

Item No. 11.2.1
Halifax Regional Council
January 14, 2014

TO: Mayor Savage and Members of Halifax Regional Council
Original Signed

SUBMITTED BY: For Councillor Bill Karsten, Chair, Audit and Finance Standing Committee

DATE: January 6, 2014

SUBJECT: Business Improvement District Contributions Fund — Proposed Policy Amendments

ORIGIN

- Staff report dated October 24, 2013 “Proposed Default Prevention and Management Practice” presented at the November 4, 2013 HRM Grants Committee meeting.
- Supplementary report dated November 25, 2013 presented at the December 2, 2013 HRM Grants Committee meeting.
- Audit and Finance Standing Committee meeting, December 20, 2013, Item No. 9.4.2.

LEGISLATIVE AUTHORITY

- Audit and Finance Standing Committee Terms of Reference, section 3.6, Liaison with the Grants Committee and Special Events Advisory Committee through the nomination of the Council and Citizen representatives and appointment of the Chair of the Committees from a member of the Audit and Finance Standing Committee,
- HRM Charter (2008) s.70 (1) respecting discretionary funding to business improvement districts.

RECOMMENDATION

The Audit and Finance Standing Committee recommends Halifax Regional Council’s adoption of amendments to Section 16 of the BID Contributions Fund Policy respecting application and report deadlines as detailed in the Discussion section of the November 25, 2013 staff report with implementation to commence in the 2014-15 fiscal year.

BACKGROUND

At the November 4, 2013 Grants Committee meeting, a staff report dated October 24, 2013 “Proposed Default Prevention and Management Practice” was before the Committee. The Grants Committee made recommendation to the Audit & Finance Standing Committee requesting the approval of updates to the default prevention and management practice for programs administered under the Grants Committee Terms of Reference. The Audit & Finance Standing Committee approved the recommendation at their November 20, 2013 meeting (attachment 2).

In addition to the recommendation that was forwarded to the Audit & Finance Standing Committee, the Grants Committee at their November 4, 2013 meeting requested a staff report regarding the addition of an application deadline to accommodate the timing of the annual BID levy approval and a reporting deadline. A Supplementary Report dated November 25, 2013 in response to this request was received at the December 2, 2013 Grants Committee meeting (see attachment 1 of report dated December 10, 2013) and was forwarded to the Audit and Finance Standing Committee for the December 20, 2013 meeting.

Please also refer to the background section of the December 10, 2013 Audit and Finance Standing Committee report (attachment 1).

DISCUSSION

The Audit and Finance Standing Committee have reviewed this matter and recommend that Halifax Regional Council approve the recommendation as contained in the recommendation section of this report.

FINANCIAL IMPLICATIONS

As outlined in the December 10, 2013 Audit and Finance Standing Committee report.

COMMUNITY ENGAGEMENT

All meetings of the Audit and Finance Standing Committee are open to the public. Reports, Agenda and Minutes are available on the HRM website.

ENVIRONMENTAL IMPLICATIONS

No environmental implications were identified.

ALTERNATIVES

Alternatives are outlined in the December 10, 2013 Audit and Finance Standing Committee Report.

ATTACHMENTS

- 1. Audit and Finance Standing Committee Report dated December 10, 2013.**
- 2. Audit and Finance Standing Committee Report dated November 13, 2013.**

A copy of this report can be obtained online at <http://www.halifax.ca/council/agendasc/cagenda.html> then choose the appropriate meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Liam MacSween, Legislative Assistant, 490-6521

Attachment 1

**Audit & Finance Standing Committee
December 20, 2013**

TO: Chair and Members, Audit & Finance Standing Committee

SUBMITTED BY: Original Signed _____
Councillor Walker, Chair, and Members of HRM Grants Committee

DATE: December 10, 2013

SUBJECT: **Business Improvement District Contributions Fund – Proposed Policy Amendments**

ORIGIN

Staff report dated October 24, 2013 “Proposed Default Prevention and Management Practice” presented at the November 4, 2013 HRM Grants Committee meeting.

Supplementary report dated November 25, 2013 presented at the December 2, 2013 HRM Grants Committee meeting.

LEGISLATIVE AUTHORITY

The HRM Grants Committee Terms of Reference set out that the duties of the Committee (s.4) are to:

- 4.1 Advise Regional Council on all matters related to the allocation of grants, as defined by Regional Council;
- 4.2 Develop eligibility criteria, priorities, policy and procedures for assistance under the respective programs and services managed under the auspices of the HRM Grants Program portfolio;
- 4.3 Evaluate programs and services managed under the auspices of the HRM Grants Program portfolio in cooperation with HRM staff, stakeholders, and the general public with a view to making recommendations to Regional Council respecting scope of programming, service standards, and funding capacity.

HRM Charter (2008) s.70 (1) respecting discretionary funding to business improvement districts.

RECOMMENDATION

The Grants Committee recommends that the Audit & Finance Standing Committee recommend Regional Council’s adoption of amendments to Section 16 of the BID Contributions Fund Policy respecting application and report deadlines as detailed in the Discussion section of the November 25, 2013 staff report with implementation to commence in the 2014-15 fiscal year.

BACKGROUND

Refer to the Background section of the November 25, 2013 staff report.

At the November 4, 2013 Grants Committee meeting, a staff report dated October 24, 2013 “Proposed Default Prevention and Management Practice” was before the Committee. The Grants Committee made recommendation to the Audit & Finance Standing Committee for the approval of updates to the default prevention and management practice for programs administered under the Grants Committee Terms of Reference. The Audit & Finance Standing Committee approved the recommendation at their November 20, 2013 meeting.

In addition to the recommendation that was forwarded to the Audit & Finance Standing Committee, the Grants Committee at their November 4, 2013 meeting requested a staff report regarding the addition of an application deadline to accommodate the timing of the annual BID levy approval and a reporting deadline. A Supplementary Report dated November 25, 2013 in response to this request was received at the December 2, 2013 Grants Committee meeting, and forms Attachment 1 of this report.

DISCUSSION

The Grants Committee reviewed and discussed the November 25, 2013 “BID Contributions Fund – Proposed Policy Amendments” supplementary report at the December 2, 2013 Grants Committee meeting.

Staff indicated that they had clarified with the Business Improvement Districts that the BID Contribution Fund program is a merit based program, and that if unused funds were offered to other BIDs, there would be no funds remaining in the event that an appeal was approved.

The Grants Committee briefly discussed the supplementary report and approved the staff recommendation.

Any recommendation from the Audit & Finance Standing Committee on this item will be forwarded to Regional Council in January, along with the recommendations from the November 20, 2013 Audit & Finance Standing Committee meeting with regard to Item 9.4.1 “Proposed Default Prevention and Management Practice”.

Refer to the Discussion section of the November 25, 2013 supplementary report for further information.

FINANCIAL IMPLICATIONS

As outlined in the November 25, 2013 supplementary report.

COMMUNITY ENGAGEMENT

Membership composition of the HRM Grants Committee consists of five (5) members of Regional Council as well as five (5) members of the general public. Grant Committee meetings are open to the public. Agendas, reports and minutes are available on the HRM website.

ENVIRONMENTAL IMPLICATIONS

None.

ALTERNATIVES

The Audit & Finance Standing Committee could amend or overturn the proposed recommendation.

ATTACHMENTS

1. November 25, 2013 supplementary report “BID Contributions Fund – Proposed Policy Amendments”

A copy of this report can be obtained online at <http://www.halifax.ca/council/agendasc/cagenda.html> then choose the appropriate meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Jennifer Weagle, Legislative Assistant, 490 6517



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Attachment 1

HRM Grants Committee
December 2, 2013

TO: Chair and Members of the HRM Grants Committee

SUBMITTED BY: Original signed

Greg Keefe, Director of Finance & ICT/CFO

DATE: November 25, 2013

SUBJECT: BID Contributions Fund - Proposed Policy Amendments

SUPPLEMENTARY REPORT

ORIGIN

November 4, 2013 – Grants Committee motion requesting a staff report regarding the addition of an application deadline to accommodate the timing of the annual BID levy approval and a reporting deadline.

LEGISLATIVE AUTHORITY

HRM Charter (2008) Section - 70 (1) respecting discretionary funding to business improvement districts.

RECOMMENDATION

It is recommended that the Grants Committee recommend the Audit & Finance Standing Committee recommend Regional Council's adoption of amendments to Section 16 of the BID Contributions Fund Policy respecting application and reporting deadlines as detailed in the Discussion section of this report with implementation to commence in the 2014-15 fiscal year.

BACKGROUND

In 2011, Regional Council approved policy for the distribution of municipal discretionary grants to Business Improvements Districts (BIDs). These grants support beautification, marketing, and related initiatives undertaken by a BID formally recognized pursuant to By-law B-700 Respecting the Regulation of Business Improvement Districts. These grants are to be matched with non-municipal funds by the recipient BID. Subject to Council's approval, the value of grant is calculated using each BID's proportional share of all levies, excluding federal and provincial tax grants. Because the timing of Council's approval of area rates fluctuates, current policy does not include a fixed application deadline. For the past two (2) years a deadline has been set in consultation with the BIDs. For clarity and consistency, an application and reporting deadline are recommended.

DISCUSSION

Application Deadline: To accommodate the uncertainty in the timing and/or approval of a proposed BID levy it is recommended that a fixed date not be included in policy. Instead, the proposed application deadline would be 30 business days (excluding weekends and statutory public holidays) after the date of the BID area rate's approval.

- If approved, the BID Contributions Fund Policy, Section 16 would be amended by the addition of: "*The application deadline to the BID Contributions Fund will be 30 business days (excluding weekends and statutory public holidays) after the date of the BID area rate's approval by Regional Council*".

Reporting Deadline: The proposed deadline for submitting a final report is April 30th of the following fiscal year. HRM's fiscal year is April 1 to March 31st. For clarity, the policy needs to be amended.

- If approved, the BID Contributions Fund Policy Section 16 would be amended to replace "A project final report shall be submitted on or before April 30th, of the fiscal year in which the contribution was made..." to read: "*A project final report will be due on or before April 30th of the following fiscal year*".

Example: The final report for a grant issued in June, 2013, would be due to HRM on or before April 30, 2014.

FINANCIAL IMPLICATIONS

The proposed amendments to policy have no financial implications.

COMMUNITY ENGAGEMENT

The BID Contributions Fund is only available to the eight (8) BID associations currently recognized by Regional Council pursuant to By-law B-700.

ENVIRONMENTAL IMPLICATIONS

Not applicable.

ALTERNATIVES

Grants Committee could amend or overturn the recommended changes to the BID Contributions Fund Policy.

ATTACHMENTS

None.

A copy of this report can be obtained online at <http://www.halifax.ca/commcoun/cc.html> then choose the appropriate Community Council and meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Peta-Jane Temple, Team Lead, Grants & Contributions, Finance & ICT, 490-5469. Peter Greechan, Community Developer, Grants & Contributions, Finance & ICT, 490-7310

Original signed

Report Approved by: Bruce Fisher, Manager, Financial Policy & Planning, 490-4493

Attachment 2
Audit & Finance Standing Committee
November 20, 2013

TO: Chair and Members, Audit & Finance Standing Committee

Original Signed

SUBMITTED BY:

Councillor Walker, Chair, and Members of HRM Grants Committee

DATE: November 13, 2013

SUBJECT: Proposed Default Prevention and Management Practice

ORIGIN

Staff report dated October 24, 2013 presented at the November 4, 2013 HRM Grants Committee meeting.

LEGISLATIVE AUTHORITY

The HRM Grants Committee Terms of Reference set out that the duties of the Committee (s.4) are to:

- 4.1 Advise Regional Council on all matters related to the allocation of grants, as defined by Regional Council;
- 4.2 Develop eligibility criteria, priorities, policy and procedures for assistance under the respective programs and services managed under the auspices of the HRM Grants Program portfolio;
- 4.3 Evaluate programs and services managed under the auspices of the HRM Grants Program portfolio in cooperation with HRM staff, stakeholders, and the general public with a view to making recommendations to Regional Council respecting scope of programming, service standards, and funding capacity.

HRM Charter (2008) s.89 and s.73 regarding tax exemption; s.70(1) funding to business improvement districts; s.79(1)(av) to (vii) grants.

RECOMMENDATION

The HRM Grants Committee recommends to the Audit & Finance Standing Committee that the default prevention and management practice for programs administered under the Grants Committee Terms of Reference be updated to include the following:

1. All applicants to programs administered under the auspices of the HRM Grants Committee shall be screened for debt to the Municipality;
2. Any extension granted to an award recipient shall be limited to one (1) year;

Recommendations continued on page 2

RECOMMENDATION contd.

3. All recipients of a cash grant, tax exemption, community property sale or lease shall be notified in writing of their obligations and the applicable sanctions for non-compliance.

BACKGROUND

Refer to the Background section of the October 24, 2013 staff report.

DISCUSSION

The Grants Committee reviewed and discussed the October 24, 2013 "Proposed Default Prevention and Management Practice" report at the November 4, 2013 Grants Committee meeting. Correspondence from David Fleming, Executive Director, North End Business Association, on behalf of the Executive Directors of the Sackville Business Association, Spryfield and District Business Association, Main Street Dartmouth Area Business Improvement District, Downtown Halifax Business Commission, Quinpool Road Mainstreet District Association, Downtown Dartmouth Business Commission, and the Spring Garden Area Business Association, dated October 28, 2013

Staff explained that the Grants program as a whole will be reviewed in 2014, and so until that time the proposed amendments are focused solely on default prevention and management.

Staff further clarified at the request of the Committee that the correspondence received from Mr. Flemming on behalf of the BIDs does not affect the staff recommendation. Staff further indicated that they would respond to the correspondence for clarification.

Refer to the Discussion section of the October 24, 2013 staff report for further information.

FINANCIAL IMPLICATIONS

As outlined in the October 24, 2013 staff report.

COMMUNITY ENGAGEMENT

Membership composition of the HRM Grants Committee consists of five (5) members of Regional Council as well as five (5) members of the general public. Grant Committee meetings are open to the public. Agendas, reports and minutes are available on the HRM website.

ENVIRONMENTAL IMPLICATIONS

None.

ALTERNATIVES

The Audit & Finance Standing Committee could amend or overturn a proposed recommendation.

ATTACHMENTS

1. Staff report dated October 24, 2013 - "Proposed Default Prevention and Management Practice"
2. Correspondence from David Fleming, Executive Director, North End Business Association, on behalf of the Executive Directors of the Sackville Business Association, Spryfield and District Business Association, Main Street Dartmouth Area Business Improvement District, Downtown Halifax Business Commission, Quinpool Road Mainstreet District Association, Downtown Dartmouth Business Commission, and the Spring Garden Area Business Association, dated October 28, 2013

A copy of this report can be obtained online at <http://www.halifax.ca/council/agendasc/cagenda.html> then choose the appropriate meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Jennifer Weagle, Legislative Assistant, 490 6732



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Attachment 1

HRM Grants Committee
November 4, 2013

TO: Chair and Members of HRM Grants Committee

Original signed

SUBMITTED BY:

Greg Keefe, Director, Finance and ICT/CFO

DATE: October 24, 2013

SUBJECT: **Proposed Default Prevention and Management Practice**

ORIGIN

July 9, 2012 – Grants Committee recommendations regarding delinquent reporting.

August 12, 2013 – Grants Committee recommendation regarding screening applicants for debt to the Municipality.

LEGISLATIVE AUTHORITY

HRM Charter (2008) s.89 and s.73 regarding tax exemption; s.70(1) funding to business improvement districts; s.79(1)(av) to (vii) grants.

RECOMMENDATION

It is recommended that the HRM Grants Committee forward the following recommendations with respect to default prevention and management for programs administered under the committee's terms of reference to the Audit & Finance Standing Committee:

1. All applicants to program's administered under the auspices of the HRM Grants Committee shall be screened for debt to the Municipality;
2. Any extension granted to an award recipient shall be limited to one (1) year;
3. All recipients of a cash grant, tax exemption, community property sale or lease shall be notified in writing of their obligations and the applicable sanctions for non-compliance.

BACKGROUND

Notwithstanding the best intentions of recipients of municipal cash grants, tax exemption, property sales and leases, a small number of defaults will invariably occur. By embedding precautions in policy and/or procedures, recipients will be alerted to their responsibilities, aware of the repercussions, and encouraged to seek support in remediating their default. Controls to prevent and manage default should be cost-effective to enforce and proportionate to a program and HRM's risks.

Within the context of the programs administered under the Grants Committee's terms of reference, default can occur with respect to mandatory reporting, full or partial repayment of funding, or non-compliance with the terms and conditions of a grant, property sale or lease. The Grants Committee has debated the application of:

- A restriction on the duration of any extension provided to a grant recipient;
- Screening of grant, tax, and property sales and leasing applicants for debt to the Municipality;
- Use of a holdback on cash grants as a means of reducing the risk of delinquent reporting;
- Maximum funding thresholds expressed as both a dollar amount and as a percentage (%) of total costs.

This report addresses only debt screening, the "carry-forward" of a grant, and compliance monitoring for conditional awards. The application of any holdback on funding and funding thresholds will be addressed under a review of the portfolio's grant programs expected in 2014.

DISCUSSION

Default Prevention: The application of a pro-active approach includes early detection with timely remediation to decrease the severity or frequency of non-compliance. A constructive and consistent approach offers mutual benefit in reducing administrative inefficiencies and assisting organizations develop their ability to self-manage.

Default Management: Allowing a recipient (or prospective applicant) to remedy the default before more intrusive measures are taken aids relationships and efficiencies. The process includes monitoring the situation, evaluating the risk of revoking eligibility or the provision of further financial or in-kind assistance, and requires that the party in default works to remediate the situation and develop their ability to develop protocols to prevent a recurrence.

Debt Screening: To date, screening applicants for debt or reporting non-compliance has only been applied to the Community Grants Program. For consistency, it is recommended that organizations "not in good standing" be notified in writing of the default and denied further consideration until they fulfill their financial obligations. Assistance may be provided through a payment plan with the frequency and value of installments negotiated with the party in default. It is important to note that "tax arrears" shall be considered an amount outstanding in excess of one (1) year¹ and excludes any amount due under an approved payment plan with HRM Finance. If approved this policy would be applied to all programs administered by the Grants Program.

¹ Arrears in excess of one year excludes the interim tax bill and accommodates any delay with respect to applying a discretionary tax exemption to an account.

Limited Extensions (Carry-Forward): If an organization is unable to complete a funded project by the reporting deadline an extension may be granted/or denied. Restricting the duration of an extension is intended to discourage misrepresentation, generic fundraising², or default. The committee has recommended any extension be restricted to one (1) year, for a combined total of two years, after which reporting is due in full or repayment is to be made to HRM. The recipient of a grant extension would be notified in writing of the terms of any extension and that default shall result in full or partial repayment to HRM. Eligibility for additional funding shall be suspended until prior funding commitments are fulfilled.

Compliance Monitoring: Compliance includes a recipient's accounting for the appropriate use of funds or the fulfillment of any obligation associated with a grant, tax exemption, property sale or lease. The approach requires that recipients are aware of their contractual obligations and remit the applicable reporting or payment within specified timelines. Recipients should also be made aware of the applicable sanctions for non-compliance (suspension of eligibility, interest charges, collection proceedings, invoking a buy-back agreement, termination with cause etc). A record of default shall be submitted to the Grants Committee annually for oversight and any implications in program design.

FINANCIAL IMPLICATIONS

None. Any revisions to existing applicant information materials, or new materials, would be incorporated into existing administrative budgets.

COMMUNITY ENGAGEMENT

Not applicable: this is an internal administrative management practice intended to reduce HRM's exposure to financial losses and/or reporting non-compliance on the part of grant, tax or property-related municipal assistance.

ENVIRONMENTAL IMPLICATIONS

None.

ALTERNATIVES

The Grants Committee could amend or overturn a proposed recommendation.

² Applications that rely heavily upon unconfirmed funding or an ill-defined fundraising campaign may be declined or awarded provisionally with conditions, a holdback, payment in installments or by reimbursement to reduce the risk of default.

ATTACHMENTS

1. Default Prevention and Management: Current Practice.

A copy of this report can be obtained online at <http://www.halifax.ca/council/agendasc/agenda.html> then choose the appropriate meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Peta-Jane Temple, Team Lead Grants & Contributions, FICT, 490-5469

Original signed

Report Approved by: Bruce Fisher, Manager, Financial Policy & Planning 490-4493

Default Prevention and Management: Current Practice

1. Community Grants Program

- Submissions are screened for compliance with any previous award under the program or debt to the Municipality.
- Mandatory final report and proof of expenditures due by stated deadline. Eligibility suspended for non-compliance.
- Annual update of delinquent reporting to the Grants Committee.

2. BID Contributions Fund

Mandatory final report and proof of expenditures due by deadline. Eligibility suspended for non-compliance.

3. Tax Exemption for Non-Profit Organizations Program

- Mandatory annual reporting for recipients of a tax exemption due by stated deadline but sanctions for non-compliance are not detailed in policy. On a case-by-case basis eligibility may be revoked or the level of exemption reduced: adjudicated by Grants Committee.
- Debt screening only for tax arrears. Interest applied to arrears.
- Collection of tax arrears secured by a lien against the property.

4. Property Sales to Non-Profit Organizations

- No screening for debt.
- Limited (ad hoc) monitoring of compliance with the terms and conditions of any conveyance or price concession.
- A supplementary Buy-Back Agreement may be used to prevent conveyance without HRM's consent or to secure heritage registration.

5. Property Leasing to Non-Profit Organizations

- No screening for debt.
- Recourse within a leasing agreement for arrears or violation of the terms of the lease.
- Limited or ad hoc monitoring.
- Eviction for non-compliance measure of last resort.

6. Community Facilities Partnership Fund (Suspended)

- Right to audit.
- Payment in instalments.
- Interim progress report and final report by stated deadline. Payment withheld for non-compliance.
- Individual contractual agreements.

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MUNICIPAL CLERK

October 28th, 2013

Chair and Members of the Grants Committee:

On behalf of the 8 business improvement districts (BID) in this letter, I am writing you with concerns about the Proposed Default Prevention and Management Practice staff report, on the November 4th agenda for your committee.

Our BID contribution fund is unique with respect to many other grant funds – including the requirement that we match funding to the municipal contribution. This allows HRM to leverage its funding with the community in order to create greater outcomes than it could on its own.

The BIDs in this letter are concerned with two aspects of this staff report:

1. The return of unused funds to general revenue. The current budget allocates \$106,000 to be proportionally distributed to the 8 BIDs for projects “for the purpose of promoting or beautifying a district.”

We are concerned that the funding is returned to general revenue in the event one BID does not apply or is ineligible. Each BID would certainly bring forward projects if greater funding was available. If the intent of this fund is to create \$106,000 worth of promotion and beautification, this funding should be available regardless of how many apply.

As such, we are asking that any funds unused by a particular BID be proportionally re-offered to the other BIDs, assuming they can match the funds.

2. Timing of budget approval/project approvals/BID year end. Currently, the process for dispersal is cumbersome. BID are required by their HRM service agreement to provide budgets and activity plans for April 1st, which include proposed BID discretionary projects. The budget approval, including the BID discretionary fund, often occurs in June. Around the same time (but not set in stone), BIDs are required to submit applications for this fund and reports on work of the previous year. This is then followed by grants committee approvals of funded projects and dispersals which can vary on timing into the fall.

BIDs can lose half a year to internal processes where they could be completing the work and ensuring compliance. A shortened internal process would improve compliance in this fund.

As such, we are asking that HRM review their processes and timelines to allow as much time as possible to complete this work. This could include shorter, well-defined internal and reporting timelines to get to Grants Committee and/or coordination between budget and grants approvals for this fund.

The BIDs in this letter are certainly interested in ensuring public funds are well-spent and accounted for. We ask that the grants committee give consideration to these concerns and ensure we are positioned to best serve our constituents.

Best,

David Fleming, Executive Director, North End Business Association

on behalf of:

Michelle Chamniss, Executive Director, Sackville Business Association

Bruce Holland, Executive Director, Spryfield and District Business Association

Graziella Grbac, Executive Director, Main Street Dartmouth Area Business Improvement District

Paul MacKinnon, Executive Director, Downtown Halifax Business Commission

Karla Nicholson, Executive Director Quinpool Road Mainstreet District Association

Tim Rissesco, Executive Director, Downtown Dartmouth Business Commission

Nancy Tissington, Executive Director, Spring Garden Area Business Association