



UNITED STATES DEPARTMENT OF COMMERCE
Economic Development Administration
Robert N.C. Nix Sr. Federal Building and U.S.
Courthouse, Room 602
900 Market Street
Philadelphia, PA 19107

December 3, 2020

In reply refer to:
EDA Control No. 115921

Lynne Pike DiSanto
Principal Planner
Capitol Region Council of Governments
241 Main Street, Fourth Floor
Hartford, CT 06106-1897

Dear Ms. DiSanto:

The U.S. Economic Development Administration's (EDA) Philadelphia Regional Office Investment Review Committee (IRC) has considered your application seeking Economic Adjustment Assistance (EAA) - CARES Act Funding for the State-wide Long-Term Recovery Coordination, Resiliency Planning, Business Retention and Business Assistance.

While your application was found to be complete and consistent with EDA's investment priorities in our initial analysis, we regret to inform you that EDA will not be able to fund your application based on an extensive review of the project and portfolio evaluation factors outlined in the EDA's FY2020 Public Works and Economic Adjustment Assistance Programs Notice of Funding Opportunity (FY20 PWEAA NOFO) including CARES. The IRC noted the following factors in reaching its decision:

- The applicant failed to provide clarification as to the need for subrecipients to be added as co-applicants since they are performing scopes of work similar in value to the co-applicant, Northeastern University;
- Total sub-recipient obligations amount to \$8+ million; accountability is a concern considering both the amount of funding and the number of sub-recipients;
- The rationale behind Council of Governments (COGS) and other subrecipients receiving varying amounts of funding for similar scopes of work when non-competitive Economic Development District (EDD) awards were all \$400,000 was not provided;
- A major concern exists regarding the apparent duplication of efforts as three COGs in their capacity as EDDs, have already received non-competitive CARES Act awards;
- The valuation of match needs more granularity; specific in-kind costs are not very well accounted for and lack context;

- For a project of such a significant amount, the concrete performance measures and outcomes intended to be achieved were not well defined;
- The Comprehensive Economic Development Strategy (CEDS) Repositioning task budget of \$2 million is too excessive and a duplication of other aspects of the scope of work. It is unclear as to the purpose or intent for CEDS Repositioning as no details or specific tasks to be performed by the GOGS for this work element were provided;
- Specific details were not provided in regard to the establishment of nine (9) separate business recovery centers, such as the location of each or how the applicant plans for the sustainability of operations after the grant period ends.

Thank you for your interest in EDA. For more information about our programs and other upcoming funding opportunities, please consult our website at www.eda.gov.

Sincerely,

Linda Cruz-Carnall
Regional Director, Philadelphia Regional Office