



Grants Program Description

Contents

| | |
|--|----|
| Introduction | 2 |
| Program Objectives | 3 |
| Guiding Principles | 3 |
| Program Description..... | 4 |
| Grant Types..... | 5 |
| Grants Program FAQs | 8 |
| Additional Resources and Information | 14 |

Although this document summarizes the Program's anticipated operation, the information contained herein is subject to the terms and conditions of any actual grant award document. The Carolina Thread Trail Governing Board reserves the right to make the final determination of any applicant's eligibility and/or qualifications for program benefits, and to make allocations of program benefits as it may, in its sole discretion, deem appropriate.

Introduction

Greenways are linear natural spaces, often containing trails that link parks, nature reserves, cultural features or historic sites with each other, for recreation, transportation and conservation purposes.

The Carolina Thread Trail (the “Program”) is a comprehensive effort aimed at preserving and enhancing our region’s natural resources for the enjoyment of future generations. It is about *collaboration, connectivity and leverage*: collaborating to promote and protect the region’s quality of life; connecting communities and people, and leveraging catalytic private capital with public capital to protect and create local and regional assets. It seeks to accomplish its objectives by inviting and encouraging communities to participate in a regional effort through their local actions. All communities within the 15-county region described below are eligible to participate, regardless of their current level of trail development.

The Program’s fundamental goal is to assist individual counties and municipalities in planning and implementing greenway systems that connect to neighboring communities and regionally significant attractions, resulting in a network of connected greenways, parks and preserved natural areas throughout the following counties (the “Region”): in North Carolina - Anson, Cabarrus, Catawba, Cleveland, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly and Union; in South Carolina - Cherokee, Chester, Lancaster and York.

Greenways benefit their surrounding communities in many ways, including the following:

- Enhance and strengthen local economies
- Protect water and air quality
- Connect historical, cultural and recreational attractions
- Build social capital by promoting interaction among citizens
- Promote community health and wellness
- Provide an alternative means of transportation
- Reconnect our children with the natural environment

A recent regional survey conducted by the UNC – Charlotte Urban Institute confirms what many of us intuitively know – that people in our region value their parks and natural areas, and are anxious to have ready access to walking, hiking and biking trails. These findings are consistent with national surveys confirming that the majority of people rate having natural spaces in their cities, suburbs and neighborhoods as “absolutely critical” or “important” to the health and quality of life of their communities.

References to the Carolina Thread Trail relate in some instances to the Program that is described herein. The Carolina Thread Trail, or “The Thread”, also refers to the backbone of the connected trail network that is the outcome of this process. It is the objective of the Program to inspire the development of a rich network of trails throughout the Region. The key spines of the system will be designated as The Thread and will generally be owned and maintained by local governments. Local trail systems will have their own identities. The Thread brand will be subordinate to the local identities, but will signify that local trails are part of a larger system.

The Program is bold and ambitious, but practical and attainable. Other comparable regions around the country have recognized the many benefits afforded by greenways and have implemented or are implementing similar regional visions.

Program Objectives

- Help local communities plan and implement trail projects, with a focus on key spines of a connected regional system
- Build the capacity of local communities to develop future greenway projects
- Promote land conservation along trail corridors
- Increase awareness of the benefits of greenways and land conservation
- Promote collaboration and communication among neighboring communities

Guiding Principles

The Program has been founded upon certain guiding principals & core values, which include:

- **Connectivity** – Creating connections between communities and historical, cultural and recreational attractions is important. The Program seeks to create a region known for its “ribbons of green” connecting people to each other and to their heritage. In offering the vision of greater community interaction, the Program seeks to build bonds among communities, as well as afford all residents greater access to our natural surroundings.
- **Collaboration** – Collaboration and communication among our communities is critical to achieving connectivity. The Program aims to encourage a collaborative process by which greenways are conceived and designed in cooperation with adjoining communities in such a way that a regional asset is created out of a series of interrelated local decisions and actions.
- **Equity & Inclusivity** – Greenways, as regional and local resources, should be free and accessible to all of our residents. The Thread will proactively bring connections and trail benefits to neighborhoods in need. The process of creating an interconnected trail network must be an inclusive one in which many voices contribute.
- **Leverage** – The Program’s success depends upon generating additional investment of outside capital in our Region’s natural and recreational resources. Carolina Thread Trail grants will complement funds from local, state and federal sources. The Program will assist communities as they develop funding strategies for their segments of The Thread.
- **Respect for the Land and for the Landowner** - As communities determine the location of their segments of The Thread, they will have alternative routes to consider that include public lands or property owned by willing landholders, including developers who want to offer this amenity to their neighborhoods. It is important to engage landowners in the project to identify opportunities and concerns.

Program Description

The Program consists of three major components:

I. COMMUNICATING AND FACILITATING A VISION OF ONNECTIVITY

The Program assists local communities in educating and inspiring their residents regarding the benefits of a connected network of trails. Trail information is provided through the web site (www.carolinathreadtrail.org). Carolina Thread Trail staff are available to help communities develop outreach strategies and facilitate bringing communities together to plan and build their segments of The Thread.

II. TECHNICAL ASSISTANCE

The Program provides technical assistance to local communities in the following ways:

- **Education and Information** – The Program sponsors an annual regional forum designed to educate local communities on the fundamentals of planning, funding, developing and maintaining trails. These forums, along with published materials and a website devoted to informing and updating communities as to trail activities of their neighbors enhances communication and collaboration among local communities. Forums feature a broad range of programs, and provide opportunities for networking, building collaborative partnerships, and sharing best practices.
- **Planning Assistance** – As part of Carolina Thread Trail planning grants (see description below), the Program encourages counties and their municipalities to begin implementing local trail networks in a thoughtful, deliberate process that involves collaboration across jurisdictional boundaries.
- **Funding Strategies** –The Program provides assistance as communities develop strategies for funding their trail systems. It provides information regarding federal and state grant programs and advocates for project funding from these sources. It also assists communities as they evaluate the viability of local funding sources.
- **Data Maintenance & Sharing** – The Program maintains GIS data pertaining to existing and planned greenways, trails and conservation lands throughout the region, as well as historic, cultural and recreational destinations, and offers access to that data for local communities.

III. GRANTS PROGRAM

The Program awards Planning and Implementation grants from a pool of private funds that serve as a catalyst for creating The Thread. Not all segments identified as The Thread will receive Implementation Grants.

In keeping with the “leverage” principle mentioned above, Thread grants can help serve as local “match” funds required by federal and state grant programs. Each grant type is described below.

Grant Types:

Planning Grants

Objective: To create a countywide greenway master plan, including the designation of the Carolina Thread Trail corridors and an action plan for implementation of those segments. The planning process must be open, inclusive and transparent. The master plan must be in a form that is adoptable by elected officials in the participating jurisdictions.

Grant Amount: Up to \$60,000. The grant amount will be based upon the scope of work needed to develop an adoptable master plan.

Elements of Process: The master planning process should include the following: an assessment of current trail conditions (existing and planned trails), GIS modeling, community meetings for public input, identification of key destinations, meetings with neighboring jurisdictions to identify connection points and adoption by elected officials.

Eligible Recipients: The objective of the master planning process is for multiple jurisdictions, preferably a county and its municipalities, to work together to create a common plan. One entity should be designated as the grantee. This entity will receive the funds and manage the grants process in partnership with the Carolina Thread Trail staff and planning consultants. The Grantee will organize meetings and manage communications with participants. The grantee may be a government agency or non-profit organization.

Prerequisites: Applicants must demonstrate interest in developing a multi-jurisdictional master plan with a high likelihood of adoption by elected officials in participating jurisdictions. Ideally, participants in the plan would include a county and its municipalities in partnership. The applicant should have selected a planning consultant from the list of firms approved by The Thread, and applications should include a planning budget. Once the routes of The Thread are identified and prioritized as part of the master plan, the Carolina Thread Trail Governing Board will ratify The Thread routes to ensure that they are consistent with its Guiding Principles.

Local Match Required: A cash match of 10% of the grant amount will be required.

Grant Cycle: Planning grants will be received at any time and will be approved by the Carolina Thread Trail Governing Board on a rolling basis as submitted.

Implementation Grants

There are three types of Implementation Grants for segments of the Carolina Thread Trail that are ready for implementation:

- **Corridor Planning Grants**

Objective: Identify trail alignment on a parcel by parcel basis by working with landowners on a specific segment of The Thread and develop the scope of work required to successfully build the trail.

Grant Amount: Up to \$20,000. The grant amount will be based upon the scope of work needed to develop the corridor plan.

Elements of Process: The output of the corridor planning process shall include specific route identification at a parcel level and a scope of work for successful implementation of the proposed project. Important elements include identification of routes of entry, physical obstacles, permitting requirements and identification of potential funding sources. To the extent that land has been secured, site due diligence may be included. The preparation of construction drawings is covered by Construction Grants. In some instances, a community may engage a consultant to perform elements of a corridor plan as well as prepare construction drawings. In such cases it may be appropriate to apply for both a Corridor Plan and a Construction Grant. (please consult with Thread staff).

Eligible Recipients: Government agencies and non-profit organizations are eligible for Corridor Planning Grants.

Prerequisites: The corridor selected for design should have been identified as a Carolina Thread Trail segment as part of a master planning process. Local community support and active engagement of local partners such as land trusts, non-profit agencies and local government is very important.

Local Match Required: Local match requirements will be evaluated on a case by case basis. Applications are enhanced by the degree of additional funding from other public or private sources.

Grant Cycle: Corridor Planning Grants will be awarded as part of a competitive grants process. Grant application deadlines will be posted on the Carolina Thread Trail website (carolinathreadtrail.org). Grant applications will be evaluated on a quarterly cycle.

- **Land Acquisition Grants**

Objective: Acquire land or easements for segments of The Thread, as well as open space for viewsheds, riparian buffers, wildlife habitats and/or recreation along The Thread.

Grant Amount: Up to \$150,000.

Elements of Process: Local governments or non-profit organizations acquire parcels (fee simple or through easements) that will become segments of The Thread or open space along The Thread.

Eligible Recipients: Local government agencies or non-profit entities such as local land trusts.

Prerequisites: The land being acquired must have been identified as part of, or adjacent to, the Carolina Thread Trail in an adopted master plan.

Local Match Required: Local match requirements will be evaluated on a case by case basis. Applications are enhanced by the degree of additional funding from other public or private sources.

Grant Cycle: Land Acquisition Grants will be awarded as part of a competitive grants process. Grant application deadlines will be posted on the Carolina Thread Trail website (carolinathreadtrail.org). Grant applications will be evaluated on a quarterly cycle.

- **Construction Grants**

Objective: Complete construction drawings and build segments of the Carolina Thread Trail.

Grant Amount: Up to \$150,000.

Elements of Process: Includes the construction of trail segments. To the extent not previously covered in a design process, site due diligence, permitting, construction budgeting and drawings, as well as actual construction costs, may be included.

Eligible Recipients: Local government agencies or non-profit entities.

Prerequisites: The trail segment being constructed must have been identified as the Carolina Thread Trail in an adopted master plan. Trail alignment and surface type must be identified, and all parcels must have been secured through acquisition, donation or easement.

Local Match Required: Local match requirements will be evaluated on a case by case basis. Applications are enhanced by the degree of additional funding from other public or private sources.

Grant Cycle: Construction Grants will be awarded as part of a competitive grants process. Grant application deadlines will be posted on the Carolina Thread Trail website (carolinathreadtrail.org). Grant applications will be evaluated on a quarterly cycle.

In addition to the specific objectives and prerequisites of each type of grant, projects and activities supported by the grants program should be consistent with the Program's Guiding Principals outlined above.

Grant Program FAQs

I. Program Overview

When may applications be submitted and when are decisions announced?

Planning Grant applications may be submitted at any time. The Carolina Thread Trail Governing Board will consider Planning Grants applications on a rolling basis and will announce grants within three months of receipt of a complete application. Implementation Grants (Corridor Planning, Land Acquisition and Construction grants) will be awarded on a quarterly cycle. Deadlines for applications will be announced well in advance. Please check the web site, www.carolinathreadtrail.org, or call our offices at 704-376-2556 for Implementation Grant schedules.

How large are the Grants and what portion of the total cost will they cover?

Planning Grants awards will be up to \$60,000 and will be based upon the scope of work required to complete an adoptable master plan. Planning Grants require a minimum of 10% local cash match. Implementation Grants for corridor planning, land acquisition and construction will vary based upon the grant type, project needs and other potential funding sources. Implementation Grant awards will range from \$10,000 to \$150,000, with Corridor Planning Grants at the lower end of the range. Access to additional funding sources will be one of the criteria considered for approval of Implementation Grants.

Where does the grant money come from?

Carolina Thread Trail grants will be awarded from funds generated from a private capital campaign. The initial phase of the capital campaign has been successful, but the ultimate pool of funds available is uncertain until the conclusion of the campaign. The Governing Board will consider the status of the campaign when determining grant awards so that available funds can be spread through the region and not granted on a first come first serve basis.

How long will the Grant Program last?

Since private contributions from which the grants will be made are expected to come in over several years, grant awards also will be spread out over several years.

How and when are the grants paid?

Proceeds from the Carolina Thread Trail capital campaign will be held by Foundation For The Carolinas (“FFTC”). Once a grant is awarded, the actual payment of the grant may depend upon the grantee meeting certain conditions as reflected in a grant agreement. Once the grantee meets those conditions, grants will be paid by FFTC. Some grants, particularly for construction, may be released in installments based upon achieving project milestones outlined in the grant agreement.

When must a grant-supported project be completed?

Projects awarded Planning Grants should be completed within 12 months after the grant award. Implementation Grant applicants must demonstrate their ability to commence the project in the near future, and to complete it within a reasonable time thereafter.

Construction Grant Projects should be of such size and scope that they will not require more than 24 months to complete.

How many grants will be awarded?

As the size of grants varies widely, the number of grant awards is not known. Ideally, one Planning Grant will be made to each county and its participating municipalities to create a countywide greenway master plan designating the Carolina Thread Trail segments. There has been no predetermined allocation of grant funds among different types of Implementation grants. It is an objective of the Governing Board to spread catalytic funds throughout the region and award grants that are large enough to have a significant impact on creating trails on the ground and key linkages in the network. Funds will not be available for all trail segments that are designated as The Thread.

Who will own the trails?

In most cases local governments will own the trails. Trails could traverse land not owned by the local governments, but easements must permit trail activity and maintenance.

How will land be acquired for the trails?

Local communities will determine the location of the trails and secure the land through purchases, donations or easements. Participants in implementation steering committees will map the course for working with landowners along the trail. A core principle of the Carolina Thread Trail is “respect for the land and respect for the landowner”. One of the factors in determining prioritization of trail routes is the availability of land from willing participants.

What does it mean to publicly adopt the master plan created in the planning process?

In general, when the public officials in a county or municipality vote to adopt a greenway master plan, it means that they are supportive of the plan as a guideline for trail development and agree in concept with the implementation of the plan. It does not mean they are committing funds from local budgets for implementation at that time, but it does represent a willingness to consider and evaluate specific projects and their funding as they arise. Depending on local ordinances, it may mean that future development permits require landowners to incorporate trail plans in their developments.

II. Eligibility

What types of activities are eligible for the Planning Grants?

Planning Grants support the development of a county-wide greenway master plan. Activities supported by these grants include an assessment of current trail conditions (existing and planned trails), GIS modeling, community meetings for public input, identification of key destinations, meetings with neighboring jurisdictions to identify connection points and adoption by elected officials. It is anticipated that recipients will engage an experienced consulting firm to assist in the development of the master plan. The Carolina Thread Trail has a list of qualified firms that are knowledgeable about the Project. Please contact the Project Director or a Community Coordinator for information about potential consultants. All GIS mapping will be done by The Trust for Public Land for consistency throughout the Region.

What types of activities are eligible for Implementation Grants?

Corridor Planning Grants may be used for specific route identification at a parcel level and development of a detailed scope of work for trail implementation. Important elements include identification of routes of entry, physical obstacles and permitting requirements. To the extent that land has been secured, Corridor Planning Grants could include site due diligence. Development of construction drawings is an activity covered by Construction Grants.

Land Acquisition Grants may be used for land acquisition or the purchase of conservation easements or development rights on land that has been identified within a Thread corridor. Projects could also include public parks or nature preserves on The Thread route that would serve as a destination for or be within the view of greenway users.

Construction Grants may be used for construction drawings and construction. Construction costs include project engineering, soil analysis, grading, landscaping, planting, restoration of habitat, benches, signage (including educational and interpretive programming structures/information kiosks), fencing, and parking areas. The Carolina Thread Trail will provide specific guidelines for Thread-related signage and general guidelines for trail surfaces and amenities. Joint applications by adjoining local governmental units are encouraged and will receive high priority.

All Implementation Grants will apply to projects that have been designated as the Carolina Thread Trail through a master plan that has been adopted by local elected officials and ratified by the Carolina Thread Trail Governing Board.

Who may apply for Grants?

The Program is intended to assist local governments (municipal or county) and non-profit organizations partnering with local governments in the following counties: In North Carolina: Anson, Cabarrus, Catawba, Cleveland, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly and Union; and in South Carolina: Chester, Cherokee, Lancaster and York.

What activities will the Grants not support?

Neither the Planning nor Implementation Grants may be used for planning, construction or development of parks, historical sites or recreational fields that are not integral to a regionally significant public greenway system. Thus, for example, the following are not eligible for support under these grants: private greenways, schoolyard parks, golf courses, ball fields, soccer complexes, fishing piers, renovation of historical facilities, horticultural or botanical gardens, community gardens or ornamental landscapes.

Must a project be located entirely within the Region to qualify for a grant?

Eligible projects may cross town, city, and county lines. In fact, grant applications collaboratively submitted by multiple jurisdictions will receive high priority. Projects located partially within the Region and extending into adjoining counties outside the Region are eligible for funding, but grant funds may only be used on the portion of the trail that is located within the Region. However, such projects will be judged by the same collaborative standard as projects located wholly within the Region (i.e. whether they result from collaborative planning efforts and promote connectivity among adjoining jurisdictions).

Will grants be made for the planning or construction of greenways that will not be open to the public?

No. Grants are only made for projects that will be open to the public. Should a grant be awarded and, at a future date, the greenway becomes unavailable for access by the public, the grant recipient would be required to return the original grant.

May an applicant receive more than one grant from the Program?

Planning Grants will be limited to one per community or group of communities. An eligible community may receive more than one Implementation Grant, subject to the objectives of the Governing Board to disburse grants to participating communities throughout the Region.

III. Applying for a Grant

What is the first step we should take once we decide to apply?

A potential applicant should contact either the Project Director or the Community Coordinator assigned to its community prior to submitting a grant proposal. The staff will discuss your ideas, answer questions about the Program and help direct you to the grant program which most closely fits your proposed project. Grant applications may be downloaded from The Thread website (www.carolinathreadtrail.org).

To whom are grant applications submitted?

Grant applications should be submitted to the Carolina Thread Trail Grants Coordinator at 105 W. Morehead St., Charlotte, NC 28202.

May we apply for the entire cost of planning or implementing the proposed project?

No. For Planning Grants, communities are required to contribute a minimum of 10% of the grant amount. Implementation Grants may provide a portion of the total cost of the project and may serve as local match required by state and federal funding sources. One of the criteria for evaluating grant applications is the availability of local, state and federal funding sources to complete the project. The greater the anticipated leverage ratio, the more competitive the proposal. Application information must include an indication of the status of other funding requests and commitments, including sources and amounts. Thread staff will work with applicants to evaluate strategies for funding their projects.

Must we have applied for state, federal and/or local funds before we apply for a grant?

No, but Carolina Thread Trail grants may be conditioned on receipt of additional funding. The Program recognizes that it may be appropriate in some situations for grant applications to be submitted simultaneously or shortly before the submission of a state or federal grant application.

If turned down, may an applicant reapply?

Yes, the applicant may reapply for the next grant cycle after the initial application has been denied. The applicant should consult with the Grants Coordinator or Community Coordinator for its community before an application is resubmitted.

Is it important for local community groups to be involved in the creation of a greenway?

Yes. The Program seeks to foster interaction between communities. An important first step toward this goal is the involvement of community groups along the route of a proposed greenway. Greenways are used more, and kept safer and cleaner, if local community groups are involved in their planning, construction and maintenance.

May a single community apply for a Planning Grant?

Planning Grants are intended for multiple jurisdictions working together to create a greenway master plan. By working together to create a master plan, individual jurisdictions can ensure that their efforts are enhanced by being part of a larger network.

IV. Selection of Recipients

How are grant decisions made?

Grants are awarded by the Carolina Thread Trail Governing Board. Recommendations for grants will be made by the Governing Board's Grants Committee. Once the Governing Board's awards are communicated, the Grants Coordinator will work with recipients to develop a grant agreement which will describe the terms of the grant. After all conditions for funding are satisfied, proceeds will be disbursed by Foundation For The Carolinas based upon the terms of the grant agreement.

What are the selection criteria for the Planning Grants?

Applicants should demonstrate that participating communities are interested in working together to create a greenway master plan and that their elected officials are likely to adopt a community-based master plan. They should have identified a grantee that is capable of managing the grant in partnership with Carolina Thread Trail staff and consultants engaged to assist in the process. The following factors are among the most important that will be considered by the Governing Board in its review of Planning Grant applications:

- The degree to which the proposed project meets the Program's "Guiding Principles" (see page 3).
- The existence of collaboration between participating local governments.
- Local community support for the proposed project.
- The likelihood that communities are prepared to move quickly from creating an adopted master plan to implementing planned segments of the Carolina Thread Trail.

What are the selection criteria for the Implementation Grants?

In reviewing applications for Implementation Grants, the following factors are among the most important that will be considered by the Governing Board:

- The degree to which the proposed project meets the Program's "Guiding Principles" (see page 3).
- The degree of collaboration among appropriate local governments in planning the project.
- Evidence of local community support for the proposed project and inclusiveness in the planning and impact of the project.
- Appropriate public access to the proposed greenway, and the degree to which the project will serve a broad cross-section of residents in the community.

- The degree to which the proposed project has the potential to provide multiple benefits (e.g. water quality/riparian buffering; alternative transportation).
- The status of land control of the proposed trail and, for some Land Acquisition grants, the likelihood of development absent affirmative conservation efforts by the applicant.
- The availability of public (federal, state and/or local) and/or additional private funds. The applicant should demonstrate either commitments for such funding or a plan to obtain commitments from federal, state and/or local sources. Although public funds are not required, preference will be given where grant funds are leveraged with public funds. Where commitments from public funding sources have not been obtained at the time of the grant application, grant awards will be made contingent upon receipt of such commitments prior to disbursement of any Program grant funds.
- The timetable for the funded project. All implementation projects must be completed within two years after disbursement of grant funds; however extensions may be granted for good cause shown.
- The applicant's ability to successfully complete the proposed project.
- A plan for, and the necessary funding and organizational support for, long-term maintenance of the proposed trail.

In addition, the Governing Board will strive to achieve a balance in disbursement of the grants based on geographic location.

Are Grants awarded with any conditions?

Any conditions to funding will be included in the grant agreement. Implementation Grants often require the applicant to use the grant to leverage public and/or private funds for the project. Often, grants will not be paid until those governmental or private funds have been secured or a firm commitment has been received. Should a grantee fail to raise the required additional funds, the Governing Board may withdraw the grant award. Implementation Grant recipients will have up to 12 months to obtain the proposed matching funds. Applicants who fail to meet this deadline may reapply.

Planning Grants recipients will have up to 12 months to complete the master plan. Implementation Grant recipients will have up to 2 years for project completion as outlined in the grant agreement. Completion deadlines may be extended for good cause shown. All grant recipients will have up to one year to obtain proposed matching funds.

V. Post Grant Matters

What types of arrangements can be used to provide maintenance for an Implementation Grant project?

A critical element of a successful Implementation Grant request is a commitment to the long-term maintenance of the proposed project. Maintenance may be provided by local governments or by partners, which could include public-private collaborations as well as special districts or for-profit/nonprofit coalitions. Likewise, plans to create an endowment fund to maintain the project are favorably received. A competitive application includes a plan for the ongoing maintenance of the proposed project.

How do recipients account for the grant funds they receive?

A final report is required for each Implementation Grant, describing the use of the grant proceeds and the degree to which the original goals of the project were met. In addition, interim reports may be required periodically so that the Governing Board is kept apprised of the project's progress. In some cases, the Governing Board may elect to phase the grant funding to correspond with the receipt of matching funds or certain other project milestones. Forms for interim and final reports will be provided.

Additional Resources & Information

For more information on the Program, including announcements of educational trail forums, information on potential funding sources and other resources for your project, please visit our web site at carolinathreadtrail.org or call us at 704-376-2556.

The Governing Board reserves the right to make the final determination of any person or organization's eligibility and/or qualifications for program benefits, and to make allocations of program benefits as it may, in its sole discretion, deem appropriate.

October 2011