

Certification of Proficient Controls,
Processes and Procedures, Implementation
Plan and Capacity Assessment

State of Wisconsin

Department of Administration

CDBG-DR Public Law 116-20

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Scope of Review

Wisconsin has a strong CDBG infrastructure in place both within the state government and in Dane County, the most affected county as identified by HUD in its allocation. The State of Wisconsin, Department of Administration (DOA) is the designated grantee for the annual State allocation of CDBG funds received by the state for use in counties and cities which are not entitlement cities and counties. Dane County, which was designated by HUD to receive 80% of the funds is an entitlement county.

The State of Wisconsin, Department of Administration is the grantee for CDBG-DR funds. The grantee will use a Memorandum of Understanding (MOU) to engage other state departments and agencies with institutional experience related to addressing defined unmet needs and delivering the programs and activities in response to the unmet needs as identified in the Action Plan. The agreement will specify roles and responsibilities of partner agencies consistent with the CDBG-DR guidelines, the Action Plan, and the deliverable timeline set forth in the Action Plan. Within Dane County, which will receive a minimum of 80% of the CDBG-DR allocation, there are multiple units of general local government (UGLG) plus the county government which are eligible for funding under the award.

As the grantee for the annual state allocation of CDBG funding, the State of Wisconsin DOA utilizes a competitive grant program based on addressing specific unmet needs and targeted activity areas for which all non-entitlement UGLGs are eligible to apply. Subrecipient agreements are executed with UGLGs that are awarded grants through existing programs. Should it be determined through the unmet needs assessment and the planned programs and activities which will be reflected in the CDBG-DR Action Plan to respond to the unmet needs, that an effective method of delivery for certain activities and programs in the Action Plan can be through partnerships with UGLGs in Dane county, the CDBG competitive process will be employed with one difference. The difference will include the State's hybrid approach with UGLG's and the State partnering to implement program activities.

Financial Control

The State of Wisconsin has the financial systems and internal controls to certify proficiency in financial management and compliance with HUD CDBG-DR requirements. The sections below outline key components of the State's financial management processes, specifically the annual Single Audit and Comprehensive Annual Financial Report.

Single Audit

The State of Wisconsin is in compliance with the Single Audit requirements. The Legislative Audit Bureau (LAB), an independent audit agency, audits the State every year. The audit is conducted in accordance with standards contained in Government Auditing Standards issued by the Comptroller General of the United States, the requirements of the Single Audit Act Amendments of 1996, and the provisions of the Office of Management and Budget Circular A133, which is now codified in 2 CFR Part 200, Subpart F. The most recent Single Audit is attached to this document and can be located on the LAB's public website at <http://legis.wisconsin.gov/lab/media/2833/19-3full.pdf> The audit does not indicate any material weaknesses, significant deficiencies, or questioned costs within the Department of Administration or the Division of Energy, Housing and Community Resources.

Annual Financial Statement

The Comprehensive Annual Financial Report (CAFR), which was prepared by the State of Wisconsin, State Controller's Office, is attached to this document. The CAFR is also available on the DOA public website at <https://doa.wi.gov/budget/CAFR2019.pdf>. The report was completed in accordance with generally accepted accounting principles (GAAP) in the United States of America. The Government Finance Officers Association of the United States and Canada (GFOA) awarded a Certificate of Achievement for Excellence in Financial Reporting to the State of Wisconsin for the CAFR - fiscal year ended June 30, 2019. This was the 23rd consecutive year (1996 to 2019) the State has received the prestigious national award. The report does not indicate any material weaknesses, significant deficiencies, or questioned costs within the Administration or the Division of Energy, Housing and Community Resources.

Procurement Processes

Procurements for CDBG Disaster programs are governed by those specific procurement requirements set forth under 24 CFR Part 570 and 2 CFR 200.318-200.326 and all applicable state laws and regulations. Aligned with the requirements of these federal regulations, when procuring goods or services to be paid for in whole or in part with CDBG funds, the State of Wisconsin shall follow its own procurement policies as those procedures are equal to or more stringent to the federal procurement requirements. Furthermore, the State of Wisconsin ensures that each procurement will occur with full and open competition.

In Wisconsin, the central authority over purchasing goods and services for all State departments, institutions and agencies is vested in the Department of Administration, and by delegation, in its State Bureau of Procurement (SBOP). Competitive bidding is the preferred method for selecting suppliers of goods and services. However, alternate methods may be considered if competitive bidding is justified as impractical or not in the best interests of the State. State law provides the following procurement methods:

- Competitive Solicitation (Request for Bids, Request for Proposals, Simplified Bidding, Best Judgment)
- Sole Source Waiver
- Emergency Procurement
- Waiver of Bidding Process
- Other Procurement Processes (Piggybacking, Collective, Intergovernmental, Cooperative)

Agencies must submit certain procurement actions to SBOP for approval prior to release of solicitations. Submissions must be in the form of a Request for Purchasing Approval/Authority or Procurement Plan. The following actions require SBOP approval:

- Requests for proposals over \$50,000
- Intergovernmental or cooperative procurements over \$50,000
- Sole source and general waivers over \$25,000
- Legal services or vehicle purchases, regardless of amount
- Collective procurements over \$50,000
- Requests for bids for services over \$50,000

Further information regarding the State of Wisconsin's procurement rules and policies may be found in the State's Procurement Manual located at: <https://doa.wi.gov/ProcurementManual/Pages/default.aspx> and as attached for reference.

The policies and procedures of each agency expending any CDBG-DR funds will include ethical standards of conduct governing employees engaged in the award or administration of CDBG-DR contracts. Each agency will maintain a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts. Conflict of Interest provisions listed at 2 CFR 200.318(i) and all other applicable federal regulations will be incorporated into the policies and procedures of each agency ultimately ensuring compliance with 2 CFR 200.318(i).

Generally, the governing statutes for procurement in Wisconsin can be found at Chapter 16, of the Wisconsin State Statutes. Procurements subject to the Wisconsin Administrative Code are also governed by procurement regulations issued by the State of Wisconsin’s Department of Administration. The methods of procurement to be followed (e.g., best judgement, simplified bid, request for proposal/bid) are documented within the State’s Procurement Manual. Governing statutes referenced above can be located at: <http://docs.legis.wisconsin.gov/statutes/statutes/16/IV>.

As outlined in the table below and in the State of Wisconsin’s Procurement Manual, the state uses a variety of competitive source selection processes, including best judgment (\$5,000 or under) simplified bid (up to \$50,000) and competitive procedures for solicitations over \$50,000. The State of Wisconsin will ensure that all opportunities be made available for small and minority owned businesses.

The State of Wisconsin’s procurement policies align with the requirements set forth under 2 CFR 200.318-200.36 ensuring fair and open competition. Further ensuring consistency with federal requirements, Wisconsin will ensure that all purchase orders and/or contracts include all clauses required by Federal statutes, executive orders and implementing regulations. The attached document titled, “Federal Procurement Requirements” will be used by each agency (in addition to the existing policies and procedures) as a check and balance, prior to issuing any solicitations, to ensure adherence to federal procurement requirements. The following table provides a cross-walk between the federal regulatory requirement and its closest counterpart under Wisconsin’s procurement laws:

Table 1: Federal Regulations and Wisconsin Procurement Crosswalk

Federal Citation	Short Title	Wisconsin Statutes, Administrative Code & Department of Administration Procurement Requirements	Short Title
2 CFR 200.318(a)	General Documented Procurement Standards	PRO-102 PRO-202	Delegation Specifications and Standards
2 CFR 200.318(b)	Contractor Oversight	PRO-405 PRO-413	Contract Administration Reporting Supplier Complaints
2 CFR 200.318(c)	Conflict of Interest provisions	PRO-109 PRO-602 PRO-608	Code of Procurement Ethics and Unlawful Benefits to State Employees, Public Officials Non-Collusion and Disclosure of Conflicts of Interest

			Employer-Employee Issues: Common Law Factors and Contracting with State Employees
2 CFR 200.318(i)	Maintain Records detailing history of procurement	PRO-105	Procurement Record Retention and Access
2 CFR 200.319	Competition	PRO-301	Competitive Procurement Policy
2 CFR 200.320	Methods of Procurement to be Followed	PRO-101, PRO-302, PRO-303, PRO-304 and PRO-306	Procurement Definitions and Thresholds, Best Judgment Purchasing, Simplified Bidding, Bidding Policy & Procedure (Official Sealed Bid), Competitive Negotiation (Request for Proposal)
Federal Citation	Short Title	Wisconsin Statutes, Administrative Code & Department of Administration Procurement Requirements	Short Title
2 CFR 200.321	Contracting with M/WBE, etc.	PRO-606	Supplier Diversity Policy and Reporting
2 CFR 200.323	Contract Cost and Price Checklist	PRO-305 PRO-308 PRO-407	Basis for Bid Awards Basis of Award for Competitive Negotiation (RFP) Pricing and Discounts
2 CFR 200.324	Federal Awarding Agency or passthrough Entity Review	PRO-110	Management Reviews
2 CFR 200.325	Bonding Requirements	PRO-607	Risk Management Considerations in Procurement: Insurance, Bonds and Sureties
2 CFR 200.326	Federal Contract Provisions	PRO-404	Standard Terms and Conditions

Procedures for Prevention of Duplication of Benefits

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) will implement the following procedures as policy to ensure that Community Development Block Grant (CDBG-DR) assistance does not duplicate prior assistance for the same purposes. As the grantee for the CDBG-DR Program, DEHCR will provide a uniform process for the prevention of Duplication of Benefits (DOB) that includes but not limited to:

- A.** Ensuring that all resources received undergo a third-party verification process. This includes verifying assistance received from FEMA, SBA, NFIP, private insurance, nonprofit/profit agencies and organizations in each grantees' community. DEHCR grant managers, caseworkers or others assigned by the Unit of General Local Government (UGLG) to work with the applicant will retrieve and summarize this information. If an agency or applicant is nonresponsive to the request for information, the assistance will be rescinded, per DEHCR policy.
- B.** An unmet needs analysis will be conducted for each applicant, utilizing the formula that is outlined in the Federal Register as noted above. The calculation demonstrates what funds were received for real and personal property, verified receipts and the amount that will be owed by the applicant (if applicable). The assigned party will follow the Verification of Receipts Procedure. If there is a policy question that includes a request for an exception, the lead contact from the UGLG grantee or contractor is required to submit a written request that identifies the policy under question and why an exception is needed. The request will be reviewed and discussed by the subrecipient and Project Manager. DEHCR may discuss concerns with the Department of Administration's Division of Legal Services to ensure compliance with CDBG-DR regulations.

After the DOB analysis is completed, the applicant and the case manager will sign the applicant DOB worksheet that includes all funds received for repairs or other needs and the final DOB amount (if applicable). A final worksheet will be forwarded to DEHCR for review and approval.

- C.** Beneficiaries of CDBG-DR are required to sign a Duplication of Benefits Certification Form (subrogation agreement). The applicant certifies and agrees to repay any duplicative assistance received for the same purpose. The following language will be contained in the agreement: "*Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.*"

- D.** To assist local government grantees and contractors, DEHCR will establish agreements with other disaster funding agencies to share information related to funding received for disaster assistance by an applicant. DEHCR will use the best, most recent data available from FEMA, SBA, insurers and any other sources of funding to prevent the duplication of benefits. DEHCR will comply with the requirements of 2019 DOB Notice (84 FR 28836). Treatment of loans will be consistent with the requirements of the Declined Loans Provision and section 1210 of the Disaster Recovery Reform Act of 2018 (DRRA) (division D of Pub. L. 115-254). The application and contract documents are the tools utilized to ensure that there is clear communication with applicants regarding their status and the

purpose of the DOB verification process. The information received is used to establish the amount received for the DOB calculation.

Attachments:

1. DOB Certification Form
2. DOB Consent to Release Form
3. Verification of Receipts Process
4. DOB Worksheet Final Approval (an applicant worksheet will also be available).

Procedures to Determine Timely Expenditure

Congress has set a 6- year expenditure period on funds allocated through PL 116-20. 82 FR 5591, “Allocations, Common Application, Waivers and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees” states that: “Each grantee must expend 100% of its allocation of CDBG-DR funds within 6 years of HUD’s execution of the Grant Agreement.” As a grantee to funds allocated by PL 116-20 and given the rules stated by the Federal Register Notice, the State of Wisconsin has developed the following procedures to ensure timely expenditure of funds.

The State of Wisconsin has assigned full administration of the CDBG DR award to the Wisconsin Department of Administration, Division of Energy, Housing and Community Resources (DEHCR). DEHCR will ensure that all funds are expended and drawn down by the 6-year deadline. DEHCR is the Lead Agency for the State of Wisconsin’s annual Small Cities allocation of CDBG funding. As part of the Action Plan process, DEHCR will develop expenditure projections and milestones. These projections and milestones will serve as a roadmap to ensure timely expenditure of funds. DEHCR uses its own STAR Accounting System (GMS) for its State CDBG program. DOC will use this system as a method to track grant budgets and drawdowns. DEHCR is also a recipient of HUD’s Neighborhood Stabilization Program (NSP). The NSP program and the CDBG-DR uses the same DRGR system. DEHCR has experience with this system and will use it to pull information about drawdowns. A Drawdown Projection Report, with data from DRGR, will be used in tandem with the Action Plan projections to ensure the pace of drawdowns and alignment with the 6-year drawdown deadline.

DEHCR Program Managers will meet regularly with DEHCR management to discuss expenditures and drawdown. These meetings will be used to ensure project compliance with the 6-year expenditure deadline. During these meetings, Program Managers will identify projects that may not meet the expenditure deadline. Program Managers will provide recommendations regarding these projects that may be stalled. DEHCR management will review these recommendations as well as reassess any potential remaining unmet needs. DEHCR will then begin the process to re-program funds to other activities.

Procedures to Detect Fraud, Waste, and Abuse

The State of Wisconsin Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) has established a procedure to detect fraud, waste, and abuse. As the grantee for the State of Wisconsin's Small Cities CDBG program, DEHCR has established a policy via the attached Fraud, Waste and Abuse Procedure and DEHCR's Monitoring Plan. The Duplication of Benefits Procedure also supports this effort.

In addition, the monitoring plan describes the objectives of the plan:

The objectives:

- To determine if an entity is carrying out its activities in a timely manner in accordance with the terms of its grantee agreement.
- To determine if costs are eligible and reasonable.
- To determine if entities have adequate controls to minimize waste mismanagement, fraud and abuse.
- To assess if the entity has a continuing capacity to carry out the project.
- To identify potential problems and to assist the grantee in complying with applicable laws.
- To resolve problems through discussion, negotiation, technical assistance and training.
- To ensure performance and compliance deficiencies are corrected and not repeated.
- To determine if conflicts of interest exist.
- To ensure that required records are maintained. Select examples include rent occupancy, ownership, household income, Davis Bacon.
- To conduct site visits/inspections of CDBG-DR assisted units to ensure that units comply with all applicable regulations, code and ordinances.

Elements of the Plan include:

- An Annual Risk Analysis is conducted to determine which recipients receive an on-site monitoring visit or desk monitoring and if additional reporting and monitoring is required.
- Onsite monitoring and response schedule and the mechanism used to carry out the review.

Attachments:

1. State of Wisconsin's Fraud, Waste and Abuse Policy
2. DEHCR Monitoring Plan

Procedures to Maintain a Comprehensive Disaster Recovery Website

The State of Wisconsin is currently creating and will maintain comprehensive webpages for the Housing Urban Development (HUD), Community Development Block Grant-Disaster Recovery (CDBG-DR) in accordance with HUD requirements, as cited in Federal Register/Vol.85, No. 17/Monday, January 27, 2020. The webpages, part of DEHCR's public website, will serve as a central source for program public information and transparency. As stated above, DEHCR is the grantee for the State of Wisconsin's CDBG-DR award. DEHCR is also the grantee for the State's annual CDBG allocation. DEHCR currently manages webpages associated with the State's CDBG program.

DEHCR's website, located at https://doa.wi.gov/Pages/AboutDOA/CDBG_Disaster-Recovery.aspx, will include CDBG-DR information. The information that will be available on the DEHCR webpage will include but may not be limited to:

1. The Unmet Needs Assessment
2. Action Plan and Amendments
3. DRGR Action Plan
4. Citizen Participation Plan
5. Announcements of Public Hearing
6. Quarterly Performance Reports (QPR); posted for 3 days to solicit comment before final submission to HUD. The final QPR will then be posted to a permanent section designated for Reporting.
7. A list and description of each CDBG-DR program
8. How to apply for assistance
9. Appeals Procedure
10. Portal for Citizen Complaints
11. Location of all project offices and hours of operation
12. List of all Sub-Recipients
13. Names of staff, responsibilities and locations
14. Guidance memoranda
15. Procurement policies and procedures

The website will be updated for the first six months on a monthly basis or as necessary until completely functional and, subsequently, it will be updated quarterly. The website will be updated by DEHCR staff. All contents from the designated program and fiscal staff will undergo review before the final posting. Website URL's will be printed on all program advertisements and outreach materials.

The State of Wisconsin adheres to ADA compliant standards for website accessibility and readability. The State supports accommodations for citizens with limited English proficiency and will publish program documents in languages based on the need of non-English speaking communities.

Implementation Plan

Timely Information on Application Status

Program applicants are Wisconsin's top priority for this recovery program. Applicants can obtain timely communication about their application status at any time during operational hours by contacting their sub-grantee's case manager via telephone, leaving an after-hours voicemail message to be returned the following business day, or by submitting an email inquiry. DEHCR Program Managers will be available during operational hours and may be contacted by similar means. Contact information will be posted to DEHCR's website and will be updated at least monthly as warranted.

Case managers will be available for face-to-face intake meetings as requested by the applicant. Accommodations can be made ahead of time for applicants with physical disabilities and/or a need for translation services. Proactive communication from Program Managers regarding application status will occur on a frequent basis during initial intake of applications. At which time, Program Managers will proactively contact applicants to request missing eligibility documentation and verify information entered on the application form. Once all documentation is received, the applicant will receive an award letter with information regarding eligibility.

The State will utilize its existing appeals process for applicants wishing to appeal a decision. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

Capacity Assessment & Staffing

The State of Wisconsin has conducted a thorough capacity assessment and developed the current administrative structure (as shown below) for positions to support critical management, oversight and implementation.

CAPACITY ASSESSMENT

The State of Wisconsin does not have any open CDBG-Disaster Relief findings or corrective actions to undertake.

The State of Wisconsin will attend CDBG-DR training as provided by HUD. DEHCR staff are signed up to attend HUD provided training March 5th and 6th in-person in Madison, WI. Additionally, DEHCR staff are attending training March 31st through April 2nd in Chicago, IL and will attend consultant-provided CDBG-DR training March 23rd – March 26th in New Orleans, LA. Lastly, CDBG-DR training will be provided by COSCDA at their convention. DEHCR staff will be in attendance.

STAFFING

The State of Wisconsin has assessed its staffing capacity and has determined it has sufficient capacity and experience to administer the CDBG-DR award. Key staff members, particularly those in the financial management section, have prior experience with the HUD CDBG annual program and will transition seamlessly into CDBG-DR program positions with minimal training to expand understanding of program differences.

The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) has appointed the following staff who have demonstrated experience in housing, economic revitalization and infrastructure, regulations implementing Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) (Section 3), fair housing compliance, procurement/contract management, environmental compliance, monitoring, quality assurance and financial management:

Mr. David Pawlisch, Director, Bureau of Community Development

David.Pawlisch@wisconsin.gov

608-261-7538

Ms. Tamra Fabian, Program Manager, Bureau of Community Development

Tamra.Fabian@wisconsin.gov

608-261-7747

The State of Wisconsin has designated the Legislative Audit Bureau as the entity responsible for conducting internal audits of agency programs and reports independently to the legislature of the State of Wisconsin.

Legislative Audit Bureau

22 East Mifflin St., Suite 500

Madison, WI 53703

Additionally, the State of Wisconsin has designated the State Controller's Office, which reports to the Secretary of the Department of Administration, who is appointed by the Governor of the State of Wisconsin and is the entity responsible for annually producing the Comprehensive Annual Financial Report (CAFR) for the State of Wisconsin.

Ms. Carol Herwig, State Controller
State Controller's Office
101 East Wilson St.
Madison, WI 53703

ADDITIONAL CAPACITY

The State will rely on sub-grantee Units of General Local Government to provide case management or grant management services to all housing program recipients. UGLG staff will be required to have knowledge, experience and /or skills to work with applicants to determine eligibility and duplication of benefits, as well as have a basic knowledge of data base management applications to support the management of applicant files. UGLG staff will provide applicants with first-line communication to inform them of their obligation to provide a complete and accurate program application, advise them on methods to obtain necessary eligibility documentation, answer questions about program assistance procedures and anticipated timelines, and provide them with a well-informed intake experience. The applications and the documentation collected from applicants are highly sensitive and will be handled by case management staff in a confidential manner.

INTERNAL AND INTERAGENCY COORDINATION

The devastating Wisconsin floods in August and September 2018 left many small communities in the western part of the state at a loss as to how to recover and rebuild. The Wisconsin Recovery Task Force (WRTF) assists these communities with planning and coordination of the long-term recovery process and improvement efforts. The WRTF is made up of six subcommittees (Agriculture, Economics, Health and Social Services, Housing, Infrastructure, and Mitigation) with members who primarily come from state and federal agencies, all of which play a role in recovery. However, the goals established and the outcomes realized are community driven.

Wisconsin Emergency Management (WEM) and the Federal Emergency Management Agency (FEMA) have been working with the WRTF to assess unmet needs and provide as many long-term recovery planning resources for the impacted area as possible. FEMA Community Planning and Capacity Building, WEM, and the WRTF have been heavily involved in the outreach to and recovery planning efforts for communities, individuals, and local long-term recovery committees. The Wisconsin Department of Health Services (DHS), in partnership with WEM, applied for and received the Crisis Counseling Assistance and Training Program (CCP) grant. The grant is a federally funded supplemental program administered by FEMA to fund mental health assistance and training activities in areas included in a major disaster declaration. The Center for Mental Health Services in the Substance Abuse and Mental Health Services Administration of the U.S. Department of Health and Human Services works with FEMA through an interagency agreement to provide technical assistance, consultation, grant administration, program oversight, and training for state mental health authorities, U.S. territories, and designated tribal authorities. WEM, in partnership with DHS, is currently working on an application to FEMA to

request access to Disaster Case Management Program (DCMP) grant funds to support recovery efforts for people affected by DR-4402. The State of Wisconsin and its local jurisdictions lack sufficient capacity to meet the remaining unmet needs without the assistance of DCMP funds. DEHCR will coordinate its efforts with these entities in order to create synergies and ensure efficient, effective use of CDBG-DR funds.

DEHCR will implement an Intra-agency Recovery Coordination Group to ensure all business areas that are involved with the CDBG-DR award are aligned to the mission. The Intra-agency Recovery Coordination Group will consist of a comprehensive group of key DEHCR and other Wisconsin Department of Administration staff who will be convened by DEHCR on a semi-regular basis to discuss progress in the long-term recovery process.

DEHCR will competitively award CDBG-DR funding to Units of General Local Government (UGLG's) and will enter into agreements with those entities to pass along all CDBG-DR requirements. One component of the agreement will be the requirement to adhere to all contractually agreed upon timelines and milestones for completion of agreed upon activities. DEHCR will ensure compliance with agreements by contacting grantees periodically, as necessary, to verify compliance with all contractually agreed upon terms including milestones met, timelines adhered to and deliverables achieved or are on pace to be achieved.

TECHNICAL ASSISTANCE

Technical assistance to local grantees will be provided by DEHCR program staff as needed. Requests for technical assistance should be made in a timely manner and within the time parameters of the appropriate program design. DEHCR may contract with a Technical Assistance Provider(s) should either demand for technical assistance exceed DEHCR's capacity. In addition, the State received significant technical assistance throughout the development of the Action Plan. Depending on the nature of assistance required, the State will coordinate with HUD to obtain an available provider, or engage in a formal procurement to hire a vendor with the expertise required to provide technical assistance in regulatory compliance, construction management, environmental procedures, etc.

ACCOUNTABILITY

Governor Tony Evers has designated the Wisconsin Department of Administration, Division of Energy, Housing and Community Resources as the administrative and fiscal agent responsible to HUD for program oversight, reporting and compliance. The CDBG-DR award Action Plan will have multiple ways for the public to provide comment and identify needs and priorities. The Action Plan will identify under what conditions a Substantial Amendment is necessary regarding the CDBG-DR award. The existing state Consolidated Plan, Citizen Participation Plan will also provide guidance regarding the need for Substantial Amendments.

CDBG-DR administration will be led under the direction of Ms. Susan Brown, Administrator of the Division of Energy, Housing and Community Resources. The Governor-appointed Secretary of the Wisconsin Department of Administration, Mr. Joel Brennan, will provide executive level oversight of the CDBG-Disaster Recovery Program. The DEHCR Administrator, housed in the Department of

Administration, is an executive-level appointee who will serve at the direct appointment of the Secretary. The Secretary will serve as authorized signatory of the legally binding grant agreement (contract) between HUD and the state and will sign sub-award agreements with UGLG's.

The DEHCR Division Administrator will execute contract amendments, certify financial reporting, and serve as the lead point of contact for HUD, including for monitoring and compliance and issue resolution. Mr. David Pawlisch, the Director of the Bureau of Community Development within DEHCR will oversee daily operations of the CDBG-DR award, including the competitive awards process, contract execution and management, policy and procedure, public information, monitoring and reporting. Ms. Colleen Holtan, the Director of the Bureau of Financial Management at the Department of Administration will oversee financial management, and oversight of the HUD line of credit, including management of the Disaster Recovery Grant Reporting (DRGR) system and timely expenditures.

Conclusion

The State has in place proficient controls, procedures, and management capacity to meet all HUD regulations. This includes financial controls, procurement processes and adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, and to detect and prevent waste, fraud, and abuse of funds. The State has demonstrated the capability to effectively manage funds, ensure timely expenditure of funds, and maintain a comprehensive website regarding all disaster recovery activities assisted. In addition, the State has demonstrated adequate capacity to manage the funds and address capacity needs. Each of these areas is adequately addressed in this document and supporting files.

Grantee's Certification

The State of Wisconsin certifies the accuracy and validate of the response.