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LETTER FROM GOVERNOR TONY EVERS

Dear Secretary Bessent,

Expanding broadband access, adoption, and affordability for all Wisconsinites has been a critical priority of my administration from the very beginning. In this day and age, having access to affordable, reliable high-speed internet is no longer a luxury, but a necessity for all. This is especially true for many of our rural communities. I'm proud that my administration has done more to expand access to high-speed internet than any other administration in our state's history, ensuring that Wisconsinites are able to work, get connected to educational and telehealth services, pursue opportunities to improve their quality of life, and stay in touch with loved ones, no matter where they live.

As a result, more than **410,000** homes and businesses across the state will be connected to new or improved high-speed internet service, made possible by historic investments of state and federal funds via the CARES Act and the American Rescue Plan Act. We've supported local infrastructure as well as local jobs, all while addressing critical needs of our communities.



GOVERNOR TONY EVERS

Under the Capital Projects Fund, Wisconsin received **\$189,354,516** to fund three programs as approved by the U.S. Department of Treasury. Each program is designed to address the access, adoption, and affordability of broadband service in Wisconsin.

First, nearly 17,000 homes and businesses are expected to receive new or improved broadband service from nearly \$42 million in grants from the **Broadband Infrastructure Program** awarded by the Wisconsin Public Service Commission (PSC).

Second, the PSC has provided nearly \$28 million in subawards to 11 projects through the **Digital Connectivity and Navigators Program**. As a result, 44,000 digital-devices, expanded public Wi-Fi networks, and digital navigation services will support underserved and underconnected areas of the state.

Finally, the **Flexible Facilities Program** overseen by the Wisconsin Department of Administration (DOA), has awarded over \$115 million for 35 projects statewide, fueling expansions and renovations to libraries, community centers, and other anchor institutions that provide digital services and access for communities across the state.

Providing needed services, expanding access, and supporting local efforts and communities is how we're closing the digital divide and ensuring every Wisconsinite has access to the high-speed internet they need to be successful and thrive in a 21st-century economy. Together, these efforts will help build stronger communities and connect folks all across our great state.

Sincerely,

Tony Evers Governor

BROADBAND INFRASTRUCTURE PROGRAM

Program Information

Approved Program Plan number	CPF_GP-000131
Program start date	October 6, 2022
Program end date	December 31, 2026
Actual CPF funds allocated to this Program	\$43,350,000 (\$41,877,262 in awarded subgrants)

Executive Summary

The U.S. Department of the Treasury (Treasury) approved the State of Wisconsin's (Wisconsin or State) Capital Projects Broadband Infrastructure Program on October 6, 2022. Governor Evers and the Public Service Commission of Wisconsin (Commission or PSC) announced the opening of the Capital Projects Broadband Infrastructure Program beginning August 14, 2023. The application window closed on November 7, 2023. The Commission received 124 grant applications requesting a total of \$221,616,886. Ultimately, the PSC awarded \$41,877,262 in Capital Projects Broadband Infrastructure Program funding to Grantees on March 26, 2024, and the PSC began administering 28 subawarded grants on behalf of the State.



Key outcomes: This funding, along with two grant awards funded by ARPA SLFRF awarded in this same grant round, is expected to connect nearly 17,000 homes and businesses to new or improved broadband services.

During the reporting period ending June 30, 2025, Wisconsin focused on program management, monitoring and compliance. Much of the staff time was dedicated to administering the program, including executing subaward agreements (eight of 28 executed within the reporting period), grantee onboarding activities, processing reimbursement requests, monitoring projects, and providing technical assistance to grantees.

Uses of Funds

The Commission awarded \$41,877,262 in Capital Projects Broadband Infrastructure funding (CPF) for 13 grantees on March 26, 2024. All grant agreements were executed by August 2024.

As of June 30, 2025, \$18,224,918.17 has been reimbursed. Most grantees have begun work on their projects, and about 44 percent of the total award amount has been reimbursed for documented project expenses. Completed work includes engineering, mainline fiber installation, splicing, boring, installations, and other eligible project costs.

Incurred administrative costs include staff time for technical assistance, outreach, and post-award administration. These include PSC staff dedicated to data, GIS, policy, management, communication and outreach, and compliance efforts.



Gov. Tony Evers learns about the expansion of high-speed internet in Egg Harbor and several neighboring communities through Broadband Infrastructure Grants. The project is one of more than two dozen that will deliver quality internet service to thousands of homes and businesses across Wisconsin.

During the current performance period, PSC staff held a grantee technical assistance webinar related to monitoring, and initiated program monitoring of documentation for subrecipients. PSC expects to continue post-award functions related to reimbursement, compliance, monitoring, subrecipient project closeout, and for additional households to be connected to broadband infrastructure.

Addressing Critical Needs

The Broadband Infrastructure Program and subsequent projects address the needs identified in the approved program plan and broadband infrastructure gaps in previously underserved and underconnected areas. Eligible applicants had to demonstrate critical needs related to work, education, and health monitoring that the proposed project would address in selected communities.

PSC anticipates that all projects will begin construction by fall 2025, and that several projects will complete construction and closeout in the 2025 calendar year. Completed work includes engineering, mainline fiber installation, splicing, boring, and installations. As of June 30, 2025, 15 projects are at least 75 percent complete, three projects are 25 to 74 percent complete, and 11 projects are under 25 percent complete.

Labor

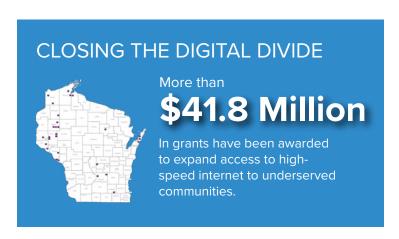
The grant agreements require that grant recipients certify that they will not discriminate in their hiring practices, that they will comply with applicable state and federal laws in their hiring practices and submit affirmative action documentation according to state statute.



Gov. Tony Evers views a fiber optic splicing demonstration in Egg Harbor as part of a visit spotlighting the Broadband Infrastructure Program. Grants were awarded to areas of the state lacking access to 100/20 wireline connections.

Community Engagement

The PSC encouraged public participation in every step of the grantmaking process. All grant application documentation is publicly available under PSC docket 5-CPF-2023 through the PSC Electronic Records Filing (ERF) System. Members of the public, potential grantees, and other interested stakeholders could submit letters of support with applications and participate in an objection period by filing comments through the system during this process. The PSC conducted outreach to potential grantees, including press releases, newsletters, webinars, and targeted engagement with stakeholders and current broadband grant recipients. As projects reach customers, PSC



asks that the ISP provides a survey link for served customers to complete to report on their experiences, fees and costs, challenges, and other feedback.

Civil Rights Compliance

Each grant recipient has executed a grant agreement contract effectuating their grant award. The grant agreements incorporate state and federal requirements related to nondiscrimination and affirmative action requirements, including but not limited to, Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. 2000d-1 et seq., and Treasury's implementing regulations, 31 C.F.R. part 22; Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. 794; Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. 1681 et seq., and the Department's implementing regulations, 31 C.F.R. part 28; Age Discrimination Act of 1975, 42 U.S.C. 6101 et seq., and the Department's implementing regulations at 31 C.F.R. part 23.

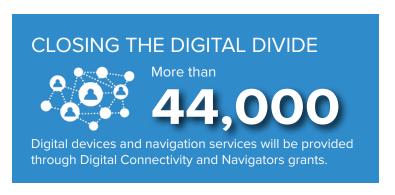
DIGITAL CONNECTIVITY AND NAVIGATORS PROGRAM - DIGITAL CONNECTIVITY TECHNOLOGY PROJECTS

Program Information

Approved Program Plan number	CPF_GP-000133
Program start date	December 14, 2023
Program end date	December 31, 2026
Actual CPF funds allocated to this Program	\$29,458,323 (\$27,883,323 in awarded subgrants)

Executive Summary

The U.S. Department of the Treasury (Treasury) approved the State of Wisconsin's Capital Projects Fund Digital Connectivity and Navigators program on December 14, 2023. The Public Service Commission of Wisconsin (PSC or Commission) is administering the subrecipient grants on behalf of the State. On April 2, 2024, Governor Evers and the PSC announced the opening of the Digital Connectivity and Navigators Program grant application. After the application period closed in July 2024, the Broadband Office reviewed, scored, and made recommendations to the



Commission. The Commission awarded \$27,883,323 in Capital Projects Funds to 11 Grantees in September 2024. All 11 projects will deploy digital-devices projects, and two of the projects will also deploy Multi-Dwelling-Unit (MDU) Wi-Fi.

Digital device projects are expected to provide over 44,000 digital devices and digital navigation services to underserved, underconnected individuals across Wisconsin. MDU projects are projected to provide Wi-Fi access to over 3,500 housing units. The publicly available Wi-Fi networks could reach as many as 30,000 users.

The PSC has hired staff dedicated jointly to the Capital Projects Broadband Infrastructure and Digital Connectivity programs: a grant specialist-advanced, a communications specialist, and a program and policy analyst-advanced.

During the reporting period, PSC staff time was dedicated to administering the program, including executing agreements, grantee onboarding, processing reimbursement requests, monitoring projects, and providing technical assistance to grantees.

Project activities have included community outreach and device fleet acquisitions, including developing processes to deploy and track devices. The majority of projects have reported positive progress.

Uses of Funds

As of June 30, 2025, all grant agreements have been executed and many of the projects have started programming. A review of 274 reimbursement requests has resulted in 11 percent of the total award, or \$3,062,965.61, being reimbursed to subrecipients. Through June 30, 2025, 11,641 digital devices have been purchased, and 7,716 digital devices have been deployed.

Administrative costs cover dedicated program staff time and partial allocations of PSC staff dedicated to data, policy, management, and compliance for both the Broadband Infrastructure and Digital Connectivity programs.

Additional allocated time from PSC management contributes to CPF

CLOSING THE DIGITAL DIVIDE

One participant had been struggling with searching for and applying to jobs through Indeed on his simple Android phone and borrowed a Chromebook to access the online job search resources... He has since gotten work and is employed while continuing to develop his digital skills.

Bayfield County Digital
Navigator, on the impact of the
county's Digital Connectivity and
Navigators grant



program development. PSC expects to continue post-award functions related to reimbursement, compliance, and monitoring.

Addressing Critical Needs

The Digital Connectivity Program seeks to address the critical needs identified in our approved program plan. The program targets underserved and underconnected households in Wisconsin including those that are impacted by low adoption rates.

Grantees have reported some early successes related to positive participant outcomes at local libraries, enabling participants to use the devices for work, education, and health monitoring. One grantee reported:

"Digital Navigators have developed a curriculum to host workshops utilizing devices from the lending library to teach individuals basic literacy skills to build their confidence in using devices. Examples of the curriculum and resource guides that have been created include internet safety, avoiding scams and fraud, basic digital literacy skills, among other topics. Some other digital literacy skills that have been taught during office hours include how to attach files to an email, how to save files, general email navigation, multi-factor authentication, creating logical file structures, and internet safety."

As each project is implemented, subrecipients will collect program qualification data about eligible for participants, and host surveys for program results. Each subrecipient reports quarterly with progress updates to the Commission's 5-CPF-2024 docket.

Labor

The grant agreements require that grant recipients certify that they will not discriminate in their hiring practices, that they will comply with applicable state and federal laws in their hiring practices and submit affirmative action documentation according to state statute.



Gov. Tony Evers chats with community leaders from the town of Cross about extending high-speed internet into rural communities. Community engagement has been a staple of efforts to bridge Wisconsin's digital divide.

Community Engagement

The PSC encourages public participation in every step of the grantmaking process. All grant application documentation is publicly available under PSC docket 5-CPF-2024 through the PSC Electronic Records Filing (ERF) System. Members of the public, potential grantees, and other interested stakeholders can submit letters of support with applications. The PSC conducted outreach to potential grantees, including press releases, one-on-one meetings, newsletters, webinars, and targeted engagement with stakeholders and current grant recipients.

Civil Rights Compliance

Each grant recipient has executed a grant agreement contract effectuating their grant award. The grant agreements incorporate state and federal requirements related to nondiscrimination and affirmative action requirements, including but not limited to, Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. 2000d-1 et seq., and the Department's implementing regulations, 31 C.F.R. part 22; Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. 794; Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. 1681 et seq., and the Department's implementing regulations, 31 C.F.R. part 28; Age Discrimination Act of 1975, 42 U.S.C. 6101 et seq., and the Department's implementing regulations at 31 C.F.R. part 23.

FLEXIBLE FACILITIES PROGRAM - MULTI-PURPOSE COMMUNITY FACILITY PROJECTS

Program Information

Approved Program Plan number	CPF_GP-000187
Program start date	December 14, 2023
Program end date	December 31, 2026
Actual CPF funds allocated to this Program	\$116,546,193 (\$115,036,955 in awarded subgrants)

Executive Summary

The State of Wisconsin Department of Administration (DOA) – Division of Energy, Housing, and Community Resources (DEHCR) created the Flexible Facilities Program (FFP) to administer the U.S. Department of the Treasury (Treasury)'s Capital Projects Fund (CPF) – Multipurpose Community Facility program. Treasury approved the program on December 14, 2023 Governor Evers and DOA announced the opening of the program for applications on April 26, 2024. Grant announcements were made on October 7, 2024.



The goals and objectives of the FFP include allocating CPF grants for capital asset investments into the construction of new facilities or renovation/expansion of existing facilities, as well as the purchase and installation of digital connectivity equipment for broadband high-speed internet access to enable work, education, and health monitoring.

During the reporting period, DOA concentrated on the application and award process, obligating funds through administrative processes and the execution of grant agreements, and developing and providing Grantees with training webinars and policy documents for grant implementation.

DOA received 100 applications from 97 local and Tribal governments throughout Wisconsin with \$297,445,801.25 in funding requested for projects costs totaling \$442,930,404.09 upon the end of the application period on July 11, 2024. A total of \$115,036,955 in grants were awarded to thirty-five (35) Grantees. Project awards included construction, renovation, or expansion of 21 libraries; nine (9) other multi-purpose facilities – eight (8) of which include library spaces in addition to other community spaces; and five (5) community centers. The awarded projects are expected to benefit approximately 342,498 residents living in twenty-eight (28) Wisconsin counties.

All grant agreements have been executed, and all FFP funds have been obligated. Twenty-nine (29) Grantees (83%) reported starting construction as of June 30, 2025, and all other Grantees are expected to start construction by the end of the third quarter of 2025. A total of \$3,992,334.65 in direct Grantee assistance has so far been expended for construction, digital connectivity investments, architectural/engineering, grant administration and other professional services.

DOA developed processes for the review and approval of requests pertaining to budget and scope adjustments and sole bidder/sole source procurement in accordance with provisions in 2 CFR § 200.320(c). The State will continue to work with and provide technical assistance to Grantees during the next annual performance period to help ensure timely project completions by the program deadline of October 31, 2026.

Uses of Funds

On October 7, 2024, awards were made to the highest scoring applicants, for projects which most closely aligned with the goals and objectives of the FFP, which included: to directly support recovery from the COVID-19 public health emergency by strengthening and improving the infrastructure necessary for participation in work, education, and health monitoring; enable investments in capital assets designed to address the lack of access to critical services; and provide the modern infrastructure necessary to access critical services, including a high-quality and affordable broadband internet connection.

A total of \$115,036,955 in awards were granted to thirty-five (35) qualified local and tribal governments throughout Wisconsin. Grant agreements were executed, and all funds have been obligated to the Grantees. Each FFP awarded project



Gov. Tony Evers gathers with stakeholders to celebrate a nearly \$3.4 million Flexible Facilities Grant to help expand and enhance the Ashland Public Library. The project will benefit more than 12,000 Ashland area residents.

includes capital asset investments for construction of a new facility, or the renovation and/or expansion of an existing facility, digital technology devices and equipment, and new or improved broadband/high speed internet access. An estimated 342,498 individuals living in twenty-eight (28) separate counties in Wisconsin will directly benefit from the implementation of the thirty-five (35) projects awarded FFP funding. An estimated 342,498 individuals living in twenty-eight (28) separate counties in Wisconsin will directly benefit from the implementation of the thirty-five (35) projects awarded FFP funding.

FFP funding distributions for new facility construction and existing facility renovation/expansion are shown in the table that follows:

Awards for New Facility Construction vs. Existing Facility Renovation/Expansion		
New Facility Construction & Digital Technology Improvements	\$47,829,419.00	42%
Existing Facility Renovation and/or Expansion & Digital Technology Improvements	\$67,207,536.00	58%

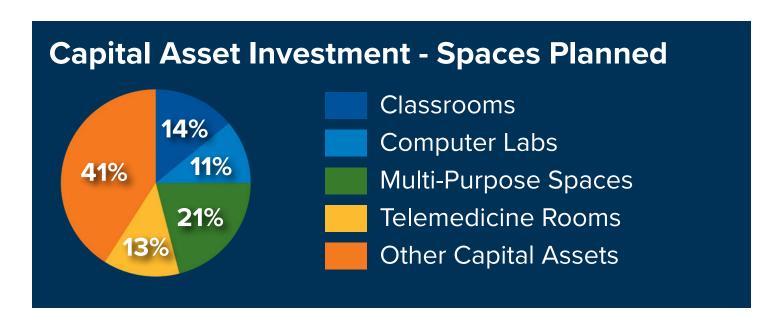
FFP funding distributions for library and non-library facilities are shown in the table that follows:

Awards for Libraries vs. Other Spaces		
Libraries & Multi-Purpose Facilities with Library Space	\$97,655,493.00	85%
Other Multi-Purpose Community Center Facilities	\$17,381,462.00	15%



Flexible Facility Program awards by facility type are displayed in the chart below:

FFP funds will be used for capital investments into three (3) main types of facilities: libraries, multi-purpose facilities with dedicated library spaces, and community centers. Planned community spaces for improving access to broadband and enabling work, education, and health monitoring include 62 classrooms, 48 computer labs, 58 telemedicine rooms, 96 miscellaneous multi-purpose spaces, 184 other capital assets (e.g., community spaces, media labs, meeting rooms, study pods), and overall improved Americans with Disabilities Act (ADA) access resulting from the facility construction, renovation or expansion. Updates to Grantees' facility plans will be in quarterly reporting and facility construction must be completed by September 30, 2026.



The chart below shows the breakdown of planned spaces in capital asset investment projects:

The FFP grant funding allocations for capital asset investments also include the purchase of digital technology equipment and devices needed for access to broadband high-speed internet and activities that enable work, education, and health monitoring. Over 1,000 pieces of digital connectivity equipment and devices will be purchased as part of the planned investments, including conferencing system equipment and devices that will enable remote access to work, education, and health monitoring. Updates to Grantees' digital connectivity and technology-related investments will be

in quarterly reporting and purchases must be completed by October 31, 2026. Key Milestones, Outputs, and Outcomes

One hundred percent (100%) of the FFP funding allocated for Grantee assistance was obligated through the execution of all thirty-five (35) FFP grant agreements in February through April 2025. A total of \$3,992,334.65 in FFP Grantee assistance costs and \$145,049.62 in the State's administration costs were expended as of June 30, 2025.

All thirty-five (35) Grantees completed environmental review activities and submitted the required environmental review report. Thirty-four (34) Grantees received environmental clearance certifications as of June 30, 2025, establishing their eligibility to proceed with construction and draw grant funds.

Ninety-seven (97) Grantee representatives participated in the FFP Implementation Training webinar held on December 12, 2024, and thirty-seven (37) participated in the Labor Standards training webinar held on May 13, 2025.

Contracting and quarterly reporting forms were developed by DOA – DEHCR and completed by Grantees for three (3) quarterly reporting periods. Data were compiled and reported to Treasury upon grant agreements being executed for the 2025 Q1 and Q2 reporting periods.

Addressing Critical Needs

The goals of the FFP are to directly support recovery from the COVID-19 public health emergency by making investments in capital assets designed to provide the modern infrastructure necessary to access critical services, including a high-quality and affordable broadband internet connection. The State's assessment of how the awarded projects will address the FFP objective goals and the extent of the Grantees' community and resident needs for critical services is based on the data and information provided in the FFP grant applications.

Critical needs specified in Grantee grant applications include but are not limited to increased or improved access to education, income generation, employment and career opportunities, health care, and broadband/high-speed



Gov. Tony Evers reviews plans to expand a multi-purpose recreation center in Shawano with the help of a \$4.25 million Flexible Facilities Grant. The landmark community project is one of 35 catalyzed by Flexible Facilities funds.

internet. Grantees also demonstrated how project specifications would address those critical needs according to measurable outcomes, such as identifying the facilities and spaces to be created (e.g., classrooms, computer labs, interview rooms, telemedicine rooms, and other multi-purpose facility spaces); and equipment and resources (e.g., desktop and laptop computers, printers/scanners, tablets, teleconferencing and other multi-media systems, and other digital technology investments) to be offered as a result of FFP projects.

Opportunities are anticipated for FFP Grantees that are conducting other publicly funded projects during the same construction period as the FFP facility construction or expansion project. Having two concurrent projects may provide the benefit an "economy of scale" where labor, supplies and materials are purchased at a reduced cost, when purchased in larger quantities. Staffing resources allocated to project management and/or construction management could also see cost savings when constructing concurrent projects, and adjacent projects.



Gov. Tony Evers helps community leaders break ground on a new Waushara County YMCA facility jumpstarted by a \$4.25 million Flexible Facilities Grant. The new facility will boast a wellness center, community lounge, and classrooms equipped with laptop computers as part of an effort to narrow the area's digital divide.

Labor

Policies and templates for labor standards requirements for FFP projects were developed and provided to Grantees during the reporting period, summarized in <u>Chapter 7: Labor Standards</u> of the <u>FFP Implementation Handbook</u>, which are posted on the <u>FFP Implementation Resources website</u>. The requirements were also reviewed in the FFP Implementation Training webinar held on December 12, 2024 and a Labor Standards training webinar held on May 13, 2025.

Grantees are required to comply with the FFP labor standards policies and all applicable federal, state and local laws and regulations. If there is a conflict among them, the Grantee is to comply with the most restrictive requirements. Grantees and subrecipient organizations are to ensure that FFP projects incorporate competitive wages, fair labor practices, payroll reporting, and compliance monitoring for the FFP project.

Contract Work Hours and Safety Standards Act (CWHSSA) overtime requirements apply to all construction contracts of \$100,000 or more, and the Fair Labor Standards Act (FLSA) apply to all construction contracts for FFP projects. In addition, to ensure fair wages, the FFP requirements include Grantees ensuring a minimum combined wage plus benefits hourly rate that is the greater of: 1) the employee's regular wage paid in accordance with a collective bargaining agreement; 2) a wage plus benefits rate of \$17.75/hour; 3) the employee's regular wage plus benefits hourly rate paid by the employer; or 4) the employee's apprenticeship wage plus benefits hourly rate, if the worker is in a registered apprenticeship program.

Fair labor practices and high labor standards for FFP Grantees include:

- Required <u>FFP Project Contract Terms & Conditions</u> document in all FFP contracts, which summarizes the labor standards and related policies and required practices applicable to the project.
- Complying with all labor standards related requirements set forth in <u>Chapter 7: Labor Standards</u> of the <u>FFP Implementation Handbook</u> and in the <u>FFP Project Contract Terms & Conditions</u> insertion;
- Encouraging the use of small businesses (as specified in the <u>FFP Project Contract Terms & Conditions</u> insertion);
- Ensuring fair wages are being paid to construction workers for the project in accordance with FFP policies;
- Collecting and monitoring payroll records from construction contractors each payroll period to ensure labor standards compliance;
- Ensuring any non-compliance issues are resolved, as applicable; and
- Reporting labor standards compliance activities and issues on the FFP Quarterly Report.

State FFP grants specialist staff will also monitor all FFP projects during the performance period, which will include a review of selected payroll records for construction work labor standards compliance.

One full-time Grants Specialist – Advanced hire was made by DOA – DEHCR to help support to the implementation of the FFP. Multiple existing staff members within DEHCR and other divisions provide financial, communications, and management functions in addition to direct program administration.

Community Engagement

The State has made multiple efforts to encourage community engagement during the reporting period, as well as throughout the implementation of the Flexible Facilities Program. The FFP application was designed to include a community engagement plan. Applicants are required to report community engagement activities each quarter during the performance period.

DOA also developed and launched an additional <u>FFP Implementation Resources website</u> in December 2024, adding to the main <u>FFP homepage</u> (originated during the previous annual reporting period), to provide external constituents with resources, updates, and materials available to assist with project implementation.

DOA held two (2) training webinars for Grantees during the reporting period to provide technical assistance and invite external constituents' input.

Community engagement efforts at this stage of FFP project implementation have been concentrated on groundbreaking events and similar pre-construction activities. As of June 30, 2025 two (2) Grantees have held project informational events, and eight (8) Grantees have held groundbreaking events, with representatives from the State visiting thirteen (13) FFP sites for announcement events, tours, or groundbreakings. Grantees are also starting to post project signs (per FFP project signage specifications) to inform community members of the project in progress and the funding sources. Grantees are required to report updates to their community engagement activities on each FFP Quarterly Report.

Civil Rights Compliance

Civil Rights and equal opportunity compliance requirements were included in the FFP Grant Announcement in 2024. During the reporting period ending June 30, 2025, the Civil Rights and equal opportunity requirements were also included in the terms and conditions in grant agreements executed with FFP Grantees (in Articles 11-13 and 25 and Attachments E and G); the FFP Implementation Training webinar and presentation slides; Chapter 3: Procurement & Contracting, Chapter 6: Equal Opportunity, and Chapter 9: Reporting of the FFP Implementation Handbook; and the Attachment 03-03: FFP Project Contract Terms & Conditions insertion from the Handbook. Grantees, subrecipients, and contractors are also required to include the Attachment 03-03 contract insertion in all contracts and subcontracts for the FFP project. Grantees must also report outcomes in their FFP Quarterly Report, related to 2 CFR § 200.321. In addition, Grantees, subrecipients, and contractors are required to comply with Wisconsin Stat. § 16.765 non-discriminatory contracting requirements, as summarized grant agreement and Attachment 03-03 document. Grantees submitted an Affirmative Action Plan or documentation verifying exemption eligibility to DOA upon having an executed grant agreement. Subrecipients and contractors are required to submit similar documentation to DOA upon being awarded a contract for the FFP project.