ANNOUNCEMENT OF FEDERAL FUNDING OPPORTUNITY

EXECUTIVE SUMMARY

- Federal Agency Name: Economic Development Administration (EDA), Department of Commerce
- **Federal Funding Opportunity Title**: National Technical Assistance, Training, Research and Evaluation: Information Dissemination and National Symposium
- Announcement Type: Federal Funding Opportunity (FFO)
- Catalog of Federal Domestic Assistance (CFDA) Numbers: 11.303, Economic Development—Technical Assistance; 11.312, Economic Development—Research and Evaluation
- **Dates**: To be considered timely, a completed application, regardless of the format in which it is submitted, must be either: (1) received by the EDA representative listed in section VII. of this competitive solicitation no later than July 23, 2007 at 5:00 p.m. EST; or (2) transmitted and time-stamped at <u>www.grants.gov</u> no later than July 23, 2007 at 5:00 p.m. EST. Any application received or transmitted, as the case may be, after 5:00 p.m. EST on July 23, 2007 will be considered non-responsive and will not be considered for funding. *See* section IV.B. for information regarding format options for submitting completed applications. By August 20, 2007, EDA expects to notify the applicants selected for investment assistance. The selected applicants should expect to receive funding for their projects within thirty (30) days of EDA's notification of selection.
- **Application Submission**: Full or partial paper applications may be submitted to EDA Headquarters in Washington, D.C. by e-mail, hand-delivery or postal mail, as provided in section VII.B. of this announcement. Applications also may be submitted electronically in whole or in part via <u>www.grants.gov</u>. *See* section IV.B. of this announcement.
- **Funding Opportunity Description**: Pursuant to the National Technical Assistance, Training, Research and Evaluation program, EDA is soliciting applications for the following projects:
 - 1. Information dissemination to practitioners serving economically distressed areas; and
 - 2. A national symposium to bring together leaders to discuss current and future trends in economic development and how to improve and implement economic development best practices.

FULL ANNOUNCEMENT TEXT

I. Funding Opportunity Description

A. Program Objective

The Economic Development Administration's (EDA) mission is to lead the federal economic development agenda by promoting innovation and competitiveness, preparing American regions for growth and success in the worldwide economy. Through its National Technical Assistance, Training, Research and Evaluation program (NTA Program), EDA works towards fulfilling its mission by funding research and technical assistance projects to promote competitiveness and innovation in distressed rural and urban regions throughout the United States and its territories. By working in conjunction with its research partners, EDA will help States, local governments and community-based organizations to achieve their highest economic potential.

B. Project Description

EDA is soliciting applications to provide technical assistance in connection with the following two (2) projects:

- (1) information dissemination to practitioners serving economically distressed areas; and
- (2) a national symposium to bring together leaders to discuss current and future trends in economic development and how to improve and implement economic development best practices.

Applicants may submit applications for one or both of the projects listed below. As described in detail below, the information dissemination project has three (3) component tasks: (i) broadcasting of strategy telecasts; (ii) preparation and dissemination of monthly electronic newsletters; and (iii) preparation and dissemination of a quarterly magazine. Applicants must address each of these three (3) components of the information dissemination project.

1. Project Title: Information Dissemination to Practitioners Serving Economically Distressed Areas

Background Statement:

As part of its ongoing mission to assist economically distressed areas, EDA supports the dissemination of information to economic development practitioners serving distressed communities. EDA's intent is to implement a coordinated and complementary information dissemination program that, through strategic linkages, reaches the maximum number of economic development practitioners. The dissemination effort includes the development of inclusive distribution lists for each deliverable, which will be made available to EDA for its use.

EDA is soliciting applications to fund three (3) separate tasks that will continue its mission of serving the economic development needs of distressed rural and urban regions, taking greater advantage of new technologies for information dissemination (including use of the Internet, audio/videoconferencing, e-mail), and identifying and providing information in new or emerging areas of economic development needed by practitioners. The project will include a variety of media, as described below in the proposed scopes of work. Applications must address all three (3) tasks described below.

Deliverables: The deliverables for each separate task are as follows:

• Task 1 – Strategy Broadcasts

Conduct four (4), thirty-minute economic development strategy broadcasts – by telecast and Webcast – targeted to practitioners nationwide. This task includes (i) selecting the topics, presenters or panelists and case studies for each broadcast, subject to EDA's concurrence; (ii) arranging for the moderator and facilities to conduct each telecast; (iii) drafting scripts for each broadcast; (iv) undertaking sufficient publicity to ensure the maximum audience is reached; (v) ensuring that sufficient local viewer facilities are available; and (vi) providing for a feedback mechanism that measures both the level of participation in and the effectiveness of the broadcasts. Each broadcast must be recorded digitally so that it can be made available and be viewable broadly on Internet distribution channels, including on EDA's and other Internet websites.

Completion Deadlines: The telecasts will take place at intervals during the year between October 1, 2007 and October 1, 2008, as determined in conjunction with EDA.

• Task 2 – Monthly Electronic Newsletters

Prepare and disseminate a monthly electronic newsletter with information targeted to a national audience of economic development practitioners. The newsletter must be in hypertext markup language (html) and in an attractive and colorful format, but also must be available as a plain text document for those who cannot access it in html. The newsletter will ordinarily (i) be no more than two (2) pages in length; (ii) cover three or four topics each month; and (iii) include summaries of critical information, subject to EDA's concurrence. Where appropriate, the newsletter will serve as a roadmap to other information resources through hot links that facilitate direct access to more in-depth information. The newsletter will be distributed at no cost to organizations and individuals working to improve the economic viability of distressed areas. The dissemination effort includes developing an inclusive e-mail distribution list, which will be made available to EDA for its use. The e-mail distribution list may involve supplementing or combining existing lists that economic development organizations currently possess in order to achieve maximum target audience penetration as quickly as possible.

Completion Deadlines: The electronic newsletter will be disseminated each month between October 1, 2007 and October 1, 2008.

• Task 3 – Quarterly Magazine

Prepare a quarterly magazine of approximately 20-40 pages in a four-color, high-quality format that will provide in-depth information to practitioners on a range of timely topics consistent with EDA's mission and subject to EDA's concurrence. The magazine will cover subjects such as current administration policy, interviews with key decision-makers and practitioners, and present and analyze best practice case studies in economic development. EDA expects that this magazine will be mailed in hard copy to up to 6,000 recipients (depending on costs), in accordance with a mailing list to be to be developed by the applicant in consultation with EDA. The mailing list also will be made available to EDA for its use. In addition to the hard copy dissemination, an html counterpart will be made available for posting on EDA's website at <u>www.eda.gov</u>.

Completion Deadlines: The quarterly magazines will be published at the end of each calendar quarter during FY 2008.

2. Project Title: 2008 National Symposium

Background Statement:

The 2008 EDA National Symposium will bring together nationally-recognized leaders to discuss "what's next" in economic development and how to implement economic development best practices. Qualified applicants must submit applications for organizing, supporting, promoting, holding and reporting on the symposium. The focus of the symposium is to disseminate and share the strategies, policies and best practices of 21st century economic development.

Deliverables: In consultation with EDA, the recipient will:

- Arrange for an appropriate venue (location to be proposed by the applicant) and related logistics, including registration, meals and a reception. The venue will need to have a major U.S. airport reachable within a thirty-minute drive.
- Secure the participation of nationally-recognized leaders in the private, public and nonprofit sectors to serve as guest speakers on the topic of 21st century economic development.
- Secure the participation of leaders from the private, public and nonprofit sectors to engage in panel discussions on current topics related to 21st century economic development.
- Select and secure attendance of recognized private and public-sector leaders in the field of economic development with a view to attracting an audience of 300.
- Orchestrate maximum media coverage of conference by local, regional, national and trade association press, including television, radio, print and Internet media outlets.

- Provide for the videotaping of the full conference that can be edited for later use, and provide 100 copies of videotape to EDA.
- Produce a 10-page report that captures the best practices and ideas that emerge from the conference on strategies for addressing "what's next" in 21st century economic development. Following final approval of the report, print 1,000 copies for EDA.
- Provide weekly reports to EDA of progress in conference development.

Timeline: The national symposium will be held in June 2008 in a location to be proposed by the applicant based on the ability to organize and execute a highly professional conference.

C. Program Authority

The authority for the NTA Program is section 207 of the Public Works and Economic Development Act of 1965 (42 U.S.C. § 3147), as amended (PWEDA), and 13 C.F.R. part 306, subpart A.

EDA published final regulations (codified at 13 C.F.R. chapter III) in the *Federal Register* on September 27, 2006 (71 FR 56658). The final regulations became effective upon publication and reflect changes made to PWEDA by the Economic Development Administration Reauthorization Act of 2004 (Pub. L. No. 108-373, 118 Stat. 1756 (2004)). These regulations will govern an award made under this announcement. The final regulations and PWEDA are accessible on EDA's Internet website at www.eda.gov/InvestmentsGrants/Lawsreg.xml.

II. Award Information

A. Funding Availability

EDA may use funds appropriated under the Revised Continuing Appropriations Resolution, 2007, Pub. L. No. 110-5 (February 15, 2007) to make awards under the NTA Program authorized by PWEDA. Approximately \$2,000,000 is available, and shall remain available until expended, for funding awards under this competitive solicitation. Based on recent past awards for projects similar to the projects solicited under this announcement, the range of total expenditures for information dissemination projects has been from \$150,000 to \$250,000 and the total expenditures for national symposia has been from \$250,000 to \$450,000. EDA anticipates publishing additional FFO announcements (and corresponding notices in the *Federal Register*) under the NTA Program later during this fiscal year.

Please note that the FFO announcement published on March 22, 2007 for EDA's economic development assistance programs references program funds allocated for Local Technical Assistance and National Technical Assistance. EDA may allocate additional funds currently available for the NTA Program to the Local Technical Assistance program for additional Local Technical Assistance projects.

B. Type of Funding Instrument

Awards under this competitive solicitation will be in the form of cooperative agreements.

III. Eligibility Information

A. Eligible Applicants and Eligible Recipients

Pursuant to PWEDA, eligible applicants for and eligible recipients of EDA investment assistance include a District Organization; an Indian Tribe or a consortium of Indian Tribes; a State; a city or other political subdivision of a State, including a special purpose unit of a State or local government engaged in economic or infrastructure development activities, or a consortium of political subdivisions; an institution of higher education or a consortium of institutions of higher education; a public or private non-profit organization or association; and, as provided in section 207 of PWEDA (42 U.S.C. § 3147) for the NTA Program, a private individual or a for-profit organization. *See* section 3 of PWEDA (42 U.S.C. § 3122) and 13 C.F.R. § 300.3.

B. Cost Sharing or Matching Share Requirement

Generally, the amount of the EDA grant may not exceed fifty (50) percent of the total cost of the project. However, a project may receive an additional amount that shall not exceed thirty (30) percent, based on the relative needs of the region in which the project will be located, as determined by EDA. *See* section 204(a) of PWEDA (42 U.S.C. § 3144) and 13 C.F.R. § 301.4(b)(1). Under this competitive solicitation, the Assistant Secretary of Commerce for Economic Development (Assistant Secretary) also has the discretion to establish a maximum EDA investment rate of up to one hundred (100) percent where the project (i) merits and is not otherwise feasible without an increase to the EDA investment rate; or (ii) will be of no or only incidental benefit to the recipient. *See* section 204(c)(3) of PWEDA (42 U.S.C. § 3144) and 13 C.F.R. § 301.4(b)(4).

While cash contributions are preferred, in-kind contributions, consisting of assumptions of debt or contributions of space, equipment and services, may provide the non-federal share requirement of the total project cost. *See* section 204(b) of PWEDA (42 U.S.C. § 3144). EDA will fairly evaluate all in-kind contributions, which must be eligible project costs and meet applicable federal cost principles and uniform administrative requirements. Funds from other federal financial assistance awards are considered matching share funds only if authorized by statute that allows such use, which may be determined by EDA's reasonable interpretation of the statute. *See* 13 C.F.R. § 300.3. The applicant must show that the matching share is committed to the project, available as needed and not conditioned or encumbered in any way that precludes its use consistent with the requirements of EDA investment assistance. *See* 13 C.F.R. § 301.5.

IV. Application and Submission Information

A. Application Packages

The application package consists of the following three forms:

- (1) Form ED-900A, "Application for Investment Assistance" (OMB Control No. 0610-0094);
- (2) Form ED-900A's program-specific component, "*National Technical Assistance, Training, and Research and Evaluation Program Requirements*" (OMB Control No. 0610-0094); and
- (3) Form SF-424, "*Application for Federal Assistance*" (OMB Control No. 4040-0004).

Applicants should note that, despite references to Form ED-900P (*Pre-Application for Investment Assistance*) in the instructions for completing Form ED-900A, a pre-application is not required under this competitive solicitation.

B. Submitting Application Packages

Applicants have the following three options for submitting a completed application package:

(1) <u>Full electronic submissions</u>. This option is feasible only for applicants with access to a scanner. Applicants choosing this option first should complete and electronically submit Forms SF-424, SF-424A (*Budget Information—Non-Construction Programs*), and SF-424B (*Assurances—Non-Construction Programs*) in the <u>www.grants.gov</u> application package. You may access this grant opportunity synopsis (and the applicable forms) by following the instructions provided at <u>http://www.grants.gov/search/basic.do</u>, whereby you can perform a basic search for this grant opportunity by completing the "*Keyword Search*," the "*Search by Funding Opportunity Number*," or the "*Search by CFDA Number*" field, and clicking the "*Search*" button.

Since applicants are unable to electronically save completed versions of Form ED-900A and Form ED-900A's program-specific component (*National Technical Assistance, Training, and Research and Evaluation Program Requirements*), applicants must print copies of the these two (2) forms from EDA's website at http://www.eda.gov/InvestmentsGrants/Application.xml, complete all pertinent sections (excluding pages 1-8 of Form ED-900A's program-specific component, since pages 1-8 consist of Forms SF-424A and SF-424B), and scan and attach these two forms and all required additional narratives (per the information set out in section IV.C. of this FFO) to the www.grants.gov application package. Applicants may then submit the entire application package through www.grants.gov. Contrary to the instructions provided in the Form ED-900A, it is not necessary to submit hardcopies of the completed application to EDA.

(2) <u>Electronic submission of Forms SF-424, SF-424A and SF-424B, followed by paper</u> (hardcopy) submission of Form ED-900A and Form ED-900A's program-specific <u>component via mail</u>. Applicants choosing this option first should complete and electronically submit Forms SF-424, SF-424A and SF-424B in the <u>www.grants.gov</u>

application package. You may access this grant opportunity synopsis (and the applicable forms) by following the instructions provided on http://www.grants.gov/search/basic.do, whereby you can perform a basic search for this grant opportunity by completing the "Keyword Search," the "Search by Funding Opportunity Number," or the "Search by CFDA Number" field, and clicking the "Search" button. Applicants should then print copies of Form ED-900A and Form ED-900A's program-specific component (National Technical Assistance, Training, and Research and Evaluation Program Requirements), both of which can be found on EDA's website at http://www.eda.gov/InvestmentsGrants/Application.xml, complete all pertinent sections (excluding pages 1-8 of Form ED-900A's programspecific component, since pages 1-8 consist of Forms SF-424A and SF-424B), attach all required additional narratives (per the information set out in section IV.C. of this FFO), and print or type their DUNS number at the top of Form ED-900A to allow EDA to match each paper (hardcopy) application received with the corresponding electronically-submitted forms. Applicants should then mail the completed Form ED-900A and ED-900A's program-specific component to EDA Headquarters as provided in section VII.B. of this announcement.

(3) <u>Full paper (hardcopy) submissions</u>. Applicants choosing this option should first download and print Form SF-424. Applicants should then save blank copies of Form ED-900A and Form ED-900A's program-specific component (*National Technical Assistance, Training, and Research and Evaluation Program Requirements*), complete these forms and attach all required additional narratives (per the information set out in section IV.C. of this FFO); and mail the completed Form SF-424, Form ED-900A and Form ED-900 A's program-specific component to EDA Headquarters as provided in section VII.B. of this announcement. All forms may be downloaded and printed from EDA's website at

http://www.eda.gov/InvestmentsGrants/Application.xml.

Applications completed in accordance with the instructions set forth in this announcement, regardless of the option chosen for submission, will be considered for EDA funding under this competitive solicitation. Incomplete applications will not be considered. EDA will evaluate applications consistent with the information set forth in section V. of this FFO.

C. Content and Form of Application Submissions

To apply for an award under this competitive solicitation, an eligible applicant must submit a completed application package in accordance with the information set forth below.

1. Application Format

Applications may be submitted in three formats: (i) full paper (hardcopy) format; (ii) partially in paper (hardcopy) format and partially in electronic format; or (iii) full electronic format, each in accordance with the procedures provided in section IV.B. of this FFO. EDA will not accept facsimile transmissions of applications.

For applicants submitting full electronic applications through <u>www.grants.gov</u>, the preferred file format for electronic attachments (e.g., the project narrative and additional exhibits to Form ED-900A and its program-specific component) is portable document format (PDF); however, EDA will accept electronic files in Microsoft Word, WordPerfect, Lotus or Excel formats.

The content of a completed application package is the same for full or partial electronic submissions and full or partial paper (hardcopy) submissions. Each application package must include the:

- a. Form ED-900A, Application for Investment Assistance;
- b. Form ED-900A's program-specific component, *National Technical Assistance*, *Training, and Research and Evaluation Program Requirements*
- c. Form SF-424, Application for Federal Assistance;
- d. Form SF-424A, Budget Information—Non-Construction Programs;
- e. Form SF-424B, Assurances—Non-Construction Programs;
- f. Description of how the applicant intends to carry out the scope of work (included in the project narrative requested in Part I of Form ED-900A's program-specific component, which should not exceed ten (10) pages);
- g. Proposed budget and accompanying explanation, including a detailed explanation of the matching share (i.e., non-federal share) to be contributed by the applicant's regional/local partners (as requested as Exhibit II.A. in Part II of Form ED-900A's program-specific component);
- h. Resumes/qualifications of key staff (which should not exceed two (2) pages per individual, with an additional two (2) pages allowed for a single summary description of all organizations or consultants named in the application); and
- i. Proposed schedule for completion of the project.

Applicants applying electronically should access the following link for assistance in navigating <u>www.grants.gov</u> and for a list of useful resources: <u>http://www.grants.gov/applicants/applicant_help.jsp</u>. If you do not find an answer to your question under <u>Frequently Asked Questions</u>, try consulting the <u>Applicant's User Guide</u>. If you still cannot find an answer to your question, contact <u>www.grants.gov</u> via email at <u>support@grants.gov</u> or telephone at 1-800-518-4726. The hours of operation for <u>www.grants.gov</u> are Monday-Friday, 7:00 a.m. to 9:00 p.m. (EST) (except for federal holidays).

2. Submission Deadline

To be considered timely, a completed application, regardless of the format in which it is submitted, must be either: (1) received by the EDA representative listed in section VII. of this competitive solicitation no later than July 23, 2007 at 5:00 p.m. EST; or (2) transmitted and time-stamped at <u>www.grants.gov</u> no later than July 23, 2007 at 5:00 p.m. EST. Any application received or transmitted, as the case may be, after 5:00 p.m. EST on July 23, 2007 will be considered non-responsive and will not be considered for funding. The closing date and time are

the same for paper submissions as for electronic submissions. By August 20, 2007, EDA expects to notify the applicants selected for investment assistance under this announcement.

EDA will not accept any changes, additions, revisions or deletions to applications after the closing date and time have passed. EDA may contact an applicant for additional clarifications regarding its application after final evaluations by the review panel.

Applicants are strongly encouraged to start early and not to wait until the approaching due date before logging on and reviewing the instructions for submitting an application through <u>www.grants.gov</u>. Applicants should save and print written proof of an electronic submission made at <u>www.grants.gov</u>. If problems occur while using <u>www.grants.gov</u>, the applicant is advised to (i) print any error message received, and (ii) call <u>www.grants.gov</u> at 1-800-518-4726 for immediate assistance. EDA may allow more time for application submission due to system problems at <u>www.grants.gov</u> that are beyond the control of the applicant.

D. Intergovernmental Review

Applications for funding under this competitive solicitation are not subject to the requirements of Executive Order 12372, "Intergovernmental Review of Federal Programs."

V. Application Review Information

A. Evaluation Criteria and Selection Procedures

To apply for an award under this competitive solicitation, an eligible applicant must submit a completed application package to EDA by the deadline specified and in the manner provided in sections IV.C. and VII.B. of this FFO. Applications that do not meet all items required or that exceed the page limitations set forth in section IV.C. of this announcement will be considered non-responsive and will not be considered by the review panel. Applications that meet all the requirements will be evaluated by a review panel comprised of at least three (3) EDA staff members, all of whom will be full-time federal employees. The review panel will evaluate the applications and rate and rank them using the following criteria of approximate equal weight:

- 1. Conformance with EDA's statutory and regulatory requirements, including the extent to which the proposed project satisfies the award requirements set out below and as provided in 13 C.F.R. § 306.2:
 - a. Strengthens the capacity of local, State or national organizations and institutions to undertake and promote effective economic development programs targeted to regions of distress;
 - b. Benefits distressed regions; and
 - c. Demonstrates innovative approaches to stimulate economic development in distressed regions;
- 2. The degree to which an EDA investment will have strong organizational leadership, relevant project management experience and a significant commitment

of human resources talent to ensure the project's successful execution (*see* 13 C.F.R. § 301.8(b));

- 3. The ability of the applicant to implement the proposed project successfully (*see* 13 C.F.R. § 301.8);
- 4. The feasibility of the budget presented; and
- 5. The cost to the Federal government.

B. Selection Factors

The Assistant Secretary, as the Selecting Official, expects to fund the highest ranking applications, as recommended by the review panel, submitted under this competitive solicitation. However, the Assistant Secretary may not make any selection, or he may select an application out of rank order for the following reasons:

- 1. A determination that the application better meets the overall objectives of sections 2 and 207 of PWEDA (42 U.S.C. §§ 3121 and 3147);
- 2. The applicant's performance under previous awards; or
- 3. The availability of funding.

VI. Award Administration Information

A. Award Notices

Unsuccessful applicants will be notified by postal mail that their applications were not selected for funding.

The Selecting Official will issue the grant award (Form CD-450), which is the authorizing financial assistance award document. By signing the Form CD-450, the recipient agrees to comply with all award provisions. EDA will send the grant award by postal mail to the appropriate business office of the recipient's organization and it must be signed and returned without modification by the recipient within thirty (30) days of receipt.

B. Administrative and National Policy Requirements

Administrative and national policy requirements for all Department of Commerce awards are contained in the *Department of Commerce Pre-Award Notification Requirements for Grants and Cooperative Agreements*, published in the *Federal Register* on December 30, 2004 (69 FR 78389). This notice may be accessed by entering the *Federal Register* volume and page number provided in the previous sentence at the following Internet website: www.gpoaccess.gov/fr/retrieve.html.

C. <u>Reporting Requirements</u>

All recipients of EDA investment assistance are required to submit financial and performance (technical) reports in accordance with the terms and conditions of the grant award.

All financial reports must be submitted in triplicate (one original and two copies) to the EDA Program Officer. *See* 13 C.F.R. § 302.16.

VII. Agency Contacts

A. Additional Information

EDA's Internet website at <u>www.eda.gov</u> contains additional information on EDA and its programs. For additional information on the NTA Program, please contact William P. Kittredge via email at <u>wkittredge@eda.doc.gov</u> (preferred) or by telephone at (202) 482-5442.

B. Addresses for Application Submissions

Full or partial paper (hardcopy) applications submitted pursuant to this competitive solicitation may be:

- 1. E-mailed to William P. Kittredge, Senior Program Analyst, at <u>wkittredge@eda.doc.gov;</u> or
- Hand-delivered or mailed to William P. Kittredge, Senior Program Analyst, Economic Development Administration, Room 7009, U.S. Department of Commerce, 1401 Constitution Avenue, N.W., Washington, D.C. 20230.

Applicants submitting full or partial paper submissions are encouraged to do so by email. Applicants are advised that, due to mail security measures, EDA's receipt of mail sent via the United States Postal Service may be substantially delayed or suspended in delivery. Applicants may wish to use a guaranteed overnight delivery service.

Applicants choosing to submit applications in whole or in part electronically through <u>www.grants.gov</u> should follow the instructions set out in section IV.B. of this announcement.

VIII. Other Information and Requirements

EDA's currently effective regulations and PWEDA are available on its Internet website at <u>http://www.eda.gov/InvestmentsGrants/Lawsreg.xml</u>. Certain EDA, Department of Commerce, and other application requirements are noted below.

- A. Projects are expected to be completed in a timely manner consistent with the nature of the project. The completion deadline for each project is specified under section I. of this announcement.
- B. If an application is selected for funding, EDA has no obligation to provide any additional future funding in connection with an award. Renewal of an award to increase funding or extend the period of performance is at EDA's sole discretion.
- C. EDA is committed to a policy of non-discrimination in the administration of all its programs.