

CIP for Affordable Housing

City of Brampton



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1 Background

Overview

Background

The **City of Brampton** is a lower-tier municipality in the Region of Peel and is the **fastest growing** of Canada's 25 largest cities. As population growth continues to increase the demand for housing, there is an opportunity for the City to focus on smart intensification to meet the forecasted demand and **improve housing affordability** for current and future Brampton residents.

According to Brampton's Housing Needs Assessment report (2018), Brampton has the highest proportion of households that find housing unaffordable compared to other Region of Peel municipalities. Rising real estate prices in Brampton are a barrier to young adults, seniors, low and middle-income families, large families, and vulnerable populations.

Context

The City's first housing strategy – '*Housing Brampton*' – was endorsed in May 2021 and proposes a range of solutions and approaches that are based on housing affordability, choice, smart density, and equitable access to housing.

The City also recently approved its new Official Plan - *Brampton Plan* - in November of 2023. *Brampton Plan* provides a path forward to implement *Brampton's 2040 Vision* and achieve a sustainable and vibrant urban future for the city.

This **City-wide Community Improvement Plan (CIP) for Affordable Housing** aims to incentivize and attract various forms of new affordable housing to the city.

Goals and Objectives

Objective One

The first objective of this Community Improvement Plan (CIP) is to implement a city-wide program which will focus on incentivizing and attracting affordable purpose-built rental and affordable ownership housing, as well as other desired housing types identified in Housing Brampton.

Objective Two

A secondary objective of this CIP is to fulfill priorities set out in the Brampton 2040 Vision. These priorities include creating sustainable urban places and creating characterful and complete neighbourhoods.



Enabling Legislation

Community Improvement Plan Areas (CIPAs) must be generally enabled through the Official Plan and then through area-specific by-laws.

Community Improvement Plan Areas

- The legislative authority to prepare an Affordable Housing CIP is established under Section 28 of the *Planning Act*. The authority to provide financial incentives is established in Sections 106 and 365.1 of the *Municipal Act* and Sections 28(6) and 28(7) of the *Planning Act*.
- A municipality must have provisions in their Official Plan relating to community improvement for the authority to establish a Community Improvement Project Area by-law and implement a CIP. In Brampton Plan, the City's recently adopted new Official Plan, Section 5.14 outlines the City's policies for CIPs, including provisions enabling community improvement to be carried out through the preparation and implementation of Community Improvement Plans.
- This CIP has been prepared in alignment with the current local and provincial policy and legislative contexts, including the changes to legislation affecting affordable housing introduced through Bill 23. However, future regulations and changes anticipated from the Province may impact the incentive program.

Brampton Policies and Programs

Housing programs and studies that inform the CIP design:

1. Concierge Program for Affordable Housing (2021)
2. Additional Residential Units Policy Review (2022)
3. Residential Rental Licensing Pilot Program (2024)
4. Brampton Housing Catalyst Capital Project
5. Community Benefits By-law
6. Brampton Parking Plan

Concierge Program for Affordable Housing

- The Concierge Program was an early deliverable of Housing Brampton and was launched in 2021 as a two-year pilot program.
- The goal of the Concierge Program is to assist non-profit and private-sector developers of affordable rental and ownership housing, including transitional housing, to navigate through site selection, funding, incentives, partnerships, and approvals processes.
- This program will be expanded as part of this City-wide CIP for Affordable Housing, using a full-time city staff person funded through the City's operating budget.

Recent Relevant Studies

Additional Residential Units Policy Review

- The Additional Residential Units (ARU) Policy Review was an early deliverable of Housing Brampton and aimed to support the provision of age-friendly, inclusive, affordable, and accessible housing.
- ARUs can be added in two configurations: either with both units as an attached ARU located in the primary dwelling, or with one unit in the primary dwelling and one as an accessory structure, such as a garden suite.
- ARUs are identified as a potential component of the City-wide Affordable Housing CIP through the garden-suite grant program.

Brampton Parking Plan

- In late 2023, the City advanced the Brampton Parking Plan as part of Brampton's 2040 Vision and the 2023 Brampton Plan.
- The Plan divides the City into **Intensifications Areas** and **Rest-of-City** and recommends the removal of parking minimums while setting parking maximums in Intensification areas. In the Rest-of-City, parking minimums are tailored to demand.
- The Brampton Parking Plan also recommends reductions in the requirements for parking for affordable housing and in key areas of the city.

Recent Relevant Studies

Brampton Housing Catalyst Capital Project

- This program focuses on enabling innovation in housing in the not-for-profit sector. Four projects were chosen to receive funding from the \$4M funding pool.
- The Catalyst Project is no longer accepting applications. The 4 selected projects will receive their allocated funding amounts, after which the Catalyst Project will close. The CIP for Affordable Housing will distribute any future funding to non-profits for housing projects and the CIP will allow for stacking of funding with the Catalyst Project for the 4 chosen non-profit projects.

Community Benefits Charge (CBC) By-law

- The CBC By-Law identified housing as a priority community benefit.
- The CIP will enable Brampton to support the direction of the CBC to fund construction of new affordable housing.

Residential Rental Licensing Pilot Program

- This program is focused on improved outcomes for small scale rental of 4 or fewer units.

2 Affordable Housing CIP

2.1 Community Improvement Project Area

As affordable housing is needed throughout the City, to effectively provide for a mix of affordable rental and ownership housing, for the Affordable Housing CIP the entire City of Brampton has been identified as the Community Improvement Project Area in the Community Improvement Project Area By-law.

The **City of Brampton Affordable Housing Community Improvement Project Area** is shown to the right and forms part of this Plan.

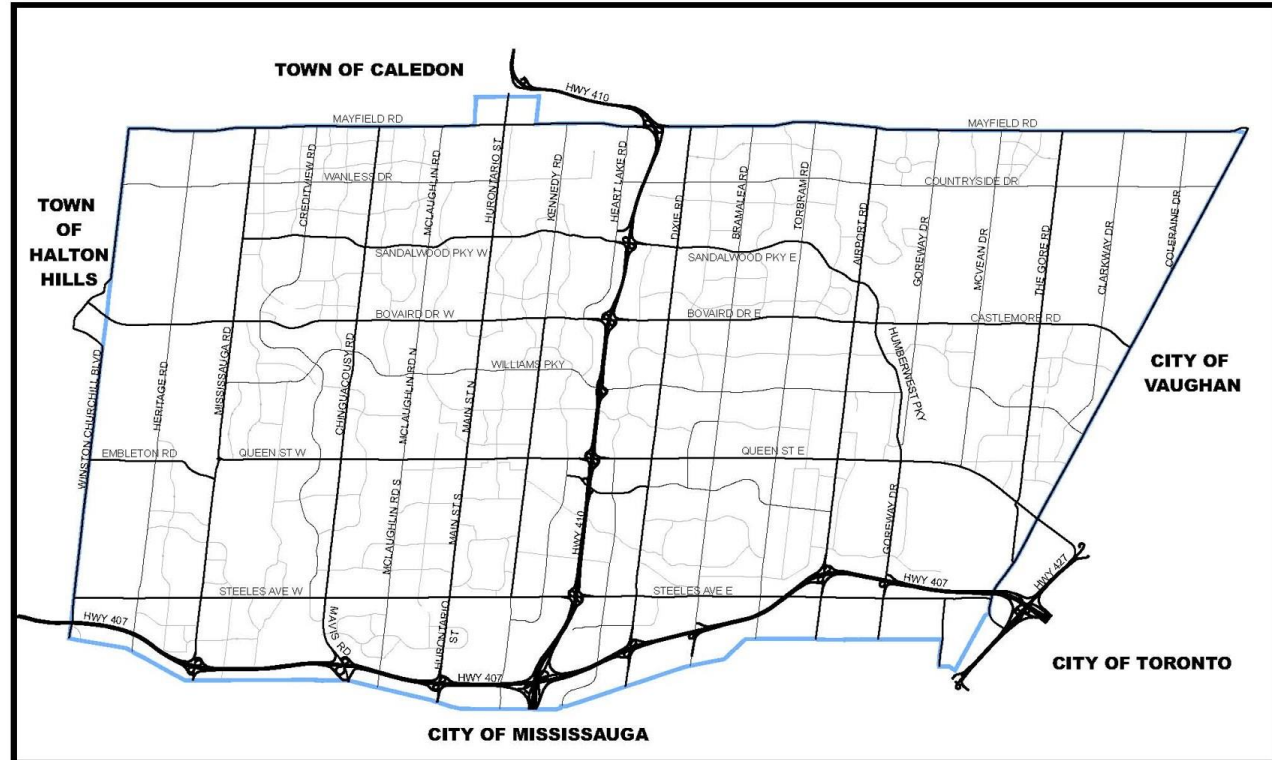


Figure 1: Brampton Affordable Housing Community Improvement Project Area

2.2 Goal and Objectives

Goal of the CIP

- The goal of the Affordable Housing CIP is to **increase the supply of affordable rental and ownership housing units** throughout the City of Brampton by **minimizing the financial barriers** to the creation of affordable units.

Objectives of the CIP

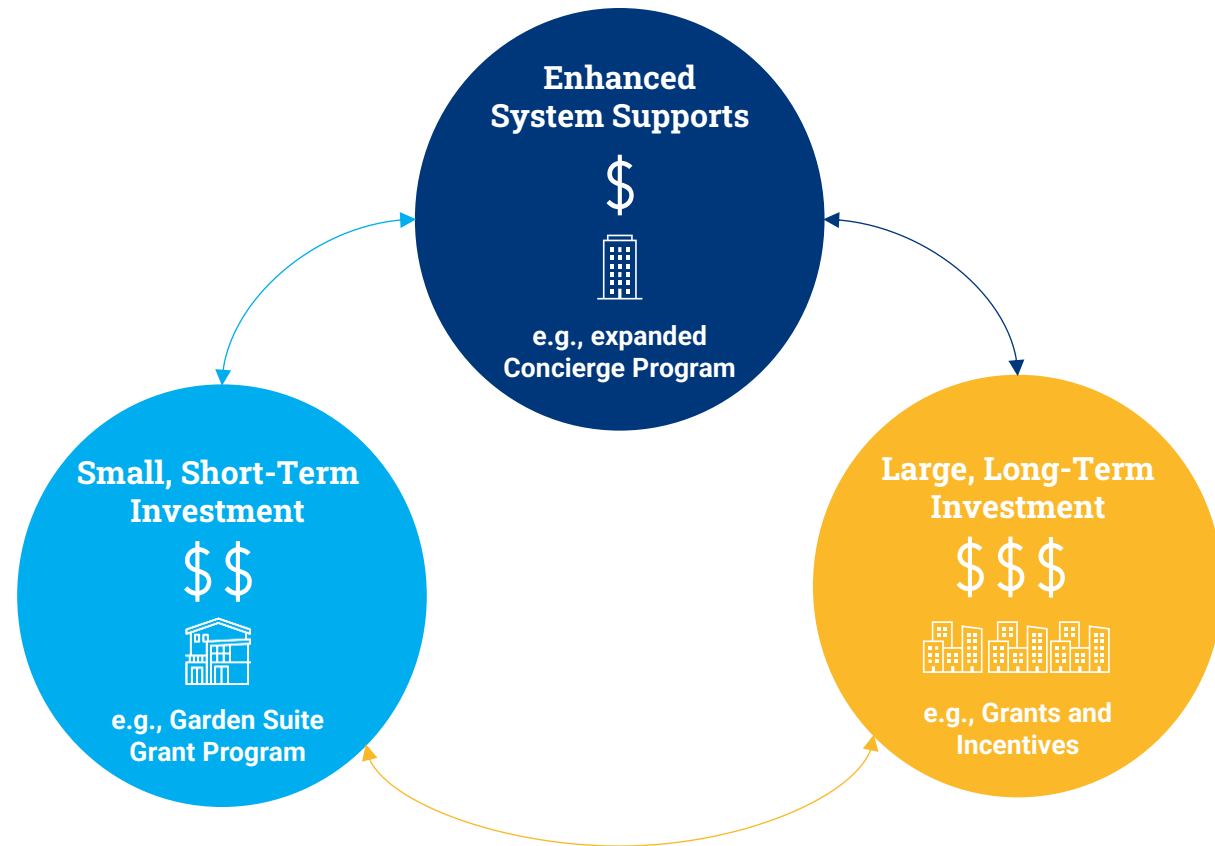
The objectives of the Affordable Housing CIP are as follows:

1. Facilitate the development of affordable rental and ownership housing by providing financial support;
2. Increase the access and supply of new affordable housing units in Brampton by incentivizing and attracting purpose-built rental and affordable housing, as well as other desired housing types identified in Housing Brampton; and,
3. To fulfill priorities set out in the Brampton 2040 Vision, specifically, to create sustainable urban places and create characterful and complete neighbourhoods.

2.3 Program Descriptions

The CIP includes **three components**:

1. Enhanced system supports to facilitate new affordable housing projects,
2. Short term investments to get rapid creation of new units, and
3. Longer-term larger investments through capital grants.



2.4 Program Descriptions

New Affordable Housing Incentive



Affordable Housing Capital Grant Program

To incentivize affordable housing development in Brampton, this program will provide an up-front grant of up to a maximum of \$340,000 per new affordable unit built.

The actual amount of funding is determined on a sliding scale based on Project Funding Sources, Affordability Delivered, Organizational Capacity and Experience, Project Maturity, Funding Phasing, Community Amenities, and Community Benefits Beyond Affordable Housing. The criteria and scoring are provided in Appendix A.

Affordable rental units must be rented at, or lower, than the affordable threshold for a period of 25 years or longer.

Affordable ownership units must be resold at or below the affordable ownership threshold for that year, within the affordability period of 25 years.

The affordable units may also qualify for the parking reductions recommended in the Brampton Parking Plan.


Requirements

- For the Affordable Housing Capital Grant Program element of the CIP, a minimum of 5 units in a development or redevelopment, and an equal proportion of each individual unit type must qualify as affordable (as defined herein).
- Up front grants will be provided in installments, as the project achieves development milestones.

2.5 Program Eligibility and Requirements

Projects will be given consideration under the Capital Grant Program subject to satisfying the following provisions:

- 1. AFFORDABILITY:** For eligibility under the Affordable Housing CIP Capital Grant Program, the affordability thresholds for both rental and ownership, published annually by the Province of Ontario in the Affordable Residential Units Bulletin will be used. The affordable rents are based on the lesser of Average Market Rent (AMR) as defined by the Canada Mortgage and Housing Corporation (CMHC) and what is affordable to the 60th percentile household. For affordable ownership housing, the lesser of what is considered affordable for the 60th percentile household in Brampton and 90% of the average purchase price is used.
 - [Affordable Residential Units for the Purposes of the Development Charges Act, 1997 Bulletin](#) (2024 thresholds)
- 2. AFFORDABILITY PERIOD:** Affordable units must remain affordable for a minimum of 25 years. An agreement between the City and the owner (registered or assessed owners of lands/buildings) will be required, which will set out the terms, duration and default provisions of the incentive to be provided. The City may discontinue any financial incentive program, and pursue legal action as set out in the agreement, where there is not compliance with an executed agreement.
- 3. NUMBER OF UNITS:** For the Affordable Housing Capital Grant Program element of the CIP, a minimum of 5 units in a development or redevelopment, and an equal proportion of each individual unit type must qualify as affordable (as defined herein).

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4. **APPLICATION:** Applications are to be submitted between Site Plan Control submission, if applicable, or Building Permit submission and prior to the issuance of an Occupancy Permit. Applications will be reviewed by Integrated City Planning staff on a first come, first served basis to confirm project eligibility. For applications wherein the total grant value is less than \$2 million, approval authority, including the authority to enter into a funding agreement, is delegated to the Commissioner of Planning, Building and Growth Management. For applications wherein the total grant value is more than \$2 million, Council approval is required. Should the application be denied by the Commissioner of Planning, Building and Growth Management, the applicant may appeal to City Council as the final approval authority.
 5. **MULTIPLE INCENTIVES:** The CIP incentives can be stacked with other government programs and funding such as the Region of Peel Affordable Rental Incentives Program (PARIP), and programs through the Canada Mortgage and Housing Corporation (CMHC), and the Federation of Canadian Municipalities (FCM). The Affordable Housing CIP Capital Grant program can also be stacked with other CIP programs offered by the City of Brampton.
 6. **SUBMISSION OF AN APPLICATION DOES NOT GUARANTEE FUNDING:** Due to the finite amount of funding available for the programs and the potential for the programs to evolve over time, the City does not commit to funding a project until there is a signed agreement between the City and the applicant. Should the program criteria change, or funding be unavailable, applicants will be informed whether the application will need to be modified, resubmitted or reassessed when the next pool of funding becomes available.



7. **HOUSING AGREEMENT:** The applicant will be required to enter into an agreement which ensures that the affordable units remain affordable, in accordance with the definition set out in this plan, for at least 25 years from occupancy. If the units are no longer deemed to be affordable, legal action will be pursued.
8. **RENT INCREASES:** During a tenancy, the housing provider agrees not to increase the rent during the affordability period by more than the prevailing rent increase guideline established for each calendar year pursuant to the Residential Tenancies Act, 2006 or any successor legislation or the rental rates established through the agreement, whichever is less. However, the rent rate established through the agreement may be adjusted to the current year during unit turnover.
9. **MAXIMUM AMOUNT OF INCENTIVES:** The total of all grants, loans and tax assistance provided shall not exceed the eligible costs of the improvements to the lands and buildings included in the development.



2.6 Program Descriptions

Grant Program for Garden Suites

Grant Program for Garden Suites

The City of Brampton has a well-established policy for creation of new additional residential units (ARUs). This program will provide grants of the municipal fees for new garden suites.

Once the City receives confirmation that the unit is registered with the Buildings Division the City will reimburse the developer of the following municipal fees paid during the construction of the unit: registration fee, building permit fee, custom home review fee, and Educational Development Charges.

The primary goal of the Garden Suite Program is the creation of new units, there is no requirement for the units to be rented at an affordable rate or to report to the City on the rents that are charged.

Federal Program: Low-Cost Financing for Homeowners to Add Additional Suites

The Federal government announced¹ a suite of new housing programs in April 2024, one of which is a low-cost loan program for new additional suites.

“Budget 2024 will propose a new Canada Secondary Suite Loan Program, to be delivered by the Canada Mortgage and Housing Corporation, enabling homeowners to access up to \$40,000 in low-interest loans to add a secondary suite to their homes. Details of this program will be shared in the coming months.”

[1. Infrastructure Canada - Solving the Housing Crisis: Canada's Housing Plan](#)

2.7 Program Descriptions

Concierge Program

Concierge Program

This portion of the City of Brampton Affordable Housing CIP leverages an existing permanent position from the City's operating budget to create a centralized resource for developers of affordable housing projects to access.

The concierge program would include:

- Assistance to developers on site feasibility aspects, identification of requisite studies prior to developers applying for regional or federal funding;
- Facilitation of inclusionary housing opportunities by connecting market developers with non-profit groups providing affordable housing;
- Education on financial assistance programs (e.g., at Region of Peel, FCM and CMHC), package of City incentives (e.g., fee waivers, grants etc. that will be established upon endorsement of Housing Brampton);
- Enable and facilitate efficient processing of affordable housing developments through inter-divisional pre-application co-ordination, timely inter-divisional application review, and thorough knowledge of staff contacts and resources needed to facilitate approvals.



Staffing Notes

The dedicated staffing for this program will be through an existing permanent position, from the City's operating budget.

3 Implementation

3.1 Implementation Plan

The Affordable Housing CIP will be implemented through the policies of the Official Plan and Section 28 of the Planning Act, 1990, R.S.O. Overall implementation will be subject to Council review and approval of program details.

Intake for the programs will run until the end of 2026, at which point staff will complete a review and report back to the next term of Council with recommendations to either cancel, amend, or continue with the Affordable Housing CIP incentive programs.

The CIP will be administered by Integrated City Planning staff, in consultation with the Corporate Support Services Department and Legislative Services. An application will be required for any person seeking financial assistance through the CIP. Application forms will be made available on the City's dedicated Housing Brampton web page, and as hard copies at the City's client service centres. Applications and supporting documentation will be reviewed by Integrated City Planning staff to ensure they are complete and meet eligibility requirements.

If eligibility requirements are not met or if there is insufficient information to make a determination with respect to eligibility, staff will inform the applicant in writing. In administering the CIP, staff may request clarification or additional supporting documentation and may perform site visits and inspections, as necessary.

For applications wherein the total grant value is less than \$2 million, approval authority, including the authority to enter into a funding agreement, is delegated to the Commissioner of Planning, Building and Growth Management. For applications wherein the total grant value is more than \$2 million, a recommendation on the application will be made by staff and forwarded to City Council for approval. In addition, should an application be denied by the Commissioner of Planning, Building and Growth Management, the applicant may appeal to City Council as the final approval authority.

Where an application is rejected by Council, proponents may reapply in the next application intake period.

3.2 Financial Management

The CIP Program funding for 2024 and 2025 are as follows:

- The Garden Suite Grant Program has funding of approximately \$45,000 approved through the 2024 budget cycle.
- The Affordable Housing CIP has funding of approximately \$6M approved through the 2024 budget cycle.
- The salary for one position per year to perform the concierge program activities and CIP administration is funded from the City's operating budget.

The CIP has been created with the assumption that additional funding for the programs will flow through future budget allocations.

Intake for the programs will run until the end of 2026, at which point staff will complete a review and report back to the next term of Council with recommendations to either cancel, amend, or continue with the Affordable Housing CIP incentive programs.

3.3 Monitoring

The Affordable Housing CIP will be monitored on an ongoing basis to track progress relative to the goal and objectives, and is structured around the following indicators:

For the **New Affordable Housing Incentive**, annual monitoring by the CIP staff will include collection and reporting on:

- Number of applications received;
- Number of units approved, completed, and occupied;
- Rents to be charged for the affordable units approved that year;
- Rents charged for the affordable units previously approved and in operation (via an annual report/attestation submitted by the owners of the affordable units); and
- Estimate and actual amount of municipal assistance/grants provided.

For the **Garden Suite Grant** program, annual monitoring will include:

- Number of Garden Suites registered;
- Number of Garden Suites that received the grant; and
- Total funding disbursed and average funding per Garden Suite.

Information on the above-listed indicators will be collected at the individual project level and aggregated. The aggregated information will be used as the basis for annual reporting to Council. To the extent possible, annual reports will also address the environmental and social effectiveness of the Affordable Housing CIP. The annual reports are intended to be used to inform decisions related to adjustments to this CIP, as well as any budget decisions related to the incentive program.

3.4 Plan Amendments

City Council may alter, change, amend or modify the terms, conditions, and details of any grant program under this CIP.

Minor and technical amendments, such as the correction of typographical errors, revisions to definitions and administrative details of specific programs, including the amount of the grants, may be made without Council approval. The City may also discontinue any of the programs contained in this Plan without an amendment being approved by Council.

Major and substantive changes may be made by amendment, in accordance with the Planning Act, which includes public consultation and Council approval. The following adjustments constitute a major or substantive change:

1. Modifications to the Community Improvement Project Area;
2. Addition of a new financial incentive program;
3. Changes to the types of eligible projects or an addition of a new eligible project; and
4. Changes to eligibility criteria.

When making any amendments to the CIP, the City must pass a by-law to adopt such amendments.

3.5 Roles and Responsibilities

Role	Responsibilities
Planning Department	<ul style="list-style-type: none"> • Provide a staff position for CIP administration. • Lead the administration, monitoring and reporting of the CIP program. • Through the Commissioner of Planning, Building and Growth Management, approve funding applications.
CIP Staff Person	<ul style="list-style-type: none"> • Process and recommend approval or rejection of CIP program applications. • Negotiate the details of the CIP legal agreement that will be registered on title. • Collect program data from internal departments and from the operators of CIP affordable housing units. • Analyze program data annually and create a report on the CIP programs for Council. • Convene an annual meeting with Integrated City Planning, Corporate Support Services Department and Legislative Services to review the annual CIP report before it goes to Council. • Annual updates and distribution of communications materials: website and emails. • Maintain the CIP standard operating procedures.
Building Division	<ul style="list-style-type: none"> • Advise potential applicants about the Garden Suite program and provide confirmation of occupancy permits when necessary.
Corporate Support Services (Finance)	<ul style="list-style-type: none"> • Review and approve CIP agreements and support with disbursement of grants.
Legislative Services	<ul style="list-style-type: none"> • Create CIP agreement templates. • Finalize CIP agreements and register them on title.
Council	<ul style="list-style-type: none"> • Review the annual CIP report. • Review and make a decision on recommendations to modify the CIP by-law, as needed.
Developer that has received CIP funding	<ul style="list-style-type: none"> • Provide annual updates via an annual report/attestation to the CIP staff on status of CIP funded units, including rent amount charged at the time of the report, and tenant income at occupancy.



Appendix A: Program Funding Evaluation

City of Brampton

City of Brampton's Protocol for the Affordable Housing CIP Capital Grant Program



Introduction

This funding evaluation framework is to be used as part of Brampton's Affordable Housing CIP Capital Grant Program.

Overview of Framework

The City of Brampton will assess the strength of projects according to the level at which it meets the following criteria and objectives:

1. Project Funding
2. Affordability Delivered
3. Organizational Capacity and Experience
4. Project Maturity
5. Funding Phasing
6. Community Amenities
7. Community Benefits Beyond Affordable Housing

Brampton Affordable Housing Funding Eligibility Matrix

1. Project Funding Review

Summarize the funding sources available to the project.

Projects that have received any of the following will be prioritized:

- Funding through the CMHC Seed or Affordable Housing Fund programs, or a Letter of Intent (LOI) through the Affordable Housing Fund,
- Peel Region Affordable Rental Incentives Program (PARIP) Funding, or
- Secure financing in place from a Schedule I Financing Facility (a Canadian financial institution regulated by the Federal Bank Act).

All the above funding organizations complete a detailed review of financial and risk mitigation plans for the project prior to awarding funding or an LOI. Projects without funding from one of these organizations will require further investigation to ensure a financial and risk mitigation plan review has been completed. In addition to the program application form, the City may request documentation from applicants to confirm project viability.

Has this project received funding from any of the following sources?

Source of Funds	Possible Score	Score Awarded
CMHC Seed Funding	2	
CMHC Affordable Housing Fund	2	
Peel Region Affordable Housing Incentives (PARIP)	2	
Schedule I bank - acquisition loan or line of credit to support their work.	2	
Other Canadian bank, Credit Union or Caisse Populaire	1	
Community or philanthropic foundation who provided a grant specifically for the housing development.	(0-2 dependent on evaluation criteria for funding)	
Has received a Letter of Intent from CMHC Affordable Housing Fund	4	
Other Funding Program	1	
Total Possible Score		13-15
Total Score		

2. Affordability

To determine the affordability threshold, the *Affordable Residential Units for the Purposes of the Development Charges Act, 1997 Bulletin* will be used. The Province of Ontario uses the lesser of the average market rents (AMR) (based on CMHC Rental data) and a rent that is affordable to incomes in the moderate-income ranges (households in the 3rd to 6th income deciles) to determine the annual affordability thresholds in the *Bulletin*.

As of June 2024, the affordable rents for use in Brampton are as follows:

	Bachelor	1-bedroom	2-bedroom	3-bedroom
Maximum Rent	\$1,348	\$1,622	\$1,866	\$2,002

The affordability threshold for affordable ownership is based on the lesser of 90% of the average sales price and being affordable to households with incomes below the top of the 6th decile range. The maximum purchase price for 2024 in Brampton is as follows.

	Affordable Ownership Maximum Price
Affordable Ownership	\$463,500

Only units within a project that meet these affordability criteria will be funded, there is no restriction on the rents or sales prices for the other units within the project.

2.1 Proportion of Affordable Units in Project

% of Affordable Units	Possible Score	Score Awarded
Less than 5 affordable units	0	
5-10 units	5	
11 or more units	10	
Total Possible Score		10
Total Score Received		

2.2 Depth of Affordability

Depth of Affordability of Affordable Units	Proportion of Affordable Units (%)	Value	Score Awarded (% * Value)
At 100% of the affordable threshold		2	
5% below the affordable threshold		4	
10% below the affordable threshold		6	
15% below the affordable threshold		8	
20% or more below the affordable threshold		10	
Total Possible Score			10
Total Score Received			

2.3 Duration of Unit Affordability

Length of time that Affordable Units will be maintained as affordable.

Note: Points in this category do not stack - points are awarded based on specific duration of affordability.

Length of Affordability	Possible Score	Score Awarded
25 years	2	
26–35 years	4	
Greater than 36 years	6	
Total Possible Score		6
Total Score Received		

3. Organizational Capacity and Experience

Question	Potential Score	Score Awarded
No previous experience or partnership with an experienced developer or provider in place	0	
Limited housing operation or development experience - under 5 years' experience or experience with a small project (less than 20 units)	5	
Significant experience - more than five years of housing operation or development experience with a moderate sized project (40 units or more).	15	
Limited housing operation or development experience. Under 5 years' experience or experience with a small project but has partnered with an experienced developer or housing operator	15	
Strong operation or development experience in addition to partnering with an experienced developer.	20	
Total Possible Score		20
Total Score Received		

4. Determining Project Maturity

Note: Points in this category do not stack - points are awarded based on most recent status/planning approval received.

Project Stage	Potential Score	Score Awarded
Pre application consultation meeting held with local municipality	0	
Official Plan/zoning approved/in effect	4	
Site Plan approved	8	
Full building permits issued	12	
Occupancy expected within 2 years of application	16	
Occupancy expected within 1 year of application	20	
Total Possible Score		20
Total Score Received		

5. Funding phasing

Funding Phasing	Potential Score	Score Awarded
All funding needed up front	0	
Funding can be provided: <ul style="list-style-type: none"> 33% upon signing a funding agreement 33% at start of construction 34% at 90% construction completion (Receipt of Quantity Surveyor report) 	5	
Total Possible Score		5
Total Score Received		

6. Community Amenities

Note: One point is awarded per amenity type - e.g. if there are two grocery stores within 800m, one point is awarded.

Criteria	Possible Score	Score Awarded
Existing or planned Regional or local municipal strategic growth area	1	
Within 800m of existing or planned frequent bus (15 minute or better service during rush hour) or higher order transit	1	
Within 800m of an existing or planned year-round fresh food market	1	
Within 800m of an existing or planned park	1	
Within 800m of an existing or planned school	1	
Within 800m of an existing or planned health centre	1	
Within 800m of an existing or planned recreation centre/library	1	
Within 800m of an existing or planned early years or childcare centre	1	
Total Possible Score		8
Total Score Received		

7. Community Benefits Beyond Affordable Housing

Criteria	Possible Score	Score Awarded
Community amenities gained through this project	1	
Energy efficiency gained through this project	1	
This project prioritizes an identified priority community in Brampton- MHSU, seniors, students, youth, newcomers, etc.	1	
This project fills a gap in service within the community	1	
This project supports alternative transportation (i.e. bike storage, car share spaces etc.)	1	
Other:	1	
Other:	1	
Total Possible Score		7
Total Score Received		

Maximum Possible Score: 99-101

Project Score Awarded: