



Subrecipient Internal Control Narrative Form
Department of Management, Division of Information Technology
Broadband Grants Program—Empower Rural Iowa, Broadband Equity, Access, and Deployment Funds
("BEAD") Notice of Funding Availability ("NOFA") #009

Subrecipient: _____ Date: _____

UEI: _____ Grant Agreement Number: _____

Instructions

For each internal control area below, review the cited NTIA guidance and describe your existing internal controls, policies, procedures, and responsible roles. Narrative responses should be sufficiently detailed to support grant monitoring and audit review.

1. Governance and Subrecipient Accountability

Guidance: [2 CFR § 200.303](#); Subrecipients must establish, document, and maintain effective internal control over the Federal award and monitor compliance with statutes, regulations, and award terms, taking prompt action when noncompliance is identified.

Describe governance structure for BEAD compliance, including executive oversight roles (who is accountable), designated compliance escalation procedures, and accountability mechanisms.

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2. Financial Management & Allowable Cost Controls

Guidance: [2 CFR § 200.302](#); [2 CFR Part 200 Subpart E](#)

Describe financial management controls for BEAD, including budgeting and budget-to-actual monitoring, allowability review, segregation of duties, approval workflows, cost allocation methods, and controls to prevent duplicate billing or duplicate reimbursement claims.

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3. Internal Time (Employee Wage) Reporting

Guidance: [2 CFR § 200.302](#); [2 CFR Part 200 Subpart E](#)

Describe financial management controls for BEAD, including hours worked on the project, direct and indirect employee cost allocation methods, allowability review, segregation of duties, approval workflows, and controls to prevent duplicate billing or duplicate reimbursement claims.

4. Payment, Reimbursement & Cost Verification Controls

Guidance: [2 CFR § 200.305](#)

Describe reimbursement and cost verification controls, including how claims are prepared and supported, documentation requirements, claim calculation and tie-out to source records, independent review/approval, and controls to prevent unsupported or duplicate costs.”

5. Fraud, Waste, and Abuse Prevention

Guidance: [2 CFR § 200.113](#); [BEAD General Terms and Conditions](#)

Describe fraud, waste, and abuse prevention controls, including staff training, fraud detection methods, reporting mechanisms, investigation procedures, and how suspected issues are escalated and tracked through resolution.

6. Whistleblower Protections

Guidance: [41 U.S.C. § 4712](#); [BEAD General Terms & Conditions](#)

Describe whistleblower protection controls, including how whistleblower rights are communicated to employees and contractors, how reports are submitted, and how retaliation is prevented and addressed.

7. Reporting & Performance Monitoring

Guidance: [2 CFR § 200.303](#); [BEAD NOFO § VII.E](#)

Describe reporting and performance monitoring controls, including reporting workflows, data validation steps, segregation of duties between preparer and reviewer, certification/approval processes, and retention of supporting documentation for reported metrics (For Example: reimbursement claims or performance testing reports).

8. Records Retention & Audit Readiness

Guidance: [2 CFR §§ 200.334–200.338](#)

Describe records retention and audit readiness controls, including retention schedules, storage methods, access controls, procedures for responding to audit/monitoring requests, and how supporting documentation is organized for timely retrieval.

9. Cybersecurity & Supply Chain Risk Management

Guidance: [2 CFR § 200.303\(e\)](#); [BEAD General Terms & Conditions](#)

Describe cybersecurity and supply chain risk controls, including governance and responsibility, access/security safeguards, incident response procedures, vendor/supplier due diligence, and how sensitive data (including PII) is protected.

See Cybersecurity & Supply Chain Risk Management Plans provided at time of grant agreement execution in IowaGrants.

Identify personnel responsible for notifying DOM DoIT of any policy changes: _____

10. Corrective Action & Clawback Readiness

Guidance: [2 CFR § 200.339](#)

Describe corrective action and clawback readiness controls, including issue identification and tracking, root-cause analysis, corrective action planning and monitoring, escalation/approval procedures, and processes to repay or remediate disallowed costs.

11. Build America, Buy America Compliance

Guidance: [NTIA “Build America, Buy America Compliance and Documentation Requirements and Procedures” \(BEAD\)](#) and [BEAD General Terms & Conditions \(Domestic Preference for Procurements / BABA\)](#).

Describe BABA compliance controls, including contract requirements flowed down to vendors/contractors, documentation collection (e.g., manufacturer certifications), waiver tracking (if applicable), verification/review procedures, and corrective action and reporting when noncompliance is identified.

12. National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA)

Guidance: [NEPA 42 U.S.C. § 4321 et seq.](#), [NHPA 54 U.S.C. § 300101 et seq.](#) and [NTIA BEAD NOFO Section VII.D.4.](#)
BEAD specific application can be found here: [Guidance on NTIA National Environmental Policy Act Compliance](#)

Describe NEPA / NHPA compliance controls, including evaluation for completeness of permits obtained, documentation collection, approval tracking (if applicable), verification/review procedures, corrective action and reporting.

13. Letter of Credit and Performance Bond

Guidance: [NTIA Programmatic Waiver](#) and [NTIA BEAD NOFO Section VI.D.2.a.ii.](#)

Describe the processes in place and personnel responsible for ensuring the Letter of Credit or Performance Bond is appropriately maintained and renewed throughout the project.

14. SAM.GOV

Guidance: [Grant Agreement Page 1](#) and [NTIA BEAD NOFO Section V.E.1.](#)

Unique entity identifier and System for Award Management (SAM) Required. Subrecipients must normally (i) Be registered in SAM before submitting an application; (ii) provide a valid unique entity identifier in its application; and (iii) continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency. Proof of SAM registration and corresponding account information must be provided by Subrecipient before any payments will be made under the Agreement.

Describe the processes in place and personnel responsible for ensuring Sam.gov registration is active and renewed throughout the project.

15. Conflicts of Interest

Guidance: [Grant Agreement Attachment B, Section 10.28](#).

Subrecipient represents, warrants, and covenants that no relationship exists or will exist during the term of the Agreement between Subrecipient, Subrecipient Contractors, or Subrecipient Personnel and the Agency or the State of Iowa that is or may constitute a conflict of interest or the appearance of impropriety.

Describe the processes in place and personnel responsible for ensuring all conflicts of interest are identified and disclosed with relation to the BEAD project.

Note: The subrecipient's conflict of interest policy is separately provided, this section should describe specifics for the project.

16. Contract Appendix II Provisions (Procurement)

Guidance: [2 CFR § 200.327](#)

While most procurement requirements were removed per the [BEAD Restructuring Policy Notice](#), subrecipients are still required to include the contract provisions noted above. Contracts will be a part of requested proof of purchase documentation within the claim reimbursement form on IowaGrants.

Describe the processes in place and personnel responsible for ensuring all contracts entered into contain the appropriate provisions and are included within the submission files as reimbursement supporting documentation for the BEAD project.

17. Locations

Guidance: [Grant Agreement Attachment A, Section 3.4.2](#) and [NTIA BEAD NOFO IIV.E.2](#).

Describe the processes in place and personnel responsible for ensuring all locations are appropriately completed and documented for the BEAD project. Including the preparation of documentation sufficient to enable the agency to determine which Eligible Specific Locations within the project Area have access to qualifying broadband as a result of the project.