

INTERNET FOR ALL

Final Proposal

Iowa Department of Management (DOM)



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

Oversight and Accountability Processes Attachment (2)

Agency Policy Documentation

1. Executive Summary

This plan is published by the Iowa Department of Management, Division of Information Technology (“DOM”), in accordance with NIST financial assistance award number 19-20-B079 as amended. This Compliance and Monitoring Plan outlines the oversight and accountability framework to facilitate the proper use of Broadband Equity, Access, and Deployment (“BEAD”) Program funds. This plan adheres to the statutory and regulatory requirements at minimum defined in:

- [47 U.S.C. § 1702 \(Infrastructure Investment and Jobs Act – BEAD enabling statute\)](#)
- [2 C.F.R. Part 200 \(Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards\)](#)
- [BEAD Notice of Funding Opportunity \(NOFO\)](#)
- [BEAD Program Restructuring Policy Notice](#)
- [BEAD General Terms and Conditions](#)
- [Department of Commerce Standard Terms and Conditions](#)
- [DOM BEAD Subgrantee Agreement](#)
- [DOM NOFA #009](#)

Monitoring and compliance reviews are designed to mitigate waste, fraud, and abuse, promote the timely and appropriate use of funds, and facilitate transparent reporting to stakeholders including the National Telecommunications and Information Administration (“NTIA”), the U.S. Department of Commerce, the Iowa General Assembly, and the public. It is assumed that any future guidance will also be incorporated into this plan.

2. Distribution of Funding

Grantees receiving awards will be considered “subrecipients” and the awards will be considered Fixed Amount Subawards for purposes of federal law. (2 C.F.R. § 200.1 (definition of “fixed amount awards”); 2 C.F.R. § 200.201; 2 C.F.R. § 200.333). The awards made pursuant under the Iowa BEAD program will be subject to all requirements imposed on Fixed Amount Subawards under 2 C.F.R. part 200, as well as applicable federal programmatic guidance that allows for reimbursement review, including the Tailoring the Application of the Uniform Guidance to the BEAD Program Policy Notice and the BEAD Restructuring Policy Notice.

Reimbursements are limited to eligible costs that have been actually incurred in connection with the broadband deployment project, as outlined in the subgrantee agreement. All reimbursed

expenditures must directly support the delivery of qualifying broadband activities and must fall within the allowable funding categories defined in the NTIA and DOM NOFO/NOFAs.

For the Iowa BEAD program, the submission of reimbursement requests is to be based on each project's progression, so financial support is aligned with completed milestones. The draw schedule is as follows:

- Draw 1: 10% of project total upon approval of the budget, compliance documentation, and submission of the engineering design certified by a professional engineer.
- Draw 2: 25% of project total upon completion of at least 25% of the project build. In the case of an LEO capacity subgrantee, upon the subscription rate reaching at least 25%.
- Draw 3: 10% of project total upon completion of at least 35% of the project build. In the case of an LEO capacity subgrantee, upon the subscription rate reaching at least 35%.
- Draw 4: 25% of project total upon completion of at least 60% of the project build. In the case of an LEO capacity subgrantee, upon the subscription rate reaching at least 60%.
- Draw 5: 10% of project total upon completion of at least 75% of the project build. In the case of an LEO capacity subgrantee, upon the subscription rate reaching at least 75%.
- Draw 6: 20% of project total upon 100% project completion, including submission of all required completion documentation and successful performance testing.

Note that the above schedule may be modified if subrecipients complete project milestones faster than anticipated. Accelerated progress will not result in penalties or delays in reimbursement.

Subrecipients must verify that all reimbursement requests are supported by complete and accurate documentation. Only those costs that are necessary, reasonable, and clearly connected to the execution of BEAD-funded projects will be approved for reimbursement. Proper recordkeeping and adherence to both state and federal compliance requirements are essential.

The sum of all monies paid to the subrecipient pursuant to the grant shall not exceed the total amount stated for the grant.

DOM may withhold payment if it is determined that the subrecipient has failed to comply with a material term of the Grant. NTIA and DOM may also enforce applicable rules and laws by imposing penalties for nonperformance, failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to,

imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation/clawback of funds, and debarment of organizations and/or personnel.

If a state or federal audit takes exception to a subrecipient's BEAD project for which federal funds have been paid or reimbursed, or if federal funds are deferred and/or disallowed as a result of any audits, the subrecipient will be liable to DOM and the State of Iowa for the full amount of any such payment, reimbursement, or any claim disallowed (or the amount of funds expended in violation of applicable laws or requirements) and for all related penalties incurred. If DOM or any federal governmental entity concludes that Grantee has been paid for any cost that is unallowable, unallocable, or unreasonable, the subrecipient will be liable to DOM for such cost. The subrecipient shall pay to DOM all amounts for which the subrecipient is liable within ten business days of receiving a written demand or written notice.

Additionally, DOM reserves the right to pursue any legal remedy at its disposal including, but not limited to, disallowance of costs, withholding of funds, or recoupment as may be necessary to ensure compliance with IJA requirements.

3. Reporting Mandates

To facilitate effective oversight and compliance with federal and state requirements, subrecipients are required to submit periodic reports that document both programmatic progress and financial performance. These reports serve to inform DOM of the project's status and to confirm that adequate resources are available to support successful completion. All reporting must be timely, complete, and submitted in accordance with the terms of the subgrantee agreement.

Subrecipients shall submit a Quarterly Status Report every three months throughout the duration of the project as defined by DOM. The reports will be due within the State of Iowa's Grants Management Platform, IowaGrants, on the following schedule:

- Quarter 1 (January – March): March 30
- Quarter 2 (April – June): June 30
- Quarter 3 (July – September): September 30
- Quarter 4 (October – December): December 31

These reports must include, at a minimum:

- Updates on project activities, including the status of make-ready work, permitting, and construction milestones.
- Identification of any material changes to the project scope, schedule, or make-ready costs since the original application.
- Identification of any issues that may impact timely completion of the project.

Should a subrecipient notify DOM that they will be unable to meet their designated project completion date, either through the Quarterly Status Report or directly, a formal extension request process will be initiated. Through this process, DOM will evaluate the circumstances surrounding the delay and the progress achieved to date, determine whether the extension request is justified, and assess if the overall project remains aligned with the program's intent. If it is determined that the extension is necessary and reasonable for the project, DOM will permit accordingly.

Upon completion of the project, subrecipients will be required to submit geospatial data detailing the network infrastructure deployed within the awarded project area. In addition, subrecipients must complete status reporting through the designated broadband reporting portal to verify the progress and completion of each service location.

All submitted data will be reviewed and validated against internal records to confirm the accuracy of the reported buildout and to identify any discrepancies. If any deviations are identified that differ from the original project scope or budget, a review will be conducted to assess whether the awarded funding remains appropriate. Adjustments may be made as necessary to align funding with the actual scope completed.

BEAD subrecipients funding must comply with a formal reporting process to support transparency and accountability. This information will be collected in the IowaGrants Portal.

- **Key Performance Indicators (KPIs):** Subrecipients must regularly report on defined KPIs, such as locations served, infrastructure deployed, and milestone progress, to demonstrate project performance.
- **Fiscal Reporting:** Detailed financial reports are required, including itemized expenditures and budget comparisons, to demonstrate that all costs are allowable, reasonable, and properly supported.
- **Unspent Funds:** Any unexpended funds must be disclosed, with an explanation for delays or timeline adjustments. Continued retention may require justification and could lead to reallocation or recapture.
- **Obligations:** Subrecipients must report all financial obligations to show progress toward full fund utilization.
- **Expenditures:** All disbursements must be documented and reported by category and date, in alignment with the approved budget and federal cost principles.