

## Response to Congressional Integrity Project

WEDC administers the awards for the Historic Tax Credit (HTC) program. It does not determine whether the qualified rehabilitation expenditures are eligible or the amount the project receives; those decisions are made by the Historical Society and the law.

WEDC offered to SHPO to re-do the order of events of having application documents transmitted to WEDC. WEDC followed its standard process for formally accepting applications, underwriting, and contracting.

As noted below, the Management Review Committee that reviewed and approved the application was chaired by Deputy Secretary and COO Tricia Braun. Under standard WEDC procedure, Secretary Hogan signed the contract.

The following timeline may be helpful.

2017

- Nov 1 (Wednesday) – Client emailed WEDC regional economic development director (REDD) the WEDC piece of the HTC application
- Nov 6 (Monday) –REDD emailed State Historic Preservation Office (SHPO) documents received noting that the application was out of order and that WEDC did not yet have the WI Historical Society (WHS) piece.
  - REDD acknowledged that he should have had the client send the WEDC docs directly to SHPO rather than REDD forwarding them himself and states that he is not accepting the application for WEDC processing until all the necessary pieces are in order.
  - REDD offers to direct the client to mail WHS the information submitted to him so everything will be packaged together and provided from WHS to WEDC as a bundle.
  - SHPO opines at length via multiple emails, but also provides REDD the WHS forms which were approved in September and October, 2017, respectively, and indicates that he doesn't want to make things difficult because of a technicality.
  - REDD notes to SHPO that while he now has the WHS forms, he still does not have enough information for WEDC to accept the application and will work with the client.
- Nov 21 – after some back and forth, client provides REDD with information requested
- Nov 22 – Bartz seeks guidance from Business and Community Development Director as to format of received information. Because the application has not at this date been submitted to underwriting for processing it is determined and relayed to the client that, rather than providing the information in an email, they must revise their application documents and resubmit to REDD.
- Dec 4 – client provides REDD with requested revised application
- Dec 5 –REDD reviews newly-supplied application and moves it forward in the system. Underwriting VP reviews the application for completeness and assigns to an underwriter for underwriting.
- Dec 18 – application is reviewed and accepted by underwriter for underwriting

- Application and underwriter follow normal process,

2018

- January 24, Management Review Committee reviews; application approved by COO Tricia Braun
- February 13 – contract executed, signed by CEO Mark Hogan