be a community/neighborhood development corporation. Another entity may only be considered to meet DCA requirements as a CQB if it meets all requirements listed below *and* designates a representative to manage the required tasks as listed in the QAP and this Scoring Guidance.

If an Applicant is seeking to name an entity such as a Local Government or Local Government entity as a CQB, it is important that the request contain enough information to determine that the role that that entity plays as a CQB is above and beyond the typical duties and responsibilities of Local Government officials.

The CQB must have a demonstrated record of increasing Defined Neighborhood residents' access to resources such as employment, education, transportation, and/or health.

| QAP Expectation | Required CQB Characteristics/Actions | Documentation |
|--|---|--|
| "Drives the revitalization initiative to make sure the housing, education, and community wellness components are successful and sustainable" | Has the organizational capacity to lead a cross-sector effort, as the Community Transformation Plan will discuss goals to increase residents' access to several types of local resources. | The Community Transformation Plan Certificate asks the Applicant to provide a summary of the CQB's mission, activities, and service area. This description must demonstrate that the CQB has a record of increasing Defined Neighborhood low-income residents' access to employment, education, transportation, and/or health. |
| "Ensures the people in the Defined Neighborhood are engaged, included, and served" | Serves as an outreach partner in gathering community input and feedback | Documentation submitted to prove "Community Engagement and Outreach" must highlight the CQB's role in the community input and engagement process. |

| | | The Community Transformation Plan Certificate will ask Applicants to note specific page numbers where the CQB's participation is evidenced. |
|---|---|--|
| "Serves as a single point of accountability for partners and funders" | Acts as a convening partner in the community. This entity must be "capable of bringing diverse local entities together to work toward the common goal of transformation." | The Applicant must certify that CQB will, for a period of five years following the placed in service date, annually update the "Challenge Worksheet" for each challenge addressed in the Community Transformation Plan. The Applicant will submit updated Challenge Worksheet(s) to DCA with the Annual Certification for a period of five years following the placed in service date. |

B. Development of a Quality Transformation Plan

In order to receive points for a submitted Community Transformation Plan:

The Applicant must assemble a Transformation Team:

- A member of the Project Team must have successfully identified as a Community Based Developer; and/or
- The Project Team must partner with a Community Quarterback.

AND

The Transformation Team must successfully implement Community Engagement and Outreach, as delineated in the 2017 QAP and explained in this Guidance.

These requirements ensure that the Community Transformation Plan represents holistic, place-based strategies informed by the community's own priorities.

The following Guidance summarizes the requirements set forth by the 2017 QAP and the minimum standards that will be used by DCA in reviewing each of the required components of a submitted Community Transformation Plan.

1. Defined Neighborhood

The Defined Neighborhood is a "targeted area" that "includes the proposed site but does not encompass the entire surrounding city, municipality, or county." The Defined Neighborhood is not to be smaller than one census tract. The QAP states, "Exceptions may apply where the city or county falls within one tract": only where the city or county falls within one tract may the Defined Neighborhood encompass the entire city or county in which the proposed site is to be located.

If the Local Government has adopted a Community Revitalization Plan, the Defined Neighborhood should align or fall within the targeted area of the Community Revitalization Plan. The Community Transformation Plan's Defined Neighborhood may be smaller than that of the Community Revitalization Plan. A Community Transformation Plan that references an existing Revitalization Plan may focus on a subset of the Targeted Area of the Revitalization Plan in defining the neighborhood for transformation.

The strategies and analysis set forth in the Community Transformation Plan must involve the entire Defined Neighborhood.

2. Public input and engagement during planning stages in collaboration with community partners (Community Quarterback and Transformation Partners)

A Community Transformation Plan requires **Community Engagement and Outreach** to public entities, the overall public, and specifically to low-income residents that reside in the Defined Neighborhood. This extensive public input and engagement during the planning stages is key to identifying the challenges and opportunities that the Community Transformation Plan will directly address. It will also assist the Team in identifying collaborative partners for the implementation of solutions to identified challenges.

Community Engagement and Outreach is comprised of two parts:

- 1. Public and Private Engagement
- 2. Citizen Outreach

Public and Private Engagement

The Transformation Team must engage with "Transformation Partners"—those entities providing the Defined Neighborhood with access to services: a local K-12 school district representative; a local health provider; an employment services provider; and/or a transportation services provider. The Transformation Team may engage with additional partners beyond this list.

The Transformation Team must hold at least **one publicly accessible forum** with these Transformation Partner(s) to identify challenges to transformation. At what level are services currently provided to low-income Defined Neighborhood residents? What barriers, if any, prevent or challenge the provision of service(s)?

Citizen Outreach

The Transformation Team must also make substantial efforts to record feedback from low-income residents in the Defined Neighborhood. Examples of low-income residents that may be the subject of outreach include (but are not limited to) public housing residents, non-English speaking populations, residents of low-income housing tax credit properties, residents that reside in high-poverty, minority-concentrated areas, residents with physical and/or mental disabilities, and residents least likely to apply for government assistance or resources. Collaborating with community action organizations serving these residents to maximize these populations' participation may be especially helpful. Citizen Outreach should include discussion on what challenges prevent these populations from

accessing community resources such as education, employment, transportation, and health services. Additionally, Citizen Outreach should engage citizens in creating a vision for their neighborhood moving forward, as delineated in the Community Transformation Plan.

The 2017 QAP requires that the Transformation Team either:

- Survey low-income Defined Neighborhood residents; or
- Hold at least two publicly accessible forums to discuss residents' current access
 to services and opportunities. The publicly accessible forum with Transformation
 Partners may be substituted for one publicly accessible Citizen Outreach forum.

These are minimally required actions. Transformation Teams may find that additional outreach may be necessary to fully understand and reflect the community's goals.

The following table lists DCA's expectations and associated documentation needed to evidence successful completion of Citizen Outreach and Engagement.

| QAP Requirement | Expectation | Documentation | |
|---|--|--|--|
| | A. Public and Private Engagement | | |
| Family Applicants must engage at least two of the following Transformation Partners, while Senior Applicants must engage at least one: • Local K-12 school district representative, • Local health provider, • Employment services provider, and/or a • Transportation services provider. The Team may engage additional partners beyond this list after meeting the stated minimum requirement. | At least one (1) meeting between Transformation Partners open to the public to identify challenges to transformation. Required attendees: Project Team representative (Community- Based Developer, if applicable) Community Quarterback, if applicable All Transformation Partners required, as listed to the left | Copy of public notice advertising publicly accessible meeting between Transformation Team and Transformation Partners Meeting agenda, report, sign in sheet, and/or minutes Identified challenges noted within the Community Transformation Plan | |
| B. Citizen Outreach | One (1) survey discominated to | Moth adalaciant reports | |
| Record feedback from the low- income population to be served on what challenges prevent this community from accessing local resources such as education, health services, employment, and transportation. As the QAP requires "substantial efforts" to record this feedback, additional | One (1) survey disseminated to the low-income population to be served. | Methodological report: • When and how long was the survey available to respondents? • How were the respondents found? • How many people responded? Resulting analysis/data | |
| this feedback, additional OR | | | |

| documentation to prove these |
|---------------------------------|
| "substantial efforts" may be |
| needed. The Transformation |
| Team may document outreach |
| undertaken to organizations |
| serving low-income residents of |
| the Defined Neighborhood with |
| the purpose of ensuring these |
| residents attend the meetings |
| and/or answer the survey. |
| |

At least two (2) public meetings held at forums accessible and available to low-income populations (consider meetings after work or on Saturdays). Documentation should evidence both the promotion of and the occurrence of these public meetings:

- Copy of public notice advertising publicly accessible meeting
- Meeting agenda, report, sign in sheet, and/or minutes

Report of meeting discussion

The Community Transformation Plan must note in its text the following information gathered from Community Engagement and Outreach:

- 1. The level to which the local population to be served (low-income families or seniors) currently access community resources (e.g., education, health services, employment, and transportation).
- 2. The challenges the local population to be served face in accessing community resources (e.g., education, health services, employment, and transportation).

3. Community Transformation Plan Goals and Implementation Strategies

- Assessment of the existing Community Revitalization Plan or other existing/past strategies directly affecting the Defined Neighborhood.
- Call for the rehabilitation or production of affordable rental housing as a policy goal for the community.
- Designate implementation measures along with specific timeframes for the achievement of such policies and housing activities.
- Include a discussion of resources that will be utilized to implement the plan.

The Plan must discuss: 1) the Local Government's current priorities and strategies for the Defined Neighborhood, which are outlined in an existing Community Revitalization Plan or other Local Government planning documents; and 2) how this Plan builds on those priorities and strategies.

Further articulation of the Plan's goals and implementation strategies must center on Community Engagement and Outreach data as cited in the QAP regarding 1) the level to which the local population to be served currently accesses community resources; and 2) the challenges this local population faces in accessing these resources. The Plan must clearly identify the specific challenges that the Plan addresses.

The Plan must also clearly prioritize these challenges and provide a rationale for **how** the community has prioritized these challenges found through Community Engagement and Outreach.

For each "prioritized challenge," the Applicant must identify:

- At least one measurable goal for 1) increasing future residents' access to these resources; and
- At least one measurable goal for 2) catalyzing improved access to such resources for the Defined Neighborhood as a whole.

A "measurable goal" using "metrics of success" is one that can be tracked using numbers over a defined time period, such as "doubling the percent of individuals over the age of 18 within the Defined Neighborhood who report spending more than 20 minutes at the local exercise facility at least twice a week in the next year." Defining a timeframe and a marker of success is essential for creating effective milestones.

For each measurable goal, whether benefitting the future residents or the Defined Neighborhood, the Community Transformation Plan must name at least one solution to be implemented by one or more Transformation Partners and/or Team members. Community Transformation Plan ("entities responsible"). The Community Transformation Plan should also note what resources have been committed by these entities or others in support of each goal.

At least one goal must be the rehabilitation and/or production of affordable rental housing as a solution to the challenges identified in the Defined Neighborhood, as set forth on p. 4 of this Guidance.

Additionally, the Plan should discuss how the formation of the Transformation Team and the implementation of Community Engagement and Outreach led to the following collaborative outcomes:

- Identification of challenges:
- Proposed solutions; and
- Partnerships formed to meet the identified challenges.