Iowa Department of Management

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BEAD Subrecipient Grant Agreement Webinar

Iowa Department of Management

Division of Information Technology

July 20, 2026

Iowa Department of Management

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Agenda

Webinar Objectives

01

Provide an overview of BEAD Program ongoing compliance and monitoring requirements.

02

Identify key components of compliance and monitoring requirements.

03

Highlight subrecipient responsibilities under Federal and State requirements to maintain compliance throughout the grant lifecycle.

Ongoing Monitoring Activities

1. Monitoring Protocol
2. Post-Award Compliance Reviews
3. Closeout Overview
4. Period of Performance

Monitoring Protocol – Phased Approach

Phase 1

Pre-Award Compliance Review
1.1 Financial and Organizational Capacity Procedure
1.2 Technical Readiness and Project Feasibility Review
1.3 Suspension and Debarment Check
1.4 Cybersecurity Risk Management
1.5 Supply Chain Risk Management

Phase 2

Post-Award Compliance Review
2.1 Budget and DC Code Analysis
2.2 Performance Measurement
2.3 Reimbursement Requests and Reviews
2.4 Verification and Continuity of Documentation
2.5 GIS Data and Percent Complete Validation
2.6 Environmental Compliance Monitoring
2.7 Match Funds
2.8 Build America, Buy America (BABA) Compliance
2.9 Requests for Information
2.10 Rolling Award Determination Letter / Non-Compliance Findings

Phase 3

Closeout
3.1 Final Inspections
3.2 Final Award Determination Letter
3.3 Closeout Activities and Reports

Post-Award Immediate Next Steps

STATUS

- Project is now active in IowaGrants.
- Grant Agreement has been issued.
- Grant Agreement is also available in the Electronic Documents section of IowaGrants.

REQUIRED ACTIONS

- Submit quarterly reports on a regular basis.
- Upload performance bond documentation within 60 days of Grant Agreement execution (if applicable).
- Complete the Environmental and Historic Preservation form in IowaGrants.

IMPORTANT PROJECT NOTICE

- Projects **cannot begin** until the Environmental and Historic Preservation form is completed in IowaGrants.
- Construction may not commence until NTIA approves the environmental review.
- No projects are cleared to begin construction yet; the State is working through next steps with NTIA.

Post-Award Compliance Reviews

Post-Award compliance reviews focus on confirming that subrecipients carry out federally funded projects in compliance with the grant's terms and conditions, as well as all applicable laws and programmatic requirements. This phase involves targeted monitoring activities to assess project progress and verify the allowability of expenditures.

Budget and DC Code Analysis

Objective:
Perform a comparison of expenditures with budget amounts for each federal award each time a reimbursement request is submitted.

Procedure:
- Review expenditures in relation to the budget and budget categories identified in the Core Application and IowaGrants.

Performance Measurement

Objective:
Measure the subrecipient's performance to show achievement of program goals and objectives.

Procedure:
- Compare schedule progress to actual progress
- Analyze percent complete
- Review for risks/issues
- Identify delays or deviations for follow-up and potential corrective action

Reimbursement Requests and Reviews

Objective:
Perform reviews of the documentation submitted for the reimbursement requests meet documentation requirements, program goals and objectives.

Procedure:
- Compare schedule progress to actual progress
- Analyze percent complete
- Review for risks/issues
- Identify delays or deviations for follow-up and potential corrective action

Verification and Continuity of Documentation

Objective:
Confirm that required reports, certifications, updated documents are retained, and program deliverables are submitted timely and meet quality standards.

Procedure:
- Maintain checklist of required deliverables
- Review submissions
- Follow-up on missing or deficient documentation

GIS and Percent Complete Validation

Objective:
Confirm project implementation to awarded locations and verify compliance with programmatic and regulatory requirements.

Procedure:
- Confirm buildout to locations and completion of milestone status
- Use tools to assess infrastructure, equipment, and operations
- Inquire and resolve discrepancies

Post-Award Compliance Reviews (cont.)

Post-Award compliance reviews focus on confirming that subrecipients carry out federally funded projects in compliance with the grant's terms and conditions, as well as all applicable laws and programmatic requirements. This phase involves targeted monitoring activities to assess project progress and verify the allowability of expenditures.

Environmental Compliance

Objective:
Confirm that the proposed project complies with environmental laws and permitting requirements (NEPA, NHPA).

Procedure:
- Determine appropriate NEPA pathway (CE, EA, EIS)
- Confirm coordination and submission of necessary forms
- Oversee NHPA Section 106 process completion
- Confirm required federal, state, and local permits are obtained

Match Funds

Objective:
Determine that match funds have been utilized per the application and grant agreement.

Procedure:
- Compare match funds commitments to actual expenditures
- Confirm remaining match funds amounts
- Compare remaining match funds to milestone completion status

Build America, Buy American (BABA) Compliance

Objective:
Confirm compliance with and retention of BABA required documentation.

Procedure:
- Identify BABA related expenditures
- Conduct testing over subrecipient expenditures and evaluate compliance with BABA.
- Review invoices for proper inclusion / exclusion on BABA waiver list.

Requests for Information

Objective:
Address deficiencies or discrepancies identified during monitoring and provide corrected or additional documentation.

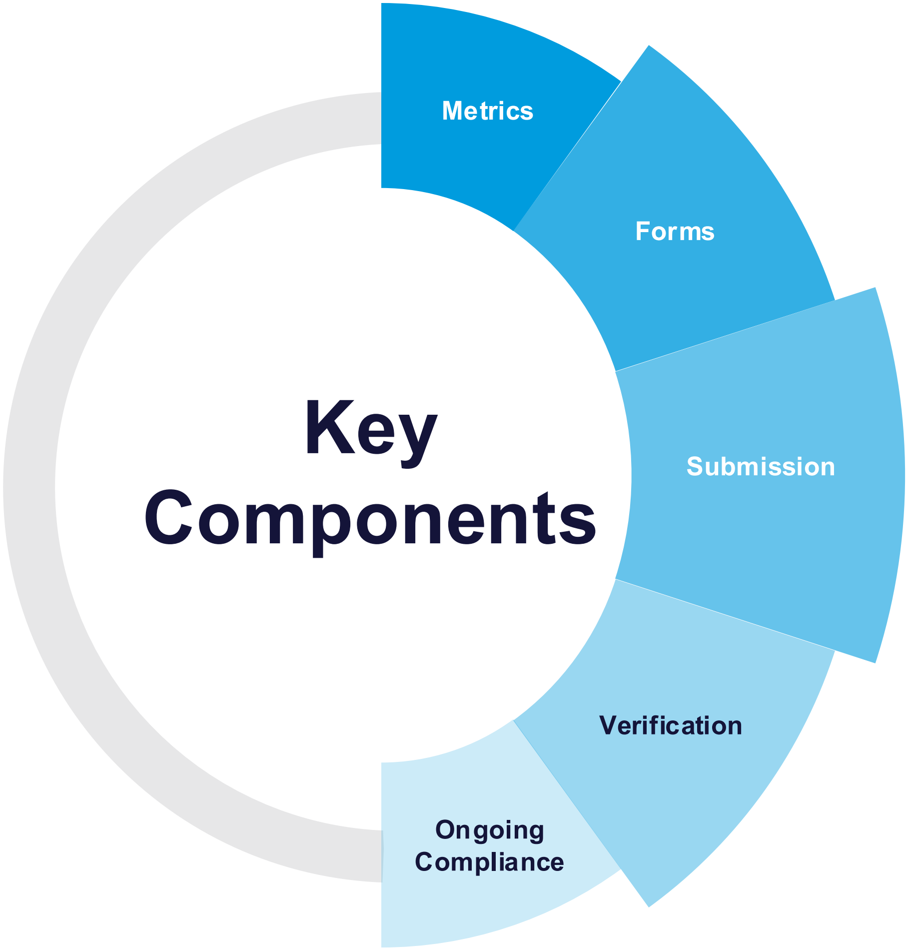
Procedure:
- Issue requests outlining discrepancies or items requiring additional clarification or documentation
- Review of additional documentation
- Facilitate resolution or escalate unresolved issues

Rolling Award Determination Letters

Objective:
Issuance of results of the reimbursement review based on the project milestones.

Procedure:
- Report eligible reimburse ment expenditures to the subrecipient
- Report locations completed or subscribers served
- Provide insight on project progress
- Report findings and corrective action plans

Closeout Overview



Final Metrics and Data

Subrecipient compiles final performance/service metrics, evidence of milestone completion, and expenditures

Required Forms and Reports

Subrecipient fills out the final reimbursement request which will include items to satisfy the financial report (SF-425), property forms (SF-428/SF-429 if applicable), UCC Filings and Attorney Certifications, etc.

Closeout Submission

Submit final closeout reimbursement request to DOM DoIT through IowaGrants for review prior to submission to NTIA (by DOM DoIT)

Completion Verification

DOM DoIT confirms construction completion and compliance with BEAD standards, as well as the submission of all closeout materials

Closeout Reports

Due 90 calendar days following the period of performance end date to DOM DoIT

Note: For Non-LEO projects, regardless of the month in which the project closes out, the federal interest period will last until **December 31, 2037.** For LEO projects, NTIA will not take a Federal interest in equipment or property acquired or improved with a LEO Capacity Subgrant (Per the BEAD Restructuring Policy Notice).

Period of Performance

Project Completion

Projects should aim to be completed by the date set forth in the Grant Agreement Section 5 (“Project Completion Date”) of the “Contracts Declaration and Execution”.

If you believe that your project will not make this deadline, please submit a project extension request in the “Contract Amendments” tab of IowaGrants as soon as possible. If you plan to submit an extension request, please be prepared to provide a new estimated completion date and a detailed explanation of why the extension request is necessary for your project.

If your project does not finish the buildout of service by the Project Completion Date, your award will be reduced for each location completed afterwards, pro-rated by day, as explained in the Grant Agreement, Attachment A, Section 5.2.6.

Cost Eligibility

The BEAD Performance Period begins on the date the Grant Agreement is executed and ends on the project completion date or 4 years from the Grant Agreement Execution date. Only expenses associated with project costs incurred, paid, and invoiced during the BEAD Performance Period, or that were incurred prior to Subrecipient’s receipt of this award and subsequently used in the Project, may be considered as Allowable Expenditures under the Grant Agreement.

- *Costs for internal labor are considered ineligible if incurred prior to the Grant Agreement execution date.*
- *Refer to the Pre-Award Webinar (March 23, 2026) for permissible and reimbursable expenses occurring prior to the Grant Agreement date.*

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Compliance Requirements

Compliance Requirements

Subrecipients are required to adhere to Federal and State compliance requirements for the BEAD program. When any one requirement may be stricter than its counterpart (Federal vs. State), the strictest requirement should be followed.

FEDERAL REQUIREMENTS

- Infrastructure Investment and Jobs Act (IIJA)
- BEAD Notice of Funding Opportunity (NOFO)
- The General Terms and Conditions for the BEAD Program*
- The Department of Commerce Standard Terms and Conditions
- Build America, Buy America Act (BABA)
- National Environmental Policy Act (NEPA)
- National Historical Preservation Act (NHPA)
- 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)
- BEAD Restructuring Policy Notice (June 2025)
- 47 U.S.C. § 1702 (Infrastructure Investment and Jobs Act – BEAD enabling statute)

STATE SPECIFIC REQUIREMENTS

- DOM DoIT's BEAD Subrecipient Agreement
- Iowa Historic Preservation Act
- Iowa Environmental Quality Act
- Iowa Code Chapter 8F
- Iowa Broadband, Equity, Access and Deployment (BEAD) Grant Program Frequently Asked Questions*

*It is important to note that the BEAD program's implementation is subject to ongoing adjustments and policy updates from the NTIA.

Definitions

Fixed Amount Subaward

A type of grant or cooperative agreement pursuant to which the Federal agency or pass-through entity provides a specific amount of funding without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the administrative burden and record-keeping requirements for both the recipient or subrecipient and the Federal agency or pass-through entity. Accountability is based primarily on performance and results. See §§ 200.102(c), 200.101(b), 200.201(b), and 200.333.

Reimbursement Method of Repayment

Costs will be reimbursed to subrecipients in accordance with either objectives met, units built, or total project complete. An Eligible Entity may not provide advance payments, or reimburse any amount of a fixed amount subgrant, upfront or before the agreed upon milestone is met.

EHP Review Process

The following outlines the steps involved in the environmental review that must be completed before construction can begin.

Complete EHP Documentation

Subrecipient completes EHP documentation in IowaGrants, including all required environmental and historic preservation information.

DOM DoIT Review

DOM DoIT verifies completeness and compliance during review. Curing may be sent back to subrecipients during this time.

Submit in ESAPTT

DOM DoIT submits to NTIA via the ESAPTT system (Environmental and Statewide Assessment Project Tracking Tool).

NTIA Review

NTIA reviews and issues the applicable NEPA decision and completes required federal consultations. NTIA anticipates a two-week review period.

Construction Begins

Construction **cannot begin until all required EHP reviews and approvals are complete**. Federal BEAD funds may not be used for construction or ground-disturbing activities prior to approval.

ESAPTT submission cannot occur until the 45-day Tribal consultation period concludes (no earlier than 8/17/26). This is an NTIA responsibility. Assuming no issues requiring resolution arise during the Tribal consultation process, all ESAPTT documentation is completed and uploaded promptly, and NTIA completes its review within two weeks without requesting additional information or corrective actions, the earliest construction could begin would be **September 1, 2026**.

EHP Requirements

SHPO Consultation Requirements

The following information is needed when completing Section 106:

- Applicant name and contact information (if not subrecipient)
- Project Title and summary (length, acreage, ROW vs. non-ROW work)
- Counties effected
- Construction details (trenching, excavation, aerial deployment, and proposed dimensions)
- Projects maps showing Area of Potential Effect (APE), include both large and small scale
- GIS shapefiles of locations (strongly encouraged)
- Determination of effect (No historic properties, no adverse effect, etc.), include ESHOP form
- Survey reports supporting documentation
- Resource Inventory Spreadsheet (RIS), when applicable
- Iowa Site Inventory Forms for cemeteries and historic resources (>45 years old)
- Any additional documentation supporting the determination

DOM DoIT"s review component requires completion of the Environmental and Historic Preservation form in IowaGrants and interaction with the SHPO office by way of their E-SHPO portal

Key Federal Reviews

- **NEPA** (National Environmental Policy Act)
- **U.S. Fish & Wildlife Service** IPaC, Section 7, National Wetlands Inventory
- **Section 106/ SHPO** Historic Preservation Review
- **Tribal Consultation** (when required)
- **Endangered Species & Other Environmental Reviews** (As applicable)

Questions / Consultation Requests

- Sara Andre – Sara.Andre@IowaEDA.com
- Branden Scott – Branden.Scott@IowaEDA.com

Note: More information can be found in the federal program guide published by DOM DoIT here.

Submit documentation as soon as possible to avoid project delays.

Match Funds

Match Requirement

Except in certain specific circumstances described herein (including projects in designated “high-cost areas,” and other cases in which NTIA has waived the matching requirement, for each broadband deployment project utilizing BEAD grant funding, each Eligible Entity shall provide, require its subrecipient to provide, or provide in concert with its subrecipient, matching funds of not less than **25 percent of project costs**.

Eligible Sources of Match

Funds from other Federal programs generally may not be used as matching funds. However, the Infrastructure Investment and Jobs Act expressly provides that matching funds for the BEAD Program may come from a Federal regional commission or authority or from funds, to the extent permitted by law, that were provided to an Eligible Entity or a subrecipient for the purpose of deploying broadband service under:

- The Families First Coronavirus Response Act of 2020;
- The Coronavirus Aid, Relief, and Economic Secure (CARES) Act of 2020;
- The Consolidated Appropriations Act, 2021 or;
- The American Rescue Plan Act of 2021
- Loan funding issued through a federal agency, such as through the USDA ReConnect Program, may also be used as match funding.

Build America, Buy America (BABA)

Compliance with Build America, Buy America

DOM DoIT is committed to validating that its subrecipients comply with all applicable BABA requirements. Please note that the NTIA has posted a BABA waiver. You can find information from NTIA on the waiver here and view the final waiver **BABA Waiver Signed.pdf** The NTIA has also posted a BABA FAQ and created a self-certification and compliance framework for the BEAD BABA waiver (see Section 4.2 of NTIA's Compliance and Documentation Requirements and Procedures)

1	**Item Categorization**	Confirm items are accurately reported as Iron/Steel (i.e. towers, poles, structural components), Manufactured Product, Construction Material, etc.
2	**Item Origin**	Certify materials are of U.S. origin or a waiver has been granted
3	**Manufacturing Threshold**	Confirm manufactured products are assembled in the U.S. with > 55% U.S. sourced components
4	**Certifications and Documentation**	Review or certify manufacturer, country of origin, contractor, and retain BABA compliance certification documents
5	**Submissions/Change Orders**	Ensure engineer/architect verifications and that change order materials are BABA compliant

NOTE: Projects with award amounts of $350,000 or less do NOT need to comply with BABA.

List of Self-Certified BABA Compliant Vendors

Background

Many broadband service providers interested in applying for BEAD funding have expressed the difficulties in determining if suppliers are BABA compliant. To streamline this process, the NTIA developed a tool that allows vendors to self-certify their compliance with BABA.

Outcome

Broadband service providers now have access to the NTIA's list of self-certified BABA compliant suppliers for their review and incorporation into their project development plans.

Incorporating into Project Planning & Application

- Broadband service providers should review the list to determine if they should utilize any of the suppliers to streamline their procurement processes and ensure BABA compliance
- Suppliers' websites are linked and will include the following information:
  - Product Name
  - Product Identifier
  - Product Description
  - Location of Manufacturing
- Applicants should capture these details within the Summary Invoice, BABA Reporting – Subrecipient Tracker, and BABA Certification (templates to be provided).

Helpful Links

BEAD Notice of Funding Opportunity – Domestic Preference for Procurements (Buy American), Page 87-88
BABA Waiver Signed.pdf
BABA FAQs
BABA Vendor List (updated November 17, 2025)

Financial Management and Annual Reviews

Financial Management

Subrecipients must implement and maintain robust financial management systems aligned with applicable federal and state regulations. Financial systems must support the proper stewardship of federal funds by promoting cost-effective project execution, maintaining transparency, and upholding accountability for program-funded expenditures.

Subrecipients are required to follow Generally Accepted Accounting Principles (GAAP) or other standard accounting practices to establish systems that facilitate accurate, current, and complete financial reporting. This includes maintaining detailed source documentation for all transactions, establishing internal controls to prevent waste, fraud, and abuse, and segregating duties among staff to promote accountability.

An **Internal Control Narrative** will be required with the first draw which will document relevant internal controls to grant management and attest as to how expenses are to be treated. Further instructions on how to document will be provided at a later date.

Annual Compliance Reviews

DOM DoIT will conduct annual reviews of various documentation to monitor compliance.

Financial Statements

(Internally Produced / Reviewed / Audited)

Active SAM.gov Registration

Policy Updates: Conflict of Interest, Procurement, and Insurance

Forms: Conflicts of Interest and Single Audit

Cybersecurity and Supply Chain Risk Management Plan Updates

Renewals of the Letter of Credit or Performance Bond

BEAD Program Audit Requirements

Federal Governing Body	Requirement Details	Citation
U.S. Department of Commerce (BEAD Program) **And** **2 CFR 200 (Federal Uniform Guidance)**	- Any non-Federal entity non-profit or for-profit that spends $1,000,000 or more in federal funds during its fiscal year must conduct a Single Audit or Program-Specific Audit under 2 CFR Part 200, Subpart F. - The Department of Commerce enforces this requirement through 2 CFR 1327.101. **Commercial entities are not subject to Subpart F but spending $1,000,000 or more in DOC grant funds must submit either a financial-related audit or a program-specific audit.** - Additionally, federal agencies like NTIA or the DOC Inspector General may audit any award at any time. - Maintain accurate and complete financial records from final expenditure report submission. Records must be available upon request to SBO, NTIA, GAO, and Department of Commerce within 30 days.	BEAD NOFO DOC General Terms and conditions 2 CFR 200 Subpart F 2 CFR 200 1327.101 2 CFR 200.334 2 CFR §200.501 2 CFR 200.507

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Reporting

BEAD Program Quarterly Reporting

Subrecipients must comply with the reporting requirements once the Grant Agreement is executed through project closeout. Failure to meet the reporting requirements may lead to actions including administrative hold status or further until the requirement is met.

Communications will be sent out to all subrecipients prior to the start of any quarterly reporting period that will include instructions, deadlines, and any other pertinent information. Technical assistance will also be offered to assist in understanding how to complete quarterly reporting in more detail.

Information Requested

- Construction Status Updates
- Use of funds percentages
- Project Build progress (miles of fiber, station sites, etc.)
- # of Jobs created and retained using BEAD funds during the period
- BABA reporting
- LEO subscription rates and Customer Premise Equipment shipped.

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

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Reimbursement Process

Reimbursement Structure

The State will utilize a fixed subaward structure with a performance-based method of repayment (similar to the SLFRF and CPF repayment structures). Subrecipients under this fixed amount subaward are not required to comply with the cost principles under the Uniform Guidance pursuant to NTIA's policy update. Awardees will be able to receive a minimum of 10% percent of the awarded funds without having any served locations. Subsequently, the performance-based milestones will require a certain number of locations to be served to receive additional funding.

The following will be required of subrecipients before any disbursement of BEAD funds:

- **Reaching grant milestones**: DOM DoIT will require the timely reporting of the completion of grant milestones, as outlined in Iowa's Final Proposal.
- **Providing compliant documentation:** DOM DoIT will require subrecipients to support a request for reimbursement through a certification and a submittal of as-builts and GIS location data. DOM DoIT will ensure that it has a right to access documents and physical assets in a manner similar to that employed by the federal government in broadband grant programs.
- **Permits and consultation documentation:** DOM DoIT will require that all necessary documents be submitted and approved by NTIA.
- **Completion of the BEAD default certification:** DOM DoIT will require this to be signed and submitted prior to approving any disbursements. A template is published on the website here.

Milestones for Reimbursement

DOM DoIT will utilize a reimbursement method of repayment to reimburse a portion of the award to subrecipients in accordance with either objectives met or percentage of completion. For LEO subrecipients, a subscription rate will be used in lieu of locations. There will be no upfront or advance payments prior to meeting milestones.

10%

Draw 1: Upon confirmation that the **approval of the budget, receipt of compliance documentation, and submission of the engineering design certified by a professional engineer** has been achieved.

25%

Draw 2: Upon confirmation of the **buildout of 25 percent of locations** to be served by the project.

10%

Draw 3: Upon confirmation of **buildout of 35 percent of locations** to be served by the project.

25%

Draw 4: Upon confirmation of the **buildout of 60 percent of locations** to be served by the project.

10%

Draw 5: Upon confirmation of the **buildout of 75 percent of locations** to be served by the project.

20%

Draw 6/Final: **Upon 100% project completion**, the letter of credit and performance bond requirements will also be released.

Note: The percentage complete is based off the number of Broadband Serviceable Locations (BSLs).

Reimbursement Requests

Payment requests, also known as Reimbursement Claims, are submitted through the **Iowa Grants Portal**.

Subrecipients should only submit Payment Requests when appropriate milestones have been met. Subrecipients will attach a list of completed locations within the Reimbursement Claim Template.

Upon review and completed validation of the reimbursement request, funds will be dispersed in accordance with the payment method provided at the time the grant agreement was executed.

Technical assistance will be offered to assist with payment requests.

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- Cybersecurity and Supply Chain Risk Management
  - NIST - Key Practices in Cyber Supply Chain Risk Management (726.22 KB) .pdf
  - NIST - Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations (4.42 MB) .pdf
  - Sample Supply Chain Risk Management Plan (255.64 KB) .pdf
  - Sample Cybersecurity Risk Management Plan (197.35 KB) .pdf
- Environmental and Historic Preservation Pre-Screening
  - NTIA FirstNet PEIS (682 KB) .pdf
  - NTIA BMPs and Mitigation Measures (560.19 KB) .pdf
  - BEAD Permitting Conference Notes (1006.35 KB) .pdf
  - NEPA Review: Categorical Exclusions (437.77 KB) .pdf
  - DNR - Permit and Environmental Review Management Tool
  - SHPO - Iowa Historic Structures and Archaeological Sites Review
  - BEAD Permitting Federal Guidance (179.9 KB) .pdf (Posted January 9, 2026)
- Letter of Credit and Performance Bonds
  - Model Letter of Credit (95.99 KB) .pdf
  - SFAA Bond Information Kit (611.59 KB) .pdf
  - LOC/Bond Options (187.35 KB) .pdf

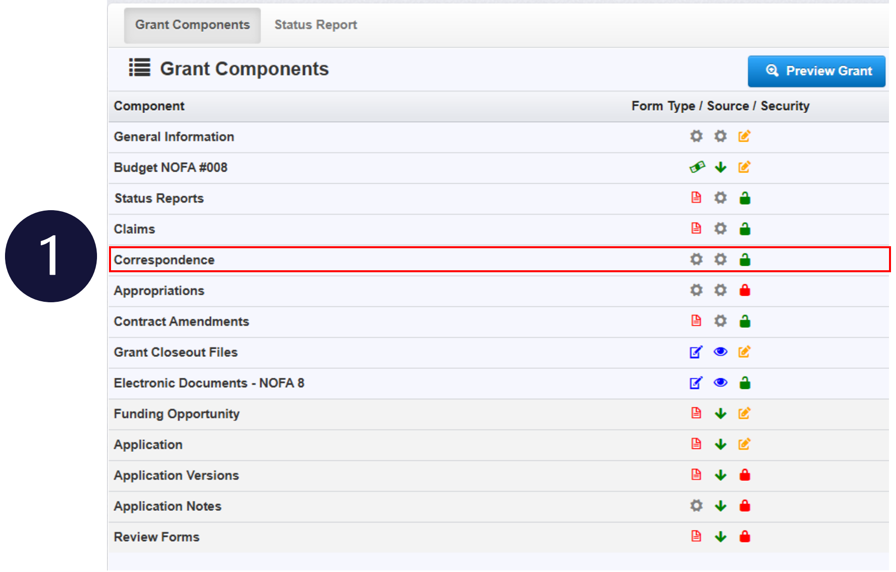
Additional Resources

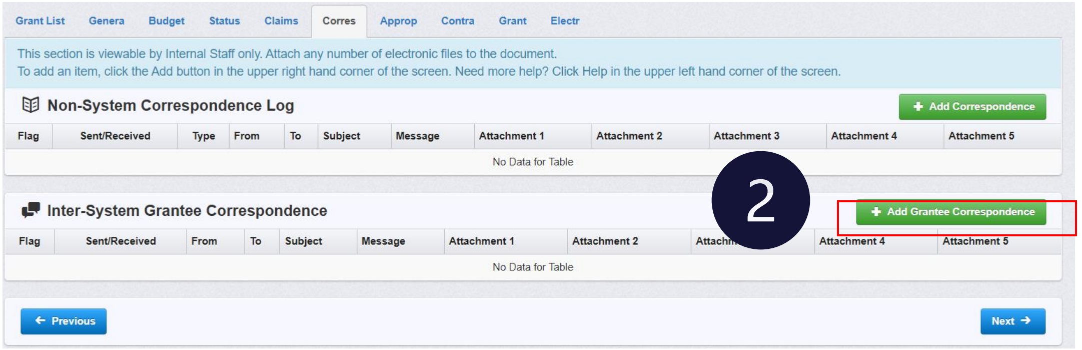
Further guidance is located on DOM's BEAD webpage with the Applicant Toolkit, located under the "Program Documentation" section and Technical Assistance website.

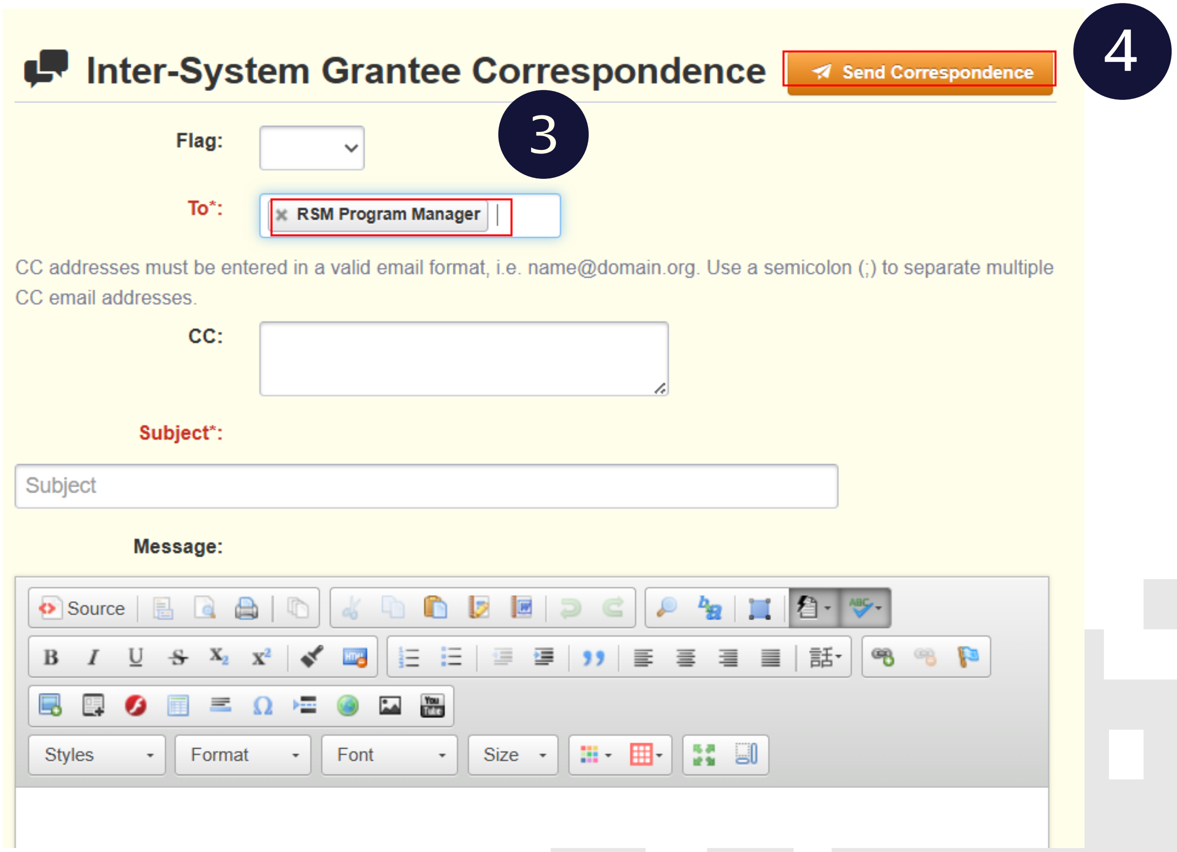
IowaGrants Correspondence Portal

All communications should be directed through the IowaGrants Inter-System Correspondence portal. A Grants Management Guide will be posted to DOM's Broadband Technical Assistance website for detailed instructions.

IowaGrants.org







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Questions & Answers

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