

**SUMMARY OF PUBLIC COMMENTS and AGENCY RESPONSE
Relating to EmR2030 and CR 21-012, Veterans Assistance Grants**

This attachment represents the unique issues raised during the public comment period. The comment section reflects a summary of the issues and represents testimony that was presented in support or opposition, or that provided information and recommendations to the Department. After considerable review of all comments, the Department submits its response to each of the issues as indicated below.

Commenter	Rule Provision	Comment / Recommendation	Agency Response
Nathan Bond, County Veterans Service Officers Association of Wisconsin	CR 21-012	The association supports the rules as proposed.	No resulting changes were made.
The American Legion, Dept. of Wisconsin	CR 21-012 Plain Language section	The proposed definition for “entrepreneur”, as created under s. 2.01 (1r) (kg), is missing.	No resulting changes were made. To avoid redundancy, the definition is not included in the plain language section since it appears in the text section of the rule. The plain language section simply summarizes substantive changes.
The American Legion, Dept. of Wisconsin	CR 21-012 s. 2.07 (3) (c)	Relating to amended definition for “evaluation committee”. 1. What is the size of the committee: Is the size fixed or variable depending on the applications? 2. Are the members who are not members of the board, department staff or public members? 3. What are the criteria for selecting members of the committee? 4. Will the committee be composed solely of veterans?	No resulting changes were made. The Department feels these issues are appropriately contained in internal processes and administrative practices rather than in the administrative rules.
The American Legion, Dept. of Wisconsin	CR 21-012 s. 2.07 (6) (a) 8.	Relating to repeal of provision “Integration of outreach and employment services into plan”. Why is this being removed as part of the evaluation criteria? One would think this would be an important part of the evaluation criteria?	No resulting changes were made. The provision being repealed was deemed by the Department as being too restrictive. The criteria previously required is not a function of every non-profit organization that applies for the funds. If the provision was retained, some applicants would be deemed ineligible for grant funds.
The American Legion, Dept. of Wisconsin	CR 21-012 Section 54	Relating to the point system. 1. What is the point system? 2. What is the range within the system? 3. Under the proposal will the system be constant or will it change each grant cycle? 4. Who develops the point system? 5. Does the committee have input on the system?	No resulting changes were made. Information relating to the point system is relayed in the grant announcement when released. Applicants are made fully aware of the requirements during each grant cycle.
The American Legion, Dept. of Wisconsin	CR 21-012 s. 2.08 (3) (g)	Relating to definition for “evaluation committee”. Same concerns as comments listed under s. 2.07 (3) (c).	No resulting changes were made. The Department feels these issues are appropriately contained in internal

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			processes and administrative practices rather than in the administrative rules.
The American Legion, Dept. of Wisconsin	CR 21-012 ss. 2.08 (5) (d) 9. and 10.	Relating to creation of these provisions. 1. In this section is the concern only grants applied for or received or is the concern any funds applied for or received? 2. What are the criteria for requesting the verification of matching funds? In order to be consistent a form should either be required from all applicants or by no applicants.	The final rule amends s. 2.08 (5) (d) 9. to clarify that the department requires applicants to disclose funds received. No resulting changes were made to s. 2.08 (5) (d) 10. as these concerns are addressed during the grant application process.
Nathan Elliot	EmR 2030 s. 2.05 (3) (a)	Relating to recovery of erroneous payments in which the department may request repayment. This language should be changed to: (3) Remedies. (a) The department WILL REQUIRE repayment..."	No resulting changes were made. The Department determines repayments based on a case-by-case basis after thoroughly investigating any possible extenuating circumstances.
Saul Newton Wisconsin Veterans Chamber of Commerce	CR 21-012 s. 2.08(5)(d)10. s. 2.07(10)(a)2. s. 2.08 (5)(j)1. am.	1. Supportive of expansion of eligibility for subsistence and health care aid grant programs. 2. Supportive of proposed rules to streamline the application and evaluation process for non-profit organizations, entrepreneurship, and employment grants. 3. Support the proposed rules to ensure reasonable accountability and transparency measures are in place, protecting the Department as well as the grant awardees. 4. Concern relating to proposal to require matching funds as a condition of an application. 5. Concern relating to restricting the use of grant funds for employee wages and compensation.	No resulting changes were made. The proposed rule, under s. 2.08(5)(d)10., permits, but does not require, the department to request matching funds. Similarly, the proposed rules, under ss. s. 2.07(10)(a)2. and 2.08 (5)(j)1. am., do not require the department to restrict grants funds to employee wages and compensation, rather the department would have discretion to establish the percentage of funds that may be used for employee wages and compensation.