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# INTERNET FOR ALL

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## Broadband Equity, Access, and Deployment (BEAD) Program

### Final Proposal Guidance for Eligible Entities



U.S. Department of Commerce  
National Telecommunications and Information Administration

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## Purpose and Overview

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The purpose of this document is to outline the National Telecommunications and Information Administration (NTIA) Final Proposal Guidance for each Eligible Entity, to assist each Eligible Entity in submitting quality Final Proposals for the Broadband Equity, Access, and Deployment (BEAD) Program.

This document is intended solely to assist recipients in better understanding the BEAD Program and the requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO or subsequently issued guidance. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

This document does not include detailed guidance for the Final Proposal Funding Request (FPFR), which includes the budget and budget narrative submitted along with the Final Proposal. The FPFR is a required submission that includes requirements set forth by NTIA and NIST to request funds pursuant to 47 U.S.C. § 1702(e)(3)(D)(ii)(III). *See also* BEAD NOFO at 46, § V.B.8. Guidance on the FPFR will be published by NTIA at a later date. The Eligible Entity's Final Proposal submission and FPFR submission must be consistent with each other. In other words, all requested uses of funds in the FPFR must comport with the information provided in the Final Proposal.

## Introduction

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### *Current Status of BEAD Program*

NTIA issued the Broadband Equity, Access, and Deployment (BEAD) Program Notice of Funding Opportunity (NOFO) in May 2022, describing the requirements under which it will award grants for the Program. The BEAD Program provides eligible states, territories, and the District of Columbia (“Eligible Entity”) the opportunity to receive federal grant funding to expand high-speed Internet access by funding planning, infrastructure deployment, and adoption programs. Currently in the BEAD Program timeline, each Eligible Entity has submitted its Letter of Intent (LOI), has received its Initial Funds, has completed development of its Five-Year Action Plan, has submitted its Initial Proposal, and most Eligible Entities have received approval of those Initial Proposals. Before the Eligible Entity can submit its Final Proposal, it must have completed its Challenge Process and Subgrantee Selection Process. Each Eligible Entity will have twelve (12) months from the approval of its Initial Proposal to complete its Challenge Process, then its Subgrantee Selection Process, and then submit its Final Proposal.

### *Overview of the Final Proposal*

The Final Proposal is the “final submission” for the Eligible Entity’s BEAD grant funding, and, among other things, should provide an update to the approved Initial Proposal on how each State and Territory will ensure that every resident has access to a reliable, affordable, and high-speed broadband connection, drawing on all funding available to accomplish this goal, including but not limited to BEAD Program funds.

The BEAD NOFO outlines the 15 Requirements of the Final Proposal (*see* pages 47-49). The BEAD NOFO also requires each Eligible Entity to provide an update on the Eligible Entity’s middle-class affordability plan in its Final Proposal (*see* page 66).

### **Overview of Documents**

The Final Proposal submission consists of the following documents as submitted by each Eligible Entity:

1. **The Final Proposal:** The Final Proposal describes the Eligible Entity’s progress in implementing the approved Initial Proposal, including how the Eligible Entity complied with the approved Initial Proposal to implement the BEAD program, and the results of its deployment Subgrantee Selection Process. The Final Proposal should demonstrate that the Eligible Entity has adequately planned for, and will, implement a program that meets BEAD program objectives. The Eligible Entity will enter narrative responses and answer questions directly within the NTIA Grants Portal BEAD Final Proposal intake module, supplemented by attachment uploads.
2. **Final Proposal Data Attachments (CSV files):** These six (6) datasets capture how and where the Eligible Entity plans to serve locations validated as part of the Challenge Process and are the basis of the Final Proposal submission. The datasets will be submitted in CSV format using provided templates, and include:
  - Subgrantees (fp\_subgrantees.csv)
  - Deployment Projects (fp\_deployment\_projects.csv)
  - Locations (fp\_locations.csv)
  - No BEAD Locations (fp\_no\_BEAD\_locations.csv)
  - Non-Deployment Projects (fp\_non\_deployment\_projects.csv)

- Community Anchor Institutions (fp\_cai.csv)

A completed *fp\_non\_deployment\_projects.csv* and *fp\_cai.csv* are only applicable if the Eligible Entity has selected non-deployment projects or plans to serve Community Anchor Institution (CAI) locations, respectively. A completed *fp\_no\_BEAD\_locations.csv* is only applicable if the Eligible Entity has locations that will not be covered by a BEAD project. Each Eligible Entity will upload the CSV files to the NTIA Grants Portal BEAD Final Proposal intake module.

3. **Final Proposal Attachments:** Each Eligible Entity will upload additional files to the NTIA Grants Portal BEAD to satisfy the Final Proposal requirements. These attachments include:

*Required:*

- Accountability Documents
  - BEAD Program Monitoring Plan
  - Agency Policy Documentation
- Local Coordination Tracker
- EHP Plans

*Conditional:*

- Tribal Resolution Document(s)
- Regulatory Barriers for Applicants

*Optional:*

- Waiver Request

4. **The Final Proposal Funding Request:** A consolidated budget form and associated project plan/narrative to support the implementation of the Final Proposal. Each Eligible Entity will be required to submit a FPFR as a separate attachment and upload it as part of the Final Proposal package using the NTIA Grants Portal. FPFR requirements are set forth by NTIA and NIST to request funds pursuant to 47 U.S.C. § 1702 (e)(3)(D)(ii)(III).<sup>1</sup>

## Final Proposal Structure

### NOFO Final Proposal Requirements Summary

The Final Proposal is comprised of the following requirements, as specified by the NOFO:

*Table 1: Final Proposal and FPFR Requirements by Document*

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<sup>1</sup> See also [BEAD NOFO](#) at 46, § IV.B.8.

Document	Requirements
<b>Final Proposal</b>	<ul style="list-style-type: none"> <li>• Subgrantee Selection Process Outcomes (Requirement 1)</li> <li>• [Requirement 2 N/A, not included in the BEAD NOFO]</li> <li>• Timeline for Implementation (Requirement 3)</li> <li>• Oversight and Accountability Processes (Requirement 4)</li> <li>• Local Coordination (Requirement 5)</li> <li>• Challenge Process Results (Requirement 6)</li> <li>• Unserved and Underserved Locations (Requirement 7)</li> <li>• Non-Deployment Uses (Requirement 8), Non-Deployment Subgrantee Selection Outcomes (Requirement 9)</li> <li>• Participation of Non-Traditional Broadband Providers (Requirement 10)</li> <li>• Implementation Status of Plans for Cost and Barrier Reduction, Labor and Workforce Activities, Utilization of Minority Businesses, Women-owned Business, and Labor Surplus Area Firms, Low-Cost Plans, and Climate Change and Resilience (Requirement 11), and Middle-Class Affordability Plans<sup>2</sup></li> <li>• Substantiation of Priority Broadband Projects (Requirement 12)</li> <li>• Subgrantee Selection Certification (Requirement 13)</li> <li>• Environmental and Historic Preservation Documentation (14)</li> <li>• Consent from Tribal Entities (Requirement 15)</li> <li>• Report of Unsuccessful Application due to Eligible Entity Regulations (Requirement 16)</li> </ul>
<b>Final Proposal Funding Request</b>	<ul style="list-style-type: none"> <li>• Project Plan/Narrative</li> <li>• Consolidated Budget Form</li> </ul>

In contrast to the two volumes of the approved Initial Proposal, each Eligible Entity will **submit the Final Proposal in one submission**. The Final Proposal will describe the implementation of the plan each Eligible Entity submitted in its approved Initial Proposal. Several Final Proposal requirements are interrelated, where the data submitted as part of Requirement o (Final Proposal Data Submission) will fulfill or support the information requested to satisfy other requirements. Therefore, the completeness and accuracy of the Final Proposal data submissions are fundamental to the assessment of the overall Final Proposal.

**The FPFR** is a separate package that an Eligible Entity must submit with its Final Proposal. The FPFR is composed of two required documents: (1) Project Plan/Narrative and (2) a Consolidated Budget Form. The contents of the FPFR must be updated from the approved Initial Proposal Funding Request (IPFR). The updated information provided in the FPFR will be used to determine if the specific award conditions (SACs) placed on the Eligible Entity’s award when the IP and IPFR were approved can be lifted based on the information provided. Additional FPFR submission guidance is forthcoming.

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<sup>2</sup> The Middle-Class Affordability Plan is not aligned to a specific Final Proposal requirement listed in section IV.B.9 of the [BEAD NOFO](#). However, section IV.C.2.c.i of the [BEAD NOFO](#) requires that Eligible Entities submit this plan as part of the Final Proposal submission.

# Final Proposal Development, Submission, Review and Approval

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## *Final Proposal Development*

The Eligible Entity will have twelve (12) months from the date of its Initial Proposal Volume II approval to complete the following:

1. Receive NTIA approval of its Challenge Process results;
2. Complete Deployment Subgrantee Selection;
3. Meet with NTIA to review its deployment subgrantee selection outcomes;
4. Post the Final Proposal for a 14-day public comment period; and
5. Submit its Final Proposal to NTIA via the NTIA Grants Portal.

The Eligible Entity is strongly encouraged to utilize the support of its assigned Federal Program Officer for informal reviews and feedback while conducting the BEAD NOFO-mandated activities (discussed in detail below) and drafting the Final Proposal. The Eligible Entity is also strongly encouraged to use NTIA's technical assistance documents linked in the section above. If the Eligible Entity needs further technical assistance beyond the documents linked above, it is encouraged to contact its Federal Program Officer.

The BEAD NOFO mandates a set of interim actions, detailed below, that the Eligible Entity must successfully complete prior to submitting its Final Proposal.

### **Challenge Process**

Once the Eligible Entity's Initial Proposal Volume I has been approved and it has submitted its Initial Proposal Volume II, the Eligible Entity may initiate its Challenge Process. The Challenge Process is meant to finalize the list of unserved, underserved, and CAI locations that may be funded by the BEAD program. The Challenge Process supports the programmatic objective of BEAD to deploy service to unserved and underserved locations within each Eligible Entity's jurisdiction. If the Eligible Entity has questions on how to conduct its Challenge Process, the Eligible Entity should contact its Federal Program Officer. For more details regarding how to complete the Challenge Process, the Eligible Entity can also see the *BEAD Challenge Process Policy Notice* on the [BroadbandUSA website](#).

### **Subgrantee Selection**

The Subgrantee Selection Process must follow the process approved in the Eligible Entity's Initial Proposal Volume II. After resolving each challenge and at least 60 days before allocating grant funds for network deployment, an Eligible Entity must provide public notice of the final classification that was approved by NTIA of each unserved location, underserved location, or eligible CAI within the jurisdiction of the Eligible Entity.

Each Eligible Entity should expect to be in frequent dialogue with its Federal Program Officer during subgrantee selection, and will be expected to share, as a part of its monitoring obligations, progress made toward provisionally selecting subgrantees that will accomplish program goals. Prior to submission of the Final Proposal, an Eligible Entity must have: (1) provisionally selected its subgrantees in accordance with the process in its approved Initial Proposal, and (2) met with NTIA to review its deployment subgrantee selection outcomes after the completion of the deployment Subgrantee Selection Process and no later than 14 calendar days prior to notification to any provisionally selected subgrantees (and prior to posting the



draft Final Proposal for public comment). If the Eligible Entity has questions related to subgrantee selection, it should contact its Federal Program Officer immediately. Each Eligible Entity will also need to provide a detailed narrative explaining the manner in which they ensured that they maximized the use of priority broadband projects, then those using reliable broadband technology, then those using alternative technology, in that order. Because this cannot be recreated after the fact, each Eligible Entity is strongly encouraged to work closely with its Federal Program Officer to ensure its appropriately following program guidance regarding prioritization.

### *Addressing BEAD-Eligible Locations Not Being Served by BEAD Funding During Subgrantee Selection*

In its Final Proposal, an Eligible Entity may account for BEAD-eligible locations that it does not propose to serve with BEAD funding. These locations may only be excluded from a BEAD-funded subgrant for the reasons detailed in the guidance to Intake Question 7.9, and the Eligible Entity must maintain appropriate evidence to support the conclusion that those locations require no BEAD service. Evidence of no BEAD service is not provided to NTIA during Final Proposal submission, though NTIA may request evidence from the Eligible Entity at any point. BEAD-eligible locations not being served through a BEAD project will be reflected in “fp\_no\_BEAD\_locations.csv” and are not subject to BEAD Program requirements.

Each Eligible Entity is required to run its Subgrantee Selection Process using the list of BEAD-eligible locations approved by NTIA in the “post\_challenge\_locations.csv” file. At the conclusion of the Subgrantee Selection Process, every BEAD-eligible BSL<sup>3</sup> in the approved Challenge Process list must be included in the Final Proposal either in the “fp\_locations.csv” file to indicate the BSL will be served as part of a BEAD project, or in the “fp\_no\_BEAD\_locations.csv” file to indicate it will not be served as part of a BEAD project. Guidance in Requirement 7 further details the eligible reason codes that would apply to a BSL included in the “fp\_no\_BEAD\_locations.csv.”

Specifically for new enforceable commitments (reason code 4), if a federal entity notifies an Eligible Entity of an enforceable commitment after submission of Challenge Process results to NTIA, the Eligible Entity may object to the new enforceable commitment and proceed as if there is no enforceable commitment.<sup>4</sup> If the Eligible Entity either makes enforceable commitments

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<sup>3</sup> Such locations have a value of 0 or 1 in the “location classification” field of the file post\_challenge\_locations.csv. Some locations with value 2 may also appear in “fp\_locations.csv” file if they are part of a BEAD project. (“A “project” may constitute a single unserved or underserved broadband-serviceable location, or a grouping of broadband-serviceable locations in which not less than 80 percent of broadband-serviceable locations served by the project are unserved locations or underserved locations.” BEAD NOFO at 14.)

<sup>4</sup> If the Eligible Entity becomes aware of a new federal enforceable commitment after submitted the Challenge Process results but before the Assistant Secretary approves those results, the Eligible Entity should notify its Federal Program Officer. Though the Eligible Entity has the right to object in this instance, it may determine after consultation with NTIA that the best path forward would be to deduplicate the new enforceable commitment before NTIA approves Challenge Process results.

under state-administered programs or does not object to new federal enforceable commitments upon notification by the awarding agency, it must apply one of the strategies described below to exclude the covered BEAD-eligible BSLs from the Subgrantee Selection Process.

When an Eligible Entity determines before Subgrantee Selection begins that BEAD-eligible locations may not be included in a BEAD project, the Eligible Entity may choose among the two permitted strategies listed below to notify applicants that the designated locations may not be served by BEAD and therefore should be factored into applications for BEAD deployment subgrants:

- **Separate:** The Eligible Entity may separate No BEAD Locations associated with any eligible reason code into separate project areas to notify applicants that the covered locations may not be served by BEAD. An Eligible Entity should avoid separating No BEAD Locations into a single, large project area and should instead separate these locations into compact and reasonable project areas. These separate project areas and accompanying locations must be listed in the “fp\_no\_BEAD\_locations.csv” file.
- **Indicate:** The Eligible Entity may identify No BEAD Locations associated with any eligible reason code as such (for example, by using an asterisk in the subgrantee selection portal or location map), so that applicants may account for them when applying to serve a project area. Indicating these locations notifies applicants of their status and the likelihood these locations will not be served by BEAD. These locations must be listed in the “fp\_no\_BEAD\_locations.csv” file.

When locations have been removed from the latest version of the FCC Fabric(reason code 3) or will be served by an enforceable commitment (reason code 4), the Eligible Entity may, in addition to the two strategies listed above, choose to omit locations to prevent potential subgrantees from including the location in applications for BEAD deployment subgrants:

- **Omit:** The Eligible Entity may omit locations removed from the latest version of the FCC Fabric (reason code 3) or covered by a new enforceable commitment (reason code 4) from the BSL list used for conducting the Subgrantee Selection Process. These omitted locations must be listed in the “fp\_no\_BEAD\_locations.csv” file.
  - For enforceable commitments, the Eligible Entity omits locations at its own risk because if the enforceable commitment is not final at the time of Final Proposal submission the Eligible Entity is required to serve the covered locations through a BEAD project.

For more details regarding Subgrantee Selection Process, please see the [BEAD Subgrantee Selection Process Primer](#).

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The Eligible Entity should also notify its FPO if the Eligible Entity make an enforceable commitment under a state-administered program after submitting the Challenge Process results but before the Assistant Secretary approves those results. Consultation with NTIA will help determine the best way to account for the new state-administered enforceable commitment and remove the covered locations from Subgrantee Selection

## Public Posting

The Eligible Entity should post the Final Proposal narrative, accompanying attachments, and applicable CSV files for public comment; FPDF materials are not required to be posted for public comment. The Eligible Entity is required to submit its entire Final Proposal (including all CSV files, attachments, and FPDF) in NGP when it publishes the draft for public comment. Once the public comment period has concluded, the Eligible Entity will update its submission in NGP to include details on its public comment and revise sections to incorporate feedback received from stakeholders during the public comment period.

The Eligible Entity is strongly encouraged to seek guidance from its Federal Program Officer as needed in the development of its Final Proposal before it is published for public comment. NTIA encourages each Eligible Entity to utilize the format of the Final Proposal Intake Questions when posting its Final Proposals for public comment prior to submission to NTIA.

The Eligible Entity must describe a public comment period of no less than 14 days, provide a high-level summary of the comments received, and demonstrate how the Eligible Entity incorporated feedback in its Final Proposal submission, as applicable. The Eligible Entity is not required to respond to all individual comments but must note where public comments impacted the contents of the Final Proposal submission.

The Eligible Entity must also demonstrate how it conducted outreach and engagement activities to encourage broad awareness, participation, and feedback during the public comment period, particularly among Tribal Governments, local community organizations, unions and worker organizations, and other underrepresented groups. Examples of outreach mechanisms include, but are not limited to, public meetings, informational brochures, local media, relevant social media channels, and direct mail.

## NGP Submission

As noted above, the Eligible Entity must submit its entire Final Proposal in NGP when it publishes the draft for public comment. This submission will initiate NTIA's review.

Each Eligible Entity can reference the NTIA Grants Portal clickpath that will be posted on the [BroadbandUSA website](#) to view instructions on how to submit the Final Proposal in the NTIA Grants Portal. If any Eligible Entity needs guidance on how to submit any portion of the Final Proposal, it should contact its Federal Program Officer and the NTIA Grants Portal Help Desk ([ngphelpdesk@ntia.gov](mailto:ngphelpdesk@ntia.gov)).

## Application Review and Curing

The Eligible Entity may be asked to address issues identified by NTIA during the review process. If the Eligible Entity is requested to address an issue identified in its Final Proposal, NTIA will contact the Eligible Entity via email. In the email, NTIA will identify the issue(s) found within the Final Proposal and the timeline for when the issue(s) must be resolved by the Eligible Entity.

Once the Eligible Entity has received the email of the issue(s) that need to be resolved for its Final Proposal to continue to be reviewed, the Eligible Entity should begin to resolve the issue(s) identified immediately. Failure to resolve the identified issue(s) will delay the review process.

## Award Approval

NTIA will approve the Final Proposal and submit the Final Proposal package to NIST for final approval. Once NIST approves the Final Proposal package, the Assistant Secretary will notify the

Eligible Entity that its Final Proposal has been approved. Once the Eligible Entity receives the notice of approval for its Final Proposal, the Eligible Entity will be able to access the remaining program funds identified in the Eligible Entity's Notice of Available Amounts to be used to implement the Eligible Entity's Final Proposal.

### *Preparing for Award and Monitoring*

NTIA will release guidance on each Eligible Entity's continuing reporting requirements, including the post-Final Proposal Semi-Annual Reports (SARs). This guidance will include the information that NTIA expects to collect from each Eligible Entity at the award-, subgrantee-, project-, contract/subcontract-, and location-levels. It is critical that each Eligible Entity consider this guidance in designing its subgrantee solicitation and provisional award materials to ensure this data can be collected from subgrantees and provided to NTIA.

## Final Proposal Guidance by NOFO Requirement

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### *Final Proposal Data Submission*

The Eligible Entity must submit data as comma separated values (CSV) files using templates provided by NTIA to document its deployment subgrantee selection outcomes. Not using the templates provided, making modifications to formulas, failing to fully complete all required fields, or changing the types of column content will result in NTIA rejecting the Final Proposal until curing is addressed. The templates can be found on the [BroadbandUSA website](#) and can also be provided by the FPO supporting the Eligible Entity. The Eligible Entity may contact its assigned Federal Program Officer as it develops the CSV files to confirm the format, field names, and data types prior to submission. To prevent difficulties with data analysis, data fields in CSV files must not contain linebreaks.

The Eligible Entity must collect **data at the project level**, rather than aggregated by the subgrantee, to complete the CSVs. This structure is to ensure that each Location ID eligible for BEAD funding is mapped to a project using the project identified. For the Final Proposal requirements, the Eligible Entity must collect information from its subgrantees at the project level, and some subgrantees may be reporting on multiple projects.

**0.1 Attachment (Required):** Complete and submit the [Subgrantees CSV file](#) (named “*fp\_subgrantees.csv*”) using the NTIA template provided.

The purpose of the Subgrantees CSV file is to capture information related to the provisionally selected subgrantees. The CSV file must adhere to the data format specified in [Table 4](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_subgrantees.csv*” as outlined in [Table 4](#) in the Appendix including:

1. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
2. **Unique Entity Identifier (UEI):** SAM.gov assigned legal identifier of subgrantee;
3. **UEI Name:** registered name associated with the UEI record in SAM.gov;
4. **FRN:** 10-digit FCC Registration Number of the subgrantee, with leading zeroes - *for deployment/last-mile projects only*;
5. **Non-Traditional Broadband Provider:** indicate whether the subgrantee is a traditional broadband provider or is a non-traditional broadband provider<sup>5</sup>;
6. **Type of Service Provider:** select a category that best describes the service provider type (e.g., ILEC, Non-ILEC Service Provider, Cooperative, Municipality, or Tribal);
7. **Woman-Owned Business Enterprise (WBE):** indicate whether the subgrantee is a woman-owned business or is not a women-owned business;
8. **Minority Business Enterprise (MBE):** indicate whether the subgrantee is a minority-owned business or is not a minority-owned business;

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<sup>5</sup> As reflected in the NOFO Section I.C.(p), page 14, “[t]he term “non-traditional broadband provider” means an electric cooperative, nonprofit organization, public-private partnership, public or private utility, public utility district, Tribal entity, or local government (including any unit, subdivision, authority, or consortium of local governments) that provides or will provide broadband services.”

9. **Small Business:** indicate whether a subgrantee qualifies as a small business or does not qualify as a small business; and
10. **Webpage:** address of the website (i.e., URL) for the subgrantee.

To download a copy of the NTIA Template for Subgrantees, please see the file named “*fp\_subgrantees.csv*.”

**0.2 Attachment (Required):** Complete and submit the [Deployment Projects CSV file](#) (named “*fp\_deployment\_projects.csv*”) using the NTIA template provided.

The purpose of the Deployment Projects CSV file is to capture the outcomes of the Subgrantee Selection Process, including details about planned deployment projects (including other than last-mile deployment projects), their scope, and their significance. This information helps NTIA understand the project’s objectives and expected outcomes.

For subgrantees that intend to implement *multiple* projects, list each unique project as a separate row and include a unique project identifier.

The CSV file must adhere to the data format specified in [Table 5](#) of the Appendix. Additionally, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_deployment\_projects.csv*” as outlined in [Table 5](#) in the Appendix, including:

1. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
2. **Project Name:** Eligibility Entity assigned project name;
3. **Project ID:** Eligible Entity assigned unique identifier;
4. **UEI:** SAM.gov assigned legal identifier of subgrantee;
5. **Project Description:** brief description of the project (max 1,000 characters);
6. **Project Type:** select a project category that best describes deployment activity (e.g., last-mile broadband deployment, CAI deployment project, middle-mile project, and MDU Wi-Fi project);
7. **Priority Broadband Project:** indicate whether the project qualifies as a priority broadband project (i.e., end-to-end fiber technology projects for all locations) or does not qualify as a priority broadband project;
8. **Estimated Miles of Aerial Fiber Deployed:** anticipated number of aerial miles of fiber to provide service to the locations within the project
9. **Estimated Miles of Buried Fiber Deployed:** anticipated number of buried miles of fiber to provide service to the locations within the project
10. **Estimated Number of Jobs:** estimated number of employment opportunities created by the project;
11. **Estimated Subaward Date:** anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active);
12. **Estimated Period of Performance Start Date:** anticipated date when the project will commence its period of performance;
13. **Estimated Period of Performance End Date:** anticipated date when the project will close its period of performance; must be after the project start date *and* before March 2, 2032;

14. **Tribal Intersection:** indicate whether any BSLs or CAIs funded by the project will intersect Tribal territory or will not intersect Tribal territory;
15. **Tribal Name(s):** name of the tribe(s) in whose territory the project will conduct activities;
16. **Projected BEAD Funding:** anticipated amount of BEAD funds used to complete the project, in USD;
17. **Fixed Amount Subaward:** indicate whether the subaward is a fixed amount subaward or not – *only applies to [last-mile] deployment projects*;
18. **Subgrantee Match:** total amount of cash and in-kind matching funds for the project to be provided by the subgrantee itself, in USD;
19. **Federal Match:** total amount of cash and in-kind matching funds for the project to be provided by match-eligible federal sources, in USD;
20. **State Match:** total amount of cash and in-kind matching funds for the project to be provided by the Eligible Entity, in USD;
21. **Other Match:** total amount of cash and in-kind matching funds for the project to be provided by other sources such as nonprofits organizations, in USD;
22. **Federal Match Source(s):** name of federal funding source(s) that is match eligible; and
23. **Notes:** optional notes about the project. For projects that have not been tentatively awarded, state the cause.

To download a copy of the NTIA Template for Deployment Projects, please see the file named “[fp\\_deployment\\_projects.csv](#).”

**o.3 Attachment (Required):** Complete and submit the [Locations CSV](#) file (named “[fp\\_locations.csv](#)”) using the NTIA template provided. The Location IDs in this list must match the approved final list from the Eligible Entity’s Challenge Process results (i.e., the fabric version selected).

The purpose of the Locations CSV file is to capture the final location data of all underserved and unserved locations eligible for BEAD funding after the Eligible Entity’s Challenge Process results are approved and the technical and performance aspects of the project. Each Location ID (BSL) must be associated with a specific Project ID. The CSV file must adhere to the data format specified in [Table 6](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “[fp\\_locations.csv](#)” as outlined in [Table 6](#) in the Appendix including:

1. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric;
2. **Project ID:** Eligible Entity assigned unique identifier defined in the Deployment Project CSV;
3. **Location Classification:** indicate the category classifying the location as unserved, underserved, or served from the approved Challenge Process locations list;
4. **Technology Code:** indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes;
5. **Upload Speed Anticipated:** planned maximum upload speed, in Mbps;
6. **Download Speed Anticipated:** planned maximum download speed, in Mbps;

7. **Low Latency:** indicate whether the committed service meets the definition of low latency or does not meet the definition of low latency as defined in the NOFO;
8. **Extremely High-Cost Threshold:** indicate whether the location exceeds the Eligible Entity defined extremely high-cost per location threshold or does not exceed the extremely high-cost per location threshold; and

To download a copy of the NTIA Template for Locations, please see the file named “*fp\_locations.csv*.”

**0.4 Question (Y/N):** Does the Eligible Entity certify that it will ensure coverage of broadband service to all unserved and underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process, but one or more of these locations will not be served through a BEAD project?

The Eligible Entity must indicate if it will use any of the reason codes described in Requirement 7 to explain why it is not serving a BEAD-eligible location through a BEAD project. If the Eligible Entity selects ‘Yes,’ it will be required to upload a separate CSV file detailing locations that will not be served through a BEAD project.

Every eligible location, as identified upon the conclusion of the Challenge Process, needs to appear in only one of two files:

- If the location is served through a BEAD project, the location is included in the *fp\_locations.csv* file
- If the location is **not** served through a BEAD project, the location is included in the *fp\_no\_BEAD\_locations.csv* file

If a location will not be served through a BEAD project, that location is not subject to BEAD Program requirements.

#### **0.5 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question**

**0.4):** Complete and submit the No BEAD Locations CSV file (named “*fp\_no\_BEAD\_locations.csv*”) using the NTIA template provided. The Location IDs in this list must match the approved final list from the Eligible Entity’s Challenge Process results (i.e., the fabric version selected).

The purpose of this No BEAD Locations CSV is to expand upon the reasons for not serving a BEAD-eligible location with a BEAD project provided in the Locations CSV. The CSV file must adhere to the data format specified in [Table 7](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file names “*fp\_no\_BEAD\_locations.csv*” as outlined in [Table 7](#) of the Appendix including:

1. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric;
2. **Location Classification:** indicate the category classifying the location as unserved, underserved, or served from the approved Challenge Process locations list;
3. **Reason:** reason, from a list, for not serving a location through a BEAD project;



4. **Non-BSL Code:** descriptor of locations not being eligible BSLs, from a list, for not serving a location through a BEAD project, as applicable to the reason code selected;
5. **Location Type:** description of the location, from a list, for not serving a location through a BEAD project, as applicable to the reason code selected;
6. **Evidence Type:** the type of evidence maintained by the Eligible Entity to support the explanation of the reason code (evidence will not be submitted with the Final Proposal);
7. **Provider ID:** the unique 6-digit code generate by the FCC that identifies a service provider, as applicable to the reason code selected;
8. **Technology:** indicate the type of technology already provided to the location, using the FCC Broadband Data Collection technology codes, as applicable to the reason code selected;
9. **Program:** indicate the state or federal enforceable commitment program, as applicable to the reason code selected;
10. **Fabric:** indicate the version of the Broadband Serviceable Location Fabric references, as applicable to the reason code selected;
11. **Challenge ID:** challenge identifier for the location challenge submitted to the FCC, as applicable to the reason code selected;
12. **Notes:** if needed, brief explanation of why locations should not receive service through a BEAD project.

To download a copy of the NTIA Template for No BEAD Locations, please see the file named “fp\_no\_BEAD\_locations.csv.”

**0.6 Question (Y/N):** If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2)?

The Eligible Entity must indicate if it intends to use BEAD funds to serve any CAIs. If the Eligible Entity intends to use BEAD funds to serve any CAIs, it certifies that it ensures coverage to broadband service to all unserved and underserved locations, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2). This will serve as the Requirement 7 certification mandated by the BEAD NOFO.

**0.7 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.6):** Complete and submit the CAIs CSV file (named “fp\_cai.csv”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

The purpose of this CAIs CSV file is to capture the eligible CAIs, as documented in the Eligible Entity’s approved Challenge Process results, that will be served by a BEAD-funded project. The CSV file must adhere to the data format specified in [Table 8](#) of the Appendix. Likewise, the Eligible Entity must complete all mandatory fields, unless otherwise denoted, in the file named “fp\_cai.csv” as outlined in [Table 8](#) in the Appendix including:

1. **Type:** indicate the CAI location type;
2. **Entity Name:** official name of the CAI;
3. **Location ID:** unique identifier of the location from the Broadband Serviceable Location Fabric, if available;
4. **Project ID:** Eligible Entity assigned unique identifier;
5. **Street Address:** street number, street name, and any applicable prefix or suffix of the first address line (primary address) of the CAI;
6. **City:** full name of the city, town, municipality, or census designated place associated with address;
7. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
8. **Zip Code:** five-digit USPS ZIP code associated with address, including any leading zeros;
9. **Latitude:** unprojected (WGS-84) geographic coordinate latitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits;
10. **Longitude:** unprojected (WGS-84) geographic coordinate longitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits;
11. **Technology Code:** indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes;
12. **Upload Speed Anticipated:** planned maximum upload speed, in Mbps; and
13. **Download Speed Anticipated:** planned maximum download speed, in Mbps;

The Eligible Entity must enter the address of the physical location of the CAI, not the administrative location. For example, the address must describe the location of the school building, not the board of education administrative building.

To download a copy of the NTIA Template for CAIs, please see the file named “*fp\_cai.csv*.”

### **0.8 Question (Y/N): Is the Eligible Entity conducting non-deployment projects?**

Intake Questions 0.8 and 0.9 relate to Non-Deployment Subgrantee Selection (Requirement 9), but for purposes of the Eligible Entity’s submission in NGP, the Non-Deployment Projects CSV file will be submitted, if applicable, in the same section as the other CSV files.

If the Eligible Entity is conducting non-deployment projects (either prior to or after the Final Proposal), select ‘Yes.’

### **0.9 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question**

**0.8):** If ‘Yes’ [to Intake Question 0.8], the Eligible Entity is conducting non-deployment projects, complete and submit the Non-Deployment Projects CSV file (named “*fp\_non\_deployment\_projects.csv*”) using the NTIA template provided.

The purpose of the Non-Deployment Project Data CSV file is to capture non-deployment projects that have been conducted or are planned to be conducted. If the Eligible Entity has begun to implement a non-deployment project approved in the Initial Proposal, it must complete all mandatory fields, unless otherwise denoted, in the file named “*fp\_non\_deployment\_projects.csv*” as outlined in [Table 9](#) the Appendix. If the Eligible Entity

plans to conduct non-deployment projects that are not fully described in the Final Proposal, it must complete all mandatory fields to the best of its knowledge.

The CSV file must adhere to the data format specified in [Table 9](#) of the Appendix. Fields include:

1. **State or Territory:** two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity;
2. **UEI:** SAM.gov assigned legal identifier of subgrantee;
3. **Project Name:** Eligibility Entity assigned project name;
4. **Project ID:** Eligible Entity assigned unique identifier;
5. **Non-Deployment Project Category:** select a project category that best describes the non-deployment activity (e.g., user training or remote learning);
6. **Estimated Number of Jobs:** estimated number of employment opportunities created by the project;
7. **Estimated Subaward Date:** anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active);
8. **Estimated Period of Performance Start Date:** anticipated date when project will commence its implementation period of performance;
9. **Estimated Period of Performance End Date:** anticipated date when project will close its implementation period of performance; must be after the project start date *and* before March 2, 2032;
10. **Tribal Intersection:** indicate whether any BSLs or CAIs funded by the project will intersect Tribal territory or will not intersect Tribal territory;
11. **Projected BEAD Funding:** anticipated amount of BEAD funds used to complete the project, in USD;
12. **Fixed Amount Subaward:** indicate whether the subaward utilizes a fixed amount mechanism as defined in 2 C.F.R. 200.333; and
13. **Notes:** optional notes about the project.

For subgrantees that intend to implement *multiple* projects, list each unique project as a separate row and include a unique project identifier.

To download a copy of the NTIA Template for Non-Deployment Projects, please see the file named “*fp\_non\_deployment\_projects.csv*.”

### [Subgrantee Selection Process Outcomes \(Requirement 1\)](#)

**Relevant Instructions from NOFO Section IV.B.9.b, Page 47:**

The Final Proposal must include...:

1. A detailed plan that specifies the outcome of the Eligible Entity’s subgrantee selection process and how the Eligible Entity will:
  - a. allocate grant funds to subgrantees for the deployment of broadband networks to unserved locations, underserved locations, and (if applicable) CAIs in accordance with the prioritization framework described in Section IV.B.7.b of this NOFO; and
  - b. align the grant funds allocated to the Eligible Entity under the BEAD Program, where practicable, with the use of other funds for broadband that the Eligible Entity receives from the federal government, an Eligible Entity, or any other source.

The purpose of this section is for the Eligible Entity to provide data on the allocation of grant funds in adherence with its approved Initial Proposal and document the outcomes of the Subgrantee Selection Process. It requires the Eligible Entity to provide a transparent and detailed account of how it fulfilled its approved Initial Proposal commitments in a fair, open, and competitive manner. Each Eligible Entity must demonstrate that the outcomes of its process prioritized serving unserved locations first, underserved locations second, and (if applicable) CAIs last. The Eligible Entity must also show that its process aligned BEAD grant funds with other funds for broadband that the Eligible Entity receives from the federal government, an Eligible Entity, or any other source.

**“(f)(1) Deployment Projects”**

References in this document to “(f)(1) deployment projects” refer to 47 U.S.C. § 1702(f)(1), which states that an Eligible Entity may use BEAD grant funds to competitively award subgrants for unserved service projects and underserved service projects.

**1.1: Text Box:** Describe how the Eligible Entity’s deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal.

The Eligible Entity must execute its deployment Subgrantee Selection Process consistent with its approved Initial Proposal. NTIA will monitor consistency between the Subgrantee Selection Process approved in the Eligible Entity’s Initial Proposal and the execution of that process. As with any award term, NTIA may impose remedies for noncompliance with the terms of the approved Initial Proposal, potentially including the disallowance of noncompliant costs incurred by the Eligible Entity.

In instances where the Eligible Entity requires a correction to its approved Initial Proposal, the Eligible Entity must notify NTIA as soon as possible and adhere to NTIA guidance. Failure to notify NTIA of changes to the process described in its approved Initial Proposal may result in rejection of the Eligible Entity’s Final Proposal, among other consequences.

To provide an adequate response, the Eligible Entity must consider its deployment subgrantee selection timelines, phases, project area definitions, scoring rubric, evaluation procedures, project prioritization methodology, strategies to ensure universal coverage, and utilization of the EHCPLT, among other elements of its deployment Subgrantee Selection Process. The Eligible Entity may respond to this question in one or more of the following ways:

- A description that the deployment Subgrantee Selection Process undertaken was consistent with that approved in the Initial Proposal.
- A description that, if the deployment Subgrantee Selection Process undertaken differed from that approved in the original Initial Proposal, the Eligible Entity received written approval for the change(s) from NTIA.

**1.2 Text Box:** Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

Final Proposals will be evaluated against the specific steps identified in the Eligible Entity’s approved Initial Proposal. If the Eligible Entity required a correction to its approved Initial Proposal and received written NTIA approval for the correction, the Eligible Entity must

describe the ways in which the executed deployment Subgrantee Selection Process differed from the process outlined in the original approved Initial Proposal. Additionally, it must describe how the Eligible Entity engaged NTIA to notify them of the need for a change and provide a justification for the change.

The Eligible Entity must provide a description of the steps that it took to ensure a Subgrantee Selection Process that is fair, open, and competitive. This should include a description of the Eligible Entity's state or territory procurement policies and procedures and the internal controls that facilitated the Eligible Entity's oversight of each phase of the process.

The Eligible Entity must describe steps it took to ensure a **fair** process, including safeguards against each of the following:

- Collusion;
- Bias;
- Conflicts of interest;
- Arbitrary decisions; and
- Other actions that would undermine confidence in the process.

Examples of steps an Eligible Entity could take to ensure a fair process include, but are not limited to:

- Evidence that all applicants had access to the scoring rubric prior to submitting applications;
- Evidence of consistent application of scoring criteria by qualified reviewers;
- Samples of training materials provided to reviewers, including training on how to report conflicts of interest;
- Description of how reviewers documented their review findings to provide a rationale for their scoring assessments;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate conflicts of interest, including methods to prevent, report, and resolve conflict of interest concerns during application review and award;
- Descriptions of the Eligible Entity's oversight procedures to ensure application of a consistent standard of review across reviewers;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate instances of collusion, including instances of collusion between potential applicants and collusion between applicants and Eligible Entity staff, contractors, or other persons involved in the deployment Subgrantee Selection Process;
- Descriptions of the use of a pre-application process (if applicable); and/or
- Evidence that all applicants had the same opportunity to cure their applications (if applicable).

The Eligible Entity must include how the deployment Subgrantee Selection Process was **open** by describing how the Eligible Entity provided adequate public notice to potential subgrantees to facilitate participation by a wide variety of potential applicants, to ensure an open and competitive process, and to prevent favoritism, collusion, and abuse.

Examples of steps an Eligible Entity could take to ensure an open process include, but are not limited to:

- Evidence that all eligible participants defined in the Eligible Entity’s approved Initial Proposal were permitted to participate;
- Evidence that all applicants had the same amount of time to apply between the public notice and deadline (or the Eligible Entity describes instances when application extensions were granted and provides a rationale for this determination), and the deadline did not place an unreasonable burden on applicants to submit an application;
- A communication plan that promotes participation from a wide variety of potential applicants;
- Coordination with small, minority-owned, women-owned, and labor surplus firms to encourage participation; and/or
- A description of the ways an Eligible Entity removed barriers or provided financial incentives.

The Eligible Entity must also describe how it ensured the deployment Subgrantee Selection Process was **competitive**, such as by using a competitively neutral evaluation criteria that did not favor one type of provider over another, except certain preferences expressed neutrally and in advance.

Examples of steps an Eligible Entity could take to ensure a competitive process include, but are not limited to:

- Evidence that different types of providers were able to submit competitive applications, such as a demonstration of the number of unique and non-traditional providers;
- Evidence that non-traditional providers were able to competitively participate in the deployment Subgrantee Selection Process;
- Evidence that the Eligible Entity only engaged in provider-specific outreach after at least one round of applications were submitted (i.e., in the case of areas that received no applications or for the purposes of deconfliction);
- A description that the Eligible Entity’s curing requests did not impose unreasonably burdensome timelines that certain providers would be at a disadvantage to address;
- A description of how public engagement or letters of support factored into the Eligible Entity’s scoring, if applicable;
- A description of how the project deconfliction process was transparently communicated to applicants and fairly applied; and/or
- A description of how the Eligible Entity’s process to adjust the scope of submitted applications followed the steps in the approved Initial Proposal.

Additionally, the Eligible Entity must describe the processes in place to ensure reviewers were trained, qualified, and objective. The Eligible Entity must describe how reviewers were identified, including how the State Broadband Office assessed reviewers’ qualifications and potential conflicts of interest (including what it did to avoid even the appearance of conflicts of interest), whether contractors were utilized, and whether different reviewers were used to review individual components of the applications (e.g., certified professional engineers reviewing applicants’ network designs). The Eligible Entity must demonstrate that it ensured the quality of each review, including reviewer oversight procedures. If applicable, the Eligible Entity must describe how a review committee or final approval by a governing body factored into the review process.

**1.3 Text Box:** Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal. If there was a divergence, explain how the process that was conducted diverged from the approved process.

When there were initially no applications to serve a location or group of locations that are unserved and underserved, the Eligible Entity must affirm that it followed a procedure consistent with the process approved in the Initial Proposal.

The Eligible Entity shall not change its subgrantee scoring rubric or change the selection process as described in the approved Initial Proposal to address locations that did not receive an application without prior notification to and approval by NTIA. The Eligible Entity should contact its assigned Federal Program Officer if it has questions whether the incentive strategies considered in these instances align with the Eligible Entity's approved Initial Proposal.

If the Eligible Entity did not encounter this issue, note 'Not Applicable' in this text box.

**1.4 Text Box:** Provide the Extremely High Cost Per Location Threshold(s) the Eligible Entity used during the Subgrantee Selection Process.

The Eligible Entity must provide the specific Extremely High Cost per Location Threshold(s) (EHCPLT) used during the Subgrantee Selection Process. If the Eligible Entity identified a specific EHCPLT in its approved Initial Proposal (rather than describing a process for identifying it), it must use that EHCPLT in its Subgrantee Selection Process. If the way the Eligible Entity determined the EHCPLT was inconsistent with the approved Initial Proposal, the difference must be explained here. Similarly, if the way the Eligible Entity applied the EHCPLT was inconsistent with the approved Initial Proposal, the difference must be explained here.

NTIA expects each Eligible Entity to set a threshold that maximizes the use of the best available technology for each location given the available funding. An Eligible Entity whose approved Initial Proposal included a detailed process for identifying an EHCPLT should work with its assigned Federal Program Officer if there are questions on developing an appropriate EHCPLT and maximizing the use of the best available technology, as laid out in NTIA guidance regarding priority, other reliable, and alternative technologies.

**1.5 Question (Y/N):** Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

The Eligible Entity must certify that it will retain all subgrantee records for a period of at least three (3) years from the date of closeout of the relevant subgrant and in accordance with 2 C.F.R. § 200.334. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

If the Eligible Entity cannot certify this, the Eligible Entity should contact its assigned Federal Program Officer. The Eligible Entity should note that responding 'No' for this question may result in an extended timeline for NTIA's review and approval of the Final Proposal through curing.



### Timeline for Implementation (Requirement 3)

**Relevant Instructions from NOFO Section IV.B.9.b, Page 47:**

The Final Proposal must include...:

3. A timeline for implementation of the detailed plan and completion of each project and other eligible activity to be funded.

**Relevant Instructions from NOFO Section IV.D.2.c., Page 74:**

Prospective subgrantees must submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project. An Eligible Entity shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the materials submitted to it demonstrate the prospective subgrantee's technical capability with respect to the proposed project.

**Relevant Instructions from NOFO Section II.B, Page 18:**

As established in [47 U.S.C. § 1702(h)(4)(C)], subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant from the Eligible Entity.

All planned projects (deployment and non-deployment projects that **have** been selected and approved) should have anticipated start/end dates listed in the respective CSV submissions (*fp\_deployment\_projects.csv* and *fp\_non\_deployment\_projects.csv*) which indicate that the project will be completed within 4 years of the receipt of the subgrant.

**3.1 Text Box:** If the Eligible Entity anticipates eligible non-deployment activities and has not already selected those projects, describe the estimated timeline for completion of subgrantee selection, if applicable. If non-deployment is not anticipated under this program, indicate 'N/A.'

**3.2 Text Box:** Has the Eligible Entity taken measures to: (a) ensure that each subgrantees will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

The Eligible Entity must affirm that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant.

The Eligible Entity also must affirm that it will ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance. For example, each Eligible Entity can satisfy this requirement by explaining its monitoring process, highlighting its speed to deployment commitments in its Subgrantee Selection Process, or creating binding agreements with its subgrantees. All of the Eligible Entity's subgrants must end at least 120 days prior to the end of the Eligible Entity's own period of performance, to allow sufficient time for the Eligible Entity to close out all of its subgrants in an orderly fashion prior to the end of its own period of performance. In that connection, the Eligible Entity also must clearly articulate that it will ensure that all BEAD grant activities that it has undertaken itself (including via contract) are completed by the end of its own period of performance.

The Eligible Entity must affirm that it will ensure each subgrantee reaches key milestones in their submitted proposals/documentation. In doing so, the Eligible Entity affirms that it will ensure subgrantees that made specific commitments in response to the "speed to deployment" scoring criteria meet the timelines stated in their applications. Each Eligible Entity must affirm that it will ensure the completion of all BEAD activities within the mandated timeframes, which may include the Eligible Entity's requirements for subgrantee reporting and accountability.

## Oversight and Accountability Processes (Requirement 4)

### **Relevant Instructions from NOFO Section IV.B.9.b, Page 47:**

The Final Proposal must include...:

4. Processes for oversight and accountability to ensure the proper use of the grant funds allocated to the Eligible Entity under the BEAD Program consistent with Section IX.G of this NOFO.

### **Relevant Instructions from NOFO Section IV.C.1.b, Page 51:**

In addition to demonstrating how it expects to satisfy the subrecipient monitoring and management requirements identified in 2 C.F.R. Part 200 Subpart D, 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. NTIA will review proposed subgrant processes during the Initial Proposal and Final Proposal review phases and will reject Proposals that fail to provide sufficient recourse against subgrantees that do not fulfill their legal and contractual responsibilities. NTIA likewise will pursue clawback of funds directly from Eligible Entities that fail to ensure subgrantee accountability to the fullest extent of the law.

### **Relevant Instructions from NOFO Section IX.G.1, Pages 95**

NTIA, Eligible Entities, and subgrantees each have a critical role to play in ensuring that the BEAD Program is implemented in a manner that ensures transparency, accountability, and oversight sufficient to, among other things:

1. Minimize the opportunity for waste, fraud, and abuse;
2. Ensure that recipients of grants under the Program use grant funds to further the overall purpose of the Program in compliance with the requirements of the Infrastructure Act, this NOFO, 2 C.F.R. Part 200, the terms and conditions of the award, and other applicable law; and
3. Allow the public to understand and monitor grants and subgrants awarded under the Program.

To that end, NTIA and Eligible Entities shall:

1. Conduct such audits of grantees and subgrantees as are necessary and appropriate, including audit requirements described in Section VII.G. Eligible Entities shall report the full results of any audits they conduct to the appropriate Federal Program Officer.
2. Develop monitoring plans, subject to the approval of the Assistant Secretary, which may include site visits or desk reviews, technical assistance, and random sampling of compliance requirements.

3. Impose specific conditions on grant awards designed to mitigate the risk of nonperformance where appropriate.

Each Eligible Entity and/or subgrantee shall, as appropriate:

1. Comply with the reporting requirements set forth in Section I.E of this NOFO.
2. Comply with the obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions.
3. Establish and widely publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. Eligible Entities and subgrantees shall produce copies of materials used for such purpose upon request of the Federal Program Officer.

**4.1 Question (Y/N):** Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

The Eligible Entity does not need to have a waste, fraud, and abuse hotline specific to its broadband office – any statewide hotline is sufficient. If the Eligible Entity does not have a public hotline at the time of its Final Proposal submission, the Eligible Entity should respond 'No' and contact its Federal Program Officer.

The Eligible Entity should understand that responding 'No' for this question may result in an extended timeline for NTIA's review and approval of its Final Proposal.

**4.2 Attachments:** Upload the following two required documents:

- (1) BEAD program monitoring plan;
- (2) Agency policy documentation which includes the following practices:
  - a. 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) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
  - b. Timely subgrantee (to Eligible Entity) reporting mandates.

The Eligible Entity must upload the required documents listed above. The Eligible Entity must describe a robust and timely monitoring plan, detailing how it will ensure subgrantee accountability for the BEAD funding subgrantees receive through at least semiannual reporting for the duration of the subgrant.

The Eligible Entity should note that under the BEAD Uniform Guidance exceptions, commercial entity subgrantees are **not** subject to 2 C.F.R. 200.501(f) but are subject to 2 C.F.R. 200.501(g), which establishes the pass-through entity as responsible for subgrantee audit compliance. In other words, non-federal entities must comply with the single audit requirement (spending \$750,000 of federal grants in a year) but commercial entities do not have such requirement

**unless** that Eligible Entity requires it. The Eligible Entity should consider these standard requirements in developing the requirements for its subgrantees.

### *BEAD Program Monitoring Plan*

Examples of details in a BEAD program monitoring plan include, but are not limited to:

- Detailing how subgrantees will comply with the terms and conditions of the award including the Infrastructure Act, BEAD NOFO, the terms of the Eligible Entity’s specific BEAD award including any Specific Award Conditions (SACs), the BEAD Program General Terms and Conditions, award amendments, and applicable laws and regulations;
- Detailing how the Eligible Entity will ensure subgrantees implement projects on schedule and make adequate progress toward achieving identified metrics, milestones, goals, objectives, and planned outcomes;
- Detailing how the Eligible Entity will ensure subgrantees meet financial and programmatic reporting requirements, adhere to submission deadlines, and provide accurate information;
- Detailing how the Eligible Entity will ensure subgrantees expend Federal funds as authorized within the period of performance; and/or
- Detailing how the Eligible Entity will monitor subgrantees to ensure the project is completed on time, and limit potential waste, fraud, and abuse of federal funding.

The Eligible Entity should refer to forthcoming NTIA guidance on completing its BEAD Program Monitoring Plan.

### *Agency Policy Documentation*

Within its agency policy documentation, the Eligible Entity must detail its reimbursement policy for deployment and non-deployment projects, or in the case of fixed amount subawards, its disbursement agreement based on milestone met, unit built, or project complete. Additionally, the Eligible Entity must include clawback provisions to which subgrantees will be subject. The Eligible Entity must also include the reporting cadence in which subgrantees will be required to submit materials to the Eligible Entity.

Examples of details that can be in the agency policy documentation include, but are not limited to:

- The timeline for how the Eligible Entity will distribute funds to the subgrantee for all deployment projects consistent with specific deadlines established by its award;
- The timeline for how subgrantees will report progress to the Eligible Entity;
- Established justifications the Eligible Entity may use to withhold reimbursement of funding to the subgrantee, or in the case of fixed amount subawards, to clawback funding; and/or
- Which entity within the state/territory is responsible for determining when the Eligible Entity can clawback funding (*i.e.*, the state’s Chief Information Office).

**4.3 Question (Y/N):** [Certify that the subgrant agreements will include, at a minimum, the following conditions:](#)

- a. Compliance with Section VII.E of the BEAD NOFO, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity’s approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity’s BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity’s Office of Inspector General (or comparable entity) and/or subgrantees’ internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

The Eligible Entity has already agreed to all of these conditions in its BEAD grant agreement. This includes the responsibility under 2 C.F.R. § 300.332 to ensure that all necessary BEAD conditions are included in each subgrant agreement. The Eligible Entity must certify, by selecting ‘Yes,’ that its subgrant agreements will include all required components to comply with the BEAD NOFO. Prior to provisionally selecting subgrantees, each Eligible Entity must publicly post a template/draft of its broadband deployment subgrant agreement for transparency purposes, to demonstrate that all required components are included.

## Local Coordination (Requirement 5)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

5. Certification that the Eligible Entity has conducted coordination, including with Tribal Governments, local community organizations, and unions and worker organizations, consistent with the requirements set forth in Section IV.C.1.c of this NOFO, a description of the coordination conducted, and a summary of the impact such coordination had on the content of the Final Proposal.

### Relevant Instructions from NOFO Section IV.C.1.c, Page 52:

In evaluating whether local coordination and outreach efforts meet the programmatic requirements, the Assistant Secretary will assess whether plans and activities undertaken ensure: (1) full geographic coverage of the Eligible Entity; (2) meaningful engagement and outreach to diverse stakeholder groups, labor organizations, and community organizations, including to promote the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to BEAD-funded eligible activities; (3) utilization of multiple awareness and participation mechanisms and different methods to convey information and outreach; (4) transparency of processes, to include the documentation and publication of results and outcomes of such coordination and outreach efforts, including additions or changes to the Eligible Entity's Initial Proposal and/or Final Proposal; and (5) outreach to and direct engagement of unserved and underserved communities to include historically underrepresented and marginalized groups and/or communities. These requirements are designed to allow Eligible Entities to tailor the program for the unique environments within its boundaries. In evaluating the sufficiency of local coordination efforts, the Assistant Secretary will consider quantitative measures as well as the quality of the engagements.

The purpose of this section is to detail how an Eligible Entity has coordinated with communities within its jurisdiction after submitting its Initial Proposal, including with marginalized and underrepresented populations. Broad stakeholder coordination is essential to the BEAD Program's success because it promotes full representation and inclusion of unserved, underserved, and underrepresented communities throughout the planning and deployment processes, and fosters strong relationships and buy-in from the individuals the BEAD Program is designed to serve.

The Eligible Entity should refer to the [Local Coordination One-Pager](#) for additional information on conducting local coordination including guidance on creating accessible meetings and how to conduct effective community engagement.

**5.1 Text Box:** Provide a description of the local coordination conducted since the submission of the Eligible Entity's approved Initial Proposal **only**, and a summary of the impact such coordination had on the content of the Final Proposal, consistent with the requirements set forth in Section IV.C.1.c of the BEAD NOFO. The response must describe how local coordination efforts undertaken reasonably ensure:

- a. Full geographic coverage of the Eligible Entity;

- b. Meaningful engagement and outreach to diverse stakeholder groups, labor organizations, and community organizations, including to promote the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to BEAD-funded eligible activities;
- c. Utilization of multiple awareness and participation mechanisms and different methods to convey information and outreach;
- d. Transparency of processes, to include the documentation and publication of results and outcomes of such coordination and outreach efforts, including additions or changes to the Eligible Entity’s Final Proposal; and
- e. Outreach to and direct engagement of unserved and underserved communities to include historically underrepresented and marginalized groups and/or communities.

The Eligible Entity must submit a summary of the local coordination it has conducted since the submission of its Initial Proposal. The Eligible Entity must describe local coordination conducted, ongoing coordination efforts, and the impact of this coordination on the content of the Final Proposal. The Eligible Entity must coordinate with political subdivisions, Tribal Governments, local and community-based organizations, and unions and worker organizations within its jurisdiction to promote full representation and inclusion of unserved, underserved, and underrepresented communities throughout the planning and deployment processes.

The Eligible Entity must address **each** of the following five criteria mentioned on page 50 of the BEAD NOFO.



**1 Geographic Coverage**

The Eligible Entity must describe how its local coordination efforts within its political subdivisions and applicable Tribal Governments included sufficient geographic granularity to demonstrate full participation within the Eligible Entity. Engagement must include Tribal, rural, suburban, and urban areas as well as all key demographic groups within the Eligible Entity’s jurisdiction, to the extent these categories are applicable in the Eligible Entity.

**2 Outreach to Diverse Groups**



As the Eligible Entity continues to conduct local coordination and outreach activities, it must ensure it has involved a diverse set of stakeholders in the development of its Final Proposal. The Eligible Entity must coordinate with local governments, Tribal governments, and stakeholders to solicit input on relevant portions of its Final Proposals. For example, the Eligible Entity should seek input from groups that carry out workforce development programs and labor unions to develop an approach to ensuring a reliable supply of skilled workers, elicit feedback on plans for creating well-paid jobs, and to recruit and hire women and other historically marginalized groups for the job opportunities created through the BEAD Program.

Examples of stakeholder groups for consideration include, but are not limited to, the following:



### 3 Multiple Awareness Mechanisms

The Eligible Entity must describe multiple mechanisms it is using or has used to promote broad awareness and participation from various stakeholder groups. It is not sufficient to only utilize one type of awareness mechanism. Examples of such methods include, but are not limited to, those listed in Figure 4 below.

#### Awareness Mechanisms

- Listening sessions or public meetings (in-person and virtual);
- Eligible Entity’s website and/or email address to submit comments directly;
- Informational materials such as fact sheets, brochures, frequently asked questions (FAQs), and newsletters;
- Social media (e.g., blogs, Twitter, Facebook, Instagram, etc.);
- Email notifications and traditional mail;
- Utilization of Community Anchor Institutions (CAIs) to help promote and disseminate information; and
- Local advertisements and public service announcements (PSAs).

Note that an Eligible Entity must use the Local Coordination Tracker Tool to document the range of awareness mechanisms used.

#### 4 Transparency

In conducting local coordination and outreach activities, the Eligible Entity must establish, document, and adhere to clear procedures to promote transparency. The Eligible Entity must describe how it has made information on planned broadband activities accessible to a diverse set of stakeholder groups.

Examples of ways to promote and document transparency include, but are not limited to:

- Posting publicly available information to easily navigable websites with up to date information;
- Conducting periodic reporting/reports on broadband efforts to local and community stakeholders;
- Involving a diverse set of stakeholders in the planning, implementation and execution of coordination and outreach efforts and activities, and in-person meetings and mailings; and/or
- Providing information in commonly used languages other than English to be accessible to a broad range of community members.

#### 5 Underrepresented Engagement

The Eligible Entity must describe direct engagement efforts with underrepresented communities within its jurisdiction (specifically including historically underrepresented and marginalized groups and/or communities) and highlight any feedback provided by these groups. The Eligible Entity must identify these communities and determine specific outreach and engagement strategies tailored to their needs, including providing outreach in the languages used in the communities these eligible activities serve.

Examples of activities to reach unserved, underserved, and underrepresented communities include, but are not limited to:

- The creation of an Eligible Entity-wide task force or advisory board with representatives from underrepresented communities;
- Frequent engagement with State, Territorial, county, Tribal, and municipal associations that may have a greater reach to these communities through their local elected official members;
- Engagement with other Eligible Entity departments or agencies that regularly serve these communities and can help identify and engage with them, such as Eligible Entity departments of education, health and human services, workforce development, and/or public health;
- Utilization of the awareness mechanisms listed in item 3 above that demonstrates a targeted focus on the above identified communities; and/or
- Investment in surveys, data collection, and mapping initiatives to better understand gaps in connectivity and needs.

**5.2 Attachment (Required):** Submit a Local Coordination Tracker Tool with **only** the Eligible Entity’s new or ongoing coordination since the submission of the Initial Proposal.

The Eligible Entity must submit an updated [Local Coordination Tracker Tool](#). The Local Coordination Tracker Tool must detail specific coordination activities the Eligible Entity has conducted since the Initial Proposal was approved, including with Tribal Governments, local community organizations, unions and worker organizations, and other groups. A completed Local Coordination Tracker must demonstrate compliance with all five coordination criteria required on pg.50 of the BEAD NOFO.

The Eligible Entity must complete the Local Coordination Tracker tool to the best of its knowledge, demonstrating a good faith effort to conduct comprehensive stakeholder engagement and provide sufficient evidence that it did so. The Local Coordination Tracker tool includes several important tabs, including:

- **Overview:** The “Overview” tab outlines the purpose of the tool and provides descriptions for each tab including how they relate to specific BEAD NOFO requirements.
- **List of Organizations:** The “List of Organizations” tab should be used to document each organization and stakeholder group engaged and the purpose of the engagement. The “List of Organizations” tab must illustrate engagement with a diverse set of stakeholders (see ‘Outreach to Diverse Groups’), including underrepresented communities, and reflect that local coordination efforts have met the requirement for sufficient geographic coverage.
- **Stakeholder Engagement Tracker:** The “Stakeholder Engagement Tracker” tab should be used to document engagement with stakeholder groups. This list must comprise a diverse set of stakeholders (see ‘Outreach to Diverse Groups’), including underrepresented communities, and reflect that local coordination efforts have met the requirement for sufficient geographic coverage. Note that the Eligible Entity is not required to complete the column for “Covered Populations Reached” since this is a Digital Equity Program requirement, but it is encouraged to do so consistent with its NTIA-accepted State Digital Equity Plan.
- **Local Plans:** The “Local Plans” tab should be used to document any plans submitted to the Eligible Entity or existing plans or programs instituted by municipal, regional, or local governments and/or Tribal Entities, and how these plans will be incorporated into the Final Proposal. Each political subdivision and federally recognized Tribe must have an opportunity to submit its own local broadband plan to the Eligible Entity for consideration in the development of the Eligible Entity’s Proposals. Each Eligible Entity must detail how it addressed each submitted plan in its Final Proposal.
- **Public Comment Disclosure:** The “Public Comment Disclosure” tab should be used to capture any feedback and public comments from political subdivisions, Tribal Governments, and stakeholders, and how the Eligible Entity will address the feedback. When populating this tab, each Eligible Entity must confirm that the file does not contain any personally identifiable information (PII) for residents, such as full names and email addresses. Professional or business contact information is acceptable.

**To download a copy of the NTIA Template for Local Coordination**, click here: [Local Coordination Tracker Tool](#).



## Challenge Process Results (Requirement 6)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

6. Description of the results of the challenge process conducted by the Eligible Entity under Section IV.B.6.

The purpose of this section is to ensure that the Eligible Entity has successfully accomplished the following objectives based on its Challenge Process results:

- Identified enforceable commitments funded by the federal government or by the Eligible Entity, within the jurisdiction of the Eligible Entity, to deploy qualifying broadband (including on Tribal Lands).
- Identified each unserved, underserved, and served location within the Eligible Entity in its approved Challenge Process results.
- Described how the Eligible Entity applied the statutory definition of the term “Community Anchor Institution,” identified all eligible CAIs in its jurisdiction, identified all eligible CAIs in applicable Tribal Lands, and assessed the needs of eligible CAIs, as defined in the Eligible Entity’s approved Initial Proposal Volume I.

### 6.1 Question (Y/N): Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

The Eligible Entity must certify, by selecting ‘Yes,’ that it has successfully completed the BEAD Challenge Process and received written approval of its results from NTIA. It is not permissible for the Eligible Entity to begin the deployment Subgrantee Selection Process without first obtaining NTIA approval of its Challenge Process results. If the Eligible Entity did not successfully complete the Challenge Process and receive written approval of the results of the Challenge Process from NTIA, select ‘No.’

The Eligible Entity should note that responding ‘No’ for this question will result in an extended timeline for NTIA’s review and approval of the Final Proposal through curing.

### 6.2 Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

The Eligible Entity must provide an active URL link to where the Eligible Entity has publicly posted the final location classifications. The link must not be broken, missing, or incorrect, and information must be downloadable/readable.

The Location IDs and CAIs submitted as part of the [Final Proposal Data Submission](#) must mirror the approved results of the Eligible Entity’s Challenge Process. In other words, the final list of serviceable locations and CAIs assigned under projects and submitted as part of the [Final Proposal Data Submission](#) must be the same eligible locations and CAIs finalized and approved as part of the Challenge Process.

The Eligible Entity must provide public notice of final classification of each unserved location, underserved location, and eligible CAI at least 60 days before allocation grant funds for network deployment (BEAD NOFO page 35). This is a legal requirement that each Eligible Entity funding broadband deployment projects must fulfill under 47 U.S.C. § 1702(h)(2)(B).

## Unserved and Underserved Locations (Requirement 7)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 47:

The Final Proposal must include...:

7. Certification that the Eligible Entity will provide service to all unserved and underserved locations, if the Eligible Entity is seeking to use BEAD funding for deployment to CAIs or for other eligible activities.

The purpose of this section is to ensure that all unserved and underserved locations, as identified upon conclusion of its Challenge Process as required under 47 U.S.C. § 1702(h)(2), will be served. The accurate identification of unserved and underserved locations is essential to achieving the goals of the BEAD program of universal coverage. The responses in this section must match the information provided in the Eligible Entity's submitted CSV files.

Each Eligible Entity has an obligation to ensure universal coverage to all unserved and underserved locations, as identified in its approved Challenge Process. The Eligible Entity should refer to the guidance in the [Subgrantee Selection](#) section of this document to address locations not requiring BEAD subsidy during subgrantee selection.

In any case where a BEAD-eligible location is identified as not being served through a BEAD project, an Eligible Entity will be required to explain the reason for not including these locations and maintain evidence that supports this explanation. Each Eligible Entity will be required to select from a list of reason codes for each BEAD-eligible location that will not be served through a BEAD project. Identifying each of those locations in the Final Proposal will allow each Eligible Entity to affirm it has met its universal coverage obligations (*see* BEAD NOFO Section IV.B.7.b), while efficiently using its BEAD allocation and preventing overbuilding. An Eligible Entity should only note a location will not be served through a BEAD project when it can affirm, through the appropriate evidence, that an unserved or underserved location meets the criteria of one of the reason codes. NTIA will assess each Eligible Entity's explanation for non-service with the presumption that the reason codes should be applied in a narrow set of circumstances.

If a location is no longer a BSL in the version of the Fabric available to the Eligible Entity, it can use the "F" reason code and indicate the Fabric version in a designated column. If the Eligible Entity believes that a Broadband Serviceable Location should be removed from the Fabric, it must submit a location challenge to the FCC as soon as possible.<sup>6</sup> It should not wait until the preparation of the Final Proposal. If the Fabric has not been updated yet, the Eligible Entity must indicate the FCC location challenge identifier when using reason codes '1' or '2.'

The requirements for Eligible Entities to maintain evidence to justify not serving a location through a BEAD project are further described in this section below. **The Eligible Entity will not submit the evidence in its Final Proposal, but Eligible Entities should be prepared to provide evidence for NTIA review, as requested.**

### Coverage of Unserved Locations

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<sup>6</sup> Note that the definition of a CAI location differs for the FCC Fabric and the definitions in the Eligible Entity's approved Initial Proposal. FCC Challenges to CAIs must follow the FCC definition of CAIs.

**7.1 Question (Y/N):** Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

The Eligible Entity must certify, by selecting ‘Yes,’ that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified by the Eligible Entity’s NTIA-approved challenge results. By selecting ‘Yes,’ the Eligible Entity certifies that there is, for every unserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

If the Eligible Entity is financially incapable of serving any unserved locations by a BEAD project, it must select ‘No.’

**7.2 Question (Y/N):** Indicate whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), **through a BEAD project.**

The Eligible Entity must certify, by selecting ‘Yes,’ that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the Eligible Entity’s NTIA-approved challenge results, and all BEAD-eligible locations are being served by a BEAD project.

If the Eligible Entity indicates ‘No,’ but has certified universal coverage in Question 7.1 and therefore has not served all BEAD-eligible unserved locations through a BEAD project, the Eligible Entity must submit the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity’s certification must match the information provided in the CSV files.

The Eligible Entity must select ‘No’ if it is financially incapable of ensuring universal coverage to all unserved locations.

**7.3 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 7.1):** If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all unserved locations.

**7.4 Attachment (Optional – Conditional on a ‘No’ Response to Intake Question 7.1):** If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all unserved locations.

*Intake Questions 7.3 and 7.4 will only appear in NGP if the Eligible Entity responds ‘No’ to Intake Question 7.1. Intake Questions 7.3 and 7.4 are related.*

The Eligible Entity must describe how it provisionally selected deployment subawards in a manner that maximized deployment of Priority Broadband Projects and non-priority broadband projects prior to deployment of alternative technologies and how it followed the prioritization framework in the BEAD NOFO to first serve all unserved locations. The Eligible Entity must



include a description of the unserved locations that it is financially incapable of serving through a BEAD project and how these locations were treated during the Subgrantee Selection Process.

### **Coverage of Underserved Locations**

**7.5 Question (Y/N):** Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

The Eligible Entity must certify, by selecting ‘Yes,’ that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified by the Eligible Entity’s NTIA-approved challenge results. By selecting ‘Yes,’ the Eligible Entity certifies that there is, for every underserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

If the Eligible Entity is financially incapable of serving any underserved location by a BEAD project, it must select ‘No.’

**7.6 Question (Y/N):** Indicate whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), **through a BEAD project.**

The Eligible Entity must certify, by selecting ‘Yes,’ that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the Eligible Entity’s NTIA-approved challenge results, and all BEAD-eligible locations are being served by a BEAD project.

If the Eligible Entity indicates ‘No’ but has certified universal coverage in Question 7.5 and therefore has not served all BEAD-eligible underserved locations through a BEAD project, the Eligible Entity must submit the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity’s certification must match the information provided in the CSV files.

The Eligible Entity must select ‘No’ if it is financially incapable of ensuring universal coverage to all underserved locations.

**7.7 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 7.5):** If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all underserved locations.

**7.8 Attachment (Optional – Conditional on a ‘No’ Response to Intake Question 7.5):** If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all underserved locations.

*Intake Questions 7.7 and 7.8 will only appear in NGP if the Eligible Entity responds ‘No’ to Intake Question 7.5. Intake Questions 7.7 and 7.8 are related.*

The Eligible Entity must describe how it provisionally selected deployment subawards in a manner that maximized deployment of Priority Broadband Projects and non-priority broadband projects prior to deployment of alternative technologies and how it followed the prioritization framework in the BEAD NOFO to first serve all unserved locations, then underserved locations. The Eligible Entity must include a description of the underserved locations that it is financially incapable of serving through a BEAD project and how these locations were treated during the Subgrantee Selection Process.

**7.9 Question (Y/N):** Certify that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

The Eligible Entity must certify, by selecting ‘Yes,’ that it will maintain documentation, following the guidelines below, to justify its determination that there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. If the Eligible Entity does not indicate a reason to not serve any unserved or underserved locations in its Final Proposal, it must still select ‘Yes’ to acknowledge the obligation to maintain evidence should it indicate a reason in the future. The Eligible Entity will not submit evidence with the Final Proposal submission.

If a location will not be served through a BEAD project, that location is not subject to BEAD Program requirements.

### *Reason Codes, Evidence Objectives, and Examples*

The table below details each reason code that the Eligible Entity may select in the *fp\_no\_BEAD\_location.csv* file. In noting a location with a reason for not being served through a BEAD project, the Eligible Entity must maintain evidence that meets the objectives described below. If the Eligible Entity cannot produce evidence that maintains these standards, its identification of not serving such locations through a BEAD project will be denied. Examples of such evidence are provided, with recommended specifications for each evidence type provided below this table. If the example evidence is not available, the Eligible Entity should obtain the clearest and most compelling evidence possible that accomplishes the evidentiary objective, and be prepared to discuss those locations with NTIA prior to Final Proposal submission.

The Eligible Entity does not have to collect all types of evidence listed for each reason code or sub-code. However, FCC location challenge IDs are required for each location where indicated by the reason code.

The codes listed below may be used in the future for locations associated with subgrant projects when the Eligible Entity identifies a location that falls within one of the reasons. This will be addressed during regular reporting.

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
1: Location should not have a broadband connection	D: Location has been demolished and is not expected to be rebuilt	Evidence must demonstrate that the location is not a business or residential location at which fixed broadband Internet access service is, or can be, installed and there is a demand for such service	<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner (e.g., zoning or land use change)</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	B: Residential location is not habitable		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	U: Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	M: Location is intended to be mobile and has not been permanently installed in its current location (e.g., it is an RV or boat)		<ul style="list-style-type: none"> <li>• Attestation from property owner</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
	R: Location is not a building but a land or natural formation, such as a large rock		<ul style="list-style-type: none"> <li>• Attestation from property owner</li> <li>• Photographic evidence</li> <li>• FCC location challenge ID (Type 6)</li> </ul>

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
	or collection of hay bales		
	Z: Location is not serviceable for another reason		<ul style="list-style-type: none"> <li>• Evidence not specified; to be collected as applicable to the reason</li> <li>• FCC location challenge ID (Type 6)</li> </ul>
2: Location does not need mass-market broadband service due to the nature of use	C: CAI location	Evidence must demonstrate that the location does not have a demand for mass-market broadband service	<ul style="list-style-type: none"> <li>• Attestation unit of government or property owner</li> <li>• Photographic evidence clearly showing the nature and use of the location</li> <li>• FCC location challenge ID (Type 4)</li> </ul>
	E: Enterprise location		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• Photographic evidence clearly showing the nature and use of the location</li> <li>• FCC location challenge ID (Type 4)</li> </ul>
	P: Government property		<ul style="list-style-type: none"> <li>• Attestation from unit of government or property owner</li> <li>• Photographic evidence clearly showing the nature and use of the location</li> <li>• FCC location challenge ID (Type 4, referring to the location as either a CAI or an enterprise)</li> </ul>
3: Location has been removed from the latest version of the	N/A	Evidence that the location is no longer on the latest version of the Fabric	Version of the Fabric referenced

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
Fabric by the FCC			
4: Location is already served by an enforceable commitment	State enforceable commitment	Evidence must demonstrate that the location is already served, or planned to be served, with qualifying broadband	<ul style="list-style-type: none"> <li>Name of the state grant program</li> <li>The Eligible Entity attests in the Final Proposal that it has properly accounted for state enforceable commitments</li> </ul>
	Federal enforceable commitment (BIP, CAFII, CPF, EACAM, RDOF, RECONNECT, SLFRF, TBCP1, TBCP2)		<ul style="list-style-type: none"> <li>Name of the federal grant program</li> <li>NTIA to validate through collaboration with other federal agencies</li> </ul>
5: Location is already served by non-subsidized service (privately funded network)	N/A	Only for locations with qualifying broadband service in the current National Broadband Map. Evidence must unequivocally demonstrate that the location is already served with qualifying broadband (is currently connected or can be connected within 10 business days of a request with a standard installation fee).	<ul style="list-style-type: none"> <li>Evidence of subscription (service record)</li> <li>Photographic evidence of infrastructure</li> <li>Network diagram</li> <li>Speed test</li> <li>Attestation from the provisional awardee that it concurs to not accept a BEAD project for the location(s)</li> </ul>
6: Other	N/A	Evidence must demonstrate that the location is not a broadband serviceable location, is already or plans to be served, or otherwise does not have demand for broadband service for a reason that does not meet one of the reasons described above	Evidence not specified; to be collected as applicable to the reason. There will be a high bar for this category; the Eligible Entity is encouraged to discuss these locations as early as possible with NTIA and establish evidence standards

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
7: The Eligible Entity is financially incapable of serving an underserved location	N/A	The Eligible Entity must demonstrate, through its overall Final Proposal submission, that it provisionally selected deployment subawards in a manner that prioritizes priority broadband service to the most locations possible and prioritized serving unserved locations first	Evidence incorporated throughout Final Proposal submission

If the Eligible Entity is indicating a reason for not serving a location through a BEAD project because the location is currently served, or planned to be served through an enforceable commitment, with Alternative Technology, the Eligible Entity must reference the guidance in the *Alternative Technology Policy Notice*. The Eligible Entity, in noting the appropriate reason code and technology code in the *fp\_no\_BEAD\_locations.csv* file, will indicate that the location applies to one of the cases described in the *Alternative Technology Policy Notice*.

*Evidence Best Practices*

The Eligible Entity must document that the evidence was collected within a reasonable time period of the Eligible Entity ascertaining that it applies to the respective unserved or underserved location. All evidence must be legible; electronic evidence must be stored in commonly used data formats. Each piece of documentation must depict the type of evidence indicated by the Eligible Entity in the “evidence\_type” column of the *fp\_no\_BEAD\_locations.csv* file.

If the Eligible Entity is supplying a reason for not serving a location on Tribal Land with a BEAD project, the Eligible Entity must also maintain clear and unambiguous evidence that the Tribal Government concurs with the Eligible Entity’s determination and collected evidence.

The list below details minimum standards to assist the Eligible Entity in collecting evidence that indisputably demonstrates that the location meets the criteria identified by the Eligible Entity for not being served through a BEAD project.

- Photographic Evidence:** Photographic evidence must be a JPEG file, timestamped and geocoded with two decimal digits resolution for the seconds part of longitude and latitude. The photo should show a terrestrial (street-level) view. Only if the Eligible Entity is restricted from accessing the location, it may rely on aerial or satellite images but needs to justify why terrestrial photographic evidence could not be collected.
- Attestation by a Unit of Local or Tribal Government:** An attestation by a unit of local or Tribal government, agency of the federal government, or other government entity owning the location must be dated and retained as a PDF file. Attestations for

locations on Tribal Lands must be made by a representative of the Tribal government. The signatory must be identified by title as a representative of the unit of local or Tribal government or federal government agency. The signature may be either digital or scanned. If a single attestation applies to multiple locations, the attestation should list all Location IDs.

- **Attestation by Private Property Owner:** An attestation by a private property owner should be retained as a PDF file. It should contain a date and a digital or scanned signature. If a single attestation applies to multiple locations, it should list all street addresses or Location IDs.
- **Land use or zoning change:** Documentation of a land use or zoning change should include an attestation by a unit of government for the jurisdiction.
- **Evidence of Subscription (Service Record):** Evidence of subscription must be preserved as a PDF file and must contain a date. Any personally identifiable information should be redacted. The evidence of subscription should indicate the service address, service provider, the technology type, and the speed tier.
- **Network Diagram:** A network diagram should include an attestation by an officer of the provider.
- **Network Speed Test:** The speed test results can be recorded in a PDF or CSV file. Speed tests can use any of the applications named in NTIA Model Challenge Process or the Eligible Entity’s Initial Proposal Volume I.

**7.10 Question (Y/N):** Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

The Eligible Entity must certify that it has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

### *Non-Deployment Uses (Requirement 8) & Non-Deployment Subgrantee Selection (Requirement 9)*

*Note: Due to congruencies in intake design across NOFO FP Requirements 8 and 9, these will be submitted together.*

**Relevant Instructions from NOFO Section IV.B.9.b, Page 47:**

The Final Proposal must include...:

8. A detailed description of all planned uses of BEAD funding that are not last-mile broadband deployment projects, including the nature of each funded initiative, how those uses are consistent with Section IV.B.7.a.iii of this NOFO, how the Eligible Entity expects the initiative to address the needs of the Eligible Entity's residents, the ways in which engagement with localities and stakeholders informed the selection of such eligible activities, and any efforts the Eligible Entity undertook to determine whether other uses of the funds might have been more effective in achieving the BEAD Program's equity, access, and deployment goals.

**Relevant Instructions from NOFO Section IV.B.7.a.iii, Pages 39 - 40:**

An Eligible Entity that can demonstrate it has a plan for bringing affordable, high-speed broadband service to all unserved and underserved locations within its jurisdiction may also allocate funding to non-deployment activities. Such eligible non-deployment uses include, but are not limited to, the following:

1. User training with respect to cybersecurity, privacy, and other digital safety matters.
2. Remote learning or telehealth services/facilities.
3. Digital literacy/upskilling (from beginner-level to advanced).
4. Computer science, coding and cybersecurity education programs.
5. 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).
6. Broadband sign-up assistance and programs that provide technology support.
7. Multi-lingual outreach to support adoption and digital literacy.
8. Prisoner education to promote pre-release digital literacy, job skills, online job-acquisition skills, etc.
9. Digital navigators.
10. 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).
11. Costs associated with stakeholder engagement, including travel, capacity-building, or contract support.
12. Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.H.2 of this NOFO.

When selecting subgrantees for non-deployment uses of BEAD funds, an Eligible Entity must adhere to the Infrastructure Act's requirement that subgrants be awarded "competitively." NTIA recognizes that the breadth of potential non-deployment eligible activities could necessitate a broad range of subgrantee selection processes, even within a single Eligible Entity, and that such processes might even require the Eligible Entity to compare and choose among very different proposals (e.g., whether to allocate funds to an affordability program, a cybersecurity training program, or a digital literacy drive). Accordingly, NTIA does not prescribe any specific framework. NTIA reminds Eligible Entities that federal grant regulations "flow through" to subrecipients (i.e., subgrantees), and that subrecipients are responsible for adherence to applicable Federal program requirements specified in the Federal award. As with deployment projects, NTIA encourages Eligible Entities to promote



participation by minority-owned businesses and other socially or economically disadvantaged individual-owned businesses.

**Relevant Instructions from NOFO Section IV.B.7.b.1, Page 41 - 42:**

The requirement that an Eligible Entity have a plan to ensure deployment to all unserved and underserved locations before contemplating non-deployment uses of funds does not impose any temporal requirement as to the order in which BEAD-funded initiatives are undertaken or completed. NTIA recognizes that broadband deployment projects often take months or years to complete, whereas certain other eligible uses of BEAD funds can be implemented more quickly. Thus, if an Eligible Entity has a plan to deploy service to all unserved and underserved locations within its jurisdiction, it may pursue non-deployment initiatives using BEAD funds before or while deployment projects are underway. For example, while an Eligible Entity is only permitted to pursue a device-subsidy program using BEAD funds if it has a plan to deploy service to all unserved and underserved locations within its jurisdiction, an Eligible Entity proposing such a program is both permitted and encouraged to implement it as soon as is feasible once its Initial Proposal has been approved.

Eligible Entity need not wait for its last-mile deployment projects to be completed before it can pursue its approved non-deployment uses. Rather, it is both permitted and encouraged to undertake those non-deployment activities as soon as is feasible.

**Relevant Instructions from NOFO Section IV.B.9.b, Page 48:**

The Final Proposal must include:

9. The means by which subgrantees for non-deployment eligible activities were selected, if the Eligible Entity pursued those initiatives via subgrant, or, alternatively, how the Eligible Entity determined that it should undertake the initiative itself;

The purpose of this requirement is to ensure that the Eligible Entity has consulted relevant stakeholders and weighed the potential options to formulate a plan for non-deployment activities that constitute an effective use of BEAD funds to execute the Program’s goals.

In the approved Initial Proposal, the Eligible Entity described the following:

- Any preferences it planned to use in selecting the type of initiatives it intended to support using BEAD Program funds;
- The means by which a subgrantee for these eligible activities would be selected;
- How the Eligible Entity expected its planned initiatives would address the needs of the Eligible Entity’s residents;
- The ways in which engagement with localities and stakeholders informed the selection of eligible activities; and
- Any efforts the Eligible Entity planned to undertake to determine whether other uses of the funds might be more effective in achieving the BEAD Program’s equity, access, and deployment goals.

At the Initial Proposal stage, an Eligible Entity was permitted to broadly state its preferences in selecting the type of initiatives it intended to support without providing a detailed description of how it would conduct its Subgrantee Selection Process. Additionally, an Eligible Entity may have described non-deployment activities it intended to undertake itself without making a subgrant, such as through a MOU with another state agency.

At the Final Proposal stage, the Eligible Entity's response to this requirement will depend on what was approved in its Initial Proposal. If the Eligible Entity's considerations for non-deployment activities have changed since its Initial Proposal was approved (e.g., the Eligible Entity's approved Initial Proposal stated it would consider funding a digital navigator program and the Eligible Entity will no longer pursue that activity), the Eligible Entity must detail why the plans in the approved Initial Proposal changed.

- **The Eligible Entity's approved Initial Proposal broadly stated its preferences for non-deployment activities but did not detail a Subgrantee Selection Process:** The Eligible Entity must detail a fair, open, and competitive Subgrantee Selection Process and expand on the non-deployment activities it will pursue.
- **The Eligible Entity's approved Initial Proposal made a showing that universal coverage would be achieved and detailed an approved non-deployment Subgrantee Selection Process:** The Eligible Entity must detail how it plans to implement non-deployment activities in a manner consistent with its approved Initial Proposal.
- **The Eligible Entity's approved Initial Proposal stated that it did not intend to have remaining BEAD funding to conduct non-deployment activities, but the Eligible Entity has remaining funding after its deployment subgrantee selection:** The Eligible Entity must detail the initiatives it plans to pursue, how the Eligible Entity will conduct a fair, open, and competitive Subgrantee Selection Process or why the Eligible Entity is choosing to implement these activities on its own, how stakeholder engagement informed these decisions, and what efforts the Eligible Entity understood to determine if other uses of funds might be more effective in achieving the BEAD Program's goals.

To describe a fair, open, and competitive non-deployment Subgrantee Selection Process, the Eligible Entity must include details on: (1) how applications will be solicited; (2) the scoring process and criteria to be used and (3) how the selection process may differ based on each non-deployment activity proposed. As detailed on page 40 of the BEAD NOFO, the breadth of potential non-deployment eligible activities could necessitate a broad range of Subgrantee Selection Processes, even within a single Eligible Entity, and that such processes might require the Eligible Entity to compare and choose among very different proposals (e.g., whether to allocate funds to an affordability program, a cybersecurity training program, or a digital literacy drive). Accordingly, NTIA does not prescribe a specific scoring or selection framework. As with deployment projects, NTIA encourages each Eligible Entity to promote participation by minority-owned businesses and other socially or economically disadvantaged individual-owned businesses.

An Eligible Entity's proposed non-deployment initiatives may align with efforts related to implementing its NTIA-accepted State Digital Equity Plan. NTIA encourages coordination between an Eligible Entity's BEAD and State Digital Equity planning teams, as remaining BEAD funds may be used to complement (but not duplicate) a State or Territory's Digital Equity grant.

**8.1 Question (Y/N):** Indicate whether the Eligible Entity has selected or will pursue projects using BEAD funding that are not (f)(1) last-mile broadband deployment projects.

47 U.S.C. § 1702 refers to using BEAD funding to competitively award subgrants for unserved and underserved service projects. The Eligible Entity’s Final Proposal must demonstrate, through the CSV uploads in [Requirement 1](#), that it will fulfill the statutory and NOFO requirements to serve all unserved and underserved locations before considering non-deployment activities. Each Eligible Entity is also strongly encouraged to consider allocating remaining funds to eligible CAIs before moving to non-deployment uses. An Eligible Entity that proposes to use BEAD funds to pursue objectives in lieu of the deployment of service to eligible CAIs must provide a strong rationale for doing so.

If the Eligible Entity has selected or plans to pursue non-deployment projects using BEAD funding, select ‘Yes.’ As outlined in Section IV. B.7.iii of the BEAD NOFO (pages 39 – 40), “eligible non-deployment projects” include, but are not limited to, the following:

EXAMPLES OF ELIGIBLE NON-DEPLOYMENT USES
<ul style="list-style-type: none"> <li>• User training with respect to cybersecurity, privacy, and other digital safety matters.</li> <li>• Remote learning or telehealth services/facilities.</li> <li>• Digital literacy/upskilling (from beginner-level to advanced).</li> <li>• Computer science, coding and cybersecurity education programs.</li> <li>• 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).</li> <li>• Broadband sign-up assistance and programs that provide technology support.</li> <li>• Multi-lingual outreach to support adoption and digital literacy.</li> <li>• Prisoner education to promote pre-release digital literacy, job skills, online job-acquisition skills, etc.</li> <li>• Digital navigators.</li> <li>• 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).</li> <li>• Costs associated with stakeholder engagement, including travel, capacity-building, or contract support.</li> <li>• Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.K.2 of this NOFO.</li> </ul>

If the Eligible Entity plans to use BEAD funding only for (f)(1) last-mile broadband deployment projects, select ‘No.’ If the Eligible Entity plans to only implement non-deployment projects itself or through an MOU, it should also select ‘Yes’ for this question. If the Eligible Entity indicates ‘No’, it will not implement non-deployment projects with BEAD funding, no further questions will appear for this section.

**8.2 Question (Y/N - Conditional on a ‘Yes’ response to Intake Question 8.1):** Confirm whether the Eligible Entity has certified plans to serve ALL (f)(1) last-mile deployment unserved and underserved locations before pursuing projects using BEAD funding that are not (f)(1) last-mile broadband deployment projects, or received approval in its Initial Proposal to pursue projects using BEAD funds that are not (f)(1) last-mile broadband deployment projects prior to the certification.

*Intake Question 8.2 will only appear in NGP if the Eligible Entity responds ‘Yes’ to Intake Question 8.1.*

The Eligible Entity's Final Proposal must demonstrate that it will fulfill the statutory and NOFO requirements to serve all unserved and underserved locations before considering non-deployment activities. The Eligible Entity's CSV data in the [Final Proposal Data Submission](#) and responses to [Requirement 7](#) must comport with its response here regarding the Eligible Entity's plans to serve all unserved and underserved locations. If the Eligible Entity identified in [Requirement 7](#) that it does not have a certified plan to reach all unserved locations, or all underserved locations, it should align its response here by selecting 'No.' If the Eligible Entity selects 'No', it must briefly reference the reason why, as indicated in [Requirement 7](#).

Each Eligible Entity is also strongly encouraged to consider allocating remaining funds to eligible CAIs before moving to non-deployment uses. An Eligible Entity that proposes to use BEAD funds to pursue objectives in lieu of the deployment of service to eligible CAIs must provide a strong rationale for doing so in Intake Question 8.7 ("Any efforts the Eligible Entity undertook to determine whether other uses of the funds might have been more effective in achieving the BEAD Program's equity, access, and deployment goals").

**8.3 Text Box (Optional):** If the Eligible Entity has or intends to pursue non-deployment projects itself without making a subgrant, describe the activities.

*Intake Question 8.3 will only appear in NGP if the Eligible Entity responds 'Yes' to Intake Question 8.1.*

This question is only required if an Eligible Entity intends to conduct non-deployment projects itself. If the Eligible Entity intends to pursue non-deployment projects itself without making a subgrant, it must describe the non-deployment activities, the organization within the Eligible Entity that will manage the implementation (e.g., the Eligible Entity's technical college system), and *why* it proposes to implement the activity without making a subgrant. For example, an Eligible Entity may justify implementing pre-existing activities because the Eligible Entity is already executing them, such as a workforce development program for broadband deployment. Please note that, even if the Eligible Entity is allocating BEAD funds to a pre-existing program or activity, such program or activity must always be an eligible BEAD cost consistent Section IV.B.7.a.iii of the BEAD NOFO (pages 39 – 40).

If the Eligible Entity has not finalized its plans regarding non-deployment projects it intends to pursue itself without making a subgrant, it may provide high-level details on proposed uses of funds. Across all non-deployment funds, the Eligible Entity must at least identify a proposed project or high-level use of funds in its Final Proposal submission. If the Eligible Entity's description does not have sufficient detail, NTIA will apply a Specific Award Condition to each funding amount associated with those non-deployment projects until the Eligible Entity is ready to submit sufficient information after Final Proposal approval.

**8.4 Question (Y/N):** Has the Eligible Entity completed the competitive non-deployment Subgrantee Selection Process?

If the Eligible Entity has completed its non-deployment Subgrantee Selection Process, select 'Yes.' The Eligible Entity would have only completed its non-deployment Subgrantee Selection Process if its process and non-deployment activities were approved in its Initial Proposal.

If the Eligible Entity plans to undertake non-deployment projects and activities, but has not yet selected subgrantees for non-deployment projects, select ‘No.’

Note that the Non-Deployment Projects CSV file is required if the Eligible Entity has completed its non-deployment Subgrantee Selection Process prior to the Final Proposal. The Eligible Entity will submit this file with the other CSV data submissions within NGP.

**8.5 Text Box (Required – Conditional on a ‘Yes’ Response to Intake Question 8.4):**

If ‘Yes’ [ to Intake Question 8.4], non-deployment subgrantee selection has been completed, describe how the process undertaken was consistent with that approved by NTIA in Volume II of the Initial Proposal.

The Eligible Entity must execute its non-deployment subgrantee selection consistent with its approved Initial Proposal. NTIA will monitor consistency between the non-deployment Subgrantee Selection Process approved in the Eligible Entity’s Initial Proposal and the execution of that process. As with any award term, NTIA may impose remedies for noncompliance with the terms of the approved Initial Proposal, potentially including the disallowance of noncompliant costs incurred by the Eligible Entity.

In instances where the Eligible Entity requires a correction to its approved Initial Proposal, the Eligible Entity must notify NTIA as soon as possible and adhere to NTIA guidance. Failure to notify NTIA of changes to the process described in its approved Initial Proposal may result in rejection of the Eligible Entity’s Final Proposal, among other consequences.

To provide an adequate response, the Eligible Entity must consider its non-deployment subgrantee selection timelines, phases, scoring rubric, evaluation procedures, and project prioritization methodology, among other elements of its non-deployment Subgrantee Selection Process. The Eligible Entity may respond to this question in one or more of the following ways:

- A description that the non-deployment Subgrantee Selection Process undertaken was consistent with that approved in the Initial Proposal.
- A description that, if the non-deployment Subgrantee Selection Process undertaken differed from that approved in the original Initial Proposal, the Eligible Entity received written approval for the change(s) from NTIA.

**8.6 Text Box (Required – Conditional on a ‘Yes’ Response to Intake Question 8.4):**

If ‘Yes’ [to Intake Question 8.4], non-deployment subgrantee selection has been completed, describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

If the Eligible Entity has not finalized its plans to conduct non-deployment subgrantee selection after the Final Proposal, it may provide high-level details of its planned process. NTIA will apply a Specific Award Condition specifying that the Eligible Entity cannot begin its non-deployment Subgrantee Selection Process until it is ready to submit sufficient information, including details on scoring processes (see Intake Question 8.8) after Final Proposal approval.

Final Proposals will be evaluated against the specific steps identified in the Eligible Entity's approved Initial Proposal. If the Eligible Entity required a correction to its approved Initial Proposal and received written NTIA approval for the correction, the Eligible Entity must describe the ways in which the executed non-deployment Subgrantee Selection Process differed from the process outlined in the original approved Initial Proposal. Additionally, it must describe how the Eligible Entity engaged NTIA to notify them of the need for a change and provide a justification for the change.

The Eligible Entity must provide a detailed description of the steps that it took to ensure a non-deployment Subgrantee Selection Process that is fair, open, and competitive. This should include a description of the Eligible Entity's state or territory procurement policies and procedures and the internal controls that facilitated the Eligible Entity's oversight of each phase of the process.

The Eligible Entity must describe steps it took to ensure a **fair** process, including safeguards against each of the following:

- Collusion;
- Bias;
- Conflicts of interest;
- Arbitrary decisions; and
- Other actions that would undermine confidence in the process

Examples of steps an Eligible Entity could take to ensure a fair process include, but are not limited to:

- Evidence that all applicants had access to the scoring rubric prior to submitting applications;
- Evidence of consistent application of scoring criteria by qualified reviewers;
- Samples of training materials provided to reviewers, including training on how to report conflicts of interest;
- Description of how reviewers documented their review findings to provide a rationale for their scoring assessments;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate conflicts of interest, including methods to prevent, report, and resolve conflict of interest concerns during application review and award;
- Descriptions of the Eligible Entity's oversight procedures to ensure application of a consistent standard of review across reviewers;
- Descriptions of the Eligible Entity's policy and/or internal controls to identify and mitigate instances of collusion, including instances of collusion between potential applicants and collusion between applicants and Eligible Entity staff, contractors, or other persons involved in the non-deployment Subgrantee Selection Process; and/or
- Evidence that all applicants had the same opportunity to cure their applications (if applicable).

The Eligible Entity must include how the non-deployment Subgrantee Selection Process was **open** by describing how the Eligible Entity provided adequate public notice to potential subgrantees to facilitate participation by a wide variety of potential applicants, to ensure an open and competitive process, and to prevent favoritism, collusion, and abuse.

Examples of steps an Eligible Entity could take to ensure an open process include, but are not limited to:

- Evidence that all eligible participants defined in the Eligible Entity’s approved Initial Proposal were permitted to participate;
- Evidence that all applicants had the same amount of time to apply between the public notice and deadline (or the Eligible Entity describes instances when application extensions were granted and provides a rationale for this determination), and the deadline did not place an unreasonable burden on applicants to submit an application;
- A communication plan that promotes participation from a wide variety of potential applicants;
- Coordination with small, minority-owned, women-owned, and labor surplus firms to encourage participation; and/or
- A description of the ways an Eligible Entity removed barriers or provided financial incentives.

The Eligible Entity must also describe how it ensured the non-deployment Subgrantee Selection Process was **competitive**, such as by using a competitively neutral evaluation criteria that did not favor one type of provider over another, except certain preferences expressed neutrally and in advance.

Examples of steps an Eligible Entity could take to ensure a competitive process include, but are not limited to:

- Evidence that different types of providers were able to submit competitive applications; and/or
- A description that the Eligible Entity’s curing requests did not impose unreasonably burdensome timelines that certain providers would be at a disadvantage to address.

Additionally, the Eligible Entity must describe the processes in place to ensure reviewers were trained, qualified, and objective. The Eligible Entity must describe how reviewers were identified, including how the State Broadband Office assessed reviewers’ qualifications and potential conflicts of interest (including what it did to avoid even the appearance of conflicts of interest), whether contractors were utilized, and whether different reviewers were used to review individual components of the applications. The Eligible Entity must demonstrate that it ensured the quality of each review, including reviewer oversight procedures. If applicable, the Eligible Entity must describe how a review committee or final approval by a governing body factored into the review process.

**8.7 Text Box (Required – Conditional on a ‘No’ Response to Intake Question 8.4):** If ‘No’ [to Intake Question 8.4], non-deployment subgrantee selection has not been completed, describe the following:

- a. A detailed description of all planned uses of BEAD funding that are not (f)(1) last-mile broadband deployment projects, including the nature of each funded project and how those uses are consistent with the eligible uses in Section IV.B.7.a.iii of the BEAD NOFO;

- b. How the Eligible Entity expects the non-deployment projects to address the needs of the Eligible Entity’s residents and how the non-deployment projects are effective in achieving the BEAD Program’s equity, access, and deployment goals;
- c. The ways in which engagement with stakeholders informed the selection of eligible non-deployment projects; and
- d. Any efforts the Eligible Entity undertook to determine whether other uses of the funds might have been more effective in achieving the BEAD Program’s equity, access, and deployment goals.

This question is only required if an Eligible Entity intends to conduct non-deployment projects. If the Eligible Entity has not finalized its plans regarding non-deployment projects it intends to pursue through a subgrant, it may provide high-level details on proposed uses of funds. Across all non-deployment funds, the Eligible Entity must at least identify a proposed project or high-level use of funds in its Final Proposal submission. If the Eligible Entity’s description does not have sufficient detail, NTIA will apply a Specific Award Condition to each funding amount associated with those non-deployment projects until the Eligible Entity is ready to submit sufficient information after Final Proposal approval.

If the Eligible Entity will be conducting non-deployment activities and holding a Subgrantee Selection Process, but has not completed its Subgrantee Selection Process yet, the Eligible Entity must provide the following:

- A plan for usage of all BEAD funding that are not (f)(1) last-mile broadband deployment projects
  - The Eligible Entity should align each proposed project to an enumerated non-deployment activity contained on page 39-40 of the BEAD NOFO;
  - If the Eligible Entity has pursued or will pursue a non-deployment activity that is not contained on page 39-40 of the BEAD NOFO, it must include a justification for how these activities advance BEAD’s statutory and Program goals (as articulated in the NOFO);
- How the Eligible Entity expects the non-deployment project(s) to address the needs of its residents;
- How the non-deployment projects will achieve the BEAD Program’s equity, access, and deployment goals;
- How stakeholder engagement informed the selection of eligible non-deployment projects;
- How the Eligible Entity assessed that its selected non-deployment activities were more effective in achieving the BEAD Program’s goals than other initiatives it could have pursued; and
- How the Eligible Entity may prioritize non-deployment projects and if any projects are tentatively planned dependent on remaining funding after prioritized non-deployment projects are awarded.

Example responses by an Eligible Entity can include, but are not limited to:

- A description of the Eligible Entity’s outreach to residents in its jurisdiction, including public comments received;
- A description of mechanisms the Eligible Entity used to target and reach a broad range of stakeholders;



- A description of how the Eligible Entity will select competing non-deployment projects; and/or
- Details on the eligible non-deployment projects the Eligible Entity plans to pursue, and why it plans to pursue those specific categories of non-deployment projects.

NTIA is aware that each Eligible Entity may propose a wide range of non-deployment uses beyond those specifically described in Section IV.B.7.a.iii of the BEAD NOFO (pages 39 – 40) and will work with each Eligible Entity leading up to the Final Proposal to discuss the eligibility of potential proposed non-deployment uses under the BEAD Program.

**8.8 Text Box (Required – Conditional on a ‘No’ Response to Intake Question 8.4): Subgrantee Selection Process:** If ‘No’ [to Intake Question 8.4], describe how and whether the scoring process to select non-deployment projects was or will be conducted in a competitive manner consistent with (1) the BEAD NOFO requirements and (2) the description within the approved Initial Proposal.

This question is only required for an Eligible Entity that intends to conduct non-deployment projects. If the Eligible Entity has not finalized its plans to conduct non-deployment subgrantee selection after Final Proposal approval, it may provide high-level details of its planned process. If the Eligible Entity’s description does not have sufficient detail, NTIA will apply a Specific Award Condition specifying that the Eligible Entity cannot begin its non-deployment Subgrantee Selection Process until it is ready to submit sufficient information after Final Proposal approval. Because the Eligible Entity will not submit non-deployment scoring rubrics in the Final Proposal, a Specific Award Condition will be applied to restrict the Eligible Entity from beginning its non-deployment Subgrantee Selection Process until NTIA has reviewed a detailed scoring rubric specific to each non-deployment project.

If the Eligible Entity selected ‘No’ for Intake Question 8.4, it must discuss how the scoring process was or will be conducted in a way that is consistent with the BEAD NOFO requirements and based on what was described in the Eligible Entity’s approved Initial Proposal.

Example responses by an Eligible Entity can include but are not limited to:

- Describing how the Eligible Entity conducted or will conduct its non-deployment scoring process and that the process aligns to specific BEAD requirements, including that the process was:
  - Open: Provision of adequate notice was given to subgrantees (including the number of days that the application period was open); a description of how the opening of the application period was publicized to potential applicants
  - Fair: Free from collusion, bias, and conflicts of interest (e.g., the use of standards of review for application reviewers, discussion of relevant COI policies)
  - Competitive: Use of competitively neutral evaluation criteria (i.e., does not disadvantage out-of-state entities or new entrants to the market)
- The Eligible Entity referencing its approved Initial Proposal to discuss its non-deployment scoring process to highlight the consistency with the proposed process outlined in Volume II of the approved Initial Proposal.

The Eligible Entity must also include a description of how it will evaluate prospective non-deployment subgrantees' general qualifications. The Eligible Entity must ensure that any prospective subgrantee:

1. Is capable of carrying out activities funded by the subgrant in a competent manner in compliance with all applicable federal, Eligible Entity, and local laws;
2. Has the financial and managerial capacity to meet the commitments of the subgrantee under the subgrant, the requirements of the Program and such other requirements as have been prescribed by the Assistant Secretary or the Eligible Entity; and
3. Has the technical and operational capability to provide the service promised in the subgrant in the manner contemplated by the subgrant award.

## Participation of Non-Traditional Broadband Providers (Requirement 10)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include...:

10. A description of efforts undertaken by the Eligible Entity to ensure the participation of non-traditional broadband providers (such as municipalities or political subdivisions, cooperatives, non-profits, Tribal Governments, and utilities), including an explanation for awards to traditional broadband providers when one or more non-traditional providers submitted competing proposals to serve an area consistent with the requirements of Section IV.C.1.a.

### Relevant Instructions from NOFO Section IV.C.1.a, Page 51:

Some laws of Eligible Entities concerning broadband, utility services, or similar subjects that predate the enactment of the Infrastructure Act may either preclude certain public sector providers from participation in the subgrant competition or may impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer. NTIA strongly encourages Eligible Entities to waive all such laws for purposes of the Program. If an Eligible Entity does not do so, the Eligible Entity must identify all such laws in its Initial Proposal and describe how the laws will be applied in connection with the competition for subgrants. Such Eligible Entity must, in its Final Proposal, disclose each unsuccessful application affected by such laws and describe how those laws impacted the decision to deny the application.

The purpose of this requirement is to ensure each Eligible Entity has engaged with non-traditional broadband providers as part of the Subgrantee Selection Process. Participation from a variety of Non-Traditional Broadband Providers is demonstrative of an open Subgrantee Selection Process.

**10.1 Text Box:** Describe efforts taken to ensure participation of non-traditional broadband providers such as municipalities or political subdivisions, cooperatives, non-profits, Tribal Governments, and utilities.

The Eligible Entity must provide a short description of outreach efforts to non-traditional broadband providers. Page 14 of the BEAD NOFO defines non-traditional broadband providers as “an electric cooperative, nonprofit organization, public-private partnership, public or private utility, public utility district, Tribal entity, or local government (including any unit, subdivision, authority, or consortium of local governments) that provides or will provide broadband services.”

The Eligible Entity must describe how it conducted outreach efforts to encourage non-traditional provider participation.

If the Eligible Entity is not using BEAD funds to deploy last-mile broadband service, note ‘Not Applicable’ in this text box.

**10.2 Question (Y/N):** In every instance in which the Eligible Entity received one or more competing proposals from non-traditional providers competing with traditional providers to serve the same location(s) consistent with the requirements of Section IV.C.1.a., was the highest-scoring applicant selected as the subgrantee?

If there was **any** instance of the following: (1) a non-traditional provider was not selected as the subgrantee for a location; (2) the non-traditional provider was the highest-scoring applicant in that location; and (3) the selected subgrantee for that location was a traditional provider, then the Eligible Entity must select ‘Yes.’

If there was **no** instance in which a non-traditional provider was not selected as the subgrantee for a location and they were the highest-scoring applicant in that location, and the selected subgrantee for that location was a traditional provider please select ‘No.’

**10.3 Text Box (Required – Conditional on a ‘No’ Response to Intake Question 10.2):** If the highest-scoring applicant was not selected as the subgrantee in every instance in which the Eligible Entity received applications from traditional and non-traditional providers for the same location(s), explain why.

For each instance where the highest-scoring applicant was not selected when applications were received from traditional and non-traditional providers for the same locations, the Eligible Entity must explain why the highest-scoring applicant was not selected as the subgrantee.

Example responses can include, but are not limited, to:

- Describing commitments made by the provisionally selected subgrantee that were more beneficial;
- Referencing any policies or laws that predate the enactment of the Infrastructure Act that prohibited the non-traditional applicant from being selected;
- Explaining why the selection of a traditional provider over the non-traditional provider was better for achieving the BEAD program’s goals; and/or
- Describing feasibility issues raised by the non-traditional provider’s application, including concerns about that provider’s ability to meet Environmental and Historic Preservation (EHP) requirements.

*Implementation Status of Plans for Cost and Barrier Reduction, Labor and Workforce Activities, Utilization of Minority Businesses, Women-owned Business, and Labor Surplus Area Firms, Low-Cost Plans, and Climate Change and Resilience (Requirement 11) Middle-Class Affordability Plans (Requirement 17)*

*Note: The Middle-Class Affordability Plan is not specifically included in the list of Final Proposal requirements in Section IV.B.10. However, it is required as part of Final Proposal submissions by Section IV.C.2.c.i, so it will be included in this document as a separate requirement (Requirement 17). Due to congruencies in intake design across NOFO FP Requirements 11 and 17, these will be submitted together.*

**Relevant Instructions from NOFO Section IV.B.9.b, Page 48:**

The Final Proposal must include... :

11. Implementation status of plans described in the Initial Proposal related to:
  - a. Steps that the Eligible Entity has taken or intends to take to promote streamlined permitting processes and cost-effective access to poles, conduits, easements, and rights of way, including the imposition of reasonable access requirements;
  - b. Labor and workforce activities, including how the Eligible Entity implemented and applied the labor-related subgrantee selection criterion required herein;
  - c. Utilization of minority businesses, women-owned business enterprises, and labor surplus area firms;
  - d. Low-cost plan requirements; and
  - e. Climate change and resilience.

**Relevant Instructions from NOFO Section IV.C.2.c.i, Page 66:**

The Infrastructure Act’s BEAD provisions are premised on Congress’s determination that “[a]ccess to affordable, reliable, high-speed broadband is essential to full participation in modern life in the United States,” and that “[t]he persistent ‘digital divide’ in the United States is a barrier to” the nation’s “economic competitiveness [and the] equitable distribution of essential public services, including health care and education.” Accordingly, Each Eligible Entity must include in its Initial and Final Proposals a middle-class affordability plan to ensure that all consumers have access to affordable high-speed internet. We expect that Eligible Entities will adopt diverse strategies to achieve this objective. For example, some Eligible Entities might require providers receiving BEAD funds to offer low-cost, high-speed plans to all middle-class households using the BEAD-funded network. Others might provide consumer subsidies to defray subscription costs for households not eligible for the Affordable Connectivity Benefit or other federal subsidies. Others may use their regulatory authority to promote structural competition. Some might assign especially high weights to selection criteria relating to affordability and/or open access in selecting BEAD subgrantees. And others might employ a combination of these methods, or other methods not mentioned here. Ultimately, however, each Eligible Entity must submit a plan to ensure that high-quality broadband services are available to all middle-class families in the BEAD-funded network’s service area at reasonable prices. Eligible Entities will be required to ensure that services offered over Funded Networks allow subscribers in the service area to utilize the ACP.

The purpose of this requirement is to ensure the Eligible Entity is making progress towards the implementation of plans approved in its Initial Proposal. Progress towards these plans is essential for the BEAD program to ensure the provision of good jobs and safe work environments, the development of a diverse and highly skilled workforce, and the promotion of minority-owned business enterprises (MBE), woman-owned business enterprises (WBE), small business (SB), and labor surplus area firms to curb contracting disparities that historically exist. This requirement also aims to ensure each Eligible Entity is continuing to implement plans to reduce costs and barriers to deployment, account for climate change, and address residents' access to affordable broadband service options.

**11.1 Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

The Eligible Entity will respond by indicating either: 'Complete,' 'In Progress,' or 'Not Started' to describe the implementation of its plans regarding reducing costs and barriers to deployment.

If needed, the following documents can be utilized as a reference resource:

The Eligible Entity can refer to the permitting resources on the [NTIA BEAD website](#), including the [Permitting Best Practices: Case Studies](#) for additional information to incorporate in its response.

The [Permitting Best Practices: Case Studies](#) outlines case studies and examples of streamlining permitting, including Broadband Ready Communities, E-Permitting, and Rights-of-Way.

The [Permitting Needs Assessment](#) contains a checklist of four major permitting categories, including Rights-of-Way, Pole Attachments, Conduit Access, and Environment Planning/Historic Preservation.

If the Eligible Entity is not implementing last-mile broadband deployment projects using BEAD funding, it must provide a response noting its intended activities and explain the extent to which promoting the use of existing infrastructure, dig-once policies, streamlined permitting processes, and cost-effective access to poles, conduits, easements, and rights of way will be applied to its activities.

**11.2 Text Box:** Provide the Eligible Entity's implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 11 related to labor activities. Affirm that the Eligible Entity applied the labor-related criterion in its Subgrantee Selection Process and will ensure subgrantees comply with federal labor and employment laws.

The Eligible Entity will respond by indicating either: 'Complete,' 'In Progress,' or 'Not Started' to describe the implementation of its plans regarding labor activities.

The Eligible Entity will also affirm that it applied the labor-related criterion in its Subgrantee Selection Process and will ensure subgrantees comply with federal labor and employment laws.

The Eligible Entity may refer to page 57 of the BEAD NOFO to reference any mandatory labor standards and protections for all subgrantees.

**11.3 Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 12 related to workforce development.

The Eligible Entity will respond by indicating either: ‘Complete,’ ‘In Progress,’ or ‘Not Started’ to describe the implementation of its plans regarding workforce development.

The Eligible Entity may refer to pages 58-60 of the BEAD NOFO for more examples of how the Eligible Entity and its subgrantees can invest in a skilled and diverse workforce.

**11.4 Text Box:** Affirm that the Eligible Entity has taken or will take all necessary affirmative steps to ensure minority businesses, women’s business enterprises, and labor surplus area firms are used, when possible, as per pages 88 – 89 of the BEAD NOFO.

The Eligible Entity must affirm that it has or will take the following steps to ensure minority-owned business enterprises, women-owned businesses enterprises, and labor surplus area firms were or will be used whenever possible:

- a. Placing qualified small and minority-owned business enterprises and women-owned business enterprises on solicitation lists;
- b. Assuring that small and minority-owned business enterprises and women-owned business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority-owned business enterprises and women-owned business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

If the Eligible Entity has taken, or plans to take, additional steps outside of the examples above, to ensure inclusion of minority and women owned business enterprises, small business, or labor surplus area firms, please describe.

**11.5 Question (Y/N):** Certify that all subgrantees selected by the Eligible Entity will be required to offer the low-cost broadband service option, as approved by NTIA in the Initial Proposal, for the duration of the 10-year Federal interest period.<sup>7</sup>

If all subgrantees will be required to offer a low-cost broadband service option for the duration of the Federal interest period, as approved by NTIA in the Initial Proposal, please select ‘Yes.’

If all subgrantees will not be required to offer a low-cost broadband service option for the duration of the Federal interest period, as approved by NTIA in the Initial Proposal please select ‘No.’

The Eligible Entity should note that responding ‘No’ for this question will result in an extended timeline for NTIA’s review of the Final Proposal. The Infrastructure Act requires that each broadband deployment subgrantee must offer at least one low-cost broadband service option. *See* 47 U.S.C. § 1702(h)(4)(B). In addition to the certification provided in the Final Proposal, NTIA reserves the right to request additional documentation on the Eligible Entity’s low-cost broadband service option and how it will be applied to its subgrantees.

**11.6 Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the Eligible Entity’s approved Initial Proposal Requirement 15 related to climate change and resilience.

The Eligible Entity will respond by indicating either: ‘Complete,’ ‘In Progress,’ or ‘Not Started’ to describe the implementation of its plans regarding climate change and resilience.

The Eligible Entity may refer to page 62 of the BEAD NOFO to reference additional context on climate resilience and climate-related risks.

**11.7 Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 20 related to middle-class affordability.

The Eligible Entity will respond by indicating either: ‘Complete,’ ‘In Progress,’ or ‘Not Started’ to describe the implementation of its plans regarding middle-class affordability.

The Eligible Entity may refer to page 66 of the BEAD NOFO to reference additional context on middle-class affordability and low-cost plans.

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<sup>7</sup> The federal interest period for BEAD-funded broadband infrastructure projects is ten years after the year in which the relevant subgrant has been closed out in accordance with 2 C.F.R. § 200.344. *See* General Terms and Conditions for NTIA BEAD Program Funds at 21 (Apr. 2024), [https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD\\_IPFR\\_GTC\\_04\\_2024.pdf](https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf).



## *Substantiation of Priority Broadband Projects (Requirement 12)*

### **Relevant Instructions from NOFO Section IV.B.9.b, Page 48:**

The Final Proposal must include...:

12. Information regarding specific commitments made by provisionally selected subgrantees to warrant a project's treatment as a Priority Broadband Project.

Data elements are provided via the Locations CSV file in the Final Proposal Data Submission.

**12.1 Text Box:** Describe how the Eligible Entity maximized deployment of Priority Broadband Projects and deployment of non-priority reliable broadband projects prior to deployment of alternative technologies. In particular, describe steps the Eligible Entity took to pursue service by reliable broadband technology in areas that the Eligible Entity proposes to serve via alternative technology.

The term "Priority Broadband Project" means a project that will provision service via end-to-end fiber-optic facilities to each end-user premises (page 14 of the BEAD NOFO). The information regarding specific commitments made by provisionally selected subgrantees to warrant a project's treatment as a Priority Broadband Project is provided by reference to the technology code in the CSV submissions for the [Final Proposal Data Submission](#).

In addition to the data elements submitted for the [Final Proposal Data Submission](#), the Eligible Entity must describe, with adequate detail, a good faith effort to apply strategies to entice providers of reliable broadband service to areas proposed to be served by alternative technologies prior to provisionally selecting projects that would deliver alternative technologies to these areas. These steps must follow the guidance outlined in the *BEAD Alternative Broadband Technology Guidance*.

## Subgrantee Selection Certification (Requirement 13)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include...:

13. Information regarding specific commitments made by provisionally selected subgrantees to warrant benefits in the Eligible Entity's subgrantee selection process (e.g., the primary and secondary criteria).

The purpose of this section is to ensure the Eligible Entity followed its approved Initial Proposal Volume II Subgrantee Selection Process to award subgrants to subgrantees through a fair, open, and competitive process. This section also aims to ensure that the level of benefits (i.e., a particular score, additional points in scoring criteria) given to provisionally selected subgrantees align with the commitments the prospective subgrantees provided the Eligible Entity.

**13.1 Text Box:** For each primary and secondary scoring criteria used in subgrantee selection, provide a summary of the range of commitments, specifically as they relate to workforce development, compliance with Federal labor and compliance laws, and affordability, made by provisionally selected subgrantees to warrant benefits in the approved Subgrantee Selection Process. Scoring criteria must be applied consistent with the prioritization framework laid out in Section IV.B.7.b of the BEAD NOFO.

The Eligible Entity must provide a summary of commitments made by provisionally selected subgrantees ("provisionally selected subgrantees" are subgrantees selected for projects during the Eligible Entity's Subgrantee Selection Process, that will be awarded its subgrants upon the approval of the Final Proposal). **The summary of subgrantee selection scoring criteria must match the criteria from the approved scoring rubric submitted with Initial Proposal Volume II.** More information on allowable criteria can be found on pages 42-46 of the BEAD NOFO.

The summary must include the two following items:

1. A summary of each primary and secondary scoring criterion used in the subgrantee selection rubric, and the weight given for meeting each criterion (e.g., substantial points or credits in evaluation)
  - Primary criteria must include:
    - Minimal BEAD program outlay;
    - Affordability; and
    - Fair labor practices.
  - Secondary criteria must include, but is not limited to:
    - Speed to deployment; and
    - Speed of network and other technical capabilities (for non-priority last-mile broadband deployment projects only).
  - Other secondary criteria can include, but is not limited to:
    - Equitable workforce development and job quality;
    - Open access; and/or
    - Local and tribal coordination.
2. A summary of commitments received from subgrantees, specifically related to:
  - Workforce development;
  - Compliance with Federal labor and compliance laws; and

- Affordability.

The Eligible Entity's response should focus on the range of commitments made by provisionally selected subgrantees that exceeded the minimum standards articulated by the approved subgrantee selection criteria and detail how the approach is consistent with the Eligible Entity's approved Initial Proposal.

If the Eligible Entity is not using BEAD funding to implement last-mile deployment projects, please note 'Not applicable' in this text box.

## Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include...:

14. Environmental documentation associated with any construction and/or ground-disturbing activities and a description of how the Eligible Entity will comply with applicable environmental and historic preservation requirements.

The purpose of this section is to ensure that the Eligible Entity provides information on how it will ensure subgrantees will comply with environmental and historic preservation requirements including but not limited to the National Environmental Policy Act of 1969 (42 U.S.C. 4321, *et seq.*) (NEPA), Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470 *et seq.*) (NHPA), Section 7 of the Endangered Species Act (16 U.S.C. 1521, *et seq.*), Section 404 of the Clean Water Act (33 U.S.C. 1251, *et seq.*), and all other applicable Federal, state, and local environmental laws and regulations.

It is a BEAD program imperative to ensure projects are in environmental compliance and a condition of the award that each Eligible Entity is a joint lead agency for NEPA.

#### 14.1 Attachment (Required): Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- If applicable, a draft supplemental environmental assessment (EA), providing any information or analysis missing from the relevant FirstNet Regional PEIS that is necessary for the programmatic review of BEAD projects within your state or territory.
- Methodology for the NEPA screening of the Eligible Entity's subgrantee projects to identify, confirm, and categorize projects qualifying for NTIA Categorical Exclusions and those requiring further environmental review.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

Within a document (file type to be decided by Eligible Entity) the Eligible Entity must provide the following:

- **Environmental and Historic Preservation Requirements:** A description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance.
- **Joint Lead Agency Responsibility Summary:** A statement of the Eligible Entity's understanding of its obligations as a joint lead agency to implement NEPA requirements under 42 U.S.C. 4336a and a description of the Eligible Entity's plan to prepare and/or supervise the preparation of all required environmental analyses and review documents.
- **Description of FirstNet Regional PEIS Evaluation:**
  - Identification of the relevant First Responder Network Authority (FirstNet) PEIS pertinent to the Eligible Entity, a summary of the Eligible Entity's evaluation of the sufficiency of the environmental analysis contained in the relevant FirstNet Regional PEIS, and a statement of whether the NEPA analysis contained in the FirstNet Regional PEIS could sufficiently cover none, some, or all of the Eligible Entity's subgrantee broadband deployment projects.
  - A description of the analysis that was used/will be used to evaluate whether the anticipated deployment related activities and projects are covered by the actions described in the FirstNet Regional PEIS, and if projects details are known, a summary table of the projects that are expected to be fully or partially covered by the FirstNet Regional PEIS.
  - If applicable, a draft supplemental environmental assessment (EA) that will cover information and/or analysis missing from the relevant FirstNet Regional PEIS will need to be prepared. If supplemental or stand-alone EAs are pending, please indicate which projects are anticipated to require one, and the type. If a draft supplemental and/or stand-alone EA has already been prepared, please include as an attachment to this submission.
- **NTIA CE Screening Description:** A description of the methodology used to identify, confirm, and categorize projects likely qualifying for NTIA Categorical Exclusions and those requiring further environmental review (Categorical Exclusions are listed in Appendix B of NTIA's NEPA guidance document available at [https://broadbandusa.ntia.gov/sites/default/files/2024-04/Guidance on NTIA NEPA Compliance April 2024.pdf](https://broadbandusa.ntia.gov/sites/default/files/2024-04/Guidance%20on%20NTIA%20NEPA%20Compliance%20April%202024.pdf)).
- **Specific Award Conditions (SACs) Description:** A description of the Eligible Entity's current or planned use of SACs and/or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects are awaiting final NEPA approval. For example, this may include utilizing an EHP-focused SAC attached to subgrantee awards that are anticipated to require ground-disturbing activities.
- **Other Relevant Information:** If necessary, a description providing additional EHP-related information supporting the BEAD Program's review of the Eligible Entity's Final Proposal. Example additional information can include other programmatic environmental analyses that the Eligible Entity proposes to develop or apply in its subgrantee EHP project analyses.

## Consent from Tribal Entities (Requirement 15)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 48:

The Final Proposal must include...:

15. To the extent an Eligible Entity's Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on Tribal Lands, the Eligible Entity must submit a Resolution of Consent from each Tribal Government, from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed.

The purpose of this section is to ensure that proper guidelines, regulations, and Tribal consent with respect to Tribal Lands were followed for deployment projects on Tribal Lands. For the program's specific instructions on obtaining Tribal consent in the case of consortia, projects in Hawaii, and projects in Alaska, please refer to footnote 70 on page 48 of the BEAD NOFO.

**15.1 Attachment(s) (Required if any deployment project is on Tribal Lands):** Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

If the Eligible Entity did not have any cases where deployment on Tribal Lands is to take place, the Eligible Entity will not upload a document for this Intake Question in NGP.

If the Eligible Entity has any deployment project taking place on federally recognized Tribal Lands the Eligible Entity must provide a Resolution of Consent (in PDF format) from each Tribal Government whose Land the deployment project will be taking place upon. Projects that intersect with Tribal Lands should be indicated in the Deployment Project CSV (submitted in the [Final Proposal Data Submission](#) with a 'Y' in the "Intersect with Tribal Lands" column.

The Resolution of Consent may follow the Tribal Government's standard format; NTIA will not provide a standard template for this requirement. The Eligible Entity must ensure that each certification document has the following:

- The appropriate Authorized Organization Representative signatures;
- Come from each Tribal Government governing authority (i.e., the Tribal Council), and/or other governing body, upon whose Tribal Lands the infrastructure will be deployed;
  - Applies to tribes specified in the Federally Recognized Indian Tribal List Act of 1994.
- Reference the BEAD NOFO and be dated after the approval of the Eligible Entity's Initial Proposal;
- The relevant context on the planned (f)(1) broadband deployment including:
  - The entities that will deploy and operate the network;
  - The broadband technologies that will be deployed on Tribal Lands;
  - The timeframe of the agreement; and
  - A description of the land proposed for use as part of the proposed project;

- Identify whether the land is owned, held in Trust, land held in fee simple by the Tribe, or land under a long-term lease by the Tribe;
- If owned, identify the landowner; and
- Provide a commitment in writing from the landowner authorizing the applicant's use of that land for the propose project;
- Appears complete; and
- The name of the Resolution of Consent PDF is included in the deployment Project Data.

## Report of Unsuccessful Applications due to Eligible Entity Regulations (Requirement 16)

### Relevant Instructions from NOFO Section IV.B.9.b, Page 49:

The Final Proposal must include...:

16. A description of (1) each unsuccessful application that was affected by laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act, that the Eligible Entity did not waive for purposes of BEAD Program project selection and that either (a) preclude certain public sector providers from participation in the subgrant competition or (b) impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer; and (2) how those laws impacted the decision to deny each such application.

The purpose of this section is to disclose whether the laws the Eligible Entity **did not** waive concerning broadband, utility services, or similar subjects that either preclude certain public sector providers from participation in the subgrant process or impose specific requirements and limitations on public sector entities impacted the Eligible Entity's Subgrantee Selection Process.

This could include laws that have the effect of excluding providers from offering broadband service or rendering them incapable of effectively competing for subgrants. The Eligible Entity must not have excluded cooperatives, nonprofit organizations, public-private partnerships, public or private utilities, public utility districts, or local governments ("potential providers") from eligibility for BEAD Program funds. An example of such law could include a ban on municipal broadband or co-op providers.

**16.1 Question (Y/N):** Did the Eligible Entity have any applications that were unsuccessful due to laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they pre-date or post-date enactment of the Infrastructure Act, that the Eligible Entity did not waive for purposes of the BEAD Program?

If the Eligible Entity had any applications that were unsuccessful due to laws within its jurisdiction concerning broadband, utility services, or similar subjects, it must indicate 'Yes.' The Eligible Entity must include all laws within its jurisdiction that directly resulted in unsuccessful applications, regardless of whether the law predates or was enacted after the passage of the Infrastructure Act in November 2021.

If the Eligible Entity did not have any cases where subgrant applications for projects were unsuccessful due to Eligible Entity laws, the Eligible Entity must select 'No.'

This question is not asking if there are any state or territory laws or regulations surrounding broadband, utility services, etc., but only about the scenario in which a state or territory law or regulation prevented a subgrantee's application from being provisionally awarded for a project.

**16.2 Attachment (Required – Conditional on a 'Yes' response to Intake Question 16.1):** As a required attachment only if there were unsuccessful applications due to laws of the Eligible Entity, submit a completed "Regulatory Barriers for Applicants" template.



*Intake Question 16.2 will only appear in NGP if the Eligible Entity responds ‘Yes’ to Intake Question 16.1.*

If the Eligible Entity selected ‘Yes’ for Intake Question 16.1, it must submit a completed “Regulatory Barriers for Applicants” template.

If the Eligible Entity did not have any cases where applications were unsuccessful due to Eligible Entity Regulations, please note ‘Not applicable’ in this text box.

**To download a copy of the NTIA Template for Report of Unsuccessful Applications due to Eligible Entity Regulations**, please navigate to the [BroadbandUSA website](#).

## Waivers and Public Comment

### **Relevant Instructions from NOFO Section IX.E, Page 95:**

It is the general intent of NTIA not to waive any of the provisions set forth in this NOFO. However, at the discretion of the Assistant Secretary, NTIA, upon its own initiative or when requested, may waive the provisions in this NOFO. Waivers may only be granted for requirements that are discretionary and not mandated by statute or other applicable law. Any request for a waiver must set forth the circumstances for the request.

### **Relevant Instructions from NOFO Section 1.B.2, Page 10**

Prior to submission to NTIA, the Final Proposal must be made available for public comment.

The purpose of this section is to: (1) document any waiver requests the Eligible Entity has submitted or may need to submit for NTIA approval; and (2) demonstrate the results of the Eligible Entity's public comment period.

The public comment period is intended to promote transparency by gathering feedback from stakeholders. Each Eligible Entity must conduct outreach and engagement activities to encourage broad awareness and participation during the public comment period, particularly among Tribal Governments, local community organizations, unions and worker organizations, and other underrepresented groups. Each Eligible Entity may utilize outreach mechanisms including, but not limited to, public meetings, informational brochures, local media, relevant social media channels, and direct mail.

**17.1 Text Box:** If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. If not applicable to the Eligible Entity, note 'Not applicable.'

An Eligible Entity must describe any waiver(s) that are in the process of review or have been approved by the NTIA as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal. Include details on the requirement(s) addressed by the waiver(s) and date(s) of submission.

If no waiver requests have been or plan to be initiated, the Eligible Entity should note 'Not Applicable' in this text box.

**17.2 Attachment (Optional):** If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form [here](#). If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

If an Eligible Entity indicates that any waiver(s) have been addressed prior to the Final Proposal in Intake Question 18.1—the Eligible Entity has already submitted required waivers or has already been approved by NTIA—the Eligible Entity does **not** need to attach a waiver as part of its Final Proposal submission.

If an Eligible Entity indicates that waiver(s) will be submitted with the Final Proposal in Intake Question 18.1, the Eligible Entity must attach waiver(s) as part of its Final Proposal submission.

If the Eligible Entity indicates that a waiver is 'Not Applicable' in Intake Question 18.1, the Eligible Entity does **not** need to attach a waiver as part of its Final Proposal submission.

The Eligible Entity should coordinate with its FPO to submit a waiver request.

**17.3 Text Box:** Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period and how the Eligible Entity addressed the comments. The response must demonstrate:

- a. The public comment period was no less than 14 days; and
- b. Outreach and engagement activities were conducted to promote feedback during the public comment period.

Prior to the conclusion of its public comment period, the Eligible Entity may note in its submission that the public comment period is ongoing.

Upon the conclusion of its public comment period, the Eligible Entity must describe how it conducted a public comment period for no less than 14 days, provide a high-level summary of the comments received, and demonstrate how the Eligible Entity incorporated feedback in its Final Proposal submission, as applicable. The Eligible Entity is not required to respond to all individual comments but must capture where public comments impacted the contents of the Final Proposal submission.

The Eligible Entity must also demonstrate how it conducted outreach and engagement activities to encourage broad awareness, participation, and feedback during the public comment period, particularly among Tribal Governments, local community organizations, unions and worker organizations, and other underrepresented groups. Examples of outreach mechanisms include, but are not limited to, public meetings, informational brochures, local media, relevant social media channels, and direct mail.

## Appendix

### Final Proposal Development Resources

To support each Eligible Entity in the development of its respective Final Proposal NTIA has created several resources for an Eligible Entity to access. Each document can be accessed using the table below.

Table 2: Overview of Supporting Documents

Document	Description
<b>Final Proposal Funding Request (FPFR) Guidance</b>	
<a href="#">FPFR Consolidated Budget Template</a>	An Excel template for the submission of the complete Final Proposal budget.
<a href="#">FPFR Budget Sample</a>	Sample budget completed using the FPFR Consolidated Budget Template.
<a href="#">FPFR Project Narrative Sample</a>	Sample document providing a high-level description of the use of funds and how they fulfill the BEAD Program objectives.
FPFR Guidance for an Eligible Entity (To be published)	Guidance for completing the Consolidated Budget Template and Project Narrative.
<b>Final Proposal Attachment Templates</b>	
<a href="#">Final Format CSVs &amp; Data Dictionary</a>	Includes the following CSV files: Subgrantees, Deployment Projects, Locations, Non-Deployment Projects, and CAIs.
<a href="#">Final Proposal Attachment: Local Coordination</a>	Resource to support an Eligible Entity in documenting required local coordination and outreach activities for BEAD and DE. Tracks stakeholders, activities, local plans, and feedback and comments.
<a href="#">Final Proposal Attachment: Regulatory Barriers</a>	Template to support an Eligible Entity in documenting if there were unsuccessful subgrantee applications as a result of the Eligible Entity's laws.
<b>General BEAD Information</b>	
<a href="#">SBO Resource Index</a>	Currently available resources for SBOs related to the Broadband Equity, Access, and Deployment Program.
<a href="#">BEAD NOFO</a>	The Notice of Funding Opportunity for the Broadband, Equity, Access, and Deployment Program. It outlines the requirements required to submit the Final Proposal.
<a href="#">Frequently Asked Questions</a>	Frequently asked questions by an Eligible Entity regarding numerous topics such as the Challenge Process, Subgrantee Selection Process, Final Proposal questions and more.
<a href="#">BEAD Initial Proposal Tricky Topics</a>	This document provides additional guidance on some of the more complex concepts and requirements of the BEAD Initial Proposal including the difference between primary vs. secondary subgrantee selection scoring criteria, the extremely high cost per location threshold vs. high-cost areas, and the low-cost broadband service option vs. Middle-Class Affordability Plan.
<b>Policy Notices and Waivers</b>	
<a href="#">BEAD Challenge Process Policy Notice</a>	This policy notice outlines NTIA's additional guidance for Requirement #3, Requirement #5, Requirement #6, and Requirement #7 of the BEAD Initial Proposal.

Document	Description
Alternative Technologies Policy Notice (To be published)	Policy Notice detailing the sequential steps an Eligible Entity must demonstrate prior to considering serving unserved and underserved locations with or alternative technologies.
<a href="#">BEAD Letter of Credit Waiver Notice</a>	This notice provides context and information on the BEAD Letter of Credit waiver.
BEAD Letter of Credit Template (To be published)	This template is a resource for an Eligible Entity to use with subgrantees to demonstrate their financial capability.
<a href="#">BEAD Build America, Buy America Waiver Request for Comment</a>	In accordance with the Build America, Buy America Act (BABA), this notice advises that DOC proposes to issue a limited, general applicability, nonavailability waiver of the Buy America Domestic Content Procurement Preference (Buy America Preference) to recipients of Federal financial assistance under NTIA’s BEAD Program, which will flow down to subrecipients. The waiver is provided in the attached link.
<a href="#">BEAD Program – Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification</a>	This provides a waiver of the professional engineer certification requirement set forth in the BEAD Program Notice of Funding Opportunity, along with clarification that the professional engineer making certifications in connection with the professional engineer certification requirement may be licensed in any of the 56 Eligible Entities.
<a href="#">BEAD Program – Waiver of Subpoint (E) of the Definition of Tribal Lands</a>	This provides a waiver to subpoint (E) of the definition of “Tribal Lands” in Section I.C(y) of the BEAD NOFO. As a result, an Eligible Entity will not be required to show Tribal consent to broadband infrastructure deployment under the BEAD Program in areas that fall within the scope of subpoint (E).
Conditional Waiver – Alaska-specific portions of Footnote 70 of the BEAD NOFO (Not publicly posted)	This provides a waiver only to Alaska to portions of Footnote 70 of the BEAD NOFO to address the sovereignty of Alaska Native tribes.
<a href="#">BEAD Financial Capability Alternatives Policy Notice</a>	The BEAD NOFO states that “Eligible Entities may, with the permission of the Assistant Secretary, allow prospective subgrantees that have the ability to issue public bonds (e.g., municipalities) to provide comparable evidence in support of their financial capabilities.” The BEAD Financial Capability Alternatives Policy Notice provides additional guidance to an Eligible Entity regarding what information should be included in making such a request and the form such comparable evidence might take.
<a href="#">Uniform Guidance Policy Notice</a>	NTIA provides guidance on the implementation of exceptions, adjustments, and clarifications to certain provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 C.F.R. Part 200, and the application of related provisions of the Uniform Guidance to the Broadband Equity, Access and Deployment (BEAD) Program.
<b>Subgrantee Selection</b>	

Document	Description
<a href="#">Notification of Provisional Selections</a>	This document provides an Eligible Entity guidance on the notification of provisional selections.
<a href="#">Subgrantee Selection Primer</a>	This primer provides a high-level overview of how an Eligible Entity can conduct a Subgrantee Selection Process.
<a href="#">BEAD Subgrantee Qualifications</a>	The BEAD NOFO (Section IV.D) requires an Eligible Entity to ensure that all prospective subgrantees can carry out activities funded by the subgrant in a competent manner and in compliance with all applicable laws. This Subgrantee Qualifications Evaluation Guide provides an overview of the BEAD NOFO requirements and how to evaluate the qualifications of prospective BEAD subgrantees.
<a href="#">2% Grant Admin Guidance Primer</a>	This resource provides guidance to a BEAD Eligible Entity on adhering to the two percent grant administration cost spending limitation, defines related terms, and offers best practices on tracking and calculating costs.
<a href="#">BEAD Subgrantee vs. Subcontractor Guidance</a>	This checklist provides a Broadband, Equity, Access, and Deployment (BEAD) Eligible Entity with considerations to determine if a partnering entity should be considered a subgrantee or a subcontractor. Note, for BEAD deployment projects, EEs must use competitively awarded subgrants.
<a href="#">Fixed Amount Subaward Primer</a>	This primer provides a Broadband Equity, Access, and Deployment (BEAD) program Eligible Entity with guidance on fixed amount subawards, which are only allowed for subgrants in which the major purpose of the project is broadband infrastructure deployment.
<b>Permitting/EHP/NEPA</b>	
<a href="#">What is Permitting?</a>	This resource provides an introduction to permitting as it relates to broadband projects including the types of permits a deployment project may require, the process for securing an easement or right of way access, and steps to obtaining permission to access federal, state, or local land.
<a href="#">Permitting Best Practices</a>	This resource provides case studies and examples of streamlining permitting including Broadband Ready Communities, E-Permitting, and Rights-of-Way (ROW).
<a href="#">Local Permitting Importance, Challenges, and Strategies</a>	Local permitting for broadband deployments may include approvals, authorizations, easements, and right-of-way permits from towns, counties, and other municipal entities. NTIA explains the importance of local permitting and offers strategies and examples of how project teams and local governments can address challenges and increase processing efficiency.
<a href="#">Permitting and Environmental Mapping Tool</a>	The NTIA Permitting and Environmental Information Application helps grant recipients and others deploying infrastructure identify permit requirements and avoid potential environmental impacts when connecting a particular location to high-speed Internet service.
<a href="#">Environmental &amp; Historical Preservation and Climate Resiliency Preparation Checklist</a>	This checklist can support an Eligible Entity's BEAD Five-Year Action Plans regarding the Environmental & Historic Preservation (EHP) requirements associated with the BEAD program.

Document	Description
<a href="#">Environmental &amp; Historical Preservation Fact Sheet</a>	This fact sheet can support an Eligible Entity’s in navigating the NEPA analysis process as required for every project funded through the BEAD program, including a description of the levels and timeline of NEPA review and EHP requirements.
<a href="#">National Historic Preservation Act, Section 106, Consultation Process Fact Sheet</a>	This fact sheet provides information and context on the National Historic Preservation Act.
<a href="#">NEPA: Environmental and Historic Preservation Compliance</a>	This webinar provides an overview of NEPA and NHPA, along with best practices for an Eligible Entity when completing these processes.
<a href="#">Guidance on NTIA NEPA Compliance</a>	<p>Guidance on NEPA process requirements, roles and responsibilities, and Appendices applicable to NTIA programs effective April 2024.</p> <p><i>NOTE:</i> BEAD grantees should view the BEAD general terms and conditions and NEPA for BEAD resources below for additional context on roles and responsibilities in the BEAD program.</p>
<a href="#">Smart Start – How to Plan and Prepare for NEPA Compliance</a>	This resource provides guidance on how to best prepare BEAD program activities for NEPA compliance.
<a href="#">NEPA FAQs For BEAD</a>	Frequently Asked Questions about roles and responsibilities supporting the NEPA compliance for an Eligible Entity in the BEAD program, including Joint Lead Agency responsibilities, Obtaining EHP and NEPA Expertise, etc.
<a href="#">NEPA For BEAD: Evaluating FirstNet PEIS Regional Chapters</a>	Guidance to assist a BEAD Eligible Entity to implement regional FirstNet Programmatic Environmental Impact Statements (PEIS) in preparation for the BEAD Final Proposal and how to “tier off” for subsequent reviews.
<b>Workforce</b>	
<a href="#">Use of BEAD Funds for Workforce Development</a>	This resource provides guidance on funding workforce activities in advance of or simultaneously with last-mile deployment projects and provides two scenarios as to how workforce activities could be considered deployment or non-deployment.
<a href="#">Workforce Planning Guide</a>	NTIA offers this Workforce Planning Guide as a resource for each Eligible Entity completing submissions for Internet For All programs. This guide intends to primarily support an Eligible Entity developing submissions to the Broadband Equity, Access, and Deployment (BEAD) program but may also be applicable as an entity develops its Digital Equity Plans. It supports an Eligible Entity in developing its workforces for grant implementation as well as designing workforce plans and standards for subgrantees.
<a href="#">Common Misconceptions About Subgrantee Selection</a>	This resource addresses common misconceptions that may dissuade non-traditional providers from participating in the BEAD program.
<b>Technology</b>	

Document	Description
<a href="#">Selecting Technology Policy Notice One Pager</a>	<p>This resource provides comprehensive guidance on obtaining applications during subgrantee selection for deploying broadband service to all unserved and underserved locations, prioritizing the most robust, affordable, and scalable technologies.</p>
<a href="#">BEAD Selecting Technology Policy Notice</a>	<p>This resource provides an Eligible Entity and prospective subgrantees with guidance on strategies to obtain bids for Priority Broadband Projects and Reliable Broadband Service projects that fall under the EHCPLT, and ways to seek out the most robust, affordable, and scalable solution for each location where the costs to deploy exceed the EHCPLT, all while ensuring coverage of all unserved and (where financially feasible) underserved locations.</p>
<a href="#">Reliable Broadband Services and Alternative Technologies</a>	<p>This resource provides a range of definitions as it relates to BEAD including reliable broadband service, priority broadband project, qualifying broadband, alternative technology, and BEAD technical requirements, as well as clarity on when alternative technologies can be deployed using BEAD funds and the selection criteria for priority broadband projects.</p>



## Critical Data Elements

Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees.

### Project ID

The Project Identifier is the link between CSV files and is essential to post-award reporting; therefore, it is crucial to name projects consistently. The naming convention is as follows:

#### ***Agency-Program-State-Project-Subproject***

The “agency” uses the four-character OPM codes.<sup>8</sup> NTIA has been assigned code **CM61**.

The “program” identifier is chosen by each agency; this program uses **BEAD**.

The “state” refers to the two-letter USPS abbreviation of the Eligible Entity state or territory.

The “project” and “sub-project” components are chosen by each Eligible Entity. Each project may consist of multiple sub-projects. The use of sub-projects is optional.

The full project identifier should be used for all inter-agency efforts, e.g., permitting, Final Proposal reporting, and post-award reporting.

All elements may consist of upper- and lower-case letters, digits, and periods. The case is not significant, i.e., Bead and BEAD refer to the same program. The project and sub-project components should contain no more than 10 characters each.

For example, a BEAD project in Hawaii might use the project identifier: CM61-BEAD-HI-1234X-7, while a project funded by the state of Louisiana may use CM61-BEAD-LA-5678-9.

### Unique Entity Identifier

Unique Entity Identifier (UEI) is a 12-digit number replacing the 9-digit DUNS number. The UEI is used by federal agencies to uniquely identify organizations receiving federal grant funding. Please provide the UEI and UEI Name (i.e., the legal name a subgrantee has registered in SAM.gov) where indicated.

### FRN

The FRN is a 10-digit FCC Registration Number issued by the Commission Registration System (CORES). It is assigned to a business or individual that is registering with the FCC. Each unique FRN is used to identify the unique registrant’s interactions with the FCC.

It is expected that all broadband providers possess an FRN. Note: the FRN is different from the six-digit Provider ID.

### Location ID

The FCC’s Broadband Serviceable Location Fabric (Fabric) is a dataset of all locations in the United States and its Territories where fixed broadband internet access service is or could be installed. The Fabric provides a 10-digit unique identifier (Location ID) for each Broadband Serviceable Location (BSL).

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<sup>8</sup> [Open Government: Data - OPM.gov](#)

For BEAD, the list of Location IDs will be the eligible BSLs approved by NTIA after an Eligible Entity completes its Challenge Process.

## List of CSVs

CSV file templates provided by NTIA should be completed as specified below. NTIA will release subsequent submission instructions for any Eligible Entity not funding deployment projects.

Table 3: CSV Files Needed for Submission

Dataset	Submission	Action
<b>Subgrantees</b>	<i>Required</i> – each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
<b>Deployment Projects</b>	<i>Required</i> – each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
<b>Locations</b>	<i>Required</i> – each Eligible Entity conducting BEAD-funded deployment projects	Submit completed CSV file via NGP
<b>No BEAD Locations</b>	<i>Optional</i> – each Eligible Entity indicating a reason for not serving an eligible location through a BEAD project	Submit completed CSV file via NGP
<b>CAIs</b>	<i>Required</i> – each Eligible Entity serving CAIs using BEAD funding	Submit completed CSV file via NGP
	<i>Optional</i> – each Eligible Entity <b>not</b> serving CAIs using BEAD funding	No action
<b>Non-Deployment Projects</b>	<i>Required</i> – each Eligible Entity conducting BEAD-funded non-deployment projects	Submit completed CSV file via NGP
	<i>Optional</i> – each Eligible Entity <b>not</b> conducting BEAD-funded non-deployment projects	No action

### Subgrantees (fp\_subgrantees.csv)

This CSV collects information about the provisionally selected subgrantees for BEAD grants. The Eligible Entity must complete all mandatory fields in the file named “fp\_subgrantees.csv.” All columns are mandatory unless otherwise specified. The header row must use the column names listed. Responses should only include US ASCII characters.

The following must be collected and submitted as part of BEAD Final Proposal:

Table 4: Guidance on Data Formats for Subgrantees (fp\_subgrantees.csv)

Column Name	Data Type	Example	Description
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity
<b>uei</b>	string {12}	F4N1QNPB95M4	<b>Unique Entity Identifier (UEI):</b> SAM.gov assigned legal identifier of subgrantee
<b>uei_name</b>	string	BEAD Telecom LLC	<b>UEI Name:</b> registered name associated with the UEI record in SAM.gov
<b>frn</b>	string {10}	0019570779	<b>FRN:</b> 10-digit FCC Registration Number (FRN) of the subgrantee, with leading zeros <i>Note: for deployment last-mile projects only</i>
<b>non_</b>	string {1}	Y	<b>Non-Traditional Broadband Provider:</b>

Column Name	Data Type	Example	Description										
<b>traditional_broadband_provider</b>	{Y, N}		indicate whether the subgrantee is a traditional broadband provider (Y) or is <u>not</u> a traditional broadband provider (N)										
<b>provider_type</b>	string {1} {I, N, C, M, T}	M	<b>Type of Service Provider:</b> select a category that best describes the service provider type: <table border="1" style="margin-left: 20px;"> <tr> <td>I</td> <td>ILEC</td> </tr> <tr> <td>N</td> <td>Non-ILEC Service Provider</td> </tr> <tr> <td>C</td> <td>Cooperative</td> </tr> <tr> <td>M</td> <td>Municipality (local government)</td> </tr> <tr> <td>T</td> <td>Tribal</td> </tr> </table>	I	ILEC	N	Non-ILEC Service Provider	C	Cooperative	M	Municipality (local government)	T	Tribal
I	ILEC												
N	Non-ILEC Service Provider												
C	Cooperative												
M	Municipality (local government)												
T	Tribal												
<b>wbe</b>	string {1} {Y, N}	Y	<b>Woman-Owned Business Enterprise (WBE):</b> indicate whether the subgrantee is a woman-owned business (Y) or is <u>not</u> a woman-owned business (N)										
<b>mbe</b>	string {1} {Y, N}	N	<b>Minority Business Enterprise (MBE):</b> indicate whether the subgrantee is a minority-owned business (Y) or is <u>not</u> a minority-owned business (N)										
<b>sb</b>	string {1} {Y, N}	Y	<b>Small Business:</b> indicate whether a subgrantee qualifies as a small business (Y) or does <u>not</u> qualify as a small business (N)										
<b>webpage</b>	string	https://example.com	<b>Webpage:</b> address of the website (i.e., URL) for the subgrantee										

### Deployment Projects (fp\_deployment\_projects.csv)

The Eligible Entity must submit a detailed plan in the form of a CSV file with details on the 47 U.S.C. § 1702 (f)(1) last-mile deployment projects to be implemented by the provisionally selected subgrantees, using the data format provided by NTIA. All columns are mandatory unless otherwise specified. The header row must use the column names listed. Responses should only include US ASCII characters.

For subgrantees that will implement multiple projects, list each project on a separate row, and include a unique project identifier.

The following must be collected and submitted as part of the BEAD Final Proposal:

Table 5: Guidance on Data Formats for Deployment Projects (fp\_deployment\_projects.csv)

Column Name	Data Type	Example	Description
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity
<b>project_name</b>	string {255}	Westchester County Internet Initiative	<b>Project Name:</b> Eligibility Entity assigned project name
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier See

Column Name	Data Type	Example	Description								
			Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees. Project section for naming convention.								
<b>uei</b>	string {12}	F4N1QNPB95M4	<b>Unique Entity Identifier (UEI):</b> SAM.gov assigned legal identifier of subgrantee								
<b>project_description</b>	string {1000}	Deployment project for Westchester County to install fiber optic cables to rural areas	<b>Project Description:</b> brief description of the project (max 1,000 characters) Do not use commas or special characters								
<b>project_type</b>	string {1} {L, C, M, W}	W	<b>Project Type:</b> select a project category that best describes deployment activity: <table border="1" data-bbox="883 709 1385 846"> <tr> <td>L</td> <td>last-mile broadband deployment</td> </tr> <tr> <td>C</td> <td>CAI deployment project</td> </tr> <tr> <td>M</td> <td>middle-mile project</td> </tr> <tr> <td>W</td> <td>MDU Wi-Fi project</td> </tr> </table>	L	last-mile broadband deployment	C	CAI deployment project	M	middle-mile project	W	MDU Wi-Fi project
L	last-mile broadband deployment										
C	CAI deployment project										
M	middle-mile project										
W	MDU Wi-Fi project										
<b>estimated_miles_aerial_fiber</b>	integer	12500	<b>Estimated Miles of Aerial Fiber Deployed:</b> anticipated number of miles of aerial fiber to provide service to the locations within the project								
<b>estimated_miles_buried_fiber</b>	integer	12500	<b>Estimated Miles of Buried Fiber Deployed:</b> anticipated number of miles of buried fiber to provide service to the locations within the project								
<b>estimated_jobs</b>	integer	24	<b>Estimated Number of Jobs:</b> the estimated number of employment opportunities (full-time equivalent) created by the project								
<b>estimated_subaward_date</b>	string {10} YYYY-MM-DD	2024-12-02	<b>Estimated Subaward Date:</b> anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active)								
<b>estimated_performance_start</b>	string {10} YYYY-MM-DD	2024-12-28	<b>Estimated Period of Performance Start Date:</b> anticipated date when project will commence its period of performance								
<b>estimated_performance_end</b>	string {10} YYYY-MM-DD	2026-12-28	<b>Estimated Period of Performance End Date:</b> anticipated date when the project will close its period of performance This must be after the project start date and before March 2, 2032								
<b>intersect_tribal</b>	string {1} {Y, N}	Y	<b>Tribal Intersection:</b> indicate whether any BSLs or CAIs funded by the project will intersect Tribal territory (Y) or will <u>not</u> intersect Tribal territory (N)								
<b>tribal_consent_name</b>	string	Seminole Tribe of Oklahoma; Cherokee	<b>Tribal Name(s):</b> name of the tribe(s) in whose territory the project will conduct activities								

Column Name	Data Type	Example	Description
			If there are multiple tribes list all tribes separated by a semi-colon The tribes listed must correspond with the Resolution(s) of Consent submitted in Requirement 15 <i>Leave empty if intersect tribal is 'N' / not applicable</i>
<b>bead_support</b>	float	54321.09	<b>Projected BEAD Funding:</b> anticipated amount of BEAD funds used to complete the project, in USD Omit any match amounts Do NOT use special characters (\$) or commas
<b>fixed_amount_subaward</b>	string {1} {Y, N}	N	<b>Fixed Amount Subaward:</b> indicate whether the subaward utilizes a fixed amount mechanism (Y) or does <u>not</u> utilize a fixed amount mechanism (N) <i>Note:</i> this option may only be used for [last-mile] deployment projects
<b>subgrantee_match</b>	float	9876.54	<b>Subgrantee Match:</b> total amount of cash and in-kind matching funds for the project to be provided by the subgrantee itself, in USD Do NOT use special characters (\$) or commas
<b>federal_match</b>	float	543.21	<b>Federal Match:</b> total amount of cash and in-kind matching funds for the project to be provided by match-eligible federal sources, in USD Do NOT use special characters (\$) or commas
<b>state_match</b>	float	4321.09	<b>State Match:</b> total amount of cash and in-kind matching funds for the project to be provided by the Eligible Entity, in USD Do NOT use special characters (\$) or commas
<b>other_match</b>	float	87.65	<b>Other Match:</b> total amount of cash and in-kind matching funds for the project to be provided by other sources such as nonprofits organizations, in USD Do NOT use special characters (\$) or commas
<b>federal_match_source</b>	string {250}	ARPA; HRSA	<b>Federal Match Source(s):</b> name of federal funding source(s) that is match eligible If multiple, enumerate sources, sorted by funding amount, and separated by a semi-colon, with the highest amount first  <i>Leave empty if none</i>
<b>notes</b>	string {250}	No bid	<b>Notes:</b> optional notes about the project For projects that have not been tentatively awarded, state the cause

## Locations (*fp\_locations.csv*)

The Eligible Entity must submit a detailed plan in the form of a CSV file with data on all 47 U.S.C. § 1702 (f)(1) last-mile deployment locations to be funded by a BEAD project, using the data format provided by NTIA. The list must be consistent with the Eligible Entity’s final classifications of each location within its jurisdiction, as documented in the Eligible Entity’s approved Challenge Process results. The Eligible Entity must complete all mandatory fields in the file named “*fp\_locations.csv*.” The header row must use the column names listed. Responses should only include US ASCII characters.

The following must be collected and submitted as part of the BEAD Final Proposal:

Table 6: Guidance on Data Formats for Locations (*fp\_locations.csv*)

Column Name	Data Type	Example	Description																
<b>location_id</b>	string {13}	1081756084	<b>Location ID:</b> unique identifier for the location, as used in the Broadband Serviceable Location Fabric																
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> <i>Eligible Entity assigned unique identifier defined in the Deployment Project CSV for the project that the location is covered by</i> Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees. Project																
<b>classification</b>	enumerated {0, 1, 2}	0	<b>Location Classification:</b> indicate the category classifying the location as unserved (0), underserved (1) or served (2) from the approved Challenge Process location list																
<b>technology</b>	integer {2}	50	<b>Technology Code:</b> indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes: <table border="1" data-bbox="808 1304 1349 1648"> <tbody> <tr> <td>0</td> <td>Other technology</td> </tr> <tr> <td>10</td> <td>Copper Wire</td> </tr> <tr> <td>40</td> <td>Coaxial Cable / HFC</td> </tr> <tr> <td>50</td> <td>Optical Carrier / Fiber to the Premises</td> </tr> <tr> <td>61</td> <td>Non-Geostationary Satellite</td> </tr> <tr> <td>70</td> <td>Unlicensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>71</td> <td>Licensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>72</td> <td>Licensed by-Rule Terrestrial Fixed Wireless</td> </tr> </tbody> </table>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless
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70	Unlicensed Terrestrial Fixed Wireless																		
71	Licensed Terrestrial Fixed Wireless																		
72	Licensed by-Rule Terrestrial Fixed Wireless																		
<b>upload_speed_anticipated</b>	integer	1000	<b>Upload Speed Anticipated:</b> planned maximum upload speed in Mbps																
<b>download_speed_anticipated</b>	integer	1000	<b>Download Speed Anticipated:</b> planned maximum download speed in Mbps																

Column Name	Data Type	Example	Description
<b>low_latency</b>	enumerated {0, 1}	1	<b>Low Latency:</b> indicate whether the committed service meets the definition of low latency (1) or does <u>not</u> meet the definition of low latency (0) <i>Note:</i> Low latency is defined as having a round-trip latency of less than or equal to 100 ms based on the 95th percentile of measurements
<b>extremely_high_cost_threshold</b>	string {1} {Y, N}	N	<b>Extremely High-Cost Threshold:</b> indicate whether the location exceeds the Eligible Entity defined extremely high-cost per location threshold (Y) or does <u>not</u> exceed the extremely high-cost per location threshold (N)

### No BEAD Locations (fp\_no\_BEAD\_locations.csv)

If the Eligible Entity designates **any** eligible location as a not being served by a BEAD project, it must submit a No BEAD Locations CSV file with data on all locations not serviced through a BEAD project, using the data format provided by NTIA. The Eligible Entity must complete all mandatory fields in the file named “fp\_no\_BEAD\_locations.csv.” The header row must use the field names listed. Responses should only include US ASCII characters; rows must not include line breaks (ASCII CR or LF). This file is **only required** if there are eligible locations the Eligible Entity **will not serve through a BEAD project**.

The following must be collected and submitted as part of the BEAD Final Proposal:

Table 7: Guidance on Data Formats for No BEAD Locations (fp\_no\_BEAD\_locations.csv)

Column Name	Data Type	Example	Description												
<b>location_id</b>	string {13}	1081756084	<b>Location ID:</b> unique identifier for the location, as used in the Broadband Serviceable Location Fabric												
<b>classification</b>	Enumerated {0, 1}	0	<b>Location Classification:</b> indicate the category classifying the location as unserved (0) or underserved (1) from the approved Challenge Process location list												
<b>reason</b>	string {1}	5	<b>Reason:</b> indicate the reason for no BEAD funded service: <table border="1" style="margin-left: 20px;"> <tr> <td>1</td> <td>location should not have broadband service</td> </tr> <tr> <td>2</td> <td>location does not need mass-market broadband service</td> </tr> <tr> <td>3</td> <td>location has been removed from the Fabric by the FCC (or listed as BSL = FALSE)</td> </tr> <tr> <td>4</td> <td>location is already served by an enforceable commitment</td> </tr> <tr> <td>5</td> <td>location is already served by non-subsidized service (privately funded network)</td> </tr> <tr> <td>6</td> <td>other</td> </tr> </table>	1	location should not have broadband service	2	location does not need mass-market broadband service	3	location has been removed from the Fabric by the FCC (or listed as BSL = FALSE)	4	location is already served by an enforceable commitment	5	location is already served by non-subsidized service (privately funded network)	6	other
1	location should not have broadband service														
2	location does not need mass-market broadband service														
3	location has been removed from the Fabric by the FCC (or listed as BSL = FALSE)														
4	location is already served by an enforceable commitment														
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6	other														



			7	insufficient funds																		
<b>non_bsl_code</b>	string {1}	R	<p><b>Non BSL Code:</b> indicate the non BSL reason for reason '1':</p> <table border="1"> <tr> <td>D</td> <td>location has been demolished and is not expected to be rebuilt</td> </tr> <tr> <td>B</td> <td>residential location is not habitable</td> </tr> <tr> <td>U</td> <td>location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building</td> </tr> <tr> <td>M</td> <td>location is intended to be mobile (e.g., it is an RV or boat)</td> </tr> <tr> <td>R</td> <td>location is not a building but a land formation, such as a large rock or collection of hay bales</td> </tr> <tr> <td>Z</td> <td>location is not serviceable for another reason</td> </tr> </table> <p><i>Leave empty for all other reason codes</i></p>		D	location has been demolished and is not expected to be rebuilt	B	residential location is not habitable	U	location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building	M	location is intended to be mobile (e.g., it is an RV or boat)	R	location is not a building but a land formation, such as a large rock or collection of hay bales	Z	location is not serviceable for another reason						
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R	location is not a building but a land formation, such as a large rock or collection of hay bales																					
Z	location is not serviceable for another reason																					
<b>location_type</b>	string {1}	E	<p><b>Location Type:</b> indicate the type of building or location that does not subscribe to mass-market broadband for reason '2':</p> <table border="1"> <tr> <td>E</td> <td>enterprise</td> </tr> <tr> <td>C</td> <td>CAI</td> </tr> <tr> <td>P</td> <td>government property</td> </tr> </table> <p><i>Leave empty for all other reason codes</i></p>		E	enterprise	C	CAI	P	government property												
E	enterprise																					
C	CAI																					
P	government property																					
<b>evidence_type</b>	string {1}	L	<p><b>Type of Evidence:</b> indicate type of evidence collected for reasons '1,' '2,' and '5':</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Nature of Evidence</th> <th>Applicable Reason Code(s)</th> </tr> </thead> <tbody> <tr> <td>L</td> <td>attestation by unit of local or Tribal government</td> <td>1</td> </tr> <tr> <td>G</td> <td>attestation by government entity owning location</td> <td>1, 2</td> </tr> <tr> <td>F</td> <td>Attestation by federal government agency</td> <td>2</td> </tr> <tr> <td>P</td> <td>photographic evidence</td> <td>1, 2, 5</td> </tr> <tr> <td>S</td> <td>evidence of subscription (service record)</td> <td>5, 2</td> </tr> </tbody> </table>		Code	Nature of Evidence	Applicable Reason Code(s)	L	attestation by unit of local or Tribal government	1	G	attestation by government entity owning location	1, 2	F	Attestation by federal government agency	2	P	photographic evidence	1, 2, 5	S	evidence of subscription (service record)	5, 2
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			<table border="1"> <tr> <td>N</td> <td>network diagram</td> <td>5</td> </tr> <tr> <td>O</td> <td>attestation by private property owner</td> <td>1, 2</td> </tr> <tr> <td>T</td> <td>network speed test</td> <td>5</td> </tr> <tr> <td>X</td> <td>other evidence</td> <td>1, 2, 4, 5</td> </tr> </table> <p>If there are multiple types of evidence, separate by space and list alphabetically.</p> <p><i>Leave empty for all other reason codes</i></p>	N	network diagram	5	O	attestation by private property owner	1, 2	T	network speed test	5	X	other evidence	1, 2, 4, 5						
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O	attestation by private property owner	1, 2																			
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X	other evidence	1, 2, 4, 5																			
<b>provider_id</b>	string {10}	0019570779	<p><b>Provider ID:</b> a unique 6-digit code generated by the FCC that identifies each service provider</p> <p>Only applicable for reason codes '4' and '5'. <i>Leave empty for all other reason codes</i></p>																		
<b>technology</b>	integer {2}	50	<p><b>Technology:</b> indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes, for reasons '4' and '5':</p> <table border="1"> <tr><td>0</td><td>Other technology</td></tr> <tr><td>10</td><td>Copper Wire</td></tr> <tr><td>40</td><td>Coaxial Cable / HFC</td></tr> <tr><td>50</td><td>Optical Carrier / Fiber to the Premises</td></tr> <tr><td>60</td><td>Geostationary Satellite</td></tr> <tr><td>61</td><td>Non-Geostationary Satellite</td></tr> <tr><td>70</td><td>Unlicensed Terrestrial Fixed Wireless</td></tr> <tr><td>71</td><td>Licensed Terrestrial Fixed Wireless</td></tr> <tr><td>72</td><td>Licensed by-Rule Terrestrial Fixed Wireless</td></tr> </table> <p>If multiple, select only one technology. If any of the multiple technologies do not meet the BEAD NOFO definition for reliable broadband, the Eligible Entity must list that technology. <i>Leave empty for all other reason codes</i></p>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	60	Geostationary Satellite	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless
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<b>program</b>	string	RDOF	<p><b>Enforceable Commitment Program:</b> denote the enforceable commitment program name for reason '4'.</p> <p>If it's a <b>federal program</b>, enter the program acronym:</p> <table border="1"> <thead> <tr> <th>Program</th> <th>Federal Agency</th> <th>Program Name</th> </tr> </thead> <tbody> <tr> <td>BIP</td> <td>NTIA</td> <td>Broadband Infrastructure Program</td> </tr> </tbody> </table>	Program	Federal Agency	Program Name	BIP	NTIA	Broadband Infrastructure Program												
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			<table border="1"> <tr> <td>CAFII</td> <td>FCC</td> <td>Connect America Fund Phase II</td> </tr> <tr> <td>CCGP</td> <td>USDA</td> <td>Community Connect Grant Program</td> </tr> <tr> <td>CPF</td> <td>US Dept. of Treasury</td> <td>Capital Projects Fund</td> </tr> <tr> <td>EACAM</td> <td>FCC</td> <td>Enhanced Alternative Connect America Cost Model</td> </tr> <tr> <td>RDOF</td> <td>FCC</td> <td>Rural Digital Opportunity Fund</td> </tr> <tr> <td>RECONNECT</td> <td>Rural Utilities Service</td> <td>Rural EConnectivity Program (ReConnect)</td> </tr> <tr> <td>SLFRF</td> <td>US Dept. of Treasury</td> <td>State and Local Fiscal Recovery Fund</td> </tr> <tr> <td>TBCP1</td> <td>NTIA</td> <td>Tribal Broadband Connectivity Program NOFO 1</td> </tr> <tr> <td>TBCP2</td> <td>NTIA</td> <td>Tribal Broadband Connectivity Program NOFO 2</td> </tr> </table> <p><i>Note:</i> the table only lists programs that are currently awarding new projects, have awarded locations to Alternative Technologies (and have measurement obligations), or are modifying projects by adding locations.</p> <p>If it's a <b>state program</b>, enter the state postal code followed by the program name (e.g., LA-GUMBO).</p> <p><i>Leave empty for all other reason codes</i></p>	CAFII	FCC	Connect America Fund Phase II	CCGP	USDA	Community Connect Grant Program	CPF	US Dept. of Treasury	Capital Projects Fund	EACAM	FCC	Enhanced Alternative Connect America Cost Model	RDOF	FCC	Rural Digital Opportunity Fund	RECONNECT	Rural Utilities Service	Rural EConnectivity Program (ReConnect)	SLFRF	US Dept. of Treasury	State and Local Fiscal Recovery Fund	TBCP1	NTIA	Tribal Broadband Connectivity Program NOFO 1	TBCP2	NTIA	Tribal Broadband Connectivity Program NOFO 2
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TBCP2	NTIA	Tribal Broadband Connectivity Program NOFO 2																												
<b>fabric</b>	integer	4	<p><b>Fabric Version:</b> version identifier of the Broadband Serviceable Location Fabric. For example, the December 2023 Fabris is version 4.</p> <p>Only applicable for reason code '3'. <i>Leave empty for all other reason codes</i></p>																											
<b>challenge_id</b>	integer	7899	<p><b>FCC Location Challenge ID:</b> the challenge identifier for the location challenge submitted to the FCC.</p> <p>Only applicable for reason codes '1,' '2,' and '5'. <i>Leave empty for all other reason codes</i></p>																											
<b>notes</b>	string	The landowner refused access to their land.	<p><b>Notes:</b> if needed, additional notes explaining why the location should not receive service through a BEAD project. Do not include linebreaks.</p> <p>Only applicable for reason codes '1' and '6'. <i>Leave empty for all other reason codes</i></p>																											

## CAIs (fp\_cai.csv)

The Eligible Entity must submit a detailed plan in the form of a CSV file with data on **all CAI locations to be funded by BEAD**, using the data format provided by NTIA. This list of funded CAIs must be consistent with the Eligible Entity’s final classifications of eligible CAI within its jurisdiction. Only funded (where projects are planned) CAIs are required in this csv. The Eligible Entity must complete all mandatory fields in the file named “fp\_cai.csv.”

This CSV submission is only mandatory if the Eligible Entity is planning on serving CAIs. The following must be collected and submitted as part of BEAD Final Proposal:

Table 78: Guidance on Data Formats for CAIs (fp\_cai.csv)

Column Name	Data Type	Example	Description														
<b>type</b>	string {1}	S	<p><b>Type:</b> indicate the CAI location type:</p> <table border="1"> <tr> <td>S</td> <td>K-12 school, junior college, community college, university, or other educational institution</td> </tr> <tr> <td>L</td> <td>library</td> </tr> <tr> <td>G</td> <td>local, state, federal or Tribal government building</td> </tr> <tr> <td>H</td> <td>health clinic, health center, hospital, or other medical provider</td> </tr> <tr> <td>F</td> <td>public safety entity such as a fire house, emergency medical service station, police station, or public safety answering point (PSAP)</td> </tr> <tr> <td>P</td> <td>public housing organization</td> </tr> <tr> <td>C</td> <td>community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals</td> </tr> </table>	S	K-12 school, junior college, community college, university, or other educational institution	L	library	G	local, state, federal or Tribal government building	H	health clinic, health center, hospital, or other medical provider	F	public safety entity such as a fire house, emergency medical service station, police station, or public safety answering point (PSAP)	P	public housing organization	C	community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals
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C	community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals																
<b>entity_name</b>	string	YMCA of New Castle County DE	<b>Entity Name:</b> official name of the CAI														
<b>location_id</b>	string {13}	1081756084	<b>Location ID:</b> unique identifier of the CAI from the Broadband Serviceable Location (BSL) Fabric if the location has a corresponding Location ID <i>The Location ID may not be available for all locations</i>														
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier for the project that the CAI is covered within See Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees. Project section for naming convention														
<b>address_primary</b>	string	10 Main St	<b>Street Address:</b>														

			street number, street name, and any applicable prefix or suffix of the first address line (primary address) of the CAI Denote the physical address of the CAI, not the administrative location																
<b>city</b>	string	Sandisfield	<b>City:</b> full name of the city, town, municipality, or census designated place associated with address																
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity																
<b>zip_code</b>	string	01255	<b>Zip Code:</b> five-digit USPS ZIP code associated with address, including any leading zeros																
<b>latitude</b>	float {-14.6 to 71.4}	42.06490	<b>Latitude:</b> unprojected (WGS-84) geographic coordinate latitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits																
<b>longitude</b>	float {179.2 to 179.8}	-73.13086	<b>Longitude:</b> unprojected (WGS-84) geographic coordinate longitude in decimal degrees for the CAI, with a minimal precision of 4 decimal digits																
<b>technology</b>	enumerated {2}	50	<b>Technology Code:</b> code for the technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes: <table border="1" data-bbox="821 989 1360 1333"> <tr> <td>0</td> <td>Other technology</td> </tr> <tr> <td>10</td> <td>Copper Wire</td> </tr> <tr> <td>40</td> <td>Coaxial Cable / HFC</td> </tr> <tr> <td>50</td> <td>Optical Carrier / Fiber to the Premises</td> </tr> <tr> <td>61</td> <td>Non-Geostationary Satellite</td> </tr> <tr> <td>70</td> <td>Unlicensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>71</td> <td>Licensed Terrestrial Fixed Wireless</td> </tr> <tr> <td>72</td> <td>Licensed by-Rule Terrestrial Fixed Wireless</td> </tr> </table>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless
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<b>upload_speed_anticipated</b>	integer	1000	<b>Upload Speed Anticipated:</b> planned maximum upload speed in Mbps																
<b>download_speed_anticipated</b>	integer	1000	<b>Download Speed Anticipated:</b> planned maximum download speed in Mbps																

### Non-Deployment Projects (fp\_non\_deployment\_projects.csv)

The Eligible Entity must submit a detailed plan in the form of a Non-Deployment Projects CSV file with data on all non-deployment projects to be funded by BEAD, using the data format provided by NTIA. The header row must use the field names listed. Responses should only include US ASCII characters.

If the Eligible Entity has begun to implement a non-deployment project approved in the Initial Proposal, it must complete all mandatory fields, unless otherwise denoted, in the file named “fp\_non\_deployment\_projects.csv.” If the Eligible Entity plans to conduct non-deployment projects that are not fully described in the Final Proposal, it must complete all mandatory fields to the best of its knowledge.

The following must be collected and submitted as part of BEAD Final Proposal:

Table 89: Guidance on Data Formats for Non-Deployment Projects (fp\_non\_deployment\_projects.csv)

Column Name	Data Type	Example	Description																		
<b>state</b>	string {2}	NJ	<b>State or Territory:</b> two-letter USPS abbreviation identifying the state or territory associated with the Eligible Entity																		
<b>uei</b>	string {12}	F4N1QNPB95M4	<b>Unique Entity Identifier (UEI):</b> SAM.gov assigned legal identifier of subgrantee																		
<b>project_name</b>	string {50}	Westchester County Internet Initiative	<b>Project Name:</b> Eligibility Entity assigned project name																		
<b>project_id</b>	string	CM61-BEAD-HI-1234X-7	<b>Project ID:</b> Eligible Entity assigned unique identifier See Below is a summary of the data fields that are critical for identifying and tracking BEAD projects and subgrantees. Project section for naming convention																		
<b>project_categorization</b>	enumerated {1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12}	2	<p><b>Non-Deployment Project Category:</b> select a project category that best describes the non-deployment activity:</p> <table border="1"> <tbody> <tr> <td>1</td> <td>User training with respect to cybersecurity, privacy, and other digital safety matters</td> </tr> <tr> <td>2</td> <td>Remote learning or telehealth services/facilities</td> </tr> <tr> <td>3</td> <td>Digital literacy/upskilling (from beginner-level to advanced)</td> </tr> <tr> <td>4</td> <td>Computer science, coding and cybersecurity education programs</td> </tr> <tr> <td>5</td> <td>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)</td> </tr> <tr> <td>6</td> <td>Broadband sign-up assistance and programs that provide technology support</td> </tr> <tr> <td>7</td> <td>Multi-lingual outreach to support adoption and digital literacy</td> </tr> <tr> <td>8</td> <td>Prisoner education to promote pre-release digital literacy, job skills, online job acquisition skills, etc.,</td> </tr> <tr> <td>9</td> <td>Digital navigators</td> </tr> </tbody> </table>	1	User training with respect to cybersecurity, privacy, and other digital safety matters	2	Remote learning or telehealth services/facilities	3	Digital literacy/upskilling (from beginner-level to advanced)	4	Computer science, coding and cybersecurity education programs	5	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)	6	Broadband sign-up assistance and programs that provide technology support	7	Multi-lingual outreach to support adoption and digital literacy	8	Prisoner education to promote pre-release digital literacy, job skills, online job acquisition skills, etc.,	9	Digital navigators
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			<table border="1"> <tr> <td>10</td> <td>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)</td> </tr> <tr> <td>11</td> <td>Costs associated with stakeholder engagement, including travel, capacity-building, or contract support</td> </tr> <tr> <td>12</td> <td>Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.H.2 of this NOFO</td> </tr> </table>	10	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)	11	Costs associated with stakeholder engagement, including travel, capacity-building, or contract support	12	Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.H.2 of this NOFO
10	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)								
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12	Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.H.2 of this NOFO								
<b>estimated_jobs</b>	integer	24	<b>Estimated Number of Jobs:</b> the estimated number of employment opportunities (full-time equivalent) created by the project						
<b>estimated_subaward_date</b>	string {10} YYYY-MM-DD	2024-12-02	<b>Estimated Subaward Date:</b> anticipated date of project execution (i.e., the date the subgrantee agreement is signed and active)						
<b>estimated_performance_start</b>	string {10} YYYY-MM-DD	2024-12-28	<b>Estimated Period of Performance Start Date:</b> anticipated date when project will commence its period of performance						
<b>estimated_performance_end</b>	string {10} YYYY-MM-DD	2026-12-28	<b>Estimated Period of Performance End Date:</b> anticipated date when the project will close its period of performance This must be after the project start date and before (1) March 2, 2032, if the Eligible Entity has made a subgrant for the project, or (2) June 30, 2032, if the Eligible Entity has undertaken the project itself						
<b>intersect_tribal</b>	string {1} {Y, N}	Y	<b>Tribal Intersection:</b> indicate whether any BSLs or CAIs funded by the project will intersect Tribal territory (Y) or will <u>not</u> intersect Tribal territory (N)						
<b>bead_support</b>	float	54321.09	<b>Projected BEAD Funding:</b> anticipated amount of BEAD funds used to complete the project, in USD. Omit any match amounts Do NOT use special characters (\$) or commas						
<b>fixed_amount_subaward</b>	string {1} {Y, N}	N	<b>Fixed Amount Subaward:</b> indicate whether the subaward utilizes a fixed amount mechanism (Y) or does <u>not</u> utilize a fixed amount mechanism (N)						
<b>notes</b>	string {250}	No bid	<b>Notes:</b> optional notes about the project For projects that have not been tentatively awarded, state the cause						





## Change Log

This appendix tracks changes to the Final Proposal Eligible Entity Guidance.

Version Number	Page Number	Date of Change (mm/dd/yyyy)	Location of Change	Description of Change
1.1	8 – 9	11/13/2024	Subgrantee Selection	<ul style="list-style-type: none"> <li>Guidance on addressing enforceable commitments during Subgrantee Selection</li> </ul>
1.1	9; 76	11/13/2024	Public Posting; Waivers and Public Comment	<ul style="list-style-type: none"> <li>Updated public comment posting period to 14 days</li> <li>Specified that submission in NGP is required upon public comment posting</li> </ul>
1.1	12 – 18; 84 – 96	11/13/2024	Final Proposal Data Submission; List of CSVs	<ul style="list-style-type: none"> <li>Clarified data requirements for CSV files</li> </ul>
1.1	15 – 16; 41 – 47; 89 – 92	11/13/2024	Final Proposal Data Submission; Requirement 7; List of CSVs	<ul style="list-style-type: none"> <li>Additional guidance and Intake Questions to address reasons for not serving a location through a BEAD project</li> <li>Removed requirement for signed Governor attestation</li> </ul>
1.1	19 – 23	11/13/2024	Requirement 1	<ul style="list-style-type: none"> <li>Removed Intake Questions addressed through additions to the CSV files and Requirement 7 for reasons for not serving a location through a BEAD project</li> <li>Revised language for Intake Question 1.3</li> </ul>
1.1	17 – 18; 51 – 58	11/13/2024	Final Proposal Data Submission; Requirements 8 and 9	<ul style="list-style-type: none"> <li>Restructured intake of Non-Deployment Projects CSV within overall Final Proposal submission to reflect NGP Intake</li> </ul>
1.1	24	11/13/2024	Requirement 3	<ul style="list-style-type: none"> <li>Revised language for Intake Question 3.2</li> </ul>

Version Number	Page Number	Date of Change (mm/dd/yyyy)	Location of Change	Description of Change
1.1	27	11/13/2024	Requirement 4	<ul style="list-style-type: none"> <li>Removed Intake Question 4.2; Revised language for Intake Question 4.1</li> </ul>
1.1	60	11/13/2024	Requirement 10	<ul style="list-style-type: none"> <li>Removed Intake Question 10.2</li> </ul>
1.2	15 – 16; 106	11/26/2024	Introduction – Overview of Documents	<ul style="list-style-type: none"> <li>Removed column for evidence file ID in the No BEAD Locations CSV</li> </ul>
1.2	8 – 9	11/26/2024	Subgrantee Selection	<ul style="list-style-type: none"> <li>Updated language providing guidance on BEAD-eligible locations not being served by BEAD</li> </ul>
1.2	16	11/26/2024	Requirement 0.7	<ul style="list-style-type: none"> <li>Revised language for Intake Question 0.7</li> </ul>
1.2	17 – 18	11/26/2024	Requirement 0.9	<ul style="list-style-type: none"> <li>Revised guidance language for Intake Question 0.9</li> </ul>
1.2	22 – 23	11/26/2024	Requirement 1	<ul style="list-style-type: none"> <li>Revised language for Intake Question 1.5</li> <li>Revised guidance language for Intake Question 1.5</li> <li>Removed Intake Question 1.3, 1.4, 1.6 and 1.8</li> <li>Renumbered Intake Questions 1.5 - 1.9 (became 1.3 - 1.5)</li> </ul>
1.2	24 – 25	11/26/2024	Requirement 3	<ul style="list-style-type: none"> <li>Revised guidance language for Intake Question 3.1</li> <li>Updated language for Intake Question 3.2</li> </ul>
1.2	39 – 47	11/26/2024	Requirement 7	<ul style="list-style-type: none"> <li>Revised guidance language for Requirement 7 Overview</li> <li>Revised guidance language for Intake Questions 7.2, 7.6, 7.9</li> <li>Removed Intake Question 7.3 and 7.8</li> <li>Renumbered Intake Questions 7.4 - 7.12 (now 7.3 - 7.10)</li> </ul>

<b>Version Number</b>	<b>Page Number</b>	<b>Date of Change (mm/dd/yyyy)</b>	<b>Location of Change</b>	<b>Description of Change</b>
1.2	52 – 58	11/26/2024	Requirement 8	<ul style="list-style-type: none"> <li>Updated guidance language for Intake Questions 8.3, 8.6, 8.7, and 8.8</li> <li>Removed Intake Question 8.9</li> </ul>
1.2	59	11/26/2024	Requirement 10	<ul style="list-style-type: none"> <li>Revised guidance language from Intake Question 10.1</li> </ul>
1.2	62 - 64	11/26/2024	Requirement 11	<ul style="list-style-type: none"> <li>Revised language for Intake Questions 11.1 - 11.4, 11.6 - 11.7</li> <li>Removed and revised guidance language for Intake Questions 11.1 - 11.4, 11.6 - 11.7</li> </ul>
1.2	65	11/26/2024	Requirement 12	<ul style="list-style-type: none"> <li>Revised guidance language for Intake Question 12.1</li> <li>Revised language for Intake Question 12.1</li> </ul>
1.2	66 – 67	11/26/2024	Requirement 13	<ul style="list-style-type: none"> <li>Added guidance language to Intake Question 13.1</li> </ul>
1.2	68 – 69	11/26/2024	Requirement 14	<ul style="list-style-type: none"> <li>Removed Intake Question 14.1</li> <li>Renumbered Intake Questions 14.2 (now 14.1)</li> <li>Revised guidance language for Intake Question 14.1 (new)</li> </ul>
1.2	76	11/26/2024	Waivers and Public Comment	<ul style="list-style-type: none"> <li>Removed Intake Question 17.3</li> <li>Renumbered Intake Question 17.4 (now 17.3)</li> </ul>
1.2	16	12/20/2024	Final Proposal Data Submission	<ul style="list-style-type: none"> <li>Revised language for Intake Question 0.7</li> </ul>
1.2	18	12/20/2024	Final Proposal Data Submission	<ul style="list-style-type: none"> <li>Revised guidance for Intake Question 0.9</li> </ul>
1.2	18	12/20/2024	Final Proposal Data Submission	<ul style="list-style-type: none"> <li>Added Grant Program for No BEAD Locations CSV file</li> </ul>