



CALL FOR PROPOSALS

CHA RENTAL HOUSING
CAPITAL CONTRIBUTION
FUND

DRAFT
2019

COWICHAN HOUSING ASSOCIATION

Table of Contents

- 1. Invitation to Proponents 4**
- 2. About the Rental Capital Housing Fund (RCHF) 4**
- 3. Maximum Funded 5**
- 4. Ineligible Projects 5**
- 5. Eligibility..... 5**
- 6. Application Process..... 7**
- 7. Proposal Requirements..... 7**
- 8. General Conditions 9**
- 9. Terms and Conditions of the RFP Process 11**
- 10. Distribution and Reporting Requirements 13**
- APPENDIX A: CHA RCHF PROPOSAL CHECKLIST..... 14**
- APPENDIX B: CHA RCHF SUBMISSION FORM 15**
- APPENDIX C: PROJECT BUDGET TEMPLATE..... 18**

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Cowichan Housing Association Request for Proposals for CHA Rental Housing Capital Contribution Fund

1. Invitation to Proponents

Cowichan Housing Association (CHA) is seeking proposals for the CHA Rental Housing Capital Contribution Fund (RHCCF).

The deadline for receipt of proposals is **DATE.**

This invitation is to eligible non-profits (including charities and cooperatives) and “for profit” organizations who have submitted a Letter of Intent (LOI) to the RHCCF and who have been invited to submit a full proposal for their affordable housing project.

Respondents to this RFP and their employees are expected to have the necessary experience, resources and capacity to undertake such a project.

For the purposes of this RFP process, Cowichan Housing Association’s contact will be:

John Horn, Executive Director
john.horn@cowichanhousing.com
250-597-1938
Suite 207, 225 Canada Avenue, Duncan, BC

CHA’s Housing Project Development Assistance Service – a service provided by CHA – may be able to help in providing background research, funding and development process information that can be used in the development of the RFP submission.

2. About the Rental Housing Capital Contribution Fund (RHCCF)

In spring of 2018, Cowichan Housing Association put forward a proposal to the Cowichan Valley Regional District (CVRD) to provide funding for a *Regional Housing Service*. In October, 2018, a public referendum was held and a proposed bylaw was passed to establish the Cowichan Housing Association *Annual Financial Contribution Service*.

On April 11, 2018, Bylaw 4201 was adopted, enabling an annual financial contribution service to Cowichan Housing Association to assist with providing programs and services related to affordable housing and homelessness prevention in the Cowichan Valley Regional District.

The resultant *Regional Housing Service* (RHS) has two primary goals:

- 1) to increase capacity (knowledge, expertise, and ability) for local communities to develop affordable housing projects; and
- 2) to increase local funds for affordable housing in order to leverage funding from other sources.

The *Housing Trust Fund* (HTF) is one component of the RHS. The overarching purpose of the *Housing Trust Fund* is to provide funding support to local organizations for affordable housing projects, from the concept stage to construction or renovation. A key aim of the programs is to leverage resources from other funders.

The Rental Housing Capital Contribution Fund (RHCCF) comprises 85% of the *Housing Trust Fund*. The goal of the RHCCF is to address the significant shortfall in affordable rental housing stock within the Cowichan Region. This

Cowichan Housing Association – Request for Proposals – Rental Housing Capital Contribution Fund

fund is to be used for equity contributions to leverage additional capital funds related to construction, demolition, renovation and repair projects that create additional affordable housing in the Cowichan Region.

The purposes of the CHA Rental Housing Capital Contribution Fund (RHCCF) are:

- a) To support development of new affordable rental housing stock as well as shelters and second stage housing by making a contribution to the capital costs associated with development projects.
- b) To enhance community contributions and partnerships in order to leverage funding resources and in-kind services from other funders and service providers.

Criteria for Affordable Rental Housing

Affordable Housing

Proponents can use any one of the following definitions in accordance with the type of housing proposed:

- a. Rents charged will be on average 20% or lower than the median or average rent for a similar unit based on municipal or electoral boundaries
- b. Rents will be based on 30% of gross household income or Provincial Income Assistance shelter allowance
- c. Projects that are a blend of market and affordable units or that are unique in other ways and thus don't meet the above definitions of affordability will be considered for Rental Housing Capital Contribution funding, but applicants must provide a rationale explaining why the project should be considered affordable housing.

3. Maximum Funded

The amount funded may be up to 10% of the overall capital budget of the project.
The amount funded will be dependent upon funds available in the current year.

4. Ineligible Projects

Due to current demand, priority in 2019 will be given to projects that address construction of new affordable rental housing.

Activities that are in receipt of funds from the CHA Project Development Funding (PDF) will not be eligible for funding under the Rental Housing Capital Contribution Fund in the same calendar year.

5. Eligibility

The CHA RHCCF funding is available to not-for-profit organizations (including charities and housing cooperatives) as well as for profit business entities whose intent is to build affordable housing.

An application to the fund must demonstrate that:

- The organization is in good standing and/or has a strong track record in addressing community needs
- The organization must have the demonstrated functional capacity to deliver the project for which funding is sought
- The proposed project fits with the overall Cowichan Attainable Housing Strategy and RHCCF criteria
- There is community support for the type and nature of affordable housing under consideration
- There are firm commitments from other funders for most of the outstanding capital costs
- The proposed project is more than 3 units

- The development aligns with local government plans and applicable bylaws
- For profit business entities must demonstrate partnerships with not-for-profit organizations
- The proponents have an ownership interest or a beneficial ownership in the proposed site, either in the form of freehold title or a long-term lease at nominal value.

Proponents

Proponents can be non-profit organizations (including charities and cooperatives) or for profit business entities.

Proponents are invited to submit their proposals along with qualified development consultants, project managers and / or constructions managers who make up their project team. Note that in the evaluation of a proposal, the entire project team will be evaluated. Proponents are not required to have identified their entire team upon submission of their proposal but should provide details on their plan to engage those services. If the proponent plans to undertake all the work itself, please note this in the submission and provide evidence of ability to successfully carry out all activities based on experience.

The proponent's philosophy should reflect their approach towards housing their identified target population(s) and any initiatives or operations undertaken should support this approach. Partnerships are encouraged to promote the use of community based resources. Proponents should possess experience in developing and maintaining long term successful relationships within their sites' local neighbourhoods as well as local governments.

Resident Selection

The housing provider will be responsible for final resident selection. Residents for Rent Geared to Income (RGI) units will be selected from the BCHousing Housing Registry, and providers may select residents for Affordable Market Rent units from the Registry or their own waitlist. Private firms will be required to partner with not-for-profit organizations for resident selection.

The housing provider will obtain a Declaration of Income and supporting documentation as evidence of the income of each resident at the time of the initial occupancy, and annually thereafter for RGI/Deep Subsidy Residents. The declaration will be in a form approved by BCHousing. The housing provider will maintain a copy of each resident's proof of income in a file available to BC Housing on request.

Staffing Requirements

For all staff working with the residents, whether part-time or full-time, paid or voluntary, the proponent will develop written policies on eligibility, selection, remuneration, training, safety and security. The safety and security policies and procedures must be in accordance with current Occupational Health and Safety Regulations contained within the Workers Compensation Act of BC. The proponent shall ensure that all staff possesses the appropriate skills, training and qualifications for the tasks that they perform.

Proponents must also ensure that the staff undergoes a criminal record check in accordance with the *Criminal Records Review Act* and keep evidence on file that the criminal record check was completed. The proponent is required to have a written policy on the frequency of subsequent criminal record checks.

6. Application Process

1. The proponent provides a Letter of Interest (LOI) to the Cowichan Housing Association.
2. The CHA Executive Director presents the LOI to the Housing Trust Fund Allocations Committee for review and recommendation to proceed, or not, to full proposal.
3. Proponent invited to submit a full proposal submit a completed RHCCF proposal package to the CHA Executive Director for review.
4. The CHA Executive Director presents the proposal package to the Housing Trust Fund Allocations Committee for evaluation and scoring. A recommendation is made by the Committee to the Board of Directors of the Cowichan Housing Association to (a) grant funds to the proponent, (b) request further information from the proponent or (c) reject the application. If further information is requested, the CHA Executive Director will work with the proponent to assess and refine relevant aspects of the proposal.
5. If approved by the Housing Trust Fund Allocations Committee, the Board of Directors of the Cowichan Housing Association reviews the Allocation Committee’s recommendation(s) and for successful applicants provides provisional approval for a capital allocation subject to CVRD Board of Directors’ approval.
6. The CHA Board makes a recommendation to the CVRD Board of Directors to fund the RHCCF grant. The CVRD Board of Directors votes on the recommendation.
7. For projects that are approved by the CVRD Board, the Board of CHA will receive the applicable Housing Trust Funds from the CVRD and will disperse those to the applicant.

7. Proposal Requirements

a. Proposal Contents

1. RHCCF Proposal Content: Proposals must provide information based on categories and points listed in Section 8. A proposal checklist is provided for reference in Appendix A.
2. Submission Form: Include an Appendix B Submission Form completed and signed by an authorized representative of the Proponent.
3. RHCCF Proposal Budget: Complete Appendix E: Capital Budget template with realistic estimated costs that include escalation and contingencies. Please identify this in separate line items. Include any identified assumptions, notes, explanations or rationale to explain how and why the submitted budget numbers were determined. The budget should be directly related to the building concept.

All proposals should be properly signed and dated where indicated. Where a Proponent is a corporation, responses should be signed with the legal name of the corporation followed by the legal signature and capacity of an Authorized Representative to bind the corporation into a Contract.

Where a Proponent is a partnership, the response form should be signed by the general partner or the partner with the authority to bind the partners. Where the Proponent is a sole proprietor, the response should be signed by the Proprietor.

b. Format

Proposals must be submitted by email to john.horn@cowichanhousing.com in Word or PDF format. Hard copy versions may be mailed to **Cowichan Housing Association at Suite 207, 225 Canada Avenue, Duncan, BC**

c. Proposals Must be Submitted on Time

Proposals must be submitted on or before the Proposal Deadline. Proposals submitted after the Proposal Deadline will not be accepted or evaluated.

The onus and responsibility rests solely with the proponent to submit its proposal on time as indicated in the RFP. Proponents are advised to make submissions well before the deadline. Proponents making submissions near the deadline do so at their own risk.

d. Amendment of Proposals

Proponents may amend their submissions prior to the Submission Deadline by the same method as prescribed for the submission of proposals.

e. Withdrawal of Proposals

Proponents may withdraw their proposals prior to the Submission Deadline by the same method as prescribed for submission of proposals.

f. Application Assessment

The Housing Trust Fund Allocations Committee will evaluate all eligible proposals to assess them according to the criteria and weighting, including urgency of the need, number and size of units created or preserved, contributions from other sources and potential impact of the project to address regional and local housing needs. See Section 8 for Assessment and Weighting Criteria.

8. General Conditions

a. Rated Criteria

The following is an overview of the categories and weighting for the application assessment criteria of the RFP.

Rated Criteria Category	Weighting (%)
Design, Capital Costs & Project Planning	40
Contributions, Equity, Levels of Support	15
Operations Planning, Capability & Capacity	40
Sustainability	5
Total Points	100

CHA recognizes that the project information provided may not be in a finalized state. Proponents are however required to provide their best estimate at time of application.

b. Qualitative Evaluation Criteria Format and Content

To allow for proper evaluation of proposals, proponents are required to address the following sections, as a minimum, in their proposals.

c. Design Capital Costs & Project Planning (40%)

- i. **Concept:** Provide a clear outline of the concept (project):
 - Describe the type of development, number of units and mix of suite types including targeted residents by suite, number of storeys, office/meeting rooms, parking and green spaces. Provide a rationale to explain as to why this type of building best suits the target population.
 - Provide any proposed site layout, building schematics, drawings or floor plans.
 - Identify any amenities and services to be offered (if any, and if separately funded) and why these have been included. For example; day-care, resident programs, retail, etc.
 - Identify and clearly explain any partnering arrangements or relationships. Provide a rationale as to how and why these partners were chosen and how the proponent intends to manage these partnerships going forward.
- ii. **Capital Budget:** Fully complete Appendix C: Capital Budget template with realistic estimated costs that include escalation and contingencies. The budget should be directly related to the building concept.
- iii. **Project Schedule:** Include a realistic project schedule showing a chronological progression of work with time estimates for major activities and an overall time-length for completion.
- iv. **Project Risks:** Identify and prioritize a comprehensive list of risks identified for all major components of the project including ongoing operations. For each high priority risk provide a contingency plan

- v. **Project Communications:** Include details on the proposed communications plan for the project: identify type, method and frequency for each identified stakeholder. Explain how any project changes to schedule or risks would be effectively communicated.
- vi. **Project Structure:** Include details on the real estate structure of the development; type of ownership, current and proposed land ownership interest structure, current and proposed subdivision, current and proposed financing partnerships or operating structures.

d. Contributions, Equity, and Levels of Support (15%)

Provide details on any owner contribution (equity) to the project.

All proponents must evidence a mortgageable interest in land to facilitate the project. Capital contribution in the form of land will be valued at the current *BC Assessment Authority* assessed value. Contributions could also include equity from local partners, waiver of development cost charges or other innovative contributions.

Submit any copies of intent (confirmed or conditional) or commitments for financial support or other contributions from community supporters, including letters of support from service clubs, foundations, municipalities or other organizations.

e. Operations Planning, Capability & Capacity (40%)

- i. **Operations:** Provide details on how operations at the project will be managed once construction is complete including:
 - Property management
 - Maintenance
 - Capital Management Plans
 - Operational Management Plan
 - Resident selection and management
 - Integration of this project into existing operations - identify and detail the impact upon the proponent's existing operations by taking on this additional housing project
 - Integration of this project with the neighbours and community
 - Involvement of any third parties - please identify and explain
 - If applicable, any Strata Council management or Air Space Parcel Remainder management
 - Provide most recent financial statements
- ii. **Operations Budget:** Must include the following
 - Monthly expected rents
 - Anticipated maintenance costs - breakdown between ongoing and periodic
 - Staffing costs
 - Anticipated Capital Replacement Reserves
 - Anticipated Operating reserves
 - Anticipated Strata or reciprocal easement and cost sharing charges (if applicable)
 - Any other identified costs
 - Identify any anticipated surplus or deficit. If project will be in a deficit position, provide a financial plan by which the society will meet this shortfall, including any request for subsidy to offset operating deficits (limited subsidy is available)
 - Include any identified assumptions, notes, explanations or rationale to explain how and why the

submitted budget numbers were determined.

- Proponents should demonstrate that the rents that they are intending to charge will be affordable and achievable within the community for the identified target population.

a. Proponent Capacity:

- Identify Board/Committee members, organization's officers, directors, and senior staff and external contractors, including their roles and their relevant experience, skills and/or education.
- Demonstrate ability to manage relations with stakeholders, such as service providers, funders, Health Authorities, local and senior governments, neighbours and community members.
- Describe the organization's capacity and ability to undertake this project both on a development and construction capacity and on an on-going operational capacity and describe any other projects that the organization has scheduled during the anticipated time frame.

b. Stakeholder Philosophy: Explain:

- The society's philosophy towards serving the target population
- Provide a rationale to explain why this design concept best suits the intended population
- Explain how the project will fit into the surrounding existing neighbourhood and how the proponent will communicate with and build neighborhood relations

f. Sustainability (5%)

i. Design & Construction

Provide details on any innovative construction methods or design elements.

ii. Socio-Economic

Provide details on any socio-economic benefits and initiatives, including employment or job-training opportunities directed towards Indigenous/First Nations, persons recovering from forms of abuse/addiction or low-income earners.

9. Terms and Conditions of the RFP Process

a. Proponents to Follow Instructions

Proponents should ensure that all information requested in this RFP is provided. CHA may direct questions or seek additional information from the proponent in writing, by email before proposals are submitted to the Housing Trust Fund Allocations Committee, to support CHA's review. However, please note that applications that are substantially incomplete will not be considered.

b. CHA Information in RFP Only an Estimate

CHA makes no representation, warranty or guarantee as to the accuracy of the information contained in the RFP or issued by way of addenda. It is the Proponent's responsibility to avail itself of all the necessary information to prepare a proposal in response to the RFP.

c. Proponents Shall Bear Their Own Costs

The Proponent shall bear all costs associated with or incurred in the preparation and presentation of its proposal, including, if applicable, costs incurred for interviews or demonstrations.

d. All New Information to Proponents by Way of Addenda

The RFP may be amended only by an addendum in accordance with this section. If CHA, for any reason, determines that it is necessary to provide additional information relating to the RFP, such information will be communicated to all Proponents by addenda.

e. Extension of Submission Date

CHA at its discretion, may extend the deadline for receipt of proposals for a reasonable amount of time.

f. Verify, Clarify and Supplement

When evaluating responses, CHA may request further information from the Proponent or third parties to verify or clarify or supplement the information provided in the proponent's proposal. CHA may revisit and re-evaluate the proponent's response or ranking based on any such information.

g. Debriefing

Proponents may request a debriefing after receipt of a notification of award. All requests must be in writing to the CHA contact and must be made within sixty (60) days of notification of award. The intent of the debriefing information session is to aid the Proponent in presenting a better proposal in subsequent RFP opportunities. Any debriefing provided is not for the purpose of providing an opportunity to challenge the RFP process.

h. RFP Protest Procedure

If a proponent wishes to challenge the outcome of the RFP process, it should provide written notice with rationale to the CHA Contact within ten (10) business days of notification of award.

i. Communications

Communications (including media and social media) with respect to funding recommendations will be undertaken by CHA. Proponents will work with CHA in communications about CHA project funding and these must be consistent with CHA communications.

j. Confidential Information of Proponent

The confidentiality of information will be maintained by CHA, except as otherwise required by law or by order of a court or tribunal. Proponents are advised that their proposals will, as necessary, be disclosed to the Community Advisory Committee and CHA Board, and retained for evaluating or participating in the evaluation of their proposals. If a Proponent has any questions about the collection and use of personal information pursuant to the RFP, questions are to be submitted to the CHA Contact.

k. RFP Process Non binding

The RFP process is intended to identify prospective affordable housing projects that can result in the

development of affordable housing in the Cowichan Region. No obligation shall be created between the proponent and CHA or CVRD by the RFP process.

10. Distribution and Reporting Requirements

a. Distribution

For projects that are approved, terms will be determined and described in an agreement that is signed by CHA and the organization. Funding will be disbursed by the CHA based on agreed upon intervals and terms.

A grant can only be paid after the organization has confirmed that all required matching project financing and contribution is in place.

b. Reporting Requirements

Projects will be required to submit quarterly Project Progress Reports, a Final Report following completion of the project, and Annual Reports thereafter to convey compliance with relevant agreements.

CHA may cancel or amend this process without liability at any time.

APPENDIX A: CHA RHCCF PROPOSAL CHECKLIST

Proposals for RHCCF funding will address the following:

1. Information on Non-profit Society or For Profit Organization Sponsor

- Name, address and contact number of the organization
- Date of incorporation
- Federal charitable tax number (if applicable)
- Attach Organization Information (if applicable, including Board/committee members, organization's officers, directors, and senior staff; including their roles and their relevant experience, skills and/or education. If involving any external individuals to be also included.)
- Organization contact name and position
- Attach Resume of Organization Project Manager
- Attach Articles of Incorporation
- Attach most recent Annual Report and Financials

2. Proposal Summary and Vision

- Project Vision and Overview
- Overview of project type and location
- Number of non market, market and subsidized units
- Alignment with Cowichan Attainable Housing Strategy
- Demonstration of need for and impact of the project
- Target tenant group and tenant income levels
- Alignment with OCP / Local Area /Neighbourhood Plan
- Demonstration of need and community support

3. Project Partners and Development Team

- Proposed funding sources and financing (if BC Housing is a proposed funding source, please attach the original submission)
- Proposed partnerships with other non-profit or private organizations
- Proposed development consultant, architect, developer etc.
- Proposed procurement technique (design tender, design build, construction management or acquisition)
- Proposed project site, status and timing of acquisition, rezoning and relevant development approvals

4. Overview of Tenant Support Services (if applicable)

- Brief description of proposed tenant support services
- Proposed funding support to cover cost of support services
- Society's expertise to provide tenants support services

5. Capital and Operating Budgets

- Overview of the capital and operating budgets
- Provide Capital Budget using the template provided
- Demonstrate sustainability of the project beyond construction (i.e., operations)
- Proposed leveraging available from senior levels of government, private industry and/or local health authority
- Project timeframe and schedule
- Proposed schedule for disbursement of RHCCF funding

APPENDIX B: CHA RHCCF SUBMISSION FORM

1. Proponent Information

PROPONENT INFORMATION	
Full Legal Name of Proponent	
Any other relevant name under which the proponent carries on Business	
Street Address	
City, Province	
Postal Code	
Phone Number	
Contact Person and Title	
Contact Phone	
Contact E-mail	

2. Acknowledgment of Non-Binding Process

The Proponent acknowledges that the RFP process will be governed by the terms and conditions of the RFP, and that, among other things, such terms and conditions confirm that this RFP process does not constitute a formal legally binding bidding process, and that there will be no legal relationship or obligations created until Cowichan Housing Association and the selected Proponent have executed a written contract.

3. Ability to Provide Deliverables

The Proponent has carefully examined the RFP documents and has a clear and comprehensive knowledge of the proposal requirements. The Proponent represents and warrants its ability to provide the Deliverables required under the RFP in accordance with the requirements of the RFP. The Proponent encloses herewith as part of the proposal the required forms and documents set out below:

ITEM	INITIAL TO ACKNOWLEDGE
RHCCF Proposal	
RHCCF Submission Form (Appendix B)	
RHCCF Budget (Appendix C)	

4. Collection and Use of Personal Information

Proponents are solely responsible for familiarizing themselves, and ensuring that they comply, with the laws applicable to the collection and dissemination of information, including bios, profiles and/or other personal information concerning employees and/or employees of any subcontractors.

Where CHA has issued an RFP that requires a Proponent to provide personal information of employees and/or subcontractors included as resources in response to the RFP, Proponents shall ensure that they have obtained written consent from each of those employees and/or subcontractors prior to submitting its proposal.

Such written consents are to specify that the personal information forwarded to CHA is required for the purposes of responding to this RFP and use by CHA only for the purposes as set out in the RFP.

CHA reserves the right to request original or copies of the consents when required. Proponents shall

comply and respond to all such requests as immediately possible.

- Personal Information ***has been submitted*** in relation to the RFP requirements and all required employee consents have been obtained and are retained by the Proponent.
- Personal Information ***has not been submitted*** in relation to the RFP requirements. Employee consents are not required.

5. Conflict of Interest

For the purpose of this process, a conflict of interest is:

- a. In relation to the request for funding, the proponent has an unfair advantage or engages in conduct directly or indirectly, that may give it an unfair advantage, including but not limited to (i) having, having access to, confidential information of CHA in the preparation of its submission that is not available to other proponents, (ii) communicating with any person with a view to influencing preferred treatment in the application process, or (iii) engaging in conduct that compromises, or could be seen to compromise, the integrity of the LOI process; or
- b. In relation to the performance of its contractual obligations contemplated in the contract that is the subject of this procurement, the Proponent’s other commitments, relationships or financial interest (i) could, or could be seen to, exercise an improper influence over the objective, unbiased and impartial exercise of its independent judgement or (ii) could, or could be seen to, compromise, impair or be incompatible with the effective performance of its contractual obligations.

If this section is left blank, the Proponent will be deemed to declare that (a) there was no Conflict of Interest in preparing this proposal; and (b) there is no foreseeable Conflict of Interest in performing the contractual obligation contemplated.

Otherwise, if the statement below applies, please check the box:

- The proponent declares that there is an actual or potential Conflict of interest relating to the preparation of its proposal, and/or the Proponent foresees an actual or potential Conflict of Interest in performing the contractual obligations contemplated in the application.

If the Proponent declares an actual or potential Conflict of Interest, the proponent must set out details of the actual or potential conflict of interest in the box below:

6. Disclosure of Information

The Proponent hereby agrees that any information provided in this proposal, even if it is identified as being supplied in confidence, may be disclosed where required by law or if required by order of a court or tribunal. The proponent hereby consents to the disclosure of this proposal by CHA to its staff and committees for the purposes of evaluating or participating in the evaluation of this proposal.

Name and Title of Proponent

Signature of Proponent Representative

Name of Witness

Signature of Witness

APPENDIX C: PROJECT BUDGET TEMPLATE

(SEE SEPARATE ATTACHMENT)

APPENDIX D: RHCCF PROJECT REPORT TEMPLATE

SECTION A: GENERAL INFORMATION	
1. Name of Organization	
2. Name of Lead Organization (if applicable)	
3. Project Title	
4. Project Manager / Grant Contact	
a. Name	
b. Title	
c. Email	
d. Telephone	
5. Executive Director or Senior Staff Person	
a. Name	
b. Title	
6. Report covers period from	
SECTION B: RHCCF PROJECT PROGRESS	
1. ACTIVITIES, PROGRESS AND TIMELINES	
a. Key activities undertaken this period	
b. Key activities going forward (if relevant)	
c. Describe changes to implementation plan and rationale for changes	
2. CHALLENGES AND SUCCESSES	
a. Describe any challenges that the project has experienced during the reporting period. How have these challenges been dealt with? Will these challenges affect your ability to meet the objectives outlined in your RHCCF application ?	
b. Describe key successes you have had during this reporting period.	
c. In light of your successes and challenges, what are some key learnings that you can share?	
SECTION C: BUDGET	
a. Please provide a financial summary (RHCCF Budget Template)	
b. Have there been any significant changes this reporting period?	
c. Are significant changes anticipated going forward?	