

Broadband Equity, Access, and Deployment (BEAD) Program  
Initial Report Form

[Sample Report Content & Guidance](#) | **\*Report will be completed in Salesforce\***

*This Initial Report Form does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific requirements set forth in the terms and conditions of a BEAD award. In all cases, statutory and regulatory mandates, and the requirements set forth in the terms and conditions of a BEAD award, including the Notice of Funding Opportunity (NOFO), shall prevail over any inconsistencies contained in this guidance.*

GENERAL INFORMATION

Federal Award Number	GAN-XXXX Provide the recipient organization’s Federal Award Number, found in the Notice of Award (Form CD-450).
Initial Report Submission Date (MM/DD/YYYY)	04/30/2023 Provide the date the Initial Report is submitted to NTIA in MM/DD/YYYY format.
Reporting Start Date (MM/DD/YYYY)	01/01/2023 Provide the start date of the Period of Performance in MM/DD/YYYY format, found in the Notice of Award (Form CD-450).
Reporting End Date (MM/DD/YYYY)	03/31/2023 Include the date that information in the Initial Report goes through in MM/DD/YYYY format.
Recipient Legal Name	State X Broadband Office Provide the recipient’s Legal Name/eligible entities legal name, which can be found on the CD-450 and supplemental page 2 of the CD-450, which should match SAM.gov.
Recipient Street Address	1234 Main Street Provide the recipient’s street address which can be found on the CD-450 and supplemental page 2 of the CD-450, which should match SAM.gov.
Recipient City, State, Zip Code	New Town X, State X 10356 Provide the recipient’s city, state, and zip code, which can be found on the CD-450 and supplemental page 2 of the CD-450, which should match SAM.gov.
EIN Number	12-3456789 Provide the recipient’s Employer Identification Number (EIN), which can be found on the CD-450 and supplemental page 2 of the CD-450, which should match SAM.gov.
Award Period Start Date (MM/DD/YYYY)	08/30/2022 Include the award period start date in MM/DD/YYYY format, found in the Notice of Award (Form CD-450).
Award Period End Date (MM/DD/YYYY)	08/30/2026 Include the award period end date in MM/DD/YYYY format, found in the Notice of Award (Form CD-450).

PLANNED AND ACTUAL USE OF FUNDS

**Instructions:** Use the table provided to provide the following information about your planned and actual use of funds over the course of the BEAD Program:

- Federal Funds Planned (\$):** Indicate planned BEAD funds to be expended over the course of the BEAD Program, broken down by eligible activity. If you do not plan to expend any federal funds for an eligible activity, put “0” in the corresponding field.

<ul style="list-style-type: none"> <li>• <b>Federal Funds Expended (\$):</b> Indicate the actual expended BEAD funds, broken down by eligible activity, from the Report Start Date (i.e., project inception) to the Report End Date (i.e., occurring within the first 90 days). If you have not expended any federal funds for an eligible activity, put “0” in the corresponding field.</li> <li>• <b>Planned Activities:</b> Provide a brief narrative (500 character or less) of the primary activities that you plan to complete, broken down by eligible activity. If you do not plan to complete any activities for an eligible activity, put “NA” in the corresponding field.</li> <li>• <b>Completed Activities:</b> Provide a brief narrative (500 characters or less) of the primary activities that have completed, broken down by eligible activity, from the Report Start Date (i.e., project inception) to the Report End Date (i.e., occurring within the first 90 days). If you have not completed any activities for an eligible activity, put “NA” in the corresponding field.</li> </ul> <p><b>Additional Guidance:</b> Reach out to your assigned Federal Project Officer (FPO) if you are having difficulty aligning or reporting on the activities put forward in the approved Initial Planning Funds application.</p> <ul style="list-style-type: none"> <li>• <b>Eligible Activities funding info:</b> Use the approved BEAD Initial Planning Funds application, paying particular attention to the Budget Narrative and Project Narrative and Eligibility documents, to pull out funding information that was initially planned for eligible activities. If activities have been adjusted in real-time based on final contracts, updated cost estimates, or other actualities, please use the most up-to-date information available to complete this report. <b>The below example pulled information from these sources to complete.</b></li> <li>• <b>Breaking out merged funds:</b> If Eligible Activities and budgets were grouped together in the Initial Planning Funds application, you will need to cross-walk the appropriate activities and related expenditures to align to the Eligible Activity categories outlined below. Use the Completed Activities field to describe the specific activities and expenditures reported and indicate what other activity it is related to in terms of the budget you submitted with the Initial Planning Funds application.</li> </ul>				
Eligible Activities	Federal Funds Planned (\$)	Federal Funds Expended (\$)	Planned Activities (500 characters or less)	Completed Activities (500 characters or less)
<b>Initial Planning Funds</b> (for additional information on eligible activities, and uses of Initial Planning Funds, see BEAD NOFO, Section IV.B.2) <b>The sum of all dollar values for eligible activities input into the ‘Federal Funds Planned (\$)’ column should equal the total award value found in the Notice of Award (Form CD-450).</b>				
1. Research and data collection, including initial identification of unserved locations and underserved locations consistent with the rules, regulations, and processes the Commission has established for making these determinations in the Broadband DATA Maps (e.g., number of studies funded through the program)	\$379,867.49	\$5,012.72	Research and Data Collection: Special Projects Manager .25 salary and consultant work to gather research and data to enhance mapping efforts, including the Five-Year Action Plan, and supplementing the Digital Equity Planning Grant. The outcome of this activity will be both a data driven and a visual assessment of those with barriers to broadband access beyond connectivity. Eventually this will build upon the broadband mapping being done through CPF to provide layers and show where gaps exist and where state efforts are alleviating challenges. This budget is exclusive to the BEAD Plan Developer and State Broadband Office Consultant.	Special Projects Manager salary at .25 and single entity consultant services to research and collect data that is being used to create the Five-Year Action Plan, while incorporating into it other resources and available data from other programs, such as the Coronavirus Capital Project Fund and the Digital Equity Planning Grant. These services have been procured and are underway.
2. The development of a preliminary budget for pre-planning activities	\$30,000.00	\$30,000.00	Development of a Preliminary Budget for Pre-Planning Activities: Includes delineating how Initial Planning Funds will be used to support the activities described herein, such as broadband staff salary support. The intended outcome of Activity 2 is the development of a	Consultant services in developing a preliminary budget for pre-planning activities; initial estimate, 30%, 60%, 90%, and 100% estimates, and approved final estimate have all been received, reviewed, and confirmed complete.

			budget as well as procedural and grant management recommendations that will allow for better gauging of activity progress and a means for measuring activity completion. A financial consulting firm will develop and implement a detailed budget and reporting format to be used as part of the BEAD planning process, to include key milestones and key performance indicators.	
3. Publications, outreach, and communications support related to broadband planning, deployment, mapping, equity, and adoption (e.g., number of reports, studies, outreach materials funded by the program)	\$343,682.50	\$436.22	Publications, Outreach, and Communications Support related to Broadband Planning, Deployment, Mapping, Equity, and Adoption: Includes the publication of opportunities to participate in regional stakeholder meetings and the BEAD program planning process in general. The outcome of this activity will be maximum feasible participation in public engagement efforts. Includes: travel costs domestically and regionally for employees to attend engagement meetings, conferences, and other events to further BEAD stakeholder engagement; costs associated with hosting regional stakeholder meetings and statewide summit meetings for broadband leadership across the state; and costs associated with publicizing events, advertising, and other outreach materials.	Travel costs domestically and regionally for employees to attend engagement meetings and other events to further BEAD stakeholder engagement.
4. Providing technical assistance to potential subgrantees, including through workshops and events (e.g., number of workshops/events funded by the program)	\$1,066,667.00	\$0.00	Providing Technical Assistance to Potential Subgrantees: Regional Planning Commissions (RPCs) in the state have been working to train community and municipal leaders on the ins-and-outs of broadband bonding, finance, and technology. This RPC work has focused especially in areas where there is an abundance of unserved locations. The state broadband office foresees many of the RPCs as working with municipalities and other community entities to continue their work and train them to take advantage of BEAD funding.	N/A

			The outcome of this activity is an engaged and knowledgeable group working with the state to ensure all stakeholders can participate in BEAD.	
5. Training for employees of the broadband program or office of the Eligible Entity or employees of political subdivisions of the Eligible Entity, and related staffing capacity or consulting or contracted support to effectuate the goals of the BEAD Program (e.g., number of employees trained through training funded by the program)	\$1,066,667.00	\$42.00	Training for Broadband Office Employees and State Partners: Those that will be accessing BEAD funds will need to receive proper training to ensure they understand how best to utilize the funds. The office is planning to hire a consultant that, in addition to other tasks, will provide training to the state broadband office staff as well as to any state, local governmental, or nonprofit entities that are engaging in BEAD approved tasks. The outcome of this activity will be better informed and prepared staff, partners, and other stakeholders which will allow for a more collaborative and cohesive Five-Year Action Plan.	The Request for Proposals (RFP) has been advertised in order to hire a training consultant. The funds for Activity 4 and 5, here, were merged in the original budget, and have been split here, with 50% funds allocated to each activity.
6. Establishing, operating, or increasing capacity of a broadband office that oversees broadband programs and broadband deployment in an Eligible Entity (e.g., number of full-time employees/part-time employees of broadband office funded)	\$1,025,650.00	\$33,600.22	Operating and Increasing State Administrative Capacity: Includes the recruitment and hiring of four additional full-time staff members (Fiber Optic Engineer, Rural Broadband Technical Specialist, shared Public Outreach Manager, shared Regulatory Compliance and Risk Manager) in the state broadband office, and the continued partial support from the Deputy Director and General Counsel to oversee the planning project and provide legal services. A subgrant will also be provided for building capacity for state organizations who assist localities in ensuring grant compliance. The intended outcome is greater capacity, the creation of a comprehensive Five-Year Action Plan, and building support for future project deliverables.	Recruitment costs for the Fiber Optic Engineer and Rural Broadband Technical Specialist. Recruitment, hiring, and salary costs for the shared Regulatory Compliance and Risk Manager and the shared Public Outreach Manager. Local community outreach travel costs for the newly hired Public Outreach Manager to: meet with consultants, planning subawardees, and stakeholders; participate in regional stakeholder engagement meetings; and conduct robust community and stakeholder outreach. This includes outreach to local towns and cities' organizations to discussion the provision of subgrant funds to build their capacity in providing grant compliance and expand their networks.
7. Asset mapping across the Eligible Entity to catalogue broadband adoption, affordability, equity, access and deployment activities	\$453,832.00	\$9,300.27	Asset Mapping: To ensure the state has a comprehensive asset map, the plan would be to hire a third party to take this information,	Consultant services related to asset mapping broadband activities across the state and use in mapping digital equity efforts, middle mile

			update it with additional assets, and develop an ongoing plan for updating the asset map going forward. The intended outcome is the creation of an asset inventory that will both augment existing efforts (such as assets documented in the Digital Equity Planning Grant), identify new efforts, and be an invitation for state organizations to be included in future assessments. This first comprehensive asset map will be included in the Five-Year Action Plan.	locations, and other allowable uses through BEAD. Work done on recommendations coming from the Digital Equity Plan, acting here as an appendix to the Five-Year Action Plan. These contract services were already established, so this functioned as a contract extension that focused on digital equity data collection and the creation of map layers, at a lower cost than recreating a map.
8. Conducting surveys of unserved, underserved, and underrepresented communities to better understand barriers to adoption (e.g., number of surveys expected to be collected)	\$100,000.00	\$3,300.00	Community Survey Conduction: This survey will inform development of the Five-Year Action Plan and other broadband planning and programming. Includes specifically the creation of the survey instrument. The state broadband office's team will include extension, legal, business development expertise, broadband experts, CARES team, and many others, capitalizing on past experience in broadband infrastructure in order to deploy these grant programs.	Initial survey completion occurred within the past year. Data gathered is being used now to jumpstart the initial phase of BEAD, acting as a foundation to assess communities and their progress over time. Office is partnering with State University to conduct this survey.
9. Costs associated with meeting the local coordination requirements in Section IV.C.1.c of this NOFO including capacity building at the local and regional levels or contracted support (number of stakeholder coordination/outreach events funded by the program)	\$71,040.00	\$0.00	Costs for meeting the Local Coordination Requirements: Includes the coordination elements of regional engagement meetings and the operations of a state broadband oversight council. The outcome of this activity is a plan that will be responsive to the needs of the state's diverse communities.	N/A
10. Reasonable post-NOFO, pre-Initial Planning Funds expenses in an amount not to exceed \$100,000 relating to the preparation of program submissions to NTIA (such as the Letter of Intent) or adding additional capacity to State or Territorial broadband offices in preparation for the BEAD Program may be reimbursed if they are incurred after the publication date of the BEAD NOFO (May 13, 2022) and prior to the date of issuance of the grant award from NTIA	\$0.00	\$0.00	N/A	N/A

11. Other uses approved in advance writing by the Assistant Secretary (including in response to an Eligible Entity's request) that support the goals of the Program	\$0.00	\$0.00	N/A	N/A
<b>Other BEAD Program Funding</b> (for additional information on these eligible activities and the stage at which they are allowable under a BEAD grant, see BEAD NOFO, Section IV.B.7.a)				
1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, and multi-tenant buildings.	\$0.00	\$0.00	N/A	N/A
2. Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.	\$0.00	\$0.00	N/A	N/A
3. Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.	\$0.00	\$0.00	N/A	N/A
4. Engineering design, permitting, and work related to environmental, historical and cultural reviews.	\$0.00	\$0.00	N/A	N/A
5. Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the BEAD Program (such as project managers, program directors, and subject matter experts).	\$0.00	\$0.00	N/A	N/A
6. Network software upgrades, including, but not limited to, cybersecurity solutions.	\$0.00	\$0.00	N/A	N/A
7. Training for cybersecurity professionals who will be working on BEAD-funded networks.	\$0.00	\$0.00	N/A	N/A
8. Workforce development, including Registered Apprenticeships and pre-apprenticeships, and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.	\$0.00	\$0.00	N/A	N/A
9. User training with respect to cybersecurity, privacy, and other digital safety matters.	\$0.00	\$0.00	N/A	N/A
10. Remote learning or telehealth services/facilities.	\$0.00	\$0.00	N/A	N/A
11. Digital literacy/upskilling (from beginner-level to advanced).	\$0.00	\$0.00	N/A	N/A
12. Computer science, coding, and cybersecurity education programs.	\$0.00	\$0.00	N/A	N/A

13. Implementation of Eligible Entity digital equity plans (to supplement, but not to duplicate or supplant, Planning Grant funds received by the Eligible Entity in connection with the Digital Equity Act of 2021).	\$0.00	\$0.00	N/A	N/A
14. Broadband sign-up assistance and programs that provide technology support.	\$0.00	\$0.00	N/A	N/A
15. Multi-lingual outreach to support adoption and digital literacy.	\$0.00	\$0.00	N/A	N/A
16. Prisoner education to promote pre-release digital literacy, job skills, online job-acquisition skills, etc.	\$0.00	\$0.00	N/A	N/A
17. Digital navigators (i.e., individuals who address the whole digital inclusion process – home connectivity, devices, and digital skills – with community members through repeated	\$0.00	\$0.00	N/A	N/A
18. Direct subsidies for use toward broadband subscription, where the Eligible Entity shows the subsidies will improve affordability for the end user population (and to supplement, but not to duplicate or supplant, the subsidies provided by the Affordable Connectivity Program).	\$0.00	\$0.00	N/A	N/A
19. Costs associated with stakeholder engagement, including travel, capacity-building, or contract support.	\$0.00	\$0.00	N/A	N/A
20. Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described in Section V.H.2 of the BEAD NOFO.	\$0.00	\$0.00	N/A	N/A

**Instructions:** Use these fields to highlight project accomplishments, challenges, and favorable developments faced from the Report Start Date (i.e., project inception) to the Report End Date (i.e., occurring within the first 90 days).

**Please describe significant project accomplishments from the Report Start Date (i.e., project inception) to the Report End Date (i.e., occurring within the first 90 days). (2,500 characters or less)**

The office has hired a consultant to research and collect data that will be used to create the Five-Year Action Plan, as well as to provide a preliminary budget for pre-planning activities. The preliminary budget for pre-planning activities has been fully completed, reviewed, and accepted, which is currently helping to provide a structure for fleshing out and planning these activities in detail. The relationship is progressing well with the consultant. Additionally, the office has successfully recruited and hired for two of four new positions within the State Broadband Office. Two of these positions will share their skillset across several grant programs: the Regulatory Compliance and Risk Manager and the Public Outreach Manager. Both positions are considered critical to the office's initial activities, and the office is excited to have added their subject matter expertise now as part of the core team. Already, they are working on outreach to potential subgrantees and local state organizations, and to craft crucial policies regarding subgrantee selection and compliance, all while ensuring the competitive nature of the selection process remains intact. The office is at a good place and is fortunate enough to have been able to utilize already existent resources in furthering the BEAD planning funds.

**Please describe any challenges (i.e., problems, delays, adverse conditions, cost overruns, high unit costs) to achieving activities from the Report Start Date (i.e., project inception) to the Report End Date (i.e., occurring within the first 90 days) (2,500 characters or less)**



The greatest challenges currently faced are regarding staffing and overall office capacity. While hiring two new roles for staff members has been successful (the Regulatory Compliance and Risk Manager, and the Public Outreach Manager), two other roles have yet to be filled (the Fiber Optic Engineer and the Rural Broadband Technical Specialist) due to a lack of qualified applicants in terms of technical skillset and desired experience level. Although salaries are competitive for the area and for a state role, the positions are in-person and the salaries are not competitive compared to most private firms. Positions have been advertised for more than 30 days, with less than 30 applicants. While challenging, the office is trying to take proactive efforts to expand recruitment efforts. This has included talking to Human Resources to expand listings to other websites, as well as to hire a skilled recruiter. In addition to this hiring hurdle, the office has experienced a 15% turnover rate over the past three months, which has resulted in the hire of a new Deputy Director who lacks institutional background. This hampered the ability to move quickly and decisively earlier while lacking a supporting leadership role. Although the position has now been backfilled, they are still new to the office, do not know its history, and are working under an overburdened Director who has little time for training. Even the office’s two newest employees have had to be self-starters with the office being too understaffed to provide much training. A lot is being asked of these new employees in terms of capitalizing on their previous experience and expertise, to really create their own roles, craft essential guidance, and provide outreach, all while being new to the office. Lastly, there have been some challenges with follow-through while being understaffed. The office has been lucky to be able to utilize existing contracts and resources, however, even getting minimal contract changes approved has been difficult in an understaffed environment. New contract approvals have proven even more difficult. Recently, a consultant was procured and hired to gather information for the Five-Year Action Plan. However, that contract approval sat and took an extra three and a half weeks to receive approval during the period that hiring was underway for a new Deputy Director. This has resulted in them only just beginning work in the past five weeks, despite being able to have begun nearly a month earlier. The office is in the process of building capacity so that things will run more smoothly, but more work needs to be done to get to that point.

**Please describe favorable developments which enabled meeting time schedules and objectives sooner, or at less cost than anticipated, or produced more or different beneficial results than originally planned. (2,500 characters or less)**

The office has been able to move forward with asset mapping activities at a reasonable cost by leveraging previously procured consultant services and expanding their contract scope to provide these services. By not having to spend time going through a new procurement process, or having to create a map from scratch, a considerable sum has been saved. This consultant is already working to provide additional map layers, and they are working with the digital equity data that is currently being compiled for the State Digital Equity Plan. Additionally, the office has partnered with the largest state university to conduct a future survey of unserved and underserved communities and has now begun reviewing old survey data from the past year to help in developing an implementation strategy and plan for this large undertaking. Due to existent resources already being in development and contractors already procured, the office has been able to capitalize on relationships and information and get a jumpstart on developing the Five-Year Action Plan. Two new hires, the Regulatory Compliance and Risk Manager, and the Public Outreach Manager (who are shared across grant programs), have also proven themselves to be assets to the office in this early process. They have been able to jump in at the ground level and began creating Standard Operating Procedures for grant compliance, talking to local communities, and making inroads to underserved and unserved communities. There is anticipation that they will greatly benefit the office going forward in these planning activities.

**PLANNED AND ACTUAL SUBGRANT PROCESS**

**Instructions:** Use the field below to provide information on your planned and actual subgrant process. Please review the BEAD NOFO, Section IV.B.7 and the BEAD NOFO, Section IV.C.1.b for further information on the requirements set out for the Subgrant Process.

As outlined in the BEAD NOFO, Section IV.B.7, each Eligible Entity must establish fair, open, and competitive processes for selecting subgrantees. Eligible Entities’ selection processes must be made clear to potential subgrantees and must be described in the Eligible Entity’s Initial Proposal and Final Proposal. As a part of this selection process, each Eligible Entity must ensure that adequate safeguards are in place to protect the integrity of the competition, including safeguards against collusion, bias, conflicts of interest, arbitrary decisions, and other factors that could undermine confidence in the process. An Eligible Entity may choose its own means of competitively selecting subgrantees for last-mile broadband deployment projects, subject to approval by the Assistant Secretary (during review of the Eligible Entity’s Initial Proposal). Each Eligible Entity’s subgrantee selection process must, however, incorporate the following principles to satisfy the Infrastructure Act’s mandates and the BEAD Program’s goals: (1) Complete Coverage of Unserved Locations and Underserved Locations, Followed by Prioritization of Eligible CAs; and (2) Selection Among Competing Proposals for the Same Location or Locations.

In addition, as outlined in the BEAD NOFO, Section IV.C.1.b, each Eligible Entity must include sufficient accountability procedures within its program to ensure subgrantee compliance with all applicable Program requirements. Each Eligible Entity must, at a minimum, include in any subgrant agreement reasonable provisions allowing for recovery of funds in the event of a subgrantee’s noncompliance with the BEAD Program’s requirements, including but not limited to failure to deploy network infrastructure in accordance with mandated deadlines. Each Eligible Entity must, at a minimum, employ the following practices: (1) distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take



the actions the funds are meant to subsidize); (2) the inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee; (3) timely subgrantee reporting mandates; and (4) robust subgrantee monitoring practices.

**Please describe the extent to which you have actually planned and/or actually executed your subgrantee selection process. (2,500 characters or less)**

The office’s newly hired Regulatory Compliance and Risk Manager, with the General Counsel and the Deputy Director, is currently crafting an official office subgrantee selection process. They are working to ensure that the process is one the office can be confident in, that it retains integrity and has safeguards in place to prevent conflicts of interest or other factors that could undermine the process. Additionally, work is being done to assess risk and provide sufficient accountability for subgrantees which are selected. This will help to prevent non-compliance and also provide a financial recoupment mechanism should they unfortunately be found non-compliant with their subaward funding. The office’s first priority is in creating an ironclad subgrantee legal agreement, with a second moving piece of defining the actual subgrantee selection process and its competitive mechanism. In addition to the creation of a subgrantee selection, a planning component is being developed in tandem to better train and provide outreach to potential subgrantees, making it more likely that they will be compliant if selected in the future. The office wants to have a robust selection of potential subgrantees to better serve all communities, especially underserved and unserved communities. This will mean bringing in candidates that the office may never have worked with as subgrantees and who may not have grant experience. To bring in these communities and put them in a better position from the start, the Public Outreach Manager, in coordination with the Regional Planning Commissions (RPCs) in the state, is providing outreach. Outreach is aimed at building awareness of the BEAD program and so that they may receive grant training to further their own direct participation in the program. This will give community participants foundational knowledge about grants compliance and best practices, as well as make BEAD more tangible and accessible overall. Lastly, the office has developed a basic risk assessment tool that will help with pre-assessments of potential subgrantees. This will help to ascertain what further technical assistance they might need now and, in the future, to help with plan development. With a widened scope for potential subgrantees, the office means to make it possible for all interested parties to become a successful subgrantee.

**SUBGRANTEE COMPLIANCE MECHANISM**

**Instruction:** Use the fields below to provide information on the appropriate mechanism you have established to ensure that all subgrantees will comply with the eligible uses prescribed under the BEAD Program. Please review the BEAD NOFO, Section IV.C.1.b for further information on ensuring subgrantee accountability and the BEAD NOFO, Section IV.D for further information on subgrantee qualifications. Please also review 2 CFR 200.332 for information on the requirements for pass-through entities as it relates to their subgrantees.

**Subgrantee Qualification:** As outlined in the BEAD NOFO, Section IV.D, Eligible Entities shall ensure that any prospective subgrantee is capable of carrying out activities funded by the subgrant in a competent manner and in compliance with all applicable federal, State, Territorial, and local laws. Eligible Entities also shall ensure that prospective subgrantees have the competence, managerial and financial capacity to meet the commitments of the subgrant and any requirements of the Program, as well as the technical and operational capability to provide the services promised in the subgrant in the manner contemplated by the subgrant award.

**Please describe the extent to which you have actually planned and/or actually executed policies and/or procedures to assess subgrantee qualification. (2,500 characters or less)**

The office has hired a Regulatory Compliance and Risk Manager to establish a series of Standard Operating Procedures and capture best practices and processes for monitoring subrecipients for compliance. This individual is working closely with legal and is currently developing an internal guide for completing an initial subrecipient risk assessment. This is just one of the documents being crafted to assess subgrantee qualifications; in tandem with the office, they are also creating other best practice guides and documents that will instruct the office in capturing metrics and criteria to keep on top of a project’s progression towards their targeted performance goals. This will include processes capturing the necessary approvals the office will require of subgrantees, in order that the office remains on top of subrecipient compliance standards through all aspects of the grant lifecycle. In addition to monitoring, compliance, and risk analysis, the office is ramping up to provide technical assistance to potential subgrantees before they begin this process. RPCs are training community and municipal leaders on the ins-and-outs of broadband bonding, finance, and technology, in order that they can better take advantage of BEAD funding. By engaging them now and teaching them about grants, they will be better prepared and more likely to successfully participate in the program. Lastly, the office is in the process of procuring a consultant that can provide training services to subrecipients that are selected to receive BEAD funds. This consultant will provide training to both the office, as well as any state, local governmental, or nonprofit entities engaging in BEAD-tasks. This additional training, in concert with the office’s increased risk analysis capacity, will help the office to better prepare potential subgrantees, assess subgrantee qualifications, and ensure that they receive any necessary assistance throughout the program’s duration.

**Subrecipient Risk Assessment Process:** As outlined in 2 CFR 200.332, pass-through entities must evaluate each identified subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.

**Please describe the extent to which you have actually planned and/or actually executed your subrecipient risk assessment process. (2,500 characters or less)**

The office has created a basic risk assessment tool that is completed during the onboarding process with the subrecipient. The newly hired Regulatory Compliance and Risk Manager is working now to develop Standard Operating Procedures for completing this form after meeting with the subrecipient and gathering some specific information to aid in completing the form. This tool answers a series of questions evaluating the capacity of the subrecipient, level of grant knowledge and experience, and their financial investment into the project. This tool will be documented in the subrecipients' file and will help the office to better determine if they are considered a low, medium, or high risk subrecipient, so that better technical assistance may be provided based on their level of need or so that the office can more closely monitor their projects for compliance.

**Subrecipient Monitoring Policies and/or Procedures:** As outlined in 2 CFR 200.332, pass-through entities must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes; in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

**Please describe the extent to which you have actually planned and/or actually executed your subrecipient monitoring policies and/or procedures. (2,500 characters or less)**

<p>The office is establishing metrics and criteria with which to monitor the stage and activities of the subaward and to review and provide approvals. Monthly meetings with the subrecipient are being planned to discuss these activities before they even move forward, to better ensure knowledge and compliance, as well as to track the general performance goals of the subaward. The office is seeking to increase its administrative capacity and has specifically hired a Regulatory Compliance and Risk Manager that is shared with other programs. This individual role is working to buildout the office's capacity in providing grant compliance oversight and guidance to subrecipients, and they have been working to develop Standard Operating Procedures for the office. They are expected to continue building out their support for future project deliverables and provide outreach and direct technical assistance support to subrecipients.</p>
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**Subrecipient Audit Policies and/or Procedures:** As outlined in 2 CFR 200.332, pass-through entities are responsible for verifying that every subrecipient is audited when it is expected that the subgrantee's Federal awards expended during the respective fiscal year equaled or exceeded the Single Audit threshold of \$750,000.

**Please describe the extent to which you have actually planned and/or actually executed your subrecipient audit policies and/or procedures. (2,500 characters or less)**

The office, with legal oversight, has crafted a policy and policy acceptance document for all subrecipients to review and sign during their onboarding process. It establishes that they are held to the guidelines set forth in 2 CFR 200.332 regarding single audit responsibilities. Another brief document has been crafted for yearly confirmation with the subrecipient of their federal award expenditures. It will confirm with the subrecipient whether they have passed within that fiscal year the Single Audit threshold of \$750,000.00 via yes or no answer, and if yes, whether an audit is in progress or on file. These documents will be collected yearly, in coordination with the fiscal end for the individual subrecipients and tracked as a metric for single audit compliance with 2 CFR 200.332.

## CERTIFICATION

**I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award document.**

Typed or printed name and title of Authorized Certifying Official

Jane B. Dawn, Director of State X Broadband Office

**Identify the name and title of the Authorized Recipient Official located in the Notice of Award (CD-450) for your project.**

Signature of Authorized Certifying Official

Jane B Dawn

**Capture the signature of the Authorized Recipient Official located in the Notice of Award (CD-450) for your project.**

Telephone (Area Code, Number, Extension)

(202) 123-4567 ext. 333

**Provide the telephone number (XXX)-(XXX)-(XXXX) + ext. (XXXX) for the individual identified as the Authorized Recipient Official, as located in the Notice of Award (CD-450) for your project.**

Email Address

Jane.dawn@stateX.gov

	Provide the email address for the individual identified as the Authorized Recipient Official, as located in the Notice of Award (CD-450) for your project.
Date of Signature	04/30/2023 Provide the date of signature by the Authorized Recipient Official in MM/DD/YYYY format.

SAMPLE