Community Benefits in York Region Working Framework

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Introduction

Community benefits are a proven, progressive way to maximize the benefits of dollars already being spent on goods, services, infrastructure and development to drive more equitable and inclusive economic growth.

In York region, community benefits can be a powerful tool, when aligned with existing programs and initiatives, to help accomplish strategic imperatives of the Regional Municipality of York, local municipalities and their partners. These include goals set out in the Region's strategic plans, including:

- strengthening York region's economy and supporting community health and well-being
- enhancing progressive workforce development strategies for underemployed and unemployed residents
- developing and retaining a region-wide workforce
- increasing and sustaining rental housing; and
- building more sustainable communities.

This Community Benefits Framework sets out a high-level roadmap to using community benefits, in pursuit of these goals, which can be adapted to fit the needs and practices of different organizations and institutions across York region. It takes an aspirational but pragmatic perspective, recognizing that time will be needed to phase in adoption of community benefits approaches and drive systemic change.

Based on research, analysis and stakeholder interviews, this Framework sets out recommendations for:

- 1. Priority areas of focus
- 2. Approaches to implementation
- 3. Key Partnerships
- 4. Supportive Infrastructure
- 5. Community Engagement
- 6. Monitoring, evaluation and compliance
- 7. Resources required

This document is intended to serve as a basis for discussion with a variety of stakeholders; its final design will be shaped in large part by their input. The Framework also sets the stage for development of a toolkit that will give detailed templates and step-by-step guidance for implementation in the areas set out above.

Background

The Framework is part of a research project initiated by the Human Services Planning Board of York Region(Board), to explore how community benefits can help deliver its goal of stimulating local job creation and training opportunities.

The Board is concerned, in particular, with underemployment – individuals who may be employed but not at their full capability, either because their skillsets are not utilized or because they cannot find fulltime work – and precarious employment, i.e. work that is temporary, casual, short-term, fixed-term, or self-employment.

The first phase of this project was a research report, which included a jurisdictional scan and interviews with multiple stakeholders. That report identified that community benefits should address workforce and training opportunities for young graduates, internationally-trained professionals, newcomers and members of disadvantaged groups. It highlighted supply chain opportunities for small and diverse businesses and entrepreneurs as an area of economic growth that could also be supported through community benefits. And, it noted the complementarity of community benefits with environmental initiatives and the movement to sustainable procurement, acknowledging the interconnections between environmental, social, and economic systems.

Objectives of this initiative:

1. Support a culture and commitment on the part of governments, anchor institutions and businesses in York region to diversity, inclusion, and maximizing the potential of our people through community benefits.

2. Promote economic growth and vitality in York region by meeting local employer needs with a strong, well-trained workforce.

3. Drive equitable economic development across York region by building supply-chain opportunities for small and diverse businesses and social enterprises.

4. Create a support system for the promotion and provision of community benefits through collaborations, partnerships, community engagement and capacity-building.

5. Leverage dollars already being spent on goods, services, infrastructure and development projects more intentionally, to achieve greater social, economic, environmental and community value in York region.

Principles:

The following principles are ambitious, but grounded in an understanding of the challenges that will need to be addressed along the way.

Collaboration and Partnerships

Community benefits can only be achieved with collaboration between key partners in York region: governments, workforce agencies, labour, community, suppliers, employers and industry associations.

Transparent

Opportunities for engagement and open, inclusive dialogue should inform the adoption and implementation of community benefits approaches. Requirements and results should be clearly communicated by procuring agencies to vendors, contractors, partners and the public.

Practical

Community benefits should build on, or connect with, existing procedures, programs and initiatives where possible to lower costs and risks, leverage efforts and resources, and ensure they are operationally feasible.

Innovative

Partners within organizations and across York region should work together in new ways and co-design new solutions to implement community benefits, within existing legal and procurement frameworks.

Adaptable

This framework must be adaptable to the particular needs of different organizations and institutions across York region.

Sustainable

Community benefits should foster positive, long-term, sustainable change to systems and cultures.

1. Areas of Focus

The Framework focuses on three priority areas for the provision of community benefits: workforce opportunities; supply chain opportunities; and other benefits identified by local communities, including, where relevant, affordable housing and environmental initiatives.

a) Workforce opportunities

Over the last decade, full-time employment has decreased, while

contract/seasonal/temporary employment has grown, reflecting national trends. Progressive employment opportunities, particularly for young graduates and newcomers, are therefore a priority of the Board. Interviews with other stakeholders and recent census data also shows there is a need to support workforce and apprenticeship opportunities for internationally-trained professionals (ITPs) and members of disadvantaged groups. Addressing mismatches between skillsets and available jobs and building a local workforce is also important.

For young graduates and members of disadvantaged groups, emphasis will be placed on "career start" opportunities and associated needs for training, mentoring, and wraparound supports.

Opportunities for newcomers and ITPs will address the need for Canadian experience. In the case of ITPs, such experience will allow them to continue in their professions or gain necessary Canadian credentials, as required.

Providing workforce opportunities for these targets groups will require:

• Appropriate targets for workforce opportunities that are clearly defined, monitored and enforced, and that are informed by a strong understanding of the number and types of potential

Key Definitions:

"Disadvantaged" means those who experience discrimination or barriers to equal opportunity (including Indigenous people, racialized groups, LBGTQ+ people, at-risk youth, the working poor, the long-term unemployed, people with disabilities and women), and who are unemployed or underemployed.

"Young graduates" means those who have graduated from a Canadian college or university within the last two years, are living in York region, and are unemployed or underemployed (i.e. working full time or on contracts, but not at their full capability, based on their level of education, skills and experience).

"Newcomers" are those who have arrived in Canada within the last five years from another country.

"Internationally trained professionals" are individuals who obtained credentials to practice their profession outside of Canada.

"Small businesses" are businesses with fewer than 20 employees, including entrepreneurs.

"Community" means York region residents who might reasonably be affected by a proposed infrastructure or development project, and who come together to participate in the process to define, monitor, and/or evaluate benefits.

workforce opportunities associated with contracts, in particular for infrastructure and development projects

- The right supportive infrastructure to recruit, prepare and connect jobseekers from target groups with available opportunities that contractors and all employers can access
- Building key partnerships between educational institutions, labour unions and employers.

WHO'S HERE? KEY FACTS

- 47% of York region residents were born outside of Canada, of whom 10% are recent immigrants
- 51% of immigrants have a university degree or higher
- Immigrants are anticipated to make up 55% of the population of York region by 2031.
- The City of Markham is the most ethnically diverse city in Canada, with 78% of its population identifying as a visible minority
- York region has the highest rate of university enrollment in Ontario by 18 year-olds (56% vs 35% province-wide in 2011)
- There is a degree of skills underutilization particularly among 15 24 year olds and internationally educated immigrants
- While median household incomes tend to be higher in York region than in the rest of the GTHA, there are neighbourhoods with low median individual incomes, most notably in Markham and Richmond Hill.

Sources: 2016 Census, York Region Economic Development Action Plan, United Way of Greater Toronto & York Region

b) Supply chain opportunities

Supply-chain opportunities for small and medium-sized businesses ("SMEs"), social enterprises and entrepreneurs, including those owned by newcomers or those owned and managed by members of disadvantaged groups, can be achieved directly through the procurement of goods and services, and indirectly, through infrastructure and development projects.

These targeted groups are aligned with the focus on small businesses and entrepreneurs in York Region's economic development strategy. They also reflect priorities of York Region and the Workforce Planning Board of York Region to better integrate newcomers into the labour market. Data from Statistics Canada indicates that rates of private business ownership and unincorporated self-employment are higher among immigrants than among the Canadian-born population, but that the average firm size is smaller.¹

Interviews with stakeholders and economic development officers across York region support taking a coordinated approach to better connect capacity-building efforts, and to make clear information about the procurement process more widely available.

Facilitating supply chain initiatives will require:

- Setting a goal for the value of contracts to be awarded to targeted businesses
- Identifying or creating contracts of a suitable scale to be delivered by these enterprises

¹ Green, D., Liu, H. and Ostrovsky, Y. <u>Immigration, Business Ownership and Employment in Canada</u> (Statistics Canada, March 2016)

- Removing potential barriers to the engagement of targeted businesses by requiring only those qualification criteria that are essential and considering proactive strategies, such as prompt payment clauses, to encourage small businesses to bid
- Drawing on York Region's annual live business survey and other sources, such as third-party certification organizations, where appropriate to create lists of targeted suppliers, and ensuring they are invited to tender or price for supply opportunities
- Communications and capacity-building activities that are coordinated with industry, supplier associations, and procurement departments that would include workshops, "meet the buyer" events, and a centralized online portal with information on different programs that are already available to assist small and medium-sized enterprises, a clear and understandable description of the procurement process for governments and publicly funded organizations, and avenues for information-sharing
- Education of, resources and guidelines for contractors who will be asked to fulfill these requirements

BUSINESSES IN YORK REGION: KEY FACTS

York Region surveyed 33,650 businesses in 2017. Of that number:

- 83.6% are small businesses of 1-19 employees
- 13.6% are medium-sized businesses (20-99 employees)
- 2.9% are large or very large (over 100/500 employees)
- The majority of York region's workforce was employed in services-producing sectors (including finance and insurance, health care and social services, and retail).
- Professional, scientific and technical services account for the largest share of businesses in York region with 19.5% share and 83% of these establishments employ between one and four employees.

Source: York Region 2017 Employment Survey, Planning & Economic Development

c) Opportunities for communities to pursue local objectives

In areas benefiting from infrastructure or development, local communities should be engaged early on to determine potential community benefits, ideally during the planning process. While these needs might include workforce and supplier opportunities, communities may also seek to address other needs, ranging from affordable housing to sustainability and public realm improvements. Engaging communities helps bring ideas to a project from the "bottom up", improving implementation, reducing resistance to projects and building pride in the community, even after the project is done.

To facilitate the determination of benefits, the following should be considered:

- community needs, as demonstrated through a review of any needs assessments carried out by governments or agencies in the area
- whether remedial action may be required to mitigate community displacement

- readiness of residents and other partners to participate in determining benefits, including consideration of whether there are already organized community associations or interest groups in the area of the project, degree of interest and participation by community members and other stakeholders in any early planning or assessment processes, and existing community partners/social infrastructure
- whether disadvantaged communities will need to be assisted to participate in this process.
- the nature of the project, and the feasibility of addressing the benefits requested.²

2. Implementation Approaches

Community benefits can be implemented through procurement or through Community Benefits Agreements (CBAs).

Demonstration projects to test both of these approaches are recommended for an initial period; based on the learnings from these projects, approaches can be further refined and strengthened.

a) Community benefits in procurement.

Through procurement of construction, goods and services, municipalities, institutions and organizations can support targeted apprenticeship and workforce opportunities for disadvantaged groups, and open up supply chain opportunities where they make sense.

Adopting a policy for the procurement of goods and services, which requires quotes to be solicited from lists of targeted suppliers, will help guide implementation of community benefits. This can apply either to all purchases for goods and services made by an organization, or can set out a program to phase targeted procurement in over time. For example, targeted procurement could focus initially on certain sectors or on categories of purchases, e.g. to purchases under \$100,000 (the threshold below which trade agreements do not apply). Even before a policy is adopted, organizations can explore small opportunities, creating and showcasing success stories to build the case for a broader approach. Using third-party organizations to help identify and certify targeted suppliers can provide a measure of quality assurance.³

Workforce opportunities can also be built into service contracts, particularly since they may offer a broader range of opportunities than construction (both for those who have fewer skills – e.g. landscaping, maintenance - and for those who have more skills, e.g. IT contracts). Professional services contracts in particular may offer more opportunities for ITPs.

For infrastructure and construction projects, thresholds should guide when it is appropriate to use community benefits. Not every project will be of sufficient size and scope to afford meaningful benefits, so it is important to consider when it is feasible and cost-effective to include them. For example, where the budget of an infrastructure or development project is largely materials rather than labour, workforce opportunities may be limited.

³ See, e.g. the Social Procurement Program from the City of Toronto, which uses third-party organizations such as the Canadian Aboriginal and Minority Suppliers Council to certify diverse suppliers:

https://www.toronto.ca/business-economy/doing-business-with-the-city/social-procurement-program/

² For example, can needs be readily met because, e.g. equipment is already on site for physical improvements, or the requested benefits can build off of or connect to other initiatives or partnerships already underway in the area

Thresholds:

Community benefits should be considered in infrastructure and construction projects that are over &M in value, to ensure that the project is of sufficient size and scope to afford meaningful workforce and supplier opportunities. This figure may be adjusted following conversations with stakeholders and a comprehensive review of capital and development planning in York region.

For initial demonstration projects, it is recommended that, in addition to the thresholds set out above, projects be analyzed according to the following criteria to determine whether they are suitable for community benefits. This analysis should be carried out by a cross-departmental group with expertise in construction, workforce/labour market, human resources, and contract management. This will allow full consideration of what is required and ensure the demonstration projects are set up for success, before moving to a regime based solely on thresholds.

Criteria:

i. Does the project have the potential to offer employment, training or apprenticeship opportunities during the design/build, engineering, construction and/or operations phases? In making this assessment, factors to be considered include:

- quality and duration (the degree to which opportunities can offer candidates meaningful experience, learning and skill development, fulfillment of apprenticeship requirements, achievement of professional credentials, and/or long-term, sustainable employment)
- cost and person-hours of labour (the percentage of costs of a project that is labour vs. materials and the number of opportunities that could be made available)
- feasibility (the likelihood that workforce outputs can be achieved within the proposed timeframe of the contract)
- labour supply (whether there are sufficient qualified candidates who are trained and/or ready to fill the jobs)
- commercial reasonableness (whether the number of jobs or hours required are reasonably achievable by the contractor given the nature of the project)

ii. Does the project have the potential to offer supply chain opportunities during the planning, construction and/or operations phases? In making this assessment, factors to be considered include:

- identification of the categories of purchases that will be required, and an assessment of whether there are suppliers who provide these goods or services who are qualified under established community benefits criteria;
- breakdown of the potential number, scope and value of the opportunities
- availability of resources for contractors, such as lists or a portal for suppliers, or supplier intermediaries
- capacity of suppliers to fulfill the needs

b) Community Benefits Agreements (CBAs)

CBAs are a strategy for ensuring community benefits are included in development projects. CBAs can be negotiated between local municipalities and private developers where the development offers opportunities for significant community benefits that would not otherwise be afforded through the planning and development process.

For example, CBAs can, drawing on input from communities, include the provision of affordable rental housing where section 37 of the Planning Act or inclusionary zoning requirements do not apply

(once they come into force), as well as targeted workforce opportunities and procurement of goods and services where projects are of a sufficient scale.

Communities should be engaged during the planning process to discuss potential community benefits, and should have the opportunity to meet with developers at an early stage. These meetings should be facilitated by the planning department and/or city councilors.

A CBA should be negotiated as early in the process as possible, ideally prior to any development approvals being granted by the municipality, and can be appended to a development agreement.

As with community benefits in procurement, thresholds should be set to guide when CBAs are appropriate, especially when workforce opportunities are desired. Consultation with stakeholders, including the development community and local governments, should take place before determining thresholds. Consultation should also help ensure that community benefits requirements can be appropriately balanced with other municipal charges or incentives (development charges, land, low-interest financing, etc.).

3. Key Partnerships

Community benefits can only be achieved with collaboration between key partners in York region: governments, workforce agencies, labour, communities, employers and industry associations. Ultimately, this framework, and the process by which it is implemented and maintained, should be co-designed with the people and institutions that will be using it.

Stakeholder engagement should therefore take place over the next 6-12 months on an ongoing basis to:

- Refine the approach and kinds of community benefits suggested in this work
- establish key partnerships and begin to build the support system
- educate communities, contractors and employers about community benefits
- consider the establishment of a community of practice for anchor organizations and municipalities, to help foster a consistent approach across York region, drive the cultural shift, and allow learnings to be shared along the way

4. Supportive Infrastructure

The following two pieces of supportive infrastructure will be required to implement community benefits.

a) The Workforce Pathway

To implement workforce opportunities associated with community benefits, a workforce pathway is needed to recruit, assess, train, support and place target candidates in jobs.

To facilitate the hiring process, a central portal should be established that would be populated and accessed by multiple workforce development agencies and employers.

The central portal should

- be transparent and public-facing;
- provide employers with access to a hiring list that identifies candidates, the occupations they are suited for, their training and qualifications, and availability

Once a candidate is selected by an employer, the administrator of the list would connect the agency that submitted the candidate with the employer, who would interview the candidate and make a final hiring decision.

Ideally, the administrator of the list would be a designated intermediary that understands the construction industry, the needs of disadvantaged groups, and has access to demand-side labour market research and planning. Human Resources teams within governments, anchor institutions and other employers in York region should also be encouraged to make use of the portal in order to widen the ambit of potential opportunities for candidates.

Further discussion and consultation within the sector is needed to establish how to coordinate the work of different agencies, and to identify strategies for recruiting, preparing and connecting job seekers to workforce opportunities related to community benefits.

Until such a portal is established, organizations can create a list of employment service providers to provide to contractors to help fulfill the requirements.

Who are the key partners? The workforce pathway and portal should be collaboratively developed with government, workforce agencies, unions, employers, and other key partners.

b) Supply Chain Initiatives

A coordinated approach to building the capacity of small businesses, entrepreneurs and social enterprises would also help facilitate supply chain initiatives. One or more intermediaries could provide clear, centralized information about the procurement process; connect suppliers to existing funding programs and capacity-building initiatives; and connect these businesses with supply chain opportunities offered by governments, institutions and developers. Third party organizations could play a role in certifying suppliers who meet defined community benefits criteria, where required. A database of small suppliers can be extracted from York Region's annual live business survey to assist with this initiative.

Who are the key partners? Governments, Small Business Enterprise Centres, local chambers of commerce and other industry associations, incubators/accelerators, organizations supporting entrepreneurs and social enterprise intermediaries could all play a role in the ecosystem.

5. Community Engagement

The involvement of local communities before, during and after a project is key to the success of community benefits. Good community engagement builds community capacity, contributes to social inclusion, and ensures the legitimacy of community benefits initiatives.

Communities should be engaged well in advance of the project to discuss potential benefits. In most cases, it makes sense to conduct these discussions during the planning process or environmental assessment stage of a project, since statutory consultation is generally required in any event. It may be helpful to use a standardized menu of benefits as a basis or starting point for discussion. Additional resources and effort may be required to ensure a diverse and representative range of voices are at the table for these conversations.

During the implementation of the project, the community should be kept informed of progress and may be part of a monitoring committee to ensure benefits are being delivered. Following the project, community input should be sought into the evaluation of the benefits (see "monitoring and evaluation").

Note that community benefits are intended to be incremental to the ordinary benefits of an infrastructure project. Items such as mitigation of noise, dust, or traffic management, for example, should not be considered as community benefits, since they should be addressed in any normal construction project.

6. Monitoring, evaluation and compliance

a) Monitoring and Evaluation

Appendix A provides a strategy and roadmap for monitoring, and evaluation of community benefits. The monitoring and evaluation strategy has three components:

- Monitoring progress towards community benefits targets embedded in each contract to assess compliance with targets;
- Evaluating the community benefits initiative as a whole to assess overall outcomes and identify opportunities for strengthening the community benefits process; and
- Evaluating the long-term impact of community benefits on the practices and perceptions of those in the broader eco-system, including employers, community, workforce development agencies, and other partners

It has also been suggested by stakeholders that measurement should include both community benefits and any 'spinoff benefits', some of which may not be measurable until well beyond the completion of the project. A cost-benefit analysis could identify second or third order benefits (e.g. the project created new jobs but also led to development, which created even more jobs and increased tax base).

b) Compliance.

Best practices make it clear that unless community benefits provisions in infrastructure and development contracts are enforced, they are unlikely to be fulfilled.

As noted in the monitoring and evaluation strategy, a strategy for monitoring progress towards targets in each contract is critical in assessing whether contractors are complying with their community benefits requirements.

A measure of flexibility may be required, particularly in the demonstration project phase. A monitoring committee, comprised of representatives of the owner, contractor and community members, can meet regularly during the project to troubleshoot and adjust targets if necessary.

However, there must also be clear provisions for enforcement in the cases of noncompliance, including standard contractual provisions for breach of contract (e.g. damages). Compliance ramifications could also be incorporated into community benefits or vendor management policies, if adopted. In the case of development, a local municipality's power to withhold development or occupancy permits is a powerful tool that has been successfully used elsewhere.

7. Resources Required

Making community benefits work requires time, effort and resources, particularly at the beginning when new systems and practices are being implemented. Everyone can benefit from sharing information and resources across York region through networks or communities of practice.

Consideration must be given to adequately resourcing the following:

a) Internal support required by governments and institutions to implement and monitor a community benefits program and individual agreements, including:

- Political buy-in from council, if applicable, and internal leadership to drive change
- communications and training for internal staff and departments who will be involved in the community benefits program, including planning, legal, procurement, social policy, and community engagement
- the creation of guidelines and customized language for procurement documents
- the creation of guidelines for contractors and vendors
- cross-departmental support for implementing, monitoring and evaluating agreements, which could include expertise from the Community and Health Services Department
- promotion of the work and its value to York region

b) Establishment and maintenance of an effective workforce pathway, including:

- creation of a central list or portal
- partnerships and/or support for a designated intermediary to host the portal and act as a coordinator
- support for ongoing engagement with workforce agencies, labour and employers

3. Support for supply-chain initiatives, including:

- coordination with partners and certification organizations, where desired
- new programs and/or coordination with partners of existing programs for capacity building initiatives
- 4. Community engagement
 - where not already included in a planning process, support for engagement of local communities, including support for disadvantaged communities if needed to participate in the process
 - needs assessments where required, particularly in areas where participation in engagement processes is low

5. Potential impact on the costs incurred by contractors and/or developers.

• consideration should be given to what additional costs may be faced by contractors or developers, and how such costs will be treated in bids. One option is to include a cash allowance or specific line item for community benefits requirements.

Community Benefits Framework

Objectives

Support a *culture and commitment* on the part of governments, anchor institutions and businesses in York region to diversity, inclusion, and maximizing the potential of our people.

Promote *economic growth and vitality* in York region by meeting local employer needs with a strong, well-trained workforce.

Drive *equitable economic development* across York region by building supply-chain opportunities for small and diverse businesses/social enterprises.

Create a *support system* for the promotion and provision of community benefits through collaborations, partnerships, community engagement and capacity-building.

Leverage spending on goods, services, infrastructure and development projects more intentionally, to achieve greater social, economic, environmental and community value.

Principles

Collaboration and partnerships among key organizations within York region

Transparent engagement and communication of community benefits requirements and results

Practical implementation approaches to ensure operational feasibility

Innovative new forms of collaboration and solutions within existing legal frameworks

Adaptable to the needs of different organizations in York region

Sustainable, positive, long-term to systems and cultures change fostered through community benefits

Areas of Focus

a) Workforce opportunities, targeted to young graduates, newcomers, internationally trained professionals & disadvantaged groups (including at-risk youth and working poor)

- b) Supply chain opportunities targeted to small and diverse businesses and social enterprises, including those owned and managed by newcomers and members of disadvantaged groups
- c) Opportunities for other locally determined benefits

Implementation

a) Procurement of goods, services and infrastructure or development projects.

b) Community Benefits Agreements negotiated between communities and/or local municipalities and developers

Thresholds and criteria for pilot projects guide when to use community benefits on infrastructure & development projects

Key Partnerships

Engagement with key stakeholders to refine framework, establish a community of practice, and build a support system

Supportive Infrastructure

a) Workforce pathway and hiring portal to address recruitment, assessment, training, supports and placement

b) Supplier initiatives to connect them to capacity-building and vendor opportunities

Community Engagement

Inclusive engagement is key to community benefits. Communities should be engaged before, during and after initiatives.

Monitoring & Evaluation

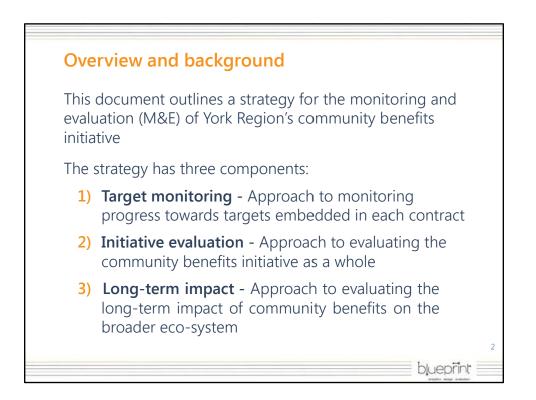
- a) Monitoring progress towards targets embedded in each contract
- b) Evaluating the community benefits initiative as a whole to assess overall outcomes
- c) Evaluating the longterm impact of community benefits on the broader ecosystem

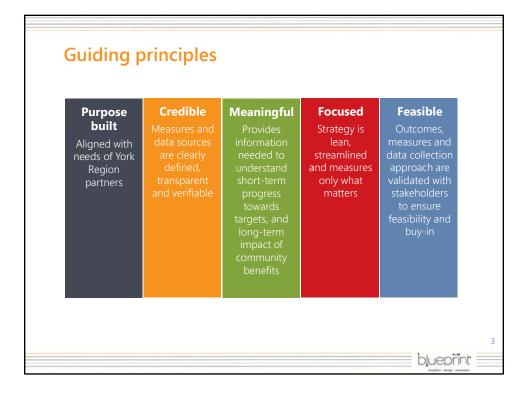
Create mechanisms for enforcement to ensure compliance.

Resources

Internal support and training for staff (including Human Resources and Finance); support for the establishment and maintenance of workforce pathway and supplier development initiatives, community engagement, monitoring and compliance Appendix A: York Region Community Benefits Monitoring and Evaluation Strategy, PowerPoint Presentation











Career development opportunities			
	Measured for*:		
Outcomes and measures	Members of disadvantaged groups	Recent graduates	Newcomers and internation trained professionals
EMPLOYMENT			
1. EMPLOYED # employed on the Project	✓	\checkmark	\checkmark
2. PERCENT OF WORKFORCE % of total number employed on the Project	\checkmark	~	\checkmark
HOURS WORKED			
3. HOURS WORKED # hours worked on the Project	\checkmark	~	\checkmark
4. PERCENT OF TOTAL HOURS % of total hours worked on Project	\checkmark	~	\checkmark
WAGES			
5. HOURLY WAGE Median hourly wage of those employed on the Project before taxes and deduction (relative to median hourly wage of non-community benefits hires)	\checkmark	\checkmark	√

