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# Workforce Development Grant Program Procedures

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MARCH 2025

State of West Virginia

West Virginia Department of Economic Development



INTERNET FOR ALL **West Virginia**

# 1. Workforce Development Program Overview

The West Virginia Department of Economic Development, Office of Broadband (WVDED) is launching the Broadband Industry Workforce Development Grant Program to empower institutions to build or expand equitable and accessible education opportunities for the broadband industry.

This program is supported by the Broadband Equity, Access, and Deployment (BEAD) program, administered by the National Telecommunications and Information Administration (NTIA).<sup>1</sup> Funds are contingent on first awarding deployment projects to reach all unserved and underserved locations in West Virginia.

The Workforce Development Grant Program will open in summer **2025**. WVDED anticipates \$20-30 million in BEAD funds to be available for workforce development programs that ensure West Virginia has the talent it needs to support the broadband industry and related technologies. WVDED is prioritizing credentials of value and development of programs in partnership with employers and training providers.

This document establishes the program procedures for the Broadband Industry Workforce Development Grant Program. Throughout this document, entities applying to the Workforce Development Program are referred to as “applicants” or “subgrantees” depending on which stage of the process is being discussed—with the latter being reserved for references to post-award processes or requirements.

## 2. Eligible Entities

Entities eligible to apply include but are not limited to:

- a) Broadband industry associations
- b) Career and Technical Education institutions
- c) County Boards of Education
- d) Employers
- e) Higher education institutions
- f) K-12 schools and school districts
- g) Public-private partnerships
- h) Workforce development organizations.

## 3. Program Guidelines

Proposed programs must support broadband industry workforce development in West Virginia. The award ceiling, meaning the highest amount that can be granted in a single award, is **\$5 million per award**.

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<sup>1</sup> For more details on NTIA’s BEAD Program, see the [Notice of Funding Opportunity](#).

Actual funds awarded will depend on the volume of applications received, the grant support needed for proposed projects, and the requirements of NTIA. WVDED reserves the right to partially fund an application or reject any or all applications made to the Program.

## Program Priorities

WVDED will prioritize programs that include:

- a) *Credentials of Value*: Credentials that have industry-wide recognition and lead to employment in the broadband sector.
- b) *Joint Development*: Programs that are jointly developed between industry and workforce development entities.
- c) *Work-Based Learning*: Training programs that include paid-work experience, or Registered Apprenticeship or Pre-Apprenticeship.

## Program Types

**Eligible programs** include but are not limited to:

- a) Certificate programs
- b) Micro-credentials
- c) Post-secondary degree programs
- d) Soft skills trainings
- e) Registered Apprenticeship Programs

See appendix for definitions.

## Eligible Expenses

The Workforce Development Grant Program is a **reimbursement program**. Subgrantees receiving funding may be reimbursed for eligible expenses up to the maximum grant amount as defined in the grant award. When seeking reimbursement, subgrantees will submit such costs as line-items and provide supporting documentation for the expense, including proof of payment from vendors and bank information showing the payment, such as a cancelled check or an official bank statement. Supporting documentation shall include time spent by each employee on project activities, total time spent by each employee during the period for which reimbursement is sought, and an hourly cost that may include employee salary, itemized payroll taxes and benefits.

Eligible expenses include:

- a) Supplies and equipment acquisition costs to be solely used for the successful implementation of broadband industry workforce development;
- b) Facility rental or acquisition costs, including facility leases;
- c) Developing curriculum;
- d) Professional services, including but not limited to project management, marketing, and/or communications costs associated with program activities;
- e) Travel and training and professional development for staff implementing workforce development activities;
- f) Scholarships for program participants;

- g) Other pertinent costs, excluding costs related to proposal preparation, not already covered in other categories; and
- h) Internal labor costs incurred as part of eligible grant activities up to the proportion of employees' time spent exclusively on grant activities.

### **Ineligible Expenses**

Costs that appear excessive or without justification will not be reimbursed. Costs that are ineligible, as determined by Federal law, will not be reimbursed. Ineligible costs include:

- a) Indirect costs (representing general overhead and administrative expenses);
- b) Internal administrative activities, other than those required for administration of grant funds received under this program;
- c) Fundraising activities;
- d) Computers or office equipment not used solely for the implementation of the program;
- e) Equipment owned or leased by entities other than the grantee or subgrantees;
- f) Expenses incurred prior to the date of the grant award announcement;
- g) Payment of interest or principal on outstanding debt instruments, or other debt service costs;
- h) Fees or issuance costs associated with the issuance of new debt;
- i) Satisfaction of any obligation arising under or pursuant to a settlement agreement, judgment, consent decree, or judicially confirmed debt restructuring plan in a judicial, administrative, or regulatory proceeding;
- j) Supporting or opposing collective bargaining, whether directly or indirectly;
- k) Purchasing or supporting any covered communications equipment or service (as defined in Section 9 of the Secure and Trusted Communications Network Act of 2019)<sup>2</sup>;
- l) Supplanting amounts of existing funding WVDED would otherwise make available for the same purposes as these funds; and
- m) Profits, fees, or other incremental charges above actual cost incurred by the Applicant.<sup>3</sup>

## **4. Application Requirements**

Applicants must demonstrate financial, managerial, and technical capacity to implement the proposed programs. Applicants will be required to submit the materials below, in addition to eligibility information and certifications as required. Applications will be submitted through the WVDED Grants Portal.

### **Unique Entity Identifier (UEI)**

To receive an award as part of this Program, applicants must obtain a Unique Entity Identifier (UEI) at the System for Award Management (SAM) SAM.gov website and provide it to WVDED. WVDED will not make an award to an applicant unless the applicant obtains and provides its UEI to WVDED.

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<sup>2</sup> See 47 U.S.C. § 1608 and FCC Covered List at <https://www.fcc.gov/supplychain/coveredlist>.

<sup>3</sup> Allowable costs are determined in accordance with the cost principles identified in 2 C.F.R. Part 200, including Subpart E of such regulations and in the grant program's authorizing legislation.

## Narrative

The narrative questions will request details on the program's credential of value<sup>4</sup>, development with partners, efficiency and efficacy of the program, cost to participants, and resources to support participants' matriculation and completion of the program. Applicants must also provide information on organizational capacity.

## Timeline

The period of performance for the Workforce Development Grant program is 4 years. Applicants must detail key milestones, outcomes, and the timeline of grant activities as described in the narrative. Subgrantees for this program **must begin providing funded services no later than one year after the award date**. Awards to selected applicants shall be made following certification that all unserved and underserved areas are covered under selected BEAD deployment projects.

## Budget

Budget information for the proposed project must be included in a completed application workbook, located in the WVDED application portal, that details the uses of requested grant funds, any additional funding sources, if available, and justification for each cost.

# 5. Evaluation Criteria

Applications will be reviewed and scored according to the criteria below.

## Criteria Summary

Criteria	Maximum Points
Credential of Value	30
Joint Development	30
Efficacy and Efficiency	20
Cost to Participants	20
Wrap-Around Services	10
Total	110

## Workforce Development Subgrantee Selection Rubric

Credential of Value

Max points: 30

<sup>4</sup> A "credential of value" refers to a qualification, certification, degree, or other formal recognition that equips an individual with knowledge, skills and abilities valued in the labor market. These credentials enhance employability, support career advancement, and align with industry or employer demands. Adapted from Lumina Foundation.

**Excellent** (25-30 points): The proposed project results in a credential of value to the broadband industry, such as a degree, certification, or other credential that will improve career and economic opportunities for recipients. The value and demand for this credential is justified using labor data in the project description and provides detail on anticipated salary or wage upon employment.

- **Average to Strong** (10-24 points): Applicant has described a credential of value but is missing one or more of the elements above.

- **Poor** (0-9 points): Applicant has not adequately described a credential of value.

### Joint Development

Max points: 30

**Excellent** (25-30 points): The proposed project has been developed in partnership with training providers, employers, and community-based organizations as appropriate. Applicant has clearly defined roles and demonstrates a commitment from each partner for respective program activities. Cite letters of commitment, support or MOUs.

- **Average to Strong** (10-24 points): Applicant has described joint development with partners but has not defined clear roles for program implementation and/or commitments from partners are unclear.

- **Poor** (0-9 points): Applicant has not adequately described joint development with partners.

### Efficiency and Efficacy

Max points: 20

- **Excellent** (17-20 points): Applicant demonstrates a cost-effective, efficient project plan and demonstrates an investment of institutional resources to support the proposed program. This includes sufficient detail to demonstrate financial, managerial, and technical capacity to implement the proposed programs. The budget is reasonable and addresses all costs required to implement the proposed program. Past program expenses are cited where applicable. Applicant has detailed key milestones and outlined appropriate timelines for graduation and/or job placements, as applicable. This section also addresses the sustainability of the programs including detailed plans beyond initial funding, demonstrated through letters of commitment from submitting entities.

- **Average to Strong** (10-16 points): Applicant has described the project plan but is missing one or more of the elements above.

- **Poor** (0-9 points): Applicant has not adequately described the project plan.

### Cost to Participants

Max points: 20

- **Excellent** (17-20 points): The proposed program is offered at reasonable cost to participants. Applicant has described planned affordability measures to support recipient participation. As applicable, applicant has detailed scholarships, paid work experience, or Registered Apprenticeships available to participants. Need-based scholarships provide description of how need is determined and documented.
- **Average to Strong** (10-16 points): Applicant has described affordability measures but is missing one or more of the elements above.
- **Poor** (0-9 points): Applicant has not adequately described affordability measures.

### Wrap-Around Services

Max points: 10

- **Excellent** (8-10 points): Applicant has detailed plans to partner with organizations that offer the kinds of wrap-around support services participants need to successfully enter and complete the program. Applicant has included relevant data to describe the scale of need for additional services. Applicant has provided letters of support from service providers, where applicable.
- **Average to Strong** (5-7 points): Applicant has described some wrap-around service partnerships but is missing one or more of the elements above.
- **Poor** (0-4 points): Applicant has not adequately described any wrap-around service partnerships.

## 6. Compliance, Reimbursement, and Reporting

Subgrantees will be required to certify compliance, collect program data, and report progress to WVDED according to NTIA guidelines. Expense documentation, including proof of payment, is required for reimbursement.

### Administrative and National Policy Requirements

Note: The following is not a comprehensive list of federal funding obligations. The following compliance items will be further detailed in a forthcoming *Guide to Reporting and Compliance Obligations for West Virginia Non-Deployment Program Subrecipients* ("Compliance Guide") which will be published on the [WVDED broadband page](#). As an overview, subgrantees under this Program will be required to comply with all applicable statutes and regulations, including but not limited to the following:

- 1) The Uniform Administrative Requirements, Cost Principles and Audit Requirements (“Uniform Guidance”) (2 CFR Part 200);<sup>5</sup>
- 2) The Department of Commerce Financial Assistance Standard Terms and Conditions;<sup>6</sup>
- 3) Domestic Preferences for Procurements (2 CFR §200.322) which encourages federal subgrantees to provide a preference for purchasing goods, products, and materials produced in the United States;
- 4) Contracting with Small and Minority Businesses, Women’s Business Enterprises, Veteran-owned Businesses, and Labor Surplus Area firms which requires that subgrantees take steps as described in 2 CFR 200.321 to assure that the types of businesses listed are used whenever possible;<sup>7</sup>

Prospective Applicants to this Program should review the applicable guidance and requirements as identified by the NTIA and the U.S. Department of Commerce and footnoted above.

### **Grant Distribution Agreement and Standard Terms**

Provisional subgrantees will be required to enter into a Grant Distribution Agreement (Grant Agreement) with WVDED. Additional terms may be required by the NTIA/Department of Commerce. To the extent necessary, WVDED reserves the right to create additional requirements that provisional subgrantees must fulfill prior to the disbursement of funds.

The above Administrative and National Policy items, as well as all compliance items applicable to this Program, will be detailed further in both the Compliance Guide for Workforce Development Grant Program Subrecipients, as well as the Grant Agreement.

### **Budget Amendments**

Upon full execution of a subgrantee’s Grant Agreement with WVDED, an established budget from the approved Project will be used for monitoring project fund expenditures. Any changes to this budget, including expense category shifts, will require submission of a proposed budget amendment. Upon approval by WVDED, this will serve as the new budget baseline. The ability to make budget amendments is subject to WVDED approval and guidance and/or approval from NTIA.

### **Clawback/Recoupment**

WVDED’s Grant Agreement allows WVDED to withhold or deduct payments if a subgrantee fails to comply with its terms. Funds withheld due to unsatisfactory performance or noncompliance may be restored upon the subgrantee’s satisfactory remedy of the issue. WVDED also reserves the right to disallow costs or recover disbursed funds following an audit or review, even after the Grant Agreement closeout. Failure to meet performance measures may result in suspended payments, termination of the

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<sup>5</sup> See 2 CFR 200, available at: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>.

<sup>6</sup> See [https://www.commerce.gov/sites/default/files/2020-11/DOC%20Standard%20Terms%20and%20Conditions%20-%2012%20November%202020%20PDF\\_0.pdf](https://www.commerce.gov/sites/default/files/2020-11/DOC%20Standard%20Terms%20and%20Conditions%20-%2012%20November%202020%20PDF_0.pdf).

<sup>7</sup> See 2 CFR 200.322.



Grant Agreement, or ineligibility for future funding until deficiencies are resolved. WVDED will provide notice and an opportunity for subgrantees to cure any failures or deficiencies.

## **Audits/Monitoring**

Subgrantees are advised that NTIA, the NIST Grants Office, the Department of Commerce Office of Inspector General (OIG), or other authorized federal entities may audit the award at any time. To ensure compliance, subgrantees must fully cooperate with WVDED, NTIA, and the U.S. Department of Commerce during any audits of WVDED's programs or awarded funds. To that end, subgrantees are required to retain all financial records, supporting documents, and other pertinent records related to their grant agreement for a minimum of five years following the submission of their final expenditure report.

## **Subgrantee Obligations and Post Award Monitoring**

Subgrantees of grant funds must comply with post-award monitoring and reporting requirements to maintain continued eligibility for disbursement of grant funds. Subgrantees are responsible for active technical, financial, and project management of their own staff and/or by hiring and managing well-qualified contractors. Subgrantees should also expect to cooperate with technical and financial monitoring and review provided by WVDED contractors and staff.

## **Protected and Proprietary Information**

Subgrantees must submit accurate and timely financial and performance data and cooperate with WVDED, the Department of Commerce, and external evaluators, while taking reasonable measures to safeguard personally identifiable information and other confidential or sensitive business data created or obtained under this Program. Subgrantees must acknowledge that this information and data submitted to WVDED or NTIA, may be accessed, reviewed, and evaluated by the Department of Commerce for program reviews and statistical purposes. Access may include Department of Commerce employees, federal agents, contractors, or non-federal personnel under appropriate confidentiality agreements.

While WVDED and NTIA will protect confidential and proprietary information from public disclosure consistent with applicable law, if subgrantees submit information or data deemed to be confidential commercial information or that otherwise should not be publicly disclosed, that information should be identified, bracketed, and marked as Privileged, Confidential, Commercial or Financial Information.<sup>8</sup>

## **Reporting and Program Data**

Program data must be tracked throughout implementation and reported to WVDED.

### **Information collected must include the following data points:**

- a) Description of the program, how and with which partners it was developed
- b) Recruiting process to attract diverse program participants

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<sup>8</sup> Per 15 CFR § 4.9(b), Confidential Commercial Information means commercial or financial information, obtained by the Department from a submitter, which may be protected from disclosure under the Freedom of Information Act (FOIA) exemption (b)(4) (5 U.S.C. 552 (b)(4)).

- c) Community engagement activities
- d) Number of people participating and participant demographics
- e) Program outcomes including credentials achieved and type, work-based learning experiences, job placements
- f) Wrap-around services accessed by participants
- g) Anecdotal/personal testimony demonstrating the positive impact of the Program.

More detailed reporting guidance is forthcoming.

## **Civil Rights Compliance**

Prior to receiving funding, subgrantees will be required by contract to agree to abide by the non-discrimination requirements set forth in the following legal authorities, to the extent applicable, as failure to do so may result in cancellation of any award and/or recoupment of funds already disbursed:

- Title VI of the Civil Rights Act of 1964;
- Title IX of the Education Amendments of 1972;
- The Americans with Disabilities Act of 1990;
- Section 504 of the Rehabilitation Act of 1973;
- The Age Discrimination Act of 1975;
- Title VII of the Civil Rights Act of 1964; and
- Any other applicable non-discrimination law(s).

## **Fraud, Waste, and Abuse Reporting**

Subgrantees shall timely disclose to the U.S. Department of Commerce, Office of Inspector General (OIG) when in connection with the award, performance, or closeout, the subgrantee has credible evidence that any principal, employee, or agent of the subgrantee has committed fraud, waste, or abuse.<sup>9</sup>

## **Whistleblower Protection**

Subgrantees will be subject to the whistleblower rights and remedies established under 41 U.S.C. § 4712. An employee of the subgrantee may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes to be evidence of gross mismanagement, waste, abuses of authority and dangers to public safety, violations of law, rule, or regulations related to a federal contract or grant. Subgrantees will be required to inform employees and contractors in writing of these whistleblower rights.<sup>10</sup>

## **Certifications**

Applicants must have a current [Certificate of Existence](#) from the West Virginia Secretary of State and a Letter of Good Standing from the West Virginia tax division. Academic institutions must show proof of accreditation.

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<sup>9</sup> The OIG reporting hotline is available [here](#).

<sup>10</sup> See also <https://www.oig.doc.gov/whistleblower/protection-program/>

Applicants must have no prior default or significant violations under any Federal, state, or local grant funding program, and no suspension or debarment as a vendor by the State of West Virginia or any Federal agency within three years prior to filing an application with WVDED for Program funding.

Applicants must be able to provide certifications required under the BEAD program, as applicable, and must meet all other applicable federal requirements for a BEAD subrecipient.

## 7. Application Assistance

Questions about the grant program or application can be submitted through the [Workforce Grant Program Question Submission Form](#) available at [broadband.wv.gov/broadband-workforce-development](https://broadband.wv.gov/broadband-workforce-development).

WVDED encourages eligible applicants to utilize the [West Virginia Grant Resource Centers](#) to support the development of competitive applications. The Grant Resource Centers assist eligible applicants in developing proposals and supporting grant writing for programs throughout all 55 counties.

## 8. Appendix: Definitions

### **Credential of Value**

A credential of value refers to a qualification, certification, degree, or other formal recognition that equips an individual with knowledge, skills and abilities valued in the labor market. These credentials enhance employability, support career advancement, and align with industry or employer demands.<sup>11</sup>

### **Certificate Programs**

A credential awarded by a certification body based on an individual demonstrating through an examination process that he or she has acquired the designated knowledge, skills, and abilities to perform a specific job. The examination can be either written, oral, or performance based. Certification is a time-limited credential that is renewed through a recertification process.<sup>12</sup>

### **Micro-credentials**

Micro-credentials are short, focused certifications that validate specific skills or competencies in a particular area. They tend to be “stackable,” meaning that they incrementally document what a person knows and can do.<sup>13</sup>

### **Post-secondary Degree Programs**

Post-secondary degree programs refer to educational opportunities pursued after high school, including associate’s degrees, bachelor's degrees, master's degrees, and other advanced degrees.

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<sup>11</sup> Adapted from the Lumina Foundation, *Education Levels Nationally*, <https://www.luminafoundation.org/topics/todays-students/education-levels/>

<sup>12</sup> National Center for Education Statistics, <https://nces.ed.gov/surveys/gemena/definitions.asp>

<sup>13</sup> Credential Engine: <https://credentialengine.org/2024/02/26/navigating-the-micro-credential-landscape-a-global-mapping-initiative/>

### **Soft Skills Trainings**

Soft skills training focuses on developing interpersonal and professional attributes such as communication, teamwork, problem-solving, time management, adaptability, and emotional intelligence. For the purpose of this grant program, these trainings must be focused on workers in broadband industry.

### **Registered Apprenticeship Programs**

Registered Apprenticeship is an industry-driven, high-quality career pathway where employers can develop and prepare their future workforce, and individuals can obtain paid work experience with a mentor, receive progressive wage increases, classroom instruction, and a portable, nationally-recognized credential. Registered Apprenticeships are industry-vetted and approved and validated by the U.S. Department of Labor or a State Apprenticeship Agency.<sup>14</sup>

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<sup>14</sup> Registered Apprenticeship Program, Apprenticeship USA,  
<https://www.apprenticeship.gov/employers/registered-apprenticeship-program>