

# INTERNET FOR ALL

## Final Proposal

Iowa Department of Management (DOM)



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

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# Final Proposal Requirements

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## 0 FINAL PROPOSAL DATA SUBMISSION

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

See “fp\_subgrantees” file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

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

See “fp\_deployment\_projects” file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

**0.3 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 NTIA-approved final list of eligible locations.

See “fp\_locations” file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

**0.4 Attachment (Required):** 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 NTIA-approved final list of eligible locations.

See “fp\_no\_BEAD\_locations” file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

**0.5 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 in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

Yes

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

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.

See “fp\_cai” file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

## 1 SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1)

**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 as modified by the BEAD Restructuring Policy Notice.

DOM executed a subgrantee selection process in full alignment with the framework established in its BEAD Initial Proposal, as modified by the BEAD Restructuring Policy Notice (RPN). All major elements of the originally approved process - timelines, evaluation phases, definitions, and prioritization methods - were preserved and adapted as needed to meet the accelerated timeline and structural updates outlined in the RPN.

While DOM eliminated the solicitation of interest phase due to the compressed RPN timelines, all remaining phases of the process were retained and executed as originally planned, including technical review, clarification, scoring, and notice of intent to award. To accommodate the RPN's revised technology prioritization, DOM repurposed its original grouping, subgrouping, and ranking methodology. Under this structure, applications were grouped into three categories: priority broadband projects, non-priority broadband projects, and community anchor institution (CAI) projects. Within each group, applications were subgrouped by unserved and underserved service projects, then ranked based on applicable scoring criteria.

DOM used Iowa Grants as the official submission system, ensuring consistent intake and document management across all applications. During the technical review phase, each application was evaluated for completeness and eligibility based on the BEAD NOFO and RPN. DOM developed and used a quantitative scoring spreadsheet that automatically grouped, subgrouped, and ranked applications based on data submitted through the application. This scoring tool enabled transparent and objective evaluation based on measurable factors such as project cost per location, project priority status, and project type.

To resolve overlapping applications for the same locations, DOM applied the scoring hierarchy and location assignment logic detailed in NOFA #009. The scoring rubric and deconfliction process ensured that the highest-ranking application received the contested location, and that the integrity of the process was preserved.

DOM prioritized universal coverage by ensuring that all unserved locations were addressed first, followed by underserved locations, and finally CAI's. Post-application negotiations were emphasized, especially given the compressed timeline. The structured NOFA, standardized application materials, and GIS tools enabled DOM to quickly identify overlaps, clarify service areas with applicants, and finalize awards efficiently.

Applicants were allowed to define their own project areas, which contributed to a more flexible, applicant-driven process while maintaining objectivity. This structure helped streamline the negotiation phase and allowed awards to be based on demonstrable strengths of applicants, including their geographic expertise and deployment experience within Iowa.

As a result, DOM was able to successfully award projects that cover all eligible unserved and underserved locations across the state, in full compliance with BEAD program objectives and NTIA expectations for universal service.

Based on the BEAD Final Proposal the state of Iowa is submitting to NTIA, it is apparent that Iowa is scheduled to return a substantial sum of BEAD funding to the federal government. In accordance with 47 U.S.C. sec. 1702(f)(5)-(6), the State of Iowa respectfully requests authorization to use some or all of the federal funding slated for return for non-deployment purposes, including broadband adoption. In addition, the State respectfully requests the opportunity to use this federal funding for subsequent grant rounds to provide deployment funding for additional community anchor institutions that may not have received service through the State's Benefit of the Bargain Round.

**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.

DOM designed and executed a subgrantee selection process that was fair, open, and competitive, in full alignment with the BEAD Initial Proposal and the RPN. A comprehensive structure was implemented to promote integrity, consistency, and public confidence, with specific safeguards against collusion, bias, conflicts of interest, and arbitrary decision-making.

### **Reviewer Structure, Qualifications, and Training**

The review team consisted of internal DOM staff and external subject matter experts with extensive experience in broadband and federal grant programs. Internal reviewers brought expertise in broadband deployment, GIS analysis, fiscal management, environmental compliance, and grant administration. External contractors from Fiber Utilities Group (FG) and RSM US LLP participated in the technical and financial reviews, respectively. FG is a leading broadband solutions provider with deep knowledge of network design and BEAD-specific federal funding, while RSM offers robust experience in public sector compliance, accounting, consulting, and risk management.

All reviewers had prior experience with broadband funding rounds managed by DOM. They received access to structured review tools including the technical review form, technical review instructions, and the quantitative scoring spreadsheet used to score and rank applications. Each reviewer was required to complete a conflict of interest disclosure form before participating in any evaluation. These disclosures detail any financial, familial, or organizational relationships that may create perceived or actual conflict. Individuals with identified conflicts would have been recused from reviewing any associated applications although there were no conflicts of interest identified.

The review process was segmented by area of expertise to ensure that each application component was evaluated by qualified personnel. RSM reviewed financial and organizational

components; FG handled network design, technical, and administrative assessments; and DOM staff reviewed budgets, general eligibility, and BEAD-specific compliance elements.

### **Transparency and Standardized Scoring**

DOM provided all applicants with the scoring rubric and evaluation criteria in advance through the publicly posted Notice of Funding Availability #009 (NOFA). The NOFA and associated exhibits were posted on DOM's website and announced via email to a broadband stakeholder list of over 5,400 contacts. Prior to accepting applications, DOM held a pre-application webinar for prospective applicants outlining the application process and requirements. During this webinar, participants were allowed to ask questions. Although the oral responses given during the webinar were not considered binding on DOM, applicants were allowed to seek formal answers during the written questions and responses phase. The pre-application webinar was recorded and posted on DOM's website along with all application materials and the formal responses to the written questions received.

Applications were reviewed using a standardized technical review form, and all scores and notes were recorded and retained in DOM's systems. The quantitative scoring spreadsheet was used to group, subgroup, and rank applications in accordance with the methodology outlined in the NOFA. To minimize the potential for bias, DOM employed a review system where individuals review sections of an application and log the results in a group setting. Each proposal is reviewed using a standardized, pre-published review form and scoring rubric. These documents outline transparent evaluation criteria including technical viability, financial sustainability, and alignment with BEAD program objectives. All technical review actions were logged into a spreadsheet to ensure traceability and support future audits. The use of universal application forms and the quantitative scoring spreadsheet ensure that the information received and reviewed is documented and free of undue influence.

When reviewers identified missing or unclear information, DOM initiated a clarification process that allowed applicants the opportunity to correct or explain issues without penalty, ensuring equitable treatment of all applicants. All clarifications were also documented.

### **Ensuring an Open and Competitive Process**

All eligible provider types were allowed to apply, including, but not limited to, cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, local governments, private sector carriers, utilities, Tribal entities, and other entities that provide or will facilitate qualifying broadband. DOM did not engage in provider-specific outreach prior to the close of the application window. Application timelines were applied uniformly to all parties, and all applications were afforded the same opportunity to cure deficiencies. The review and scoring process applied consistently to all technology types, including fiber, fixed wireless, and satellite (LEO), using the same rubric, timeline, and procedures. The NOFA application process included applications from multiple technology types including fiber, fixed wireless, and LEO.

To promote openness, DOM widely publicized the funding opportunity, conducted live informational sessions, and maintained regular communications via email and web postings. A

formal process for reviewing overlapping project areas (deconfliction) was detailed in the NOFA and applied fairly to all applicants.

### **Documentation and Public Accountability**

Upon completion of the review process, DOM published aggregate scoring results and award decisions in a manner that respected proprietary data while promoting transparency. All application materials, scoring criteria, webinar recordings, and official communications were posted publicly on the NOFA #009 webpage. DOM maintained consistent documentation throughout the process and has retained all evaluations, decisions, and communications.

DOM took many steps to ensure that the process was a fair, open, and competitive process and to ensure the training, qualifications, and objectiveness of reviewers. To uphold public confidence and meet NTIA's expectations for program integrity, DOM implemented a robust framework of safeguards to ensure that the subgrantee selection process for the BEAD program was fair, impartial, and free from collusion, bias, or conflicts of interest.

**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.

All locations were included in an application.

**1.4 Text Box:** If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

Original locations that were identified as community support organizations (type C) were removed from the list of eligible locations. Additional type C locations that were State of Iowa sponsored locations, but most likely leased locations, were also removed from eligibility. Locations previously identified as Type C, but are considered correctional facilities, were re-classified as law enforcement (type F) locations.

**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.



Yes

### **3 TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)**

**3.1 Text Box:** Has the Eligible Entity taken measures to: (a) ensure that each subgrantee 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 NTIA | 32 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.

DOM has implemented a comprehensive set of measures to ensure timely completion of BEAD-funded projects and full adherence to the timeline requirements of 47 U.S.C. § 1702(f)(2) and 2 C.F.R. § 200.344.

#### **(a) Subgrantee Service Delivery Within Four Years**

DOM's grant agreement explicitly requires that "...Grantee must complete the project and begin providing service to each customer within the project area no later than four years from the date of execution of this grant agreement..." and aligns directly with the statutory service delivery deadline.

Additionally, DOM's grant agreement includes enforceable provisions requiring subgrantees to meet construction and performance milestones, with consequences for noncompliance. Per Attachment B - Federal Funding - Required Provisions Section 9 Enforcement Actions, DOM retains the right to require corrective actions and may withhold funds or pursue clawbacks in cases of substantial failure to perform. These terms ensure that project timelines are not only planned but enforceable.

#### **(b) Completion 120 Days Prior to End of Performance Period**

The grant agreement also accounts for 2 C.F.R. § 200.344, which requires all subgrantee activities to be completed at least 120 days before the close of Iowa's BEAD period of performance. The subgrant period of performance is set to end no later than 120 days prior to the end of the state's award period, in alignment with federal grants closeout policies. This buffer ensures DOM retains sufficient time for reconciliation, final reporting, and administrative closeout of all awards.

DOM's compliance staff and accounting team monitor the performance period of each subgrant through internal tracking systems and quarterly review calls with NTIA, ensuring visibility into both financial and programmatic timelines.

#### **(c) Completion of All Eligible Entity Activities Before Period End**

DOM has contractors, internal staff, and systems in place to ensure that all eligible entity activities - including oversight, compliance, monitoring, and reporting - are completed before the end of the award's period of performance. DOM holds quarterly calls with NTIA and adheres to BEAD-specific semiannual reporting deadlines. Dedicated compliance staff oversee program-

level timelines and coordinate with subgrantees to ensure alignment with final reporting and closeout procedures.

Per section 13 of the grant agreement, subgrantees are required to submit performance reports at least semiannually, providing updates on construction, spending, and service availability metrics. DOM uses these reports to verify progress, identify delays, and trigger any necessary interventions to keep the program on schedule.

## 4 OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

**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?

Yes

**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.

See “BEAD Program Monitoring Plan” and “Agency Policy Documentation” files at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.

**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, as modified by the BEAD Restructuring Policy Notice, 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.

Yes

## 5 LOCAL COORDINATION (REQUIREMENT 5)

**5.1 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, including how the Eligible Entity addressed the comments.

DOM's public comment period is set from 8/28/25 - 9/3/25. DOM will provide a high-level summary of the comments received in the Final Proposal submission. There were 19 public comment submissions. The majority of comments (11) were from service providers. Service provider comments were primarily focused on perceived map inaccuracies regarding Broadband Service Locations (BSL's) eligibility or classification as unserved or underserved. Other service provider comments referenced the cost of serving locations with fiber versus other lower cost technologies.

The remaining public comments were from various national organizations, local citizens and businesses spanning topics such as cost, service provider capabilities and technology choices.

## 6 CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

**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.

Yes

**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.

DOM posted the final location classifications at <https://dom.iowa.gov/broadband/notice-funding-availability-009> on July 9, 2025.

## 7 UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

**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).

Yes

**7.2 Text Box :** If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

NA

**7.3 Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

NA

**7.4 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).

Yes

**7.5 Text Box:** If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonable excessive, , explain and include a strong showing of how the Eligible Entity made that determination.

NA

**7.6 Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

NA

**7.7 Question (Y/N):** Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and 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.

Yes

**7.8 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 NTIA | 54 Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes



## **11 IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE (REQUIREMENT 11)**

**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.

### **Reducing Costs and Barriers to Deployment**

In Progress

DOM has made measurable progress implementing the strategies outlined in Requirement 14 of the Initial Proposal, but several activities remain ongoing as BEAD deployment scales.

### **Streamlined Access to Information**

DOM has expanded access to critical planning resources by publishing comprehensive guides, FAQs, templates, mapping portals, and GIS layers on the NOFA #009 webpage: (<https://dom.iowa.gov/broadband/notice-funding-availability-009>). These resources support applicants and subgrantees in evaluating network investment opportunities, designing project areas, and understanding BEAD requirements. Although DOM has not issued formal policy recommendations to local governments, we continue to encourage local jurisdictions to adopt practices that minimize permitting delays and administrative burdens.

### **Internal Mapping Initiatives**

DOM has developed detailed data reference materials, including maps detailing statewide eligible service locations and CAI's, which are integrated directly into the BEAD application and evaluation process. DOM also maintains public facing mapping data of Iowa DOT's five-year state-funded infrastructure projects ([dom.iowa.gov/broadband/dig-once](https://dom.iowa.gov/broadband/dig-once)), providing broadband providers with insight into construction activities that may impact network planning. These mapping resources, available through DOM's website, contain GIS data that aids in route planning, permitting coordination, and project design.

### **Coordination with Local Governments**

DOM has engaged city and county governments through targeted meetings, presentations, and participation in statewide association conferences. These engagements are designed to encourage proactive local leadership and investment in broadband projects. In prior broadband rounds, DOM has distributed educational materials and technical guidance to local officials, and DOM intends to continue this outreach during BEAD implementation. While DOM has not formally tracked local follow-through on broadband readiness efforts, ongoing coordination with community leaders remains an important element.

### **Education and Technical Assistance for Providers**

To reduce compliance uncertainty and support provider participation, DOM provides technical assistance through its BEAD webpage and help desk, referring applicants to the online resources when questions arise. DOM also plans to host additional compliance-focused webinars and publish new guidance documents as BEAD deployment progresses. These technical assistance efforts will be supported by DOM's contracted partners, including consultants with federal compliance expertise.

## **Exploration of Partnership with Iowa Geological Survey**

DOM has not yet formally partnered with the Iowa Geological Survey, but it remains open to leveraging its expertise in future applications where geologic or environmental information could benefit applicants. DOM plans to recommend these resources to providers as applicable.

**11.2 Question (Y/N):** Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes

**11.3 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.2):** If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

NA

**11.4 Question (Y/N):** Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes

**11.5 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.4):** If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10- year Federal interest period, explain why the Eligible Entity was unable to do so.

NA

**11.6 Question (Y/N):** Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes

**11.7 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.6):** If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and

resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

NA

## 12 SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

**12.1 Text Box:** Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

DOM applied the BEAD RPN definition of Priority Broadband Project as published in the NOFA. Under this definition, consistent with BEAD requirements, Priority Broadband Projects refers to projects that deliver broadband service with speeds of at least 100/20 Mbps, maintain latency of 100 ms or less, and are designed to easily scale to meet the evolving connectivity needs of households and businesses. This definition reflects the BEAD program's commitment to funding infrastructure that provides long-term, sustainable broadband access and supports future technologies such as 5G and successor networks.

The criteria for Priority Broadband Projects ensure that funded projects not only address immediate connectivity needs but also deliver infrastructure capable of supporting Iowa's economic, educational, and healthcare priorities for decades to come. High performance standards reduce the likelihood of repeated investments in the same area and equips all areas of the state with the most capable broadband service available. This future-proof approach aligns with BEAD's core goal of closing the digital divide and creating equitable access to high-quality internet service.

To ensure a consistent and fair application of the criteria, DOM established a multi-level determination process. DOM considered multiple aspects in determining what projects met the definition. DOM recognized that some technologies inherently offer superior speed and latency performance while the scalability requirements depend on the details in the application and how the proposal met the other required elements in the NOFA. This determination was based on well-established industry standards and supported by technical research demonstrating a particular technology's capacity and long-term upgrade potential.

Applicants proposing fixed wireless, satellite, or other wireless technology solutions were required to submit Exhibit I – Wireless Project Design Worksheet, providing evidence that their proposed technology could meet or exceed the Priority Broadband Project performance requirements. Applicants were encouraged to submit any relevant technical documentation, specifications, or network design plans to support their application.

Review of Exhibit I submissions was conducted by DOM's contracted partner and internal GIS team, which has extensive expertise in broadband network performance and design. This review assessed whether proposed technologies could meet BEAD's speed, latency, and capacity requirements under real-world operating conditions. In addition, DOM's internal GIS team conducted independent analyses using publicly available datasets and performance modeling to evaluate factors affecting network reliability and scalability. This analysis considered propagation models, service area density, and potential physical obstructions to wireless service to ensure that proposed networks could maintain the required performance in all eligible locations. For example, GIS mapping was used to identify service area coverage of locations in the proposed application, density thresholds were used to assess whether wireless beam capacity would be exceeded, and canopy coverage data was used to estimate potential service degradation due to foliage interference.

DOM also reviewed each applicant's financial capacity, responsiveness, administrative capability, and past performance in administering broadband projects. This included an evaluation of financial statements, business structure, and a review of prior grant compliance, timeliness of project completion, and any defaults or de-obligations of funding to determine the projects financial, managerial, and operational capability. Applicants with a history of defaulted locations from prior state or federal broadband awards were closely scrutinized to ensure they possessed the managerial, operational, and financial stability to successfully execute a BEAD-funded project.

This thorough review process ensured that only projects capable of delivering high-quality, sustainable service are designated as Priority Broadband Projects. By combining technical review, GIS analysis, and performance and financial history evaluation, DOM's determinations safeguard the BEAD investment, reduce the likelihood of future overbuild needs, and help ensure equitable access to reliable broadband service. Through this structured, evidence-based approach, DOM has ensured that the designation of Priority Broadband Project is applied fairly, consistently, and in direct alignment with the BEAD program's intent. By prioritizing projects that meet rigorous performance, scalability, and reliability standards, and by verifying that applicants have both the technical capacity and a strong track record of delivery, DOM is maximizing the long-term impact of BEAD investments in Iowa.

## 13 SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

**13.1 Text Box:** Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

DOM implemented the RPN scoring framework precisely as required. Section 3 of NOFA #009 Exhibit A explains the scoring criteria and how the scoring, rank ordering procedure, grouping, subgrouping, and overlapping procedure were implemented.

DOM entered scoring information into the quantitative scoring spreadsheet during technical review. The spreadsheet then was used to conduct the rank ordering procedure. Applications were first grouped by Group A: Priority Broadband Projects, Group B: Non-Priority Broadband Projects, and Group C: Community Anchor Institution Projects.

Next, applications were subgrouped within Group A and Group B by unserved service projects and underserved service projects. The applications were then ranked within each subgroup by lowest cost. The lowest cost application within each subgroup was assigned a rank that immediately followed the lowest ranked application of the preceding subgroup by award order which resulted in a cumulative rank assigned to each application.

Applications with overlapping locations were evaluated based on the scoring criteria:

Primary Criteria: Minimal BEAD Program Outlay

DOM scored applications based solely on the per-location cost to the BEAD program, using the formula (project cost – amount of applicant matching funds provided) / number of eligible service locations. The application with the lowest cost per location was awarded that location unless there was a competing proposal in the same group within 15% of the lowest cost proposal.

Secondary Criteria: Speed to Deployment and Speed of Network and Other Technical Capabilities

Where there were overlapping locations within the same group that were within 15% of the lowest cost for that location, DOM implemented the secondary scoring criteria.

1. Speed to Deployment: Projects with shorter projected completion timelines earned higher scores. The score was based on the cumulative number of days from application opening to proposed service completion date.
2. Speed of Network and Other Technical Capabilities: This was evaluated in two subcategories.
  - a. Relative Speed: Calculated as the average of proposed download and upload Mbps, compared across all applicants; the highest speed set the scoring benchmark.
  - b. Latency: Projects proposing latency under 30 ms earned full points; latency between 30-60 ms earned half; over 60 ms received none (latency capped at 100 ms).

DOM reserved up to 100 points for secondary scoring, weighted as follows:

- Speed to Deployment = 20% (20 points)
- Relative Speed = 60% (60 points)
- Latency = 20% (20 points)

Total Applications Reviewed: 140

Locations Triggering Secondary Scoring (within 15% overlap): 2,483

Final Awards Impacted by Secondary Criteria Application: 25

These secondary criteria were only activated where a location was included in multiple projects in the same project group and where cost-based selection alone could not distinguish among similarly priced offers. In such cases, speed to deployment and superior network performance tipped the decision in favor of applicants best supporting both rapid buildout and technical reliability.

## 14 ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION (REQUIREMENT 14)

**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 National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- 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 chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-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.
- 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.

See "Environmental and Historic Preservation" file at <https://dom.iowa.gov/broadband/notice-funding-availability-009>.



## **15 CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)**

**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.

DOM is working to obtain Tribal Consent from any applicable Tribal Government affected by the BEAD program in Iowa. DOM intends to adhere to the Programmatic Waiver of Tribal Consent Deadline issued by NTIA on 8/26/25.

## **16 PROHIBITION ON EXCLUDING PROVIDER TYPES (Requirement 16)**

**16.1 Question (Y/N):** Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes

## 17 WAIVERS

**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. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

DOM is working to obtain Tribal Consent from any applicable Tribal Government affected by the BEAD program in Iowa. DOM intends to adhere to the Programmatic Waiver of Tribal Consent Deadline issued by NTIA on 8/26/25.