

Georgia Technology Authority Broadband Equity, Access, and Deployment

Grant Management Manual

POLICIES AND PROCEDURES



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I. INTRODUCTION

Overview

The Georgia Technology Authority (GTA) aims to utilize this Grant Manual to facilitate the management of its Broadband Equity, Access, and Deployment grant. Through this manual, GTA establishes comprehensive policies and procedures governing the application, receipt, management, and closure of this Federal grant award.

Included within this Grant Manual are detailed explanations of relevant Federal laws and policies governing grant administration, along with other detailed information commonly used throughout the grant life cycle. It is important to note that while this manual serves as a key resource, it does not aim to replace or override any Federal guidance on grant administration. As Federal guidance is updated, this Grant Manual will be updated and version history will be documented.

The structure of the Grant Manual is organized as follows:

- Background information about the GTA Broadband Office
- Rules governing federal Grant Administration
- Guidance on managing the grant throughout its life cycle
- A glossary of terms pertinent to federal grants

About the Office

Georgia Technology Authority (GTA) coordinates the Broadband Advisory Committee to promote collaboration between State agencies, local governments, industry representatives, community organizations, and others to further deployment of broadband services throughout Georgia.

GTA is assisting the Governor's Office of Planning and Budget (OPB) to expand broadband across the state, supporting every Georgian's access to high speed, reliable internet.

Roles and Responsibilities

The Governor's Office of Planning and Budget (OPB) is the Eligible Entity for the State of Georgia and will serve as the fiduciary recipient of the funds. Acting as a subrecipient to OPB, GTA will carry out the technical implementation of the BEAD program to including planning, subrecipient¹ selection, implementation, monitoring and compliance, reporting, and closeout activities.

¹ NTIA refers to subrecipients as subgrantees due to the definition of subrecipient in 2 CFR § 200.331 and subsequent determination of subrecipient and contractor in Federal awards. This document will utilize the term subrecipient.

II. GRANT OVERVIEW

Broadband Equity Access and Deployment

Funded by the Bipartisan Infrastructure Law, Broadband Equity, Access, and Deployment (BEAD) is a Federal grant program that aims to get all Americans online by funding partnerships between states or territories, communities, and stakeholders to build infrastructure where we need it, and increase adoption of high-speed internet. BEAD prioritizes unserved locations that have no internet access or that only have access under 25/3 Mbps, and underserved locations that only have access under 100/20 Mbps. The BEAD program provides Federal funding for grants to Eligible Entities for broadband planning, deployment, mapping, equity, and adoption activities.

Scope

Five Year Action Plan

GTA's Broadband Equity, Access, and Deployment (BEAD) Program Five-Year Action Plan can be viewed [here](#). The plan includes a comprehensive broadband needs assessment and establishes the State's goal of providing all Georgians with robust, high-speed internet connections, along with the tools and skills needed to make the most of opportunities enabled by broadband access.

Initial Proposal Volume I

GTA's Initial Proposal Volume I can be found [here](#). This plan provides information on the State's existing broadband funding, unserved and underserved locations, community anchor institutions, and GTA's plans for the challenge process.

Initial Proposal Volume II

The Initial Proposal Volume 2 describes how Georgia will distribute its allocated BEAD funds to achieve Georgia's objectives in compliance with State and Federal requirements. [This version](#) was submitted to NTIA for approval on May 31, 2024 and was approved by NTIA on September 17, 2024. The November 8, 2023 public comment webinar recording is available for viewing [here](#). In addition, Georgia submitted the Initial Proposal Correction letter, requesting a correction pursuant to the June 6, 2025 BEAD Restructuring policy Notice requirements to NTIA on June 20, 2025.

Initial Proposal Volume II Correction Letter

In alignment with NTIA's BEAD Restructuring Policy Notice, Eligible Entities were required to submit a letter to NTIA within 30 calendar days of the release of the Policy Notice to request an Initial Proposal correction to incorporate the terms of the Policy Notice into its Initial Proposal. GTA submitted this correction letter to NTIA on June 20, 2025 and received approval of this letter on June 27, 2025.

State Vision and Goals

Our vision for a fully connected Georgia is to ensure that every Georgian has reliable and affordable access to the internet along with the necessary tools and skills that unlock opportunities for educational advancement, economic success, job creation, improved health, and strengthened social ties. This will create more connected, resilient, and prosperous communities and cultivate an environment across the state where our citizens and workforce can thrive, our infrastructure can support growth, and our industries can continue to lead the way.

The Georgia Broadband Deployment Initiative (GBDI), established in the 2018 Achieving Connectivity Everywhere (ACE) Act,² calls for the promotion and deployment of broadband services throughout the state to unserved areas with a minimum of 25 Mbps download and 3 Mbps upload speeds.³ Per the

² Senate Bill 402, <https://www.legis.ga.gov/legislation/52636>; enacted through Georgia Code Title 50, Chapter 40, <https://broadband.georgia.gov/media/6/download>.

³"Georgia Broadband Deployment Initiative," DCA, <https://broadband.georgia.gov/sites/default/files/documents/georgia-broadband-deployment-initiative.pdf>.

establishing statute, “the goal of such program shall be to provide broadband services coverage throughout the entire State.”⁴

With that high-level mission as a guide, as well as the objective of addressing access, affordability, equity, and adoption issues, GTA has established the following broadband and digital connectivity goals and objectives:

1. **Ensure comprehensive high-speed internet accessibility.** GTA's goal is to ensure the availability of robust high-speed internet connections for all Georgians, with a particular focus on the populations most affected by limited-service options. GTA plans to collaborate with internet service providers (ISPs), community anchor institutions (CAIs), local government entities, and other reputable organizations to efficiently build out broadband infrastructure to the remaining unserved/underserved locations, to track the quality of high-speed internet services and the associated costs to subscribe to services, and to help incentivize the availability of affordable connectivity options.
2. **Empower workforce advancement and economic growth in unserved and underserved communities and population groups through broadband expansion projects.** This will entail deploying funding to improve service in economically distressed areas, incentivizing the participation of small Georgia-based providers in funding programs, and expanding affordable broadband workforce training initiatives across Georgia through a state-led program.
3. **Bolster cybersecurity across state networks, foster a cyber-ready workforce, and establish lasting partnerships for collaborative action.** This will be achieved through the consistent compliance of each state agency and all BEAD-funded networks with the information security policies and standards issued by GTA. With the assistance of its Office of Information Security, GTA will cultivate an environment of modern cybersecurity education, training, research, and practical application for both private and public sectors. This goal encapsulates our overarching pursuit of a secure, informed, and collaborative digital environment.
4. **Reduce obstacles to digital connectivity (equity) and foster an environment conducive to economic growth, academic achievement, and improved healthcare outcomes.** This encompasses the identification and mitigation of technological and economic obstacles to internet access, the promotion of digital literacy programs among all age groups to optimize internet usage benefits, and support for CAIs' digital connectivity programming. To effectively serve impacted communities, GTA commits to assisting these institutions toward having 1 Gbps or faster internet connectivity and being equipped to deliver technology-based training and services, thereby maximizing their transformative impact.

Federal Reporting Requirements

NTIA requires subrecipients to provide Eligible Entities with no less than semiannual reports to demonstrate project compliance. GTA collects reporting data quarterly and annually to ensure effective and compliant use of funds. Reports include updates on project status, expenditures, timeline, labor reporting, and ongoing certification of compliance with program standards. GTA also collects broadband location information such as the fabric IDs of planned locations, speeds pre-investment, and planned speeds to be delivered. These reporting requirements ensure that funds are used effectively and in compliance with State and Federal guidelines. GTA will continue to update its reporting requirements as the NTIA issues further guidance. GTA will continue to pivot with any updated reporting requirements established by NTIA throughout the BEAD program.

Federal grant recipients are also required to file a Federal Funding Accountability and Transparency Act (FFATA) subaward report for any sub-grants equal to or greater than \$30,000.00. The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov. FFATA reports are required to

⁴ GA Code § 50-40-81 (2021).

be submitted by the end of the month following the month in which the prime grant recipient makes any award to a subrecipient.⁵

Follow These Steps to Report FFATA (formerly FSRS.gov)

As of March 8th 2025, FSRS.gov was retired, and all subaward reporting data and functionality are now on SAM.gov. Federal users do not need a role to search and view subaward and subcontract reports, simply sign in with your government email. There is a [public subaward API](#) and [public subcontract API](#) for any large data downloads needs.

Entities that need to report subawards will need a role in SAM.gov. You only need to follow these steps once to connect your accounts.

If you got an FSRS.gov account or changed your FSRS.gov permissions after 1/30/2025, request the Data Entry role for entity reporting from your Workspace instead, and ask for the subaward reporting permission in your request comment.

1. Sign in here to SAM.gov using your legacy FSRS.gov username and password
2. Verify your entity name and UEI are correct
3. If applicable, add more entities to your SAM.gov account—you may need to request permission from the Entity Administrator

Once you finish, go to your SAM.gov Workspace and select **My Roles** to confirm you have a reporting role assigned to the entity you are responsible for reporting for.

Federal Grant Regulations and Requirements

The policies included herein adhere to the relevant Federal regulations and guidelines governing grant management, including the NIST Financial Assistance Award, applicable Uniform Guidance and the BEAD program guidance.

Pursuant to Specific Award Conditions under NIST Financial Assistance Award Number: 22-20-B061, the following Federal applicable statutes and regulations are incorporated by reference:

Reference	Definition
The Department of Commerce, National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO) No. NTIA-BEAD-2022 , dated May 13, 2022.	Outlines funding and eligibility for expanding high-speed internet in unserved and underserved areas through the BEAD program.
The Department of Commerce Pre-Award Notification Requirements for Grants and Cooperative Agreements as published in the Federal Register on December 30, 2014 (79 FR 78390).	Sets forth administrative requirements and policies applicants must follow before receiving Department of Commerce grants or cooperative agreements.
BEAD Notice Of Funding Opportunity , pg. 86	This page references other policy requirements, including: <ul style="list-style-type: none"> • Environmental and National Historical Preservation Requirements • Property Trust Relationship and Public Notice Filings for Grant-Acquired Property • Domestic Preference for Procurements (Buy American)

⁵ title-2/

The Department of Commerce Financial Assistance Standard Terms and Conditions (ST&C) issued November 12, 2020.	Establishes standard terms and conditions for all Department of Commerce financial assistance awards, including administrative, financial, and reporting requirements.
Code of Federal Regulations, Title 2, § 200, Uniform Guidance (2CFR200)	Provides uniform administrative requirements, cost principles, and audit standards for federal awards to promote consistency and accountability across federal programs.
The Uniform Guidance Policy Notice issued by NTIA on December 26, 2023 Tailoring the Application of the Uniform Guidance to the BEAD Program	Under the Uniform Guidance, grantees may issue fixed amount subawards for BEAD projects whose primary purpose is broadband deployment, even if the value of the subaward exceeds the Simplified Acquisition Threshold. While the Uniform Guidance generally restricts the use of fixed amount subawards in programs requiring mandatory cost sharing or matching, the NTIA has elected to retain all match requirements for BEAD projects, including those using fixed amount subawards.
Restructuring Policy Notice	Published by NTIA on June 6 th , 2025, this RFP eliminates the following sections of the BEAD Notice of Funding Opportunity (NOFO): <ul style="list-style-type: none"> • “Fair Labor Practices and Highly Skilled Workforce” • “Advancing Equitable Workforce Development and Job Quality Objectives” • “Civil Rights and Nondiscrimination Law Compliance” • “Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms”
Program Fraud Civil Remedies Act (42 U.S.C. §§ 3801 – 3812)	This Act provides federal agencies with administrative remedies for addressing false claims or statements made to federal agencies or programs.
Whistleblower Protection Laws	The following laws, which protect whistleblowers who report fraud, waste, or abuse, were fully considered in the development of this policy: <ul style="list-style-type: none"> • Whistleblower Protection Act • Sarbanes-Oxley Act • Dodd – Frank Wall Street Reform • Consumer Protection Act

Additional Policies and Requirements

- [False Claims Act, United States Code Title 31, Sections 3729 to 3733](#)
- [Program Fraud Civil Remedies Act, United States Code Title 42, Sections 3801 to 3812](#)
- [National Environmental Policy Act, United States Code Title 42, Section 4321 et seq.](#)
- [National Historic Preservation Act, United States Code Title 54, Section 300101 et seq.](#)
- [Infrastructure Investment and Jobs Act, Public Law Number 117-58](#)
- [Build America, Buy America Act, Public Law Number 117-58, Sections 70901 to 70927](#)
- [White House Executive Order M24-02](#)
- [Executive Order 14005, Ensuring the Future Is Made in All of America by All of America's Workers](#)

- [Code of Federal Regulations Title 2, Part 184](#)
- [Council on Environmental Quality](#)
- [Clean Air Act, Section 309, United States Code Title 42, Section 7609](#)
- [Access Broadband Act, United States Code Title 47, Section 1307](#)
- [Infrastructure Act, Section 60105.101](#)
- [Code of Federal Regulations Title 2, Sections 200.334 to 200.337](#)
- [Code of Federal Regulations Title 47, Section 1.2112\(a\)\(1\) to \(7\)](#)

III. AWARD MANAGEMENT

Funding Instruments

The State of Georgia achieves its objectives primarily by allocating funds to various agencies, organizations, or individuals through the utilization of Memorandums of Understanding (MOU), subgrant/subaward agreements, and contracts. These financial tools serve as the framework for delineating the terms, conditions, nature, and extent of the agreement between the state and the recipient of financial aid. Each instrument serves a distinct purpose and establishes unique relationships between the state and the recipient, with varying degrees of control or involvement by the funding agency. The selection of a funding mechanism is guided by existing legislation, appropriations, and federal directives. State grant managers collaborate with agency or department heads to determine the most suitable funding mechanism for a particular situation.

A non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. Demonstrated in 2 CFR § 200.331 Subrecipient and contractor determinations, a subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Conversely, a contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor.

Fixed Amount Subawards

In accordance with NTIA guidance, the State will utilize a fixed amount subaward under a performance-based reimbursement method of repayment in which costs will be reimbursed to Subrecipients in accordance with either objectives met, units built, or total Project complete. Funding for deployment Projects will be disbursed to Subrecipients as the performance-based milestones are met, which would allow the GTA to withhold funds if the Subrecipient fails to take the actions the funds are meant to subsidize. Under this approach, subrecipients will receive fixed amount subawards⁶ upon meeting certain criteria set by GTA. Once the subrecipients have received their fixed amount subawards, they will be required to progress through a series of milestones delineated by the attainment of BSLs. These BSLs serve as benchmarks for measuring the progress and effectiveness of the broadband projects. As subrecipients successfully reach each milestone, they will submit documentation to GTA to demonstrate their compliance. Upon verification, the Governor's Office of Planning and Budget (OPB) will then reimburse the subrecipients based on the milestones achieved.

Fixed amount subawards base the determination to distribute funding on milestones and project progress. This approach simplifies the administrative process by reducing the need for extensive cost documentation. Funding is still disbursed on a reimbursement basis rather than an advanced payment, however the basis for distribution decisions is project completion. Project completion status may be measured by the percent of locations served and miles completed, project milestones, or alternate evidence such as contractor progress reports of completed installation. By tying reimbursements to the

⁶ Based on NTIA's recent Uniform Guidance update, [Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program, December 2023](#).

attainment of BSLs, the GTA aims to promote accountability, efficiency, and the timely delivery of broadband services to underserved communities across the state.

Subrecipients will be required to be registered with the System for Award Management (www.SAM.gov) and obtain a Unique Entity Identifier (UEI) and maintain the active UEI registration throughout the life of the grant award. For more information on this requirement, [2 CFR § 25](#) may be reviewed.

Subrecipient Application Process

The Broadband Equity, Access, and Deployment (BEAD) application process will adhere to the guidelines outlined in the [Georgia Technology Authority's \(GTA\) Initial Proposal Volume 2](#). This proposal serves as the foundational document detailing the framework for BEAD funding distribution and project evaluation criteria. Updates to this grant manual will be implemented to align with the approved BEAD process outlined by the National Telecommunications and Information Administration (NTIA). These updates will incorporate any revisions or adjustments necessary to ensure consistency between the BEAD application process and NTIA's requirements and standards.

Key components of the BEAD application process, as outlined in GTA's Initial Proposal Volume 2, may include eligibility criteria for applicants and evaluation metrics for project proposals. Additionally, the application process may involve a thorough review of each proposal to assess its eligibility and potential impact on broadband access and deployment across Georgia.

By following the framework established in the Initial Proposal Volume 2 and incorporating NTIA-approved processes, the BEAD application process aims to streamline funding distribution, enhance transparency, and facilitate the equitable deployment of broadband infrastructure to underserved communities throughout the state.

Following the BEAD Restructuring Policy Notice published on June 6, 2025, the State of Georgia conducted a Benefit of the Bargain Round for applications following the updated definition of Priority Broadband Project while also removing prescribed regulatory requirements as described in the revised [GTA BEAD NOFO](#), [FAQs](#), and [webinar](#) recording with accompanying [slides](#).

The application process, through the Benefit of the Bargain Round, complied with the BEAD Restructuring Policy Notice by adhering to the revised definition of Priority Broadband, which is described below. The State of Georgia, to facilitate compliance, will apply this definition across the program.

Priority Broadband Project—The term “Priority Broadband Project” means a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services⁷.

GTA BEAD Budget Modifications

Two types of subrecipient budget modifications may occur: proposed modifications may involve reallocating amounts between budget categories while maintaining the same budget total, or proposed changes may be directed at the underlying scope of the project. To shift amounts between budget categories, the grantee initiates the process by submitting the proposed changes to GTA in a revised budget template. GTA then reviews for cost reasonableness and alignment with the project and program's objective. For a scope modification, the grantee submits a scope modification form detailing the changes and potential impact the change may have on their project such as timeline. GTA reviews the proposal to ensure it does not substantially affect the project's objectives before approving the modification. Once the review is complete, the modification is documented and signed by all parties.

GTA updates its program budget through the NIST portal and by making corresponding changes in the Internal Project Financial Reporting (IPFR) system. The process, described in the [NIST Grants Management Reference Guide](#) begins with GTA identifying necessary budget adjustments and submitting these modifications through the NIST portal. Upon approval, GTA updates the IPFR system to reflect the

⁷ [NTIA BEAD Restructuring Policy Notice](#)

new financial allocations. This ensures that all budget modifications are documented, maintaining compliance with federal guidelines and ensuring accurate tracking and reporting of financial data.

Drawdown of Funds

Drawdowns for reimbursements are conducted by OPB, the prime recipient of BEAD funds. To initiate the Automated Standard Application for Payments (ASAP) enrollment process, OPB provides the Grants Specialist the ASAP Point of Contact for the organization, including name, email address, mailing address, telephone number, and the organizational EIN and UEI numbers. The ASAP enrollment is a multi-step online process. The remaining steps are completed by the OPB within the ASAP system (e.g., adding all required personnel and bank account information in an ASAP account). Once OPB's enrollment is initiated, the Point of Contact must contact the ASAP Customer Support Team (contact information below) to create a profile in ASAP.

ASAP User Roles (as identified by ASAP)

POINT OF CONTACT (POC) is responsible for adding, modifying, and deleting the non-Federal entity officials in ASAP. This person's contact information must be sent to the Grants Specialist when initiating enrollment.

HEAD OF ORGANIZATION (HOO) is the non-Federal entity management official who approves or rejects the officials named by the Point of Contact. The HOO can add officials but not delete officials. Only one person shall be designated as the Head of Organization.

RE-DELEGATED HEAD OF ORGANIZATION (RHOO) can act on behalf of the Head of Organization to approve officials.

AUTHORIZING OFFICIAL (AO) confirms the non-Federal entity's information and identifies users (e.g., payment requestor) who need access to ASAP. This role is not synonymous with, and must not be confused with, the Authorized Organizational Representative identified in the award agreement.

FINANCIAL OFFICIAL (FO) enters the bank account information for the non-Federal entity.

PAYMENT REQUESTOR (PR) may request funds from the non-Federal entity's ASAP account.

To draw down BEAD (Broadband Equity, Access, and Deployment) funds from ASAP, OPB initiates the process by submitting a request through the system. This request includes details such as the desired amount and any necessary supporting documentation. Once submitted, the request undergoes a review by grant management authorities to ensure compliance with grant terms and regulations. Upon approval, the request is processed within ASAP, transferring the funds from the BEAD grant account to OPB's designated bank account. OPB will then be notified once the drawdown is completed, receiving details of the transaction for their records. Both the recipient and the grantor agency maintain thorough records of the drawdown for auditing purposes. Throughout this process, compliance monitoring may occur to ensure funds are used appropriately according to grant guidelines. Following these steps enables recipients to access BEAD funds efficiently, supporting their broadband access and deployment initiatives while maintaining financial and regulatory integrity.

Payment Request and Reimbursements

To receive funding, subrecipients submit payment applications detailing the work performed during a covered period. Funding is distributed on a reimbursement basis and not disbursed as advanced payments. GTA reviews the pay applications and compares them to key milestones using network completion as the basis for reimbursement. If adjustments to the payment application are necessary, revision comments are sent to the grantee who modifies their request or provides additional documentation. Once approved, GTA recommends payment to OPB who disburses the funding.

Compliance and Monitoring

GTA will adhere to all compliance standards set forth in the Notice of Funding Opportunity, the June 6, 2025 BEAD Policy Restructuring Notice, and other Federal compliance requirements. This includes compliance with regulations such as NEPA/NHPA environmental and historic preservation and Buy American provisions. GTA will ensure all projects meet these Federal guidelines as detailed in subsequent sections of the Grant Management Manual by collecting reporting data and reporting it to

OPB. The compliance environment and strategy will be continuously updated as the NTIA issues further guidance.

As required by NTIA and best practices outlined in 2 CFR § 200.206, GTA will conduct risk assessments of each prospective subrecipient to evaluate potential risks posed by applicant prior to issuing Federal awards. GTA will evaluate financial stability, management systems and standards, history of performance, audit reports and findings, and the ability of the applicant to implement requirement. As part of GTA's BEAD application review process it evaluated the following:

- (i) **Financial stability.** The applicant's record of effectively managing financial risks, assets, and resources;
- (ii) **Management systems and standards.** Quality of management systems and ability to meet the management standards prescribed in this part;
- (iii) **History of performance.** The applicant's record of managing previous and current Federal awards, including compliance with reporting requirements and conformance to the terms and conditions of Federal awards, if applicable;
- (iv) **Audit reports and findings.** Reports and findings from audits performed under subpart F or the reports and findings of any other available audits, if applicable; and
- (v) **Ability to effectively implement requirements.** The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on recipients of Federal awards.

A risk assessment score (low risk, medium risk, or high risk) is assigned to each subrecipient, which directly relates to the level of monitoring for each. The risk assessment will be updated annually, along with subsequent monitoring plan for each subrecipient.

GTA is required to monitor activities under Federal awards to ensure compliance with applicable Federal requirements and that performance expectations are being achieved. Monitoring must cover each program, function, or activity and can include subrecipient monitoring as appropriate. See § 200.332 for additional pass-through entity requirements. Monitoring activities are discussed throughout the Performance and Financial Monitoring and Reporting section of 2 CFR § 200 (§ 200.328 thru 200.343).

Some examples of monitoring include reviewing financial, personnel, procurement, property, and program activities. For instance, a grant monitor typically reviews records, interviews key personnel, views grant-funded purchases, and otherwise investigates how grant funds are managed. At the conclusion of monitoring activities, the grant monitor may prepare an in-depth report documenting the results. If the grant monitor discovers compliance issues, they typically reach out to the organization in an attempt to resolve them.

Subrecipient Monitoring and Audits Program

Georgia Technology Authority (GTA) will conduct activities to assess the risk of non-compliance, fraud, and/or fiscal negligence of each subrecipient. This process begins with an evaluation of inherent risks to the program, an evaluation of specific risk at the grant application level, and individual evaluations of the internal control and performance environment of each subrecipient. These assessments directly impact the level of detailed test work performed during annual audits, helping to ensure the extent of auditing procedures is commensurate with the level of risk for each subrecipient.

Inherent risk is assessed across the following functional areas:

- Reporting
- Procurement
- Disbursements
- Change management
- Claims and disputes
- Document control
- Construction fieldwork (as applicable)
- Others as identified

As a part of its ongoing monitoring efforts, GTA will conduct regular audits of financial records, performance data, and other information at each subrecipient. The frequency and extent of these procedures will vary by subrecipient, as determined by the risk assessment or other criteria, and typically include inquiry, observation, and inspection of data and records, within the following functional areas:

- 2 CFR Compliance / Single Audit results (if applicable)
- State Reporting
- Procurement (if applicable)
- Permitting
- Disbursements
- Subcontracting
- Change Orders / Contingency Use
- Inspections
- Construction fieldwork
- Environmental

GTA employs transparent communication with each subrecipient by providing a monitoring notification letter to each subrecipient inclusive of the scope of the monitoring event. During fieldwork, auditors will conduct interviews with subrecipient personnel, obtain and review outside auditor reports, analyze commitment and expenditure data, and review management and performance reporting, as applicable. Auditors will select sample transactions for further testing, and will perform vouching, recalculation, validation, and other auditing techniques to identify if instances of non-compliance, fraud, or fiscal negligence have occurred. Observations identified during audits will be shared with subrecipients, and reportable findings communicated to the State Auditor and federal cognizant agency, as applicable. GTA will maintain a log of observations and findings for each subrecipient and will conduct follow up procedures on prior issues at least annually. Depending on the severity of the issue and any determined actions by the State or Federal agencies, GTA may require a repayment of funds, reduce future payments, or impact an organization's eligibility for future programs.

In some instances, auditing procedures may involve inquiry, observation, and inspection of information provided by personnel other than the subrecipient. Due to this, it is important to determine the nature of the relationship and apply audit procedures and professional judgement as applicable.

Closeout

Inspection and acceptance of the work, close-out of infrastructure, and making the final payment involve the completion of the following tasks:

- An Attestation of Grant Work Completion and Contractor Full Payment, and a request for final payment should be submitted by the subrecipient to the state.
- GTA shall:
 - Conduct a thorough review of the grant agreement and associated documents to identify closeout requirements and deadlines.
 - Obtain equipment/capital asset listing acquired with Federal Funds
 - Obtain certification that the subrecipient has obtained as-builts/equipment manuals/commissioning reports/shape files.
 - Verify completion of all project activities and deliverables.
 - Confirm executed grant agreement, amendments, and approved budget/scope adjustments are attached and reconciled to Grants Management System (GMS)
 - Confirm all Payment Applications (PAs) in GMS and Smartsheet are closed/complete.
 - Confirm final period Compliance and Monitoring Workbook is complete and approved, and that all Compliance and Monitoring findings are attached to GMS and the final monitoring report is reconciled to GMS dashboard.
 - Update application status to "Complete" in Smartsheet and GMS.
 - Mark grant as closed on following quarterly Treasury report; set up for future reporting-only status.
 - Log file as closed and store according to Record Retention in Team Docs.
 - Submit closeout notification to subrecipient.

Financial Closeout

Financial Closeout will be conducted by OPB and GTA to include the following:

- Review financial records to ensure accuracy and completeness.
- Prepare final financial reports in accordance with state requirements.
- Resolve any outstanding financial issues or discrepancies.

Programmatic Closeout

Programmatic Closeout will be conducted by GTA to include the following:

- Compile programmatic data and performance reports for the grant period.
- Assess project outcomes and achievements against stated objectives.
- Document lessons learned and best practices for future reference.

IV. POST AWARD REQUIREMENTS

Internal Controls

The non-Federal entity must:

- (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- (b) Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal awards.
- (c) Evaluate and monitor the non-Federal entity's compliance with statutes, regulations and the terms and conditions of Federal awards.
- (d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- (e) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

Responsibilities

1. Deputy State Chief Information Officer and Executive Director of the Georgia Broadband Program:

- Oversees the overall management and compliance of Federal grants.
- Ensures grant activities align with approved budgets, work plans, and grant terms.
- Coordinates with program staff and finance department to monitor grant expenditures and ensure timely reporting.
- Facilitates communication with federal grantors and responds to inquiries or requests for information promptly.
- Conducts periodic reviews and assessments to evaluate grant performance and compliance.

2. Program Staff:

- Implements grant activities in accordance with approved project plans and grant objectives.
- Maintains accurate records of program activities, expenditures, and outcomes.

- Collaborates with the grant manager to prepare required reports and documentation for grant compliance.
- Participates in monitoring visits and audits conducted by Federal grantors or auditors.

3. Finance Department:

- Provides oversight of financial transactions related to Federal grants.
- Ensures accurate accounting and recording of grant expenditures.
- Performs reconciliations between grant budgets and actual expenditures.
- Prepares financial reports and invoices for submission to Federal grantors.

Grant Oversight

The Office of Planning and Budget serves as the pass-through entity of funding to the Georgia Technology Authority. OPB, who is the Eligible Entity, will act as the fiduciary recipient of the funds. This role entails a responsibility to oversee the proper allocation, distribution, and use of the funds to ensure compliance with federal and state requirements.

Acting as a subrecipient to OPB, GTA is tasked with the technical implementation of the BEAD program including the design of the structure of program and oversight over the compliance and performance within the program. GTA is responsible for reviewing all applications for eligibility, scoring eligible applications, recommending potential projects for award consideration to the Governor's Office, and compliance and monitoring of selected subrecipients.

Internal Control Procedures:

Procedure	Responsible Entity	Activity Details
1. Grant Application and Award	GTA	<ul style="list-style-type: none"> • Ensure that all grant applications are reviewed and approved by authorized personnel before submission. • Verify that grant awards are accepted only if they align with agency objectives and capacity to administer.
2. Grant Agreement and Compliance	GTA, Contractor (RSM)	<ul style="list-style-type: none"> • Review grant agreements to understand terms, conditions, and reporting requirements. • Develop a detailed work plan and budget aligned with grant objectives. • Establish procedures to monitor compliance with federal regulations, including Uniform Guidance (2 CFR § 200).
3. Financial Management	OPB	<ul style="list-style-type: none"> • Maintain segregation of duties between authorization, recording, and reconciliation of financial transactions. • Implement controls to prevent unauthorized expenditures and ensure expenditures are allowable, reasonable, and allocable. • Conduct regular reviews and reconciliations of financial records related to grant expenditures.
4. Reporting and Documentation	GTA	<ul style="list-style-type: none"> • Prepare accurate and timely financial and programmatic reports as required by federal grantors. • Maintain complete and organized documentation to support expenditures, activities, and achievements reported in grant reports. • Retain records in accordance with federal and state record retention policies.

5. Monitoring and Oversight	GTA	<ul style="list-style-type: none"> Conduct periodic monitoring of grant activities to ensure compliance with grant terms and achievement of performance goals. Document monitoring activities and findings, including any corrective actions taken. Respond promptly to monitoring visits, audits, or inquiries from federal grantors or auditors.
6. Training and Communication	Contractor (RSM)	<ul style="list-style-type: none"> Provide training to personnel involved in grant management on federal regulations, internal controls, and compliance requirements. Foster a culture of transparency and accountability through regular communication and updates on grant management procedures and requirements. Review and Revision: Conduct periodic reviews of this SOP to ensure relevance and effectiveness. Update procedures as necessary to reflect changes in federal regulations, agency policies, or best practices in grant management
7. Approvals	GTA	<ul style="list-style-type: none"> All procedures should be approved by a representative from GTA [Jessica Simmons or designee] Reporting should be reviewed and signed off with GTA approval

Cost Allowability

Cost allowability under 2 CFR § 200 governs what costs are permissible under Federal grants and agreements. It outlines principles for determining whether costs incurred by grant recipients can be charged to a Federal award. Understanding cost allowability is crucial for ensuring compliance with Federal regulations and maximizing the effective use of grant funds.

Principles of Cost Allowability

According to 2 CFR § 200, costs must meet the following general criteria to be allowable under Federal awards:

Type	Description
Reasonable Costs	A cost is considered reasonable if the nature and amount reflect what a prudent person would incur under similar circumstances. Factors such as market prices for goods or services, whether the cost is necessary for the performance of the award, and the actions that a prudent person would take are considered.
Allocable Costs	A cost is considered reasonable if the nature and amount reflect what a prudent person would incur under similar circumstances. Factors such as market prices for goods or services, whether the cost is necessary for the performance of the award, and the actions that a prudent person would take are considered.
Consistently Treated Costs	Costs must be consistently treated as either direct or indirect (facilities and administrative) costs. This means that costs must be treated consistently in similar circumstances and must be treated consistently as either direct or indirect costs for all Federal awards.

Conformance with Limitations or Exclusions	Costs must conform to any limitations or exclusions set forth in 2 CFR § 200 or in the award itself. Certain types of costs may be unallowable or subject to specific restrictions under Federal guidelines.
Reasonable Documentation	Costs must be adequately documented. Documentation should be sufficient to demonstrate compliance with Federal requirements and the terms and conditions of the award. This includes receipts, invoices, personnel records, timesheets, and other records as appropriate.

Specific Types of Costs

While 2 CFR § 200 provides general principles, it also includes specific guidance on various types of costs, such as:

- **Personnel Costs:** Guidance on allowable compensation, including salaries and wages, fringe benefits, and associated costs.
- **Travel Costs:** Criteria for allowable travel expenses, including transportation, lodging, subsistence, and related costs.
- **Equipment Costs:** Requirements for determining the allowability of equipment purchases and related costs.
- **Materials and Supplies Costs:** Guidelines for determining the allowability of materials, supplies, and other expendable items.
- **Contract and Subaward Costs:** Requirements for determining the allowability of contract and subaward costs, including procurement standards and oversight.

Responsibilities

It is the responsibility of grant recipients to understand and apply the principles of cost allowability outlined in 2 CFR § 200. This includes ensuring that costs charged to federal awards are reasonable, allocable, consistently treated, and adequately documented. Proper understanding and adherence to these principles not only ensure compliance but also promote effective stewardship of Federal funds.

Administrative Costs

The BEAD program has a cap of 2% of project funds only for costs related to the administration of the Eligible Entity's grant. Programmatic costs and administrative costs that are not for the administration of the Eligible Entity's grants do not count towards this 2% cap. The 2% statutory cap includes any subcontracts or subawards made to assist in the administration of the Eligible Entities grant. The 2% statutory cap on costs related to the administration of the Eligible Entity's grant administrative costs does not apply to funds allocated during the Initial Planning Funds phase of the BEAD Program (see BEAD NOFO section IV.B.2). Otherwise, the 2% statutory cap applies to all other BEAD Program funding.

Only those costs that are related to the administration of the Eligible Entity's grant count towards the 2% cap. Additionally, the 2% statutory cap does not apply to funds allocated during the Initial Planning Funds phase of the BEAD Program (see BEAD NOFO section IV.B.2).⁸

Compliance and Reporting

Failure to comply with the cost allowability principles outlined in 2 CFR § 200 may result in disallowance of costs, penalties, or other administrative actions. Grant recipients are responsible for maintaining records and documentation that support the allowability of costs charged to Federal awards and for complying with any reporting requirements specified in the award terms and conditions.

⁸ [BEAD: Frequently Asked Questions and Answers Version 13](#)

Procurement

This policy outlines procurement activities under the Georgia BEAD program, including those for program staff, subrecipients, and contractors, ensuring adherence to Federal, State, and local laws. It provides guidance on the proper procurement methods based on thresholds and ensures adequate documentation for compliance with grant terms and conditions.

Compliance oversight will be managed by GTA with services provided by a compliance and monitoring team. GTA will provide ultimate programmatic and financial oversight and approval.

1.1 Subrecipient Qualifications

GTA will ensure that any prospective subrecipient (including contractors and subcontractors) has the capability to execute funded activities competently and in compliance with all applicable laws. This includes managerial and financial capacity, technical and operational capability, and adherence to program commitments.

1.1.1 General Principles

The following procurement policy requirements apply to all procurement activities conducted by GTA, its subrecipients, and contractors:

Each grantee and subrecipient must use the procurement procedures outlined in 2 CFR § 200, reflecting applicable State and local laws and regulations.

In case of conflict between State, local, and Federal standards, the most restrictive standards will be applied.

1.1.2 Conflict of Interest / Code of Conduct

No employee, officer, or agent of the GTA BEAD program shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest exists. Georgia laws require full disclosure of any real or perceived conflict of interest. Such a conflict could arise if the employee, officer, or agent, any immediate family member, partner, or associated organization has a financial or other interest in a firm considered for award. No officer, employee, or agent shall solicit or accept gratuities, favors, or anything of monetary value from contractors or firms, potential contractors or firms, or parties to sub-agreements.

1.2 Competition

All procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of 2 CFR § 200.319 and [§ 200.320](#).

In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to the following, as described in [2CFR200.319\(c\)](#) :

- (1) Placing unreasonable requirements on firms in order for them to qualify to do business;
- (2) Requiring unnecessary experience and excessive bonding;
- (3) Noncompetitive pricing practices between firms or between affiliated companies;
- (4) Noncompetitive contracts to consultants that are on retainer contracts;
- (5) Organizational conflicts of interest;
- (6) Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
- (7) Any arbitrary action in the procurement process.

The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage

geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

The non-Federal entity must have written procedures for procurement transactions. These procedures must ensure that all solicitations: [2CFR200.319 \(b\)](#):

(1) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and

(2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

The non-Federal entity must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.

Noncompetitive procurements can only be awarded in accordance with [§ 200.320\(c\)](#).

1.3 Procurement Methods

1.3.1 Procurement by the State

As a subrecipient under OPB, the Georgia Technology Authority (GTA) serves as a central State agency for Georgia, ensuring secure technology and policies. GTA assists agencies in delivering efficient services. Leveraging Georgia’s purchasing power, the GTA Office of Procurement Management secures the best value in technological goods and services for State agencies, eligible users, and the Georgia Broadband Program. Our objective is to establish and maintain transparent and effective procurement practices statewide, while fostering strong relationships with state agencies, eligible users, and vendors. GTA’s procurement process promotes fair competition and provides professional leadership and guidance.

The GTA Procurement Manual contains the procurement policies and procedures GTA will follow for all goods and services throughout the BEAD lifecycle.

A. Federal Procurement Methods

Any procurement using Federal funds must adhere to 2 CFR § 200, which includes Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. These guidelines should be followed for all purchases under federal grant programs or other federal funding sources, with an initial project cost estimate completed for each federal procurement activity.

B. Cost or Price Analysis

2 CFR § 200.324 mandates that grantees and subrecipients conduct a cost or price analysis for every procurement action, including any contract modifications that exceed the Simplified Acquisition Threshold (SAT), currently set at \$250,000. This analysis ensures that the price paid is reasonable. Cost analysis involves reviewing and evaluating each cost element that contributes to the overall price to determine its reasonableness. This method is typically used for sole source contracts or construction contracts with labor, material, and profit components, all of which must be considered for reasonableness. Price analysis is preferred due to its efficiency, fairness, and compliance with government and commercial

practices. It involves comparing price quotations and is used for purchasing materials, supplies, or other fixed-price items.

For Federal grant purposes, costs or prices based on estimated costs should only be allowed if the incurred costs or cost estimates included in negotiated prices align with Federal cost principles. For non-Federal purchases, entities should prepare a cost or price estimate before procurement whenever possible. For construction contracts, an architect or engineer provides a probable cost opinion, which can be used for procurement purposes. For commodities contracts, a price estimate from sources such as the internet, a catalog, or a vendor may be used. Additionally, for purchases exceeding the SAT, a formal cost or price analysis is required for federal grant purposes after procurement in all sole source procurements, with all contract modifications (e.g., change orders), and in any situation where competition was lacking after a formal procurement process (e.g., only one bid was received). Each procuring entity is responsible for completing this analysis.

C. Procurement Summary

CFR Source	Type	Threshold	Consolidated Requirement	Full Requirement
§200.320(a)(1)	Micro Purchases	$\leq \$10,000 / \$50,000$. <i>Note: Public institutions can be consistent with state threshold of 25k</i>	No procurement documentation required <i>Note that if grantee increases micropurchase threshold above \$10,000 that the annual board certified resolution must be provided.</i>	<ul style="list-style-type: none"> To the extent practicable, purchases must be distributed equitably amongst qualified suppliers with reasonable prices. The distribution of purchases among qualified suppliers can happen either at the time of the purchase or over several purchasing events. No solicitation or rate quotations are required, if the non-federal entity considers the price to be reasonable based on research, experience, purchase history or other information and documents, accordingly. Annual justification required for raised threshold
§200.320(a)(2)	Small Purchases	$\$10,000 / \$50,000 - \$250,000$	Three (3) quotes must be obtained 1. Contract formed with selected vendor including Appendix 2	<ul style="list-style-type: none"> Price or rate quotations must be obtained from an adequate number of qualified sources (minimum of 3 is standard). The quotes must be written / documented, cannot be verbal.
§200.320(b)(1)	Sealed Bids	$\geq \$250,000$	1. Evidence of public advertisement 2. RFP package 3. All bids received 4. Bid leveling/analysis of bids	<ul style="list-style-type: none"> Bids must be publicly solicited from an adequate number of qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised. The invitation for bids must define the items or services in order for the bidder to properly respond.

			<p>performed</p> <p>5. Contract formed with selected vendor including Appendix 2</p>	<ul style="list-style-type: none"> • All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly. • A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. • Any or all bids may be rejected if there is a sound documented reason.
§200.320(b)(2)	Competitive Proposals	≥ \$250,000	<p>1. Evidence of public advertisement</p> <p>2. RFP package</p> <p>3. All bids received</p> <p>4. Bid leveling/analysis of bids performed</p> <p>5. Contract formed with selected vendor including Appendix 2</p>	<ul style="list-style-type: none"> • Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified offerors. Any response to publicized requests for proposals must be considered to the maximum extent practical. • The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and making selections. • Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the non-Federal entity, with price and other factors considered. • The non-Federal entity may use competitive proposal procedures for qualifications- based procurement of architectural/engineering (A/E) professional services whereby offeror's qualifications are evaluated and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot

				be used to purchase other types of services through A/E firms that are a potential source to perform the proposed effort.
§ 200.320(c)	Non-Competitive Proposals	The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold	<ol style="list-style-type: none"> 1. Sole source justification form required providing narrative to the reasons why sole source was the only viable option. 2. Contract formed with selected vendor including Appendix 2 	<ul style="list-style-type: none"> • The item is available only from a single source. • The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation. • The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity. • After solicitation of a number of sources, competition is determined inadequate.
§ 200.321	Minority Businesses Women's Business Enterprise (MWBE)	All acquisitions of property or services	<ol style="list-style-type: none"> 1. Solicitation list includes MWBE(s) 2. MWBE(s) are solicited as potential sources 3. Requirements should be divided into smaller tasks (when economically feasible) to permit maximum MWBE participation 4. Encouraging participation from MWBE 	<ul style="list-style-type: none"> • Placing qualified small and minority businesses and women's business enterprises on solicitation lists. • Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources. • Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises. • Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises. • Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce. • Requiring the prime contractor, if subcontracts are to be let, to take the

				affirmative steps listed in (1) through (5) of this section.
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1.3.2 Procurement by Subrecipients

A. Fixed Amount Subawards

In direct correlation with the [Uniform Guidance for the BEAD Program](#), Fixed Amount Subawards reduce some of the administrative burden for the recipient and subrecipient by allowing partial payment to be made upon completion milestones defined in the Subrecipient Terms & Conditions Agreement. GTA will reimburse costs to subrecipients in accordance with either objectives met, units built, or total project complete. Moreover, based on this subaward type, the following provision of 2CFR200 do not apply: Cost Principles and Procurement.

B. Procurements by States and Indian Tribes

When conducting procurement transactions under a Federal award, a State or Indian Tribe must follow the same policies and procedures it uses for procurements with non-Federal funds. If such policies and procedures do not exist, States and Indian Tribes must follow the procurement standards in [§§ 200.318 through 200.327](#). In addition to its own policies and procedures, a State or Indian Tribe must also comply with the following procurement standards: [§§ 200.321, 200.322, 200.323, and 200.327](#). All other recipients and subrecipients, including subrecipients of a State or Indian Tribe, must follow the procurement standards in [§§ 200.318 through 200.327](#).

Procurement and Policy Compliance

1.4 Contractor Debarment and Suspension

Federal procurement guidelines prohibit contracting with any parties that are listed on the “System for Award Management”⁹ (SAM) as debarred or suspended. This list identifies all parties that have previously been debarred, suspended, or otherwise excluded from receiving any solicitations for procurement activities in addition to contracting on any projects involving federal funds. The procuring entity is responsible for ensuring that they do not contract any debarred or suspended entities and that the entity has an active SAM registration.

1.5 Procurement of Recovered Materials

A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at [40 CFR § 247](#) that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines. Products that can be purchased using recovered materials include, but are not limited to:

- Construction Products (building insulation, carpet, carpet cushion, cement and concrete, consolidated and reprocessed latex paint, floor tiles, flowable fill, laminated paperboard, modular threshold ramps, non-pressure pipe, patio blocks, railroad grade crossing surfaces, roofing materials, shower and restroom dividers, and structural fiberboard)
- Landscaping Products (garden hoses, hydraulic mulch, lawn and garden edging)
- Non-paper Office Products (office furniture, plastic envelopes, and plastic trash bags)
- Paper and Paper Products (newsprint, paperboard, and packaging products)

⁹ www.sam.gov

- Parks and Recreation Products (plastic fencing and running tracks)
- Transportation Products (channelizers, traffic cones, and delineators)
- Vehicular Products (engine coolants, retread tires, and rebuilt vehicular parts)
- Miscellaneous Products (mats, pallets, and signage)

Exemptions from this requirement are available if the purchases cannot be competitively provided within a reasonable timeframe, do not meet reasonable performance standards, or are not at a reasonable price. Procurement specifications should require vendors and contractors to provide certifications concerning recovered materials used in the project.

V. REGULATORY REQUIREMENTS

Bonding Requirements

In accordance with 2 CFR § 200.326, bonding requirements for construction or facility improvement contracts or subcontracts that exceed the Simplified Acquisition Threshold (SAT) are mandatory for the BEAD Program.

A bid guarantee from each bidder amounting to five percent of the bid price is required. This "bid guarantee" must be a firm commitment, such as a bid bond, certified check, or other negotiable instrument, accompanying a bid to ensure that the bidder will execute the necessary contractual documents within the specified time upon acceptance of the bid.

A performance bond from the contractor for 100 percent of the contract price is required. A "performance bond" secures the fulfillment of all the contractor's obligations under the contract.

A payment bond from the contractor for 100 percent of the contract price is required. A "payment bond" guarantees that all persons supplying labor and materials for the execution of the work as required by law will be paid.

Contract Provisions

In addition to its own policies and procedures, GTA must also adhere to the following procurement standards: [§§ 200.321](#), [200.322](#), [200.323](#), and [200.327](#).

Environmental Planning and Historic Preservation

The National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) require comprehensive evaluations of environmental and historical impacts for all funded infrastructure projects before construction can commence. This section outlines the procedural framework and responsibilities under NEPA and NHPA.

National Environmental Policy Act

The National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations mandate an environmental analysis for all major federal actions to assess their potential significant impacts on the environment. NEPA applies to federal agency actions, including decisions to fund non-federal projects through grants and cooperative agreements, if the activities remain under federal authority and control. Non-federal entities must inform the awarding agency of any direct, indirect, or cumulative impacts on the quality of the human environment and assist the agency in complying with NEPA.¹⁰

National Historic Preservation Act

The National Historic Preservation Act (NHPA) and the Advisory Council on Historic Preservation (ACHP) require federal agencies to consider the effects of their undertakings on historic properties and, when necessary, allow ACHP to comment. Historic properties include districts, buildings, structures, sites, and objects. Non-federal entities must notify the awarding agency of any effects an award may have on properties listed or eligible for listing on the National Register of Historic Places

Environmental Assessment

Prior to the initiation of any broadband deployment projects, it is imperative to conduct a comprehensive Environmental Assessment to evaluate the potential environmental impacts. This assessment must encompass studies on air and water quality, soil erosion, wildlife habitat disruption, and other pertinent factors. The National Telecommunications and Information Administration (NTIA) has delineated a detailed step-by-step process for completing the environmental assessment. The NTIA has outlined a general step by step process of what Grantees can expect to partake in to complete the environmental assessment process. (LINK: https://broadbandusa.ntia.gov/sites/default/files/2023-03/NEPA_Review_Environmental_Assessments.pdf)

¹⁰ 40 CFR § 1500 - 1508

Categorical Exclusions

Another component of a National Environmental Policy Act (NEPA) review involves an environmental assessment (EA). This comprehensive document assesses the potential impacts of a proposed federal action, such as a BEAD funded project, to determine if it will significantly affect the environment, including historic or cultural areas. An EA is conducted when a proposed project does not qualify for a categorical exclusion (CE).

A categorical exclusion (CE) refers to actions that a Federal agency has determined, following review by the Council on Environmental Quality (CEQ), to have no significant individual or cumulative impact on the human environment. Therefore, these actions typically do not require an environmental assessment or environmental impact statement.

Recently, NTIA, through the BEAD Restructuring Policy Notice, introduced the Environmental Screening and Permitting Tracking Tool (ESAPTT) wherein GTA will upload within the NTIA Grants Portal to aid in issuing NEPA approvals

Historic Preservation Assessment

A Historic Preservation Assessment must be conducted before starting broadband deployment projects to identify and protect historically significant sites and structures. This assessment will follow NHPA guidelines and recommendations from Georgia's State Historic Preservation Office. Environmental and Historic Preservation Assessment reports should be made available for public review and input to ensure transparency and community engagement. Public consultation can include in-person hearings, meetings (virtual or in-person), and online platforms for gathering stakeholder feedback.¹¹

Mitigation Plan

Based on the findings of the Environmental and Historic Preservation Assessments, a comprehensive mitigation plan should be developed by the grantee. This plan should outline strategies to minimize and mitigate environmental and historic preservation impacts.

Historic Preservation Protocols

Our approach begins with a meticulous review of regulatory frameworks to establish a thorough understanding of requirements for environmental impact assessments (EIAs), categorical exclusions (CEs), and historic preservation permitting. Utilizing advanced environmental science and spatial analysis techniques, we assess potential project impacts and engage stakeholders, working closely with State Historic Preservation Officers (SHPOs) to facilitate mandatory consultations as mandated by NEPA.

For projects requiring in-depth analysis, a detailed Environmental Impact Statement (EIS) will be prepared by the Georgia EPD that comprehensively evaluate alternatives, mitigation strategies, and cumulative effects. In cases eligible for categorical exclusions, GTA will liaison with the state's SHPO and environmental office to expedite reviews while adhering to strict regulatory criteria, ensuring efficient project delivery without compromising environmental stewardship.

Throughout the project lifecycle, GTA will advise prospective subrecipients to collaborate with various federal, state, and local stakeholders, such as:

- **Federal land and resource managing agencies:** This includes the National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management, National Marine Fisheries Service, U.S. Army Corps of Engineers, U.S. Coast Guard, U.S. Forest Service, and others. These agencies will provide guidance on any restrictions or special conditions for infrastructure proposed on federal land or impacting federally managed resources like wetlands, endangered species, and navigable waterways.

¹¹ National Environmental Policy Act, Council on Environmental Quality

- **State and local agencies:** Coordination with the State or Local Historic Preservation Office and other relevant agencies will be necessary, especially those that may need to issue permits for proposed projects.

We prioritize open communication, proactive risk management, and adaptive strategies to address evolving regulatory landscapes and community expectations. Our commitment extends to providing technical assistance through webinars, FAQs, templates, and additional materials aimed at supporting environmental assessments, application preparation, grantee onboarding, compliance, and monitoring.

Build America, Buy America

Requirements

Build America, Buy America Act

The Build America Buy America Act, enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects after May 14, 2022. The domestic content procurement preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects be produced in the United States. Accordingly, all funds made available through the BEAD Program for broadband infrastructure must comply with the Build America, Buy America Act.

General Principles

The BEAD program will adhere the requirements of Build America, Buy America Act (BABAA) (2 CFR § 184), the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.). The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.

Applying the Buy America Preference¹²

All awards under the BEAD program with infrastructure projects must include the Buy America Preference in the terms and conditions. The Buy America Preference must be included in all subawards, contracts, and purchase orders for the work performed or products supplied under the program. The terms and conditions of the BEAD award flow down to subawards to subrecipients.

The Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding brought to the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America preference apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

The Buy America preference only applies to the iron and steel, manufactured products, and construction materials incorporated into an infrastructure project receiving a federal award. If an agency has determined that no funds from a particular project receiving a federal award will be used for infrastructure, a Buy America preference does not apply to that project.

The Buy America preference does not apply to non-infrastructure components or expenditures under an infrastructure project receiving a federal award. The Buy America preference applies to an entire infrastructure project, even if it is funded by both Federal and non-Federal funds under one or more awards.

Categories of Articles, Materials, and Supplies

An article, material, or supply should only be classified into one of the following categories:

¹² See 2 CFR § 184.8 for Exemptions to the Buy America Preference.

- Iron or Steel Products
- Manufactured Products
- Construction Materials
- Section 70917(c) Materials

Construction Material Standards

The Buy America Preference applies to non-ferrous metals, plastic and polymer-based products, glass, fiber optic cable (including drop cable), optical fiber, lumber, drywall, and engineered wood.¹³

Buy America Preference Waivers¹⁴

The Department of Commerce (DOC) may issue waivers of the Buy America Preference under an infrastructure project/program in any case in which the head of the DOC finds that:

- Applying the Buy America preference would be inconsistent with the public interest (a “public interest waiver”)
- Types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality (a “nonavailability waiver”); or
- The inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25 percent (an “unreasonable cost waiver”).

DOC is responsible for processing and approving all waivers, including waivers requested by GTA and on behalf of subrecipients consistent with the procedures in 2 CFR § 184.7. The Made In America Office (MIAO) must review every waiver. To the greatest extent practicable, waivers should be targeted to specific products and projects.

Before issuing a final waiver, the DOC must make the proposed waiver and the detailed written explanation publicly available in an easily accessible location on a website designated by the DOC and OMB. The DOC must also provide a period of not less than 15 calendar days for public comment on the proposed waiver. General applicability waivers are subject to a minimum 30-day public comment period when reviewed for modification or renewal. The MIAO may request that the DOC use a 30-day comment period for other waivers on a case-by-case basis when circumstances applicability waivers are subject to a minimum 30-day public comment period when reviewed for modification or renewal. The MIAO may request that the DOC use a 30-day comment period for other waivers on a case-by-case basis when circumstances warrant — for example when a waiver covers items of special importance to American supply chains (such as those identified in section 3(b) of the Executive Order 13953) or involves a substantial amount of Federal funding.¹⁵

Subrecipients of the BEAD program should consult with the GTA office to understand the process and applicability of waivers to the Buy America Preference before seeking waivers.

Full details of waiver justification types and the process DOC will apply when requesting them can be found in 2 CFR § 184.7.

Limited Liability General Applicability Nonavailability Waiver (“Waiver”)

The purpose of this waiver is for NTIA to grant exceptions to the Buy America laws for certain products so that providers and manufacturers do not need to individually apply for waivers with a few, very limited exceptions.

The Waiver does not provide a process for manufacturers or others to seek exceptions outside of what is included in the Waiver.

¹³ See 2 CFR § 184.6 for the standard associated with each construction material to be considered “produced in the United States”

¹⁴ Sec. 7921(b)(1) of the Build America, Buy America Act

¹⁵ Made in America Office of the Office of Management and Budget

The Waiver does the following:

- Waives requirements for non-optic-glass inputs to preforms
- Fully waives both criteria of the Buy America requirement for all broadband electronics EXCEPT OLTs, OLT line cards, OLT pluggables and ONTs/ONUs.
- Waives the 55% criteria for OLTs, OLT line cards, OLT pluggables and ONT/ONUs, but requires these products to be manufactured in the U.S. and meet manufacturing process definitions detailed in the Proposed Waiver
- Sets criteria for enclosures to be manufactured in the U.S.
- Projects may follow *de minimis* approach for low-cost equipment internationally sourced
- Prohibits the purchase of products manufactured in China for the BEAD Program
- Requires reporting of products that are purchased from foreign sources
- Provides a waiver for a term of 5 years from the date of the finalized Waiver

Procedures

The purpose of the following procedures is to ensure infrastructure projects funded under the GTA BEAD program are adequately documented and in compliance with all requirements of the Build America, Buy America Act.

BABAA Documentation

Generally, the Architect or Engineer contract should include, as a basic service, obtaining and maintaining all BABAA documentation (particularly manufacturers' certifications) during construction, which shall be transferred to the recipient. The architect or engineer will need to certify to this action at the project's end.

Compliance

All iron, steel, manufactured products (including fiber-optic communications facilities), and construction materials used in the project or other eligible activities must be produced in the United States unless a waiver is granted. Under Section 70912 of the Build America, Buy America Act, a manufactured product is considered domestically produced if it is manufactured in the United States and the cost of its components exceeds 55 percent of the total component cost, unless another standard for domestic content is established by applicable law or regulation.

Prospective subrecipients are prohibited from using BEAD funding to purchase or support any covered communications equipment or services as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019. Additionally, the Infrastructure Act prohibits the use of BEAD funding for fiber optic cable and optical transmission equipment manufactured in the People's Republic of China, unless a waiver is obtained from the assistant secretary.

The construction contract(s) must stipulate the procurement and installation of items compliant with BABAA standards or those under an approved waiver. Contractors are obligated to furnish manufacturers' certifications for all BABAA-compliant items to the relevant authority before seeking reimbursement from the agency. Additionally, the contractor must certify that all items utilized in the contract adhere to BABAA regulations and provide corresponding manufacturers' certifications.

For each BABAA-relevant item (excluding aggregate and aggregate binding materials), a manufacturer's certification letter or equivalent documentation evidencing compliance is mandatory. This documentation must include a concise description of the certified item along with its part number (if applicable), confirming compliance with BABAA standards. An authorized representative from the company must endorse this document.

All procuring entities under the GTA BEAD program are responsible for adequately documenting the

compliance of all “Contractors,” “Subcontractors,” “Sellers,” and “Material Suppliers” with the requirements of BABAA. The following is a guide that will help procuring entities work with these entities to ensure compliance is adequately documented.

Assemble the Data

Generate a table listing the country of origin for all materials and components used in the project. Directly beneath this table, provide space for authorized and knowledgeable individual(s) to sign and date below their printed name(s). Following each signature, include the title of the certifying individual(s), the company’s name, and contact details such as telephone number and email address for reaching the individual(s).

Compliance Certification

Prepare a document, either paper or electronic, on the letterhead of the company titled “BABAA Compliance Certification.” Include the identifying project designation in the second line. Then insert the following statement:

“I hereby certify that to the best of my knowledge and belief, all Iron, Steel, Manufactured Products, and Construction Materials installed on this project by my company and by any and all subcontractors and suppliers for this project with the Build America, Buy America Act (BABAA) requirements of the comply Infrastructure Investment and Jobs Act of 2021 (Pub. L. 117- 58, §§ 70901-70953), or are the subject of a waiver approved by the Secretary of Commerce or designee.”

Compilation

The information tabulated in step 3.6.1, “Assemble the Data,” for all materials and components of products employed in the project should then be inserted.

Certifying

After compiling all information and documentation, each certifying individual(s) provides a wet signature and date.

Required Contract Clause

Compliance with BABAA must be spelled out in agreements for services, construction contracts, and procurement contracts. Sample language for inclusion of contracts can be found in Appendix 1 taken from NTIA’s guidance on BABAA.

APPENDIX 1 – SAMPLE LANGUAGE FOR INCLUSION INTO CONTRACTS

Build America, Buy America Act Sample Language for Inclusion Into Contracts (to include loans, grants, and loan guarantee documents)¹⁶

Sample Language for Inclusion into Recipient Contracts

Domestic Preference Requirements for Federal Financial Assistance to Non-Federal Entities. Federal Financial Assistance to Non-Federal Entities, defined pursuant to 2 CFR 200.1 as any State, local government, Indian tribe, Institution of Higher Education, or nonprofit organization, shall be governed by the requirements of Section 70914 of the Build America, Buy America Act (BABAA), under Title IX of the Infrastructure Investment and Jobs Act, Pub. L. 177-58. Any requests for waiver of these requirements must be submitted pursuant to USDA's guidance available online at [USDA Buy America Waivers for Federal Financial Assistance | USDA](#).

Sample Language for Inclusion into Professional Services Agreements

Short Form for Entities Experienced Working with Domestic Preference Requirements

This agreement is for professional services related to a project that is subject to the Build America, Buy America Act (BABAA) requirements under Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub. L. 177-58. While professional services are not subject to BABAA, the Provider understands that they are responsible for ensuring that, absent a waiver by the [name of Federal Agency], Provider shall not approve for use in this project, any iron, steel, manufactured products, or construction materials unless such materials have been produced in the United States. Provider shall obtain all necessary compliance certificates for work that is within provider's scope of work. Failure to do so shall be a default under this agreement. Guidance on complying with BABAA is outlined by the Office of Management and Budget's Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, April 18, 2022.

More Detailed Form for Entities Less Experienced Working with Domestic Preference Requirements

Add to main body of agreement:

This agreement is for services related to a project that is subject to the Build America, Buy America Act (BABAA) requirements under Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub. L. 177-58. Absent an approved waiver, all iron, steel, manufactured products, and construction materials used in this project must be produced in the United States, as further outlined by the Office of Management and Budget's Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, April 18, 2022.

Add to description of services:

Opinions of total project costs and revisions thereof should reflect compliance with BABAA requirements.

Determine and certify that to the best of Provider's knowledge and belief all iron and steel products, manufactured products, and construction materials referenced in any technical analysis/report; the plans, specifications, and bidding documents; any bid addenda; and change orders comply with all federal requirements, including BABAA. Review and approve or take action with respect to shop drawings, samples, and other required Contractor submittals, including applications for payment, to ensure compliance with BABAA. Review substitutes and "or equals" for conformity with contract conditions, [insert name of Agency] regulations, and BABAA requirements. Obtain and review manufacturers' and contractors' certifications on compliance with BABAA requirements and maintain copies of certifications in project files.

Assist Owner, if needed, in due diligence related to any BABAA waiver request.

¹⁶ USDA Attachment F - BABAA Sample Language for Inclusion into contracts.
<https://www.rd.usda.gov/media/file/download/BABAA-samplelanguage-inclusionintocontracts.pdf>

Sample Language for Inclusion into Construction Contracts

Advertisement for Bids

This agreement is for services related to a project that is subject to the Build America, Buy America Act (BABAA) requirements under Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub.

L. 177-58. Absent an approved waiver, all iron, steel, manufactured products, and construction materials used in this project must be produced in the United States, as further outlined by the Office of Management and Budget's Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, April 18, 2022.

Instructions to Bidders

Any request for substitute or "or equal" shall include the Manufacturer's Certification of compliance with the Build America, Buy America Act (BABAA) requirements mandated by Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub. L. 177-58.

If the Instructions include a Federal requirements section, include the following: BABAA requirements apply to this project.

Bid Form

Bidder's representation section: Bidder is familiar with all laws and regulations that may affect cost, progress, and performance of the work, including BABAA requirements.

General or Supplemental Conditions

Definitions Section:

Term	Definition
Build America, Buy America Act (BABAA)	Requirements instituted by the Bipartisan Infrastructure Law of 2021 mandating domestic preference that all iron and steel, manufactured products, and construction materials are produced in the United States.
Construction Materials	Those articles, materials, or supply – other than an item of primarily iron or steel; a manufactured product; cement and cementitious materials; aggregates such as stone, sand, or gravel; or aggregate binding agents or additives – that are or consist primarily of: non-ferrous metals, plastic and polymer-based products, glass, lumber or drywall.
Manufactured Product	Items assembled out of components, or otherwise made or processed from raw materials into finished products. Manufactured products must be manufactured (assembled) in the United States, and the cost of components that were mined, produced, or manufactured in the United States must be greater than 55 percent of the total cost of all components of the project.
Manufacturer's Certification	Documentation provided by a Manufacturer, certifying that the items provided by Manufacturer meet the domestic preference requirements of BABAA

Contractor's Responsibilities Section:

All products must meet BABAA requirements.

Contractor shall include Manufacturer's Certification for BABAA requirements with all applicable submittals. If a specific manufacture is used in the bidding, a statement that Manufacturer will comply with BABAA must be included with the bid submission. Contractor shall comply with BABAA requirements, including coordination with manufacturers, distributors, and suppliers to correct deficiencies in any BABAA documentation.

Engineer/Architect approval of shop drawings or samples shall include review of BABAA documentation.

Contractor shall certify upon completion that all work and materials have complied with BABAA requirements.

For any change orders, Contractor shall provide BABAA documentation for any new products or materials required by the change.

Installation of materials or products that are not compliant with BABAA requirements shall be considered defective work. Contractor should ensure that Engineer/Architect has an approved Manufacturer's Certification or waiver prior to items being delivered to the project site.

By submitting an application for payment, based in whole or in part on furnishing equipment or materials, Contractor certifies that such equipment and materials, to contractor's knowledge, are compliant with BABAA requirements.

Federal Requirements Section:

Domestic Preference: Iron and steel products, Manufactured Products, and Construction Materials used in this project comply with the Build America, Buy America Act (BABAA) requirements mandated by Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub. L. 117-58.

Reporting

Financial and Progress Reports (NIST)

There are reporting requirements associated with every National Institute of Standards and Technology (NIST) grant or cooperative agreement. These reports are due at specific, pre-defined times during the life cycle of a grant. It is important that all reports are accurate, complete, and submitted on time. Reports are required even if no activity has occurred on the project or grant. Progress reports cover only activities occurring during the subject reporting period, while financial reports are cumulative.

For most NIST awards, the progress and financial reports are due on a semi-annual basis for the periods of October 1 - March 31 and April 1 - September 30, or any portion thereof, unless otherwise specified in a Specific Award Condition. Some programs might require quarterly (October 1 – December 31, January 1 – March 31, April 1 – June 30, and July 1 – September 30), annual or off-period reporting. Interim Reports are due 30 days after the end of each reporting period.

Final reports are due 120 days after the end date of the award; refer to the closeout section of this guide for additional detail on final report requirements.

Elements of the progress report (NIST)

The Specific Award Conditions will indicate if a certain format for the progress report is required (e.g., the Research Performance Progress Report). The progress report will generally include the following elements. Discuss any specific requirements with your FPO, including formatting or additional submission requirements.

- **Award Information:** Award Number, Project Title, Agency, Principal Investigator, Award Period, and Reporting Period.
- **Project Summary:** A summary of the activities in the approved award and corresponding project description. The focus must be on activities to be completed within the reporting period.
- **Progress and Outcomes:** Discussion of the activities and progress of the project that occurred within the reporting period, including data, results of any monitoring or data collection activities.

To the greatest extent practicable, performance must be tied back to funds spent in the progress report 2 CFR § 200.329.

- **Challenges:** Any challenges encountered, anticipated problems, delays with the project, or budget transfers, including explanation.
- **Other Requirements:** The Specific Award Conditions will stipulate other reporting requirements, if applicable. Federal Financial Report (SF-425) The financial report must be submitted on the most current SF-425 form. Obligations and expenditures must be reported, per the required reporting schedule identified in the award. The report must match the data as reported in ASAP or as substantiated by the SF-270. The Grants Specialist must reconcile spending against progress reported in the corresponding progress report and monitor drawdowns and spend for unanticipated over or under-spend during the life of the award.

VI. POLICY REQUIREMENTS

Uniformed Guidance

The following 2CFR policy requirements apply to this assistance listing:

Subpart B, General provisions

Subpart C, Pre-Federal Award Requirements and Contents of Federal Awards

Subpart D, Post Federal; Award Requirements

Subpart E, Cost Principles

Subpart F, Audit Requirements

Updated Policy Guidance

GTA will employ a conscious effort to ensure updated policy guidance is applied to the BEAD grants management process. This section of the Grants Manual includes relevant guidance updates to further facilitate compliance with NTIA guidelines.

FAQ 13: Released on August 5, 2025

https://broadbandusa.ntia.gov/sites/default/files/2025-08/BEAD_FAQs_v13.pdf [BEAD Restructuring Policy Notice](#)

The Department of Commerce, National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO): BEAD Restructuring Policy Notice, dated June 6, 2025. It is accessible at:

<https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>

Uniform Guidance: BEAD Program

In December of 2023, NTIA issued a policy notice on the applicability of the Uniform Guidance²⁴ on the BEAD Program. This Policy Notice applies to BEAD subawards for which the major purpose of the subaward is a broadband infrastructure “project,” as the term project is defined in the Section I.C.(t) in the BEAD NOFO. In this policy notice, NTIA states:

Consistent with the clarification provided by the Department of the Treasury in its recent guidance regarding broadband infrastructure projects funded by the State and Local Fiscal Recovery Funds and Capital Projects Fund, NTIA clarifies that Eligible Entities may elect to treat subawards as fixed amount subawards even if the Eligible Entity requires subrecipients to submit evidence of costs. Eligible Entities thus may treat subawards providing for a maximum payment amount that is based on a reasonable estimate of actual cost (see 2 CFR § 200.201(b)(1)) as fixed amount subawards, even if the subaward agreement also provides that payments to the subrecipient will be limited to actual costs after review of evidence of costs....Subrecipients that receive fixed amount subawards pursuant to this Policy Notice are not required to comply with the cost principles under the Uniform Guidance.

NTIA further reiterates that the additional flexibility provided here does not change the BEAD Program’s prohibition on Eligible Entities or subrecipients claiming profit and fees as allowable costs. Moreover, payments to subrecipients under fixed amount subgrants shall be made on a reimbursement basis in accordance with terms of the subgrants. See NOFO Sec. IV.C.1.b. Pursuant to 2 CFR § 200.201(b)(1), acceptable forms of payment include, but are not limited to: (a) partial payments of agreed amounts upon meeting milestones or other triggering events identified in the subgrant; (b) payments on a unit price basis, for a defined unit or units, at a defined price or prices identified in the subgrant; or (c) a single payment upon completion of the project.

²⁴ DEPARTMENT OF COMMERCE National Telecommunications and Information Administration ACTION: Policy Notice; [Tailoring the Application of the Uniform Guidance to the BEAD Program \(ntia.gov\)](#)

Program Income

NTIA provides here that, in the case of subawards whose major purpose is a broadband infrastructure project, BEAD subrecipients may retain program income without restriction. As a result, subrecipients may retain program income, such as income derived from the servicing and use of supported networks and connections (e.g., wholesale revenues, end-user subscription revenues, etc.), for profit. NTIA reiterates, however, that this additional flexibility for the use of program income does not change the BEAD Program's prohibition on Eligible Entities or subrecipients claiming profit and fees as allowable costs.¹² Proposed subrecipient budgets thus may not include profit, fees, or similar charges.

Property Standards for Fixed Amount Subawards

NTIA proposed certain exceptions and clarifications to the property standards noted [here](#). In the case of a subaward that is not a fixed amount subaward, the subrecipient must follow the property standards provided by 2 CFR § 200.310-316.

Federal Interest Period

The Uniform Guidance requires real property and equipment acquired or improved with a subgrant to be held in trust for the beneficiaries of the BEAD Program. The Federal interest in all real property or equipment acquired or improved as part of a subgrant for which the major purpose is a broadband infrastructure project will continue for 10 years after the year in which the subgrant for a project has been closed out in accordance with 2 CFR § 200.344.

1.1 Recordation of the Federal Interest in BEAD-Funded Property

- 1.1.1 Useful Life and Compliance with 2 CFR 200.311, 200.313. During the useful life of the BEAD-funded property, the Grantee must adhere to the requirements contained in the terms and conditions of the award, including adherence to the use, management, and disposition requirements set forth in 2 CFR 200.311 or 200.313, as applicable. NTIA will provide additional information concerning the review and approval process for transactions involving BEAD-funded real property and equipment in subsequent guidance.
- 1.1.2 To document the Federal interest in BEAD-funded real property, the Grantee or Subrecipient must prepare and properly record a "Covenant of Purpose, Use and Ownership" (Covenant). The Covenant differs from a traditional mortgage lien in that it does not establish a traditional creditor relationship requiring the periodic repayment of principal and interest to NTIA. Rather, pursuant to the Covenant, the Grantee or Subrecipient acknowledges that it holds title to the BEAD-funded property in trust for the public purposes of the BEAD financial assistance award and agrees, among other commitments, that it will repay the Federal interest if it disposes of or alienates an interest in the BEAD-funded property, or uses it in a manner inconsistent with the public purposes of the BEAD award, during the useful life of the BEAD-funded property. The Covenant must be properly recorded in the real property records in the jurisdiction in which the real property is located in order to provide public record notice to interested parties that there are certain restrictions on the use and disposition of the BEAD-funded property during its useful life and that NTIA retains an undivided equitable reversionary interest in the BEAD-funded property during the Federal Interest Period. NTIA will provide a suggested sample form to use for the Covenant to record notice of the Federal interest in real property.
- 1.1.3 UCC-1 Filing & Attorney's Certification. Pursuant to 2 C.F.R. § 200.316, after acquiring all or any portion of the equipment under this award, the Grantee or Subrecipient shall properly file a UCC-1 with the appropriate State office where the equipment will be located in accordance with the State's Uniform Commercial Code (UCC). This security interest shall be executed in advance 20 of any sale or lease and not later than closeout of the grant or subgrant, as applicable. The UCC filing(s) must include the below or substantively similar language providing public notice of the Federal interest in the equipment acquired with BEAD funding. Also, a clear and accurate inventory of the subject equipment must be attached to and filed with the UCC-1. The UCC filing must include the below or substantively similar language: The Equipment set forth at Attachment A hereto was acquired with funding under a financial assistance award (Award Number) issued by the National Institute of Standards and Technology, U.S. Department of

Commerce. As such, the U.S. Department of Commerce retains an undivided equitable reversionary interest (Federal interest) in the Equipment for [insert number] years after the end of the year in which the award is closed out in accordance with 2 CFR 200.344.

In addition, within 15 calendar days following the required UCC filing(s), the Grantee shall provide the Grants Officer with complete and certified copies of the filed UCC forms and attachments for the equipment acquired with NTIA BEAD funding including all subgrants, along with a certification from legal counsel, licensed by the State within which the filings were made (Attorney's Certification), that the UCC filing was properly executed and filed in accordance with applicable state law. The Attorney's Certification must include the below or substantively similar language:

NIST Award Number: XX-XX-XXXX Pursuant to 28 USC 1746, I hereby certify as follows:
I am legal counsel at _____. I am licensed to
practice law in the State of _____ having been a license holder of said state and in
good standing since _____.
Attached hereto is a certified copy of UCC-1 form(s) reflecting that this document was filed in the
_____ on _____, 202x, bearing the following filing information [insert
filing data, e.g., instrument number, etc.) and consists of _____ recorded pages as certified by the
Secretary of State of _____.
I certify that this UCC-1 form(s) has/have been validly executed and properly recorded as noted
above. I certify under the penalty of perjury that the foregoing is true and correct.
Executed on this _____ day of _____. _____ (Attorney name and
title) (Address and phone number)

In addition, during the estimated useful life of the [type of equipment, e.g. robotic equipment], the Grantee or Subrecipient is hereby authorized and directed by the Grants Officer to timely file any necessary UCC-3 continuation statements (or other filings) for the subject equipment consistent with the requirements set forth in this specific award condition. Copies of all filed UCC continuation statements, together with an Attorney's Certification, must be submitted to the Grants Officer within 15 calendar days following each such filing. The UCC filing(s) and the accompanying Attorney's Certification(s) must be acceptable in form and in substance to NTIA and the National Institute of Standards and Technology (NIST) Grants Officer.

Audit Requirements

Under the Uniform Guidance, all non-Federal entity subrecipients that expend \$750,000¹⁸ or more in Federal award funds, in the aggregate across all subawards, during their fiscal year are subject to the audit requirements in subpart F. Non-Federal entity subrecipients are required to submit single audits or program-specific audits to the Federal Audit Clearinghouse, the government wide repository for audits of financial assistance programs.

Commercial entity subrecipients are not subject to Subpart F but are subject to the audit requirements as stipulated in the award or sub-award between a Federal awarding agency and a recipient.

And pursuant to 2 CFR § 200.501(h), Eligible Entities have an obligation to ensure compliance by commercial entity subrecipients. Under that provision, methods to ensure compliance for Federal awards made to commercial entity subrecipients may include pre-award audits, monitoring during the agreement, and post-award audits.

¹⁸ The threshold triggering the requirement for a Single Audit increased in October of 2024 from \$750,000 to \$1,000,000. This means that only entities that annually expend \$1 million or more of federal funds in their fiscal year will be subject to a Single Audit when this change goes into effect. Current NTIA guidance reflects \$750,000 amount while awaiting an update to confirm the alignment to the increase.

Change in Key Personnel and Principal Investigator/Project Director

In accordance with 2 CFR § 200.308 certain changes in key personnel or Principal Investigator (PI) require approval from the Grants Officer. Recipients must discuss any changes with your NIST Grants Specialist and Federal Program Officer as soon as possible. In some cases, the selection of an application for award is made partly on the qualifications of the Principal Investigator. NIST may wish to consider alternative remedies (e.g., transferring the award to the current PI's new organization, when applicable). A request to change the official PI or Key Personnel must be submitted via email to the UGAM, or as designated in the Specific Award Conditions. The request for a change in PI or Key Personnel is not approved until the Grants Officer issues written approval.

Record Management

This policy outlines the procedures record retention compliance while adhering to the applicable BEAD program requirements, Georgia State laws, and 2 CFR § 200. It is intended to establish a policy framework for BEAD program staff, contractors, subrecipients and any other resources engaged to support the successful delivery of the BEAD program.

The compliance oversight will be driven by the Compliance Team who has adequate knowledge and experience to effectively implement the BEAD program. The Compliance Team will consist of contractors with extensive experience and knowledge of accounting and audit principles, Uniform Guidance, and federal grant funding.

Record Retention and Policy Compliance

All records related to grant management, including time and effort reporting, and supporting documentation, must be retained in compliance with federal regulations and program guidelines. Subrecipients shall maintain appropriate audit trails to provide accountability for all expenditures using grant funds. Audit trails maintained by the subrecipient will, at a minimum, identify the supporting documentation prepared by the subrecipient to permit an audit of its accounting systems and verification of expenditures under this grant program. The subrecipient must maintain fiscal records and supporting documentation for all expenditures under this grant pursuant to 2 CFR § 200.333 and state law, except that the period for retention of records shall be a minimum of seven (7) years from the later of the completion of conclusion of the grant project; submission of the final report; or any litigation, dispute, or audit. Records related to expenses related to this grant must be retained for seven (7) years after final disposition. GTA may direct the subrecipient to retain documents for longer periods of time or to transfer certain records to GTA or federal custody when it is determined that the records possess long-term retention value in accordance with retention schedules approved by the State Records Committee or the federal government.

VII. ANTI-FRAUD, WASTE, AND ABUSE POLICY

The State will utilize a mechanism to report fraud, waste, and abuse operated by the Office of the Inspector General (OIG). The State will also utilize Federal reporting mechanisms such as the U.S. Department of Commerce's Inspector General hotline.

Reports and Investigations

Suspected fraud, waste, or abuse should be reported by contacting Georgia's Offices of Inspector General based on the requirement for GTA to establish and widely publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) or subrecipients' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program.

Suspected fraud, waste, or abuse can be reported by utilizing the OIG complaint form found [here](#).

The telephone numbers and email addresses for GA OIG can be found below:

Primary: [\(404\) 656-7924](tel:(404)656-7924)

Toll Free: [\(866\) 435-7644](tel:8664357644)

Email: inspector.general@oig.ga.gov

Whistleblower Protection

If you are a public employee, you may qualify for whistle blower protection, which will protect your identity from disclosure without your consent unless certain rare exceptions apply. See O.C.G.A. § 45-1-4 for details.

VIII. DEFINITIONS

Term	Definition
Abuse	The excessive or incorrect utilization of services or the undertaking of actions that deviate from standard business practices.
Accounting System	A framework used to record and report financial transactions for the purpose of managing, monitoring, and assessing Direct and Indirect Costs.
Automated Clearing House (ACH)	A banking transaction within the United States that electronically transfers funds between banks, bypassing credit card networks, commonly known as ACH transfer or transaction.
Administrative Cost	Refer to Indirect Cost.
Allowable Cost	A cost deemed reasonable, allocable, and conformable to cost principles while being consistent with policies and procedures applicable to both federal and non-federal activities; recognized under Generally Accepted Accounting Principles; and not charged to any other federal award, unless specifically permitted by law.
American Rescue Plan Act Funding (ARPA)	A legislative package signed into law on March 11, 2021, aimed at mitigating COVID-19 effects, with \$1.9 trillion allocated for various supports.
Applicant	Any individual, entity, or organization that requests Grant Funds.
Applicant Agency	An agency requesting Grant Funds, which becomes the Grantee upon award.
Application	Refer to Grant Application.
Appropriation	Funds allocated by legislative directive for specific purposes.
Approved Budget	A financial plan documented in the Grant Agreement, detailing all obligated funds, inclusive of federal, state, and matching contributions for the project.
Assistant Secretary	The deputy head of the Communications and Information sector at the United States Department of Commerce.
Assurance	A written commitment by an Applicant, included in the application, to comply with specified requirements if awarded Grant Funds.
Audit	Financial, Single, or Program Audit conducted according to §200.514 Scope of Audit for non-Federal entities expending \$750,000 or more in Federal awards during their fiscal year, unless opting for a program-

	specific audit as per §200.501(c).
Authorization	Legislation sanctioning the activities of federal agencies and programs.
Authorized Signature	The legally binding endorsement by an individual authorized to act on behalf of an organization, typically on the Grant Award.
Award	Financial assistance given by federal, state, and/or private foundation entities to support a public purpose, inclusive of grants and agreements, as monetary funds or property.
Award Special Conditions	Clauses in an award that mandate particular actions as prerequisites for receiving the grant.
Broadband Equity Access and Deployment Program (BEAD)	\$42.45 billion to expand high-speed Internet access by funding planning, infrastructure deployment and adoption programs.
Bid	A proposal from a company, firm, or individual to supply goods or services, made in response to a request for those goods or services.
Broadband DATA Maps	Maps developed following the 18 requirements of 47 U.S.C. Section 642.
Broadband Equity	Realized when every individual and community has access to cost-effective, high-speed, and dependable internet that fulfills their ongoing requirements.
Broadband Serviceable Location	A business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed.
Broadband; Broadband Service	The terms 'broadband' or 'broadband service' are defined as 'broadband internet access service' under Section 8.1(b) of Title 47 in the Code of Federal Regulations or any following regulation. This refers to a widespread retail service provided through wire or radio, capable of transmitting data at minimum speeds of one hundred megabits per second for downloads and at least twenty megabits per second for uploads, covering all or most internet endpoints. It includes any features necessary for the operation of the communications service but does not include dial-up internet.
Budget	An itemized financial plan for a grant, detailing both revenues and expenditures.
Budget Category	Allocation of project expenses into various classifications, such as Personnel, Supplies, Operating, Travel, Equipment, Consultant/Contracts, and Indirect Costs.
Budget Revision	A request by a Grantee/Subrecipient to amend an approved budget, potentially involving fund reallocations or changes to Budget Categories.
Budget Worksheet	A tool used for itemizing, quantifying, and pricing resources needed to execute a project's activities, like

	personnel, materials, and equipment.
Build America, Buy American (BABAA)	A legislative measure that requires all iron, steel, manufactured products, and construction materials used in federally funded infrastructure projects to be produced in the United States.
Buy America Preference	The 'domestic content procurement preference' outlined in section 70914 of the Build America, Buy America Act mandates that the leader of each Federal agency must guarantee that all funds allocated for a Federal infrastructure project can only be used if all the iron, steel, manufactured goods, and construction materials used in the project are made in the United States.
Buy American	A set of procurement rules established by the United States government that requires federal agencies to prefer purchasing American-made goods and materials in their contracts.
Buy American Act (41 U.S.C. § 8301–8305)	Legislation requiring the federal government to prefer U.S.-made products in its purchases.
Capital Projects Fund	The Capital Projects Fund (CPF) provides \$10 billion to states, territories, freely associated states, and Tribal governments to fund critical capital projects that enable work, education, and health monitoring in response to the public health emergency. These funds are addressing many challenges laid bare by the pandemic, especially in rural America, Tribal communities, and low- and moderate-income communities, helping to ensure that all communities have access to the high-quality modern infrastructure, including broadband, needed to access critical services.
Cash Match	Non-federal monetary contributions required from a Grantee to complement the federal Grant Award funds, including actual cash outlays for project costs like personnel salaries.
Catalog of Federal Domestic Assistance (CFDA)	A directory of Federal programs, services, and activities providing assistance to the American public, each with a unique CFDA number for identification.
CFR	Code of Federal Regulation - The codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government. Title 2 part 200 establishes uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities.
Change order	An adjustment to the original contract, either adding or removing tasks, which alters the original contract's total cost and/or the projected completion date. Approval from the GTA, subrecipient, contractor, subcontractor, and project architect or engineer, as relevant, is required before the change order can be enacted.
Closeout Procedures	Steps to confirm completion of all administrative actions and required work of a grant.
Code of Federal Regulations (CFR)	The collection of permanent rules published in the Federal Register by federal departments and agencies.

Cognizant Agency for Indirect Costs (Federal Cognizant Agency)	A federal agency tasked with the review, negotiation, and approval of indirect cost proposals and allocation plans on behalf of the government.
Commingling of Funds	The mixing of Grant Award funds with other financial sources, which is prohibited to ensure that each award is individually accounted for.
Competitive Grant	A discretionary grant for which applicants compete, subject to selection freedom by the funding source. Refer to Discretionary Grant.
Compliance Team	The Compliance Team will be made up of contractors who possess a deep understanding and expertise in accounting and auditing principles, Uniform Guidance, and federal grant funding.
Component	Any article, material, or supply, whether processed or raw, that is directly integrated into a finished product; or, in relevant cases, a product made of iron or steel.
Conflict of Interest (1.1.2)	A circumstance where a person or entity is engaged with various interests, which may be financial or of other types, and advocating for one interest might mean acting in opposition to another.
Consultants	Individuals or organizations employed by grant recipients or subrecipients to deliver professional services associated with the BEAD program.
Contract	An enforceable legal agreement between parties where each promises to perform an action in exchange for a benefit, known as consideration. It's established on the basis of several factual elements, which include: a commitment to act, a designated time or situation for fulfilling that commitment, specific conditions that detail the obligations including the execution of said promises, and the actual carrying out of the agreed actions. Specifically, a Grant Agreement is a type of contract awarded to recipients of grant funding.
Contract / Contractors	For the context of Federal financial assistance, a contract is a legal document through which a recipient or subrecipient acquires property or services necessary to implement a project or program funded by a Federal award.
Contractor	A party engaged through a contract to provide goods or services necessary for carrying out a project or program under a Federal Award.
Cooperative Agreement	A binding legal contract where the federal government grants something of value, often monetary, to a state, local government, or private entity for the purpose of serving the public interest.
Coronavirus State Fiscal Recovery Funds	Part of the American Rescue Plan, providing \$350 billion for state, local, territorial, and Tribal governments to address COVID-19 impacts.
Corrective action	Necessary actions to address identified issues or concerns.
Cost Allocation Plan	A document outlining methods and procedures for distributing costs across various programs.

Cost Sharing (Matching)	An arrangement where the grantee commits to contributing a certain sum or percentage of the project's costs, sometimes through "in-kind" contributions.
Data Universal Numbering System (DUNS)	The (DUNS) number is a nine-digit identifier assigned by Dun & Bradstreet to uniquely identify business entities, which was a requirement for applying for federal grants and contracts. However, this identifier has been replaced by the Unique Entity ID (UEI), which is managed through the System for Award Management (SAM). The transition to the UEI as the new standard for federal awards identification occurred on April 4, 2022.
De Minimis Indirect Cost Rate	Grantees who have not previously established an Indirect Cost Rate can opt to apply a standard 10% De Minimis Rate to their Modified Total Direct Costs (MTDC), a decision which can be perpetually utilized. This option excludes grantees mentioned in Appendix VII, Part 200 for States, Local Governments, and Indian Tribes. It's essential to charge costs either as indirect or direct, avoiding any duplication or inconsistent categorization, as per section §200.403. Once this approach is adopted, it must be consistently applied across all federal funding until the grantee decides to negotiate a different rate, an action that can be initiated at any time by the non-federal entity.
Debarment	A sanction imposed to exclude a recipient from participating in federal contracts and certain non-procurement transactions.
Department of Commerce	The United States Department of Commerce is an executive department of the U.S. federal government concerned with creating the conditions for economic growth and opportunity.
Department of Transportation and Development	A state agency responsible for the maintenance and regulation of transportation infrastructure and services, including highways, railroads, and public transportation systems.
Desk Review	Monitoring that includes evaluation of Subrecipient reports and activities.
Digital Inclusion	Denotes the essential measures needed to make sure every individual and community, particularly those facing the greatest barriers, can access and use Information and Communication Technologies (ICTs) (National Digital Inclusion Alliance, n.d.).
Direct Appropriation	Funding dedicated to a specific end, generally through legislative or executive designation.
Direct Costs	Expenses directly attributable to a project, encompassing only actual cash outlays, not indirect costs.
Disallowed Costs	Expenditures deemed outside the grant's scope, excessive, or non-compliant with grant terms.

Discretionary Grant	An award given under regulatory frameworks that permit the funding entity to have considerable discretion in choosing the project, the recipient, and setting the funding amount. Typically, such funds are allocated through a competitive process. This is also referred to as a Competitive Grant.
Disposition (of Equipment)	The process of handling equipment no longer required for its original purpose under an award.
Drawdown	The method by which grant recipients formally request their allocated grant money.
Electronic Fund Transfer (EFT)	A system that allows the transfer of funds between banks electronically, without manual bank staff intervention.
Eligibility	A set of criteria that applicants must satisfy to qualify for a program.
Eligible Entity	Refers to any state in the United States, the District of Columbia, Puerto Rico, American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands, or in instances where an application fails, a political subdivision or group of subdivisions acting as a Substitute Entity.
Employee	As per the I.R.S., someone who performs services under an employer's control regarding what and how tasks are executed.
Entitlement Grant	Funds provided to eligible entities based on a statutory formula, not via competitive processes.
Entity	Any government organization, public or private entity, or federal agency involved in receiving an Award or Subaward, as defined at 2 CFR § 25.
Environmental and Historic Preservation (EHP)	A process that ensures compliance with federal laws related to environmental and historic preservation during the planning and implementation of projects, ensuring that environmental and historical resources are protected.
Equipment	Property with a per-unit acquisition cost of \$5,000 or more and a useful lifespan exceeding one year.
Evaluation	A numerical assessment measuring a project's success against its goals and objectives.
Excluded Parties List	A previously maintained GSA database, now replaced by the System for Award Management (SAM), listing parties excluded from federal procurement and assistance.
Expenditure	The utilization of funds by a non-Federal entity for project-related costs under a Federal award.
Fair Market Value (FMV)	The price at which property would transact between a willing buyer and seller, both having reasonable knowledge and neither being compelled to act.
Federal Agency	An organizational unit of the U.S. government with responsibilities outlined and specified in 5 U.S.C. 551(1) and further detailed in 5 U.S.C. 552(f).

Federal Award	Financial support received directly or indirectly from federal agencies, characterized by either financial assistance or cost-reimbursement contracts.
Federal Award Identification Number (FAIN)	A distinct number assigned to each Federal Award for tracking purposes.
Federal Awarding Agency	A Federal entity providing direct Award funds and specifying the terms of use.
Federal Communications Commission	An independent agency of the U.S. government created to regulate interstate communications by radio, television, wire, satellite, and cable.
Federal Financial Assistance	Value transfer, typically monetary, from a federal agency to a non-federal entity, under agreements such as Cooperative Agreements and Grants.
Federal Funding Accountability and Transparency Act (FFATA)	A 2006 act mandating public access to Federal Award data via a searchable website, currently www.USASpending.gov .
Federal Register	The official daily publication for rules, proposed rules, and notices of federal agencies and organizations.
Federal Share	The portion of project costs funded by Federal resources.
Federally Approved Indirect Cost Rate	A sanctioned indirect cost rate that has been officially agreed upon through negotiations between a grantee and the federal government.
Final Disposition (of equipment)	Equipment obtained through a grant that has a fair market value of under \$5,000 per item can be kept, sold, or otherwise discarded without any additional responsibilities to the agency that provided the funding.
Financial Assistance Agreements	Contracts to provide financial aid, mainly through grants and cooperative agreements.
Financial Assistance Standard Terms and Conditions	The uniform conditions and stipulations applied to financial assistance instruments such as grants and cooperative agreements.
Financial Audit	An impartial assessment that verifies the accuracy and completeness of an organization's financial statements for stakeholders like regulators and investors.
Financial Officer	The individual in charge of a Grantee's financial activities, including accounting, funds management, and financial reporting.
Financial Review	A financial review offers a moderate level of assurance that an organization's financial statements are accurate and do not require significant changes, ensuring they adhere to established accounting standards through a process of questions and analytical evaluations.
Financial Risk Assessment	An evaluation by the Pass-Through Entity of Subrecipients' risk of noncompliance for subrecipient monitoring (OMB 2 CFR § 200.332(b)).

Fiscal Agent	An organization can act as a Fiscal Agent for artists or entities that cannot legally apply for grants themselves. This agent handles the grant application process and manages the funds but remains legally accountable for their use. Auditors typically require that both the applicant's financial records and their related activities be audited before issuing an unqualified audit opinion to a Fiscal Agent.
Formal Procurement	Procurement methods employed when the cost of acquiring property or services under a federal award surpasses the Simplified Acquisition Threshold (SAT).
Formula Grant	Funding distributed to eligible entities based on legislative formulas, encompassing block and categorical grants.
Fraud	The deliberate misrepresentation or hiding of an important fact that misleads others and causes them to take actions to their disadvantage.
Funding Period	The timeframe during which funds are available for obligation by the grantee.
General Fund	A financial repository for supporting the budget or financing of government operations.
General Ledger	The main accounting record of a company that consolidates all the financial and non-financial data from various subledgers or books of original entry. It includes accounts for all transactions related to a company's assets, liabilities, equity, revenue, and expenses, serving as a central repository for all accounting data.
Generally Accepted Accounting Principles (GAAP)	A framework of accounting standards, guidelines, and detailed procedures that dictate financial reporting practices. Recognized universally as the benchmark for financial accuracy, GAAP ensures uniformity and reliability in financial statements.
Generally Accepted Government Auditing Standards (GAGAS)	Audit principles issued by the U.S. Comptroller General, applicable to financial audits.
Gifts/Donations	Contributions made for philanthropic reasons or to support a cause.
Goals	Broad statements that define the intended achievements of a project, linked to specific Objectives.
Governor's Emergency Education Relief Fund	A fund provided by the CARES Act to help governors provide emergency support to education agencies and institutions most significantly impacted by COVID-19.
Grant	Funding provided by a governmental entity to support public services, stimulate the economy, and benefit the public.
Grant Agreement	A financial assistance contract between a Federal awarding agency or Pass-through Entity and a non-Federal entity.
Grant Agreement Modification	Changes to an executed Grant Agreement.
Grant Amendment	A modification to any aspect of a Grant Award, except for the involved parties.
Grant Announcement	Refer to Funding Opportunity Announcement.

Grant Application	Specific documents and forms compiled to request grant funding.
Grant Award	The complete set of documents and activities pertaining to a funded initiative.
Grant Award End Date	The conclusion of the period during which awarding agency support ceases.
Grant Award Notice (GAN)	A legal document confirming that a grant has been awarded. Federal agencies use it to notify recipients of the initial award and to document any subsequent modifications to the grant. This document is also known as a Notice of Grant Award.
Grant Award Period	The span defined in the award document marking the commencement and termination of agency sponsorship.
Grant Award Start Date	The inception of the period in the award document marking the start of agency sponsorship.
Grant Extension	An elongation of the original Grant Award Period without additional funds.
Grant Funds	Monetary resources received through a Grant Award.
Grant Number	The identifier for tracking a Grant Award and associated documentation.
Grant Opportunity	Refer to Funding Opportunity Announcement.
Grant Proposal	Refer to Grant Application.
Grant Reviewer	An individual who assesses and often scores Grant Applications in a competitive process.
Grantee	An entity or individual awarded a grant.
Grantor	An agency or department dispensing grant funds, either originally or as a pass-through.
Grants Life Cycle	The process encompasses everything from the initial announcement of grant availability to the final closeout of the grant. It includes submitting applications, evaluating them, distributing the funds, and monitoring the outcomes after the grant has been awarded.
Independent Contractor	An individual qualifies as an independent contractor if the payer only controls the outcome of the work, not the methods used. However, if the employer dictates the tasks and how they are carried out, the individual is considered an employee, not an independent contractor, even if labeled otherwise. The key is whether the employer has the legal right to control the work's details.
Indirect Cost	Expenses for shared purposes benefiting more than one project, not easily attributable to a specific cost objective.
Indirect Cost Rate	A rate negotiated with the Federal government representing the proportion of indirect costs to a grant.
Informal Procurement	Procurement methods applied when the cost of property or services under a Federal award stays below the Simplified Acquisition Threshold (SAT).
Infrastructure	Current assets such as facilities, equipment, materials, and structures that an internet service provider uses primarily for its business or public enterprise

	operations. This includes, but is not limited to, items like copper wires, optical cables, loose tube cables, communication huts, conduits, vaults, patch panels, mounting hardware, poles, generators, network nodes, routers, switches, microwave relays, receivers, site routers, outdoor cabinets, towers, easements, rights-of-way, and buildings or structures owned by the entity that are utilized for placement or collocation purposes.
Infrastructure Investment and Jobs Act (IIJA)	A U.S. law enacted in 2021 that allocates approximately \$1.2 trillion to modernize and improve the nation's infrastructure. This includes investments in transportation, broadband, utilities, and environmental remediation, aimed at enhancing economic growth, creating jobs, and addressing climate change.
Initial Proposal Funding Request (IPFR)	A preliminary request for funding outlining a proposal's financial needs.
In-Kind Match	Non-cash contributions valued at market rates required from a Grantee to supplement the Federal Grant Award funds.
Interagency Agreement	A formal arrangement between governmental agencies defining collaborative efforts.
Internal Control	Procedures established by a Grantee to ensure compliant management of Grant Awards as per Federal guidelines.
Internal Controls over Financial Reporting (ICFR)	A process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements in accordance with applicable accounting standards.
Internet Service Provider	A company that provides subscribers with access to the internet.
Letter of Intent (LOI)	A letter or application that describes an organization's activities and funding needs is sent to a potential grantor. This initial communication helps to assess if it is suitable to proceed with a detailed grant proposal.
Letter of Support	A testimonial accompanying a proposal, endorsing the project from an expert or supporter.
Local Government	A local church district, city or town government, or a district's board of education.
Maintenance of Effort	A statutory requirement mandates that recipients, to qualify for federal funding, must sustain their financial support to the program at a specified percentage of their previous fiscal year's contribution, which can be up to 100% or less.
Management Letter	Communication from auditors post-audit, discussing financial and management issues and suggesting improvements.
Manufactured products	Items, substances, or resources that have been transformed into distinct forms and shapes or merged with other items, substances, or resources to produce a new product with characteristics different from the individual components.

Manufacturer's Certification	Documentation issued by a manufacturer confirming that the products supplied comply with the domestic preference standards of the BABAA
Match	A stipulated amount or percentage of funds a grantee must raise to match a grant.
Matching Funds	Non-Federal contributions required to complement Federal Grant Award funds.
Memorandum of Understanding (Interagency Agreement)	A document outlining agreed collaborative work between government agencies or departments.
Micro-purchase	A transaction for supplies or services with a total cost that falls below the micro-purchase threshold. Micro-purchases are considered a part of the smaller purchasing activities of a non-Federal entity.
Modified Total Direct Costs (MTDC)	The direct costs for a project, excluding specified items like equipment and exceeding \$25,000 per subaward.
Monitoring	A review process of the financial and programmatic management aspects of a grant, using various sources of information.
Narrative	A written proposal detail explaining the who, what, why, where, when, and how of the intended project or objective.
Narrative Report	A detailed account of activities and progress under a Grant Award, potentially including data elements.
National Environment Policy Act (NEPA) (42 U.S.C. § 4321 et seq.)	An environmental law that mandates federal agencies to assess the environmental effects of their proposed actions prior to making decisions.
National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.)	Legislation intended to preserve historical and archaeological sites in the United States.
National Telecommunications and Information Administration (NTIA)	An agency of the U.S. Department of Commerce that advises the President on telecommunications and information policy issues, including broadband deployment, spectrum management, and internet governance.
National Institute of Standards and Technology (NIST)	A non-regulatory US government agency that develops standards and guidelines to promote innovation and technological competitiveness
No-Cost Grant Extensions	An extended Grant Award Period without additional funding, allowing completion of the original work scope.
Non-Federal Entity (NFE)	An organization involved in a Federal award as either a Recipient or Subrecipient, excluding federal entities.
Non-Permanent Record	Records that possess temporary value to the day-to-day operation of the agency or to the preservation of the institutional memory of that agency.
Nonprofit Organization	Any corporation, trust, association, cooperative, or similar entity (excluding Institutions of Higher Education) that operates mainly for scientific, educational, service, charitable, or similar public interest purposes. It must not be primarily profit-driven and should use its net proceeds to enhance, maintain, or grow its operations.

Notice of Funding Opportunity (NOFO) or Funding Opportunity Announcement (FOA)	Documentation announcing the intent to provide grants, known variably as Grant RFP, Grant Opportunity, etc.
Notice of Grant Award	The document that communicates the provision of Grant Funds to a Grantee.
Objective	Tangible, quantifiable targets of a project, linked to specific goals and outcomes.
Offer	A reply to a solicitation that would create a contractual obligation if accepted. When responding to an Invitation to Bid (ITB), these replies are referred to as 'bids' or 'sealed bids'.
Office of Management and Budget (OMB)	The federal agency within the Executive Office of the President responsible for overseeing the implementation of the President's vision across the Executive Branch.
Office of Planning and Budget	A government office dedicated to fiscal planning and budget management.
On-Site Monitoring Visit	An in-person evaluation of grant-related activities conducted by a Grantor.
Outcomes	The measurable results or impacts of a project, indicating its success.
Pass-Through Entity (PTE)	A non-federal organization that distributes federal program funds to a subrecipient to facilitate the execution of a portion of the program.
Pass-Through Funding	Federal funds managed by a Pass-Through Entity rather than being distributed directly from the federal level.
Payment Request	A formal application for reimbursement of expenses under a Grant Award.
Peer Review	An assessment process involving experts to review and judge funding proposals.
Permanent Record	A document that is permanently preserved and never discarded.
Personnel	Staff members whose salaries and benefits are wholly or partly funded through Grant or Matching Funds, governed by written policies.
Prime Recipient	A non-Federal entity known as a recipient is one that directly receives a federal award from a federal awarding agency to implement a specific activity within a federal program. This designation as a recipient does not extend to subrecipients. For further details, refer to § 200.69 regarding Non-Federal entities in the OMB Uniform Grants Guidance.
Prior Approval	Official consent required in advance for actions that impact the financial or operational aspects of a project.
Procurement	The acquisition process of goods and services necessary for grant-funded project execution.

Produced in the United States	Refers to iron or steel products where all steps, from initial melting to coating, took place in the United States. For manufactured products, it means the item was made in the United States and the cost of its components, which were mined, produced, or made in the U.S., exceeds 55 percent of the total cost of all components. For construction materials, it indicates that all manufacturing processes were conducted in the United States.
Program	A set of activities funded by a grant, categorized as either a federal or non-federal initiative.
Program Administrator	An individual overseeing the financial and administrative tasks of a grant.
Program Announcement	Also known as a Request for Application or Announcement of Funding Availability, indicating available grants.
Program Audit	A non-federal entity spending \$750,000 or more in federal awards during its fiscal year must undergo a Single Audit as per §200.514, unless it opts for a program-specific audit. If federal awards are from just one federal program (excluding research and development) and don't require a financial statement audit, the entity can choose a program-specific audit according to §200.507 instead.
Program Income	Revenue earned by a grantee directly from grant-supported activities.
Programmatic Report	Refer to Narrative Report.
Progress Report	Refer to Narrative Report.
Project	A set of planned activities and expenditures outlined in a Grant Agreement.
Project Cost	All expenses tied to approved activities under a Grant Agreement.
Project Director	The individual with daily responsibility for project execution within the Grantee organization.
Project Number	Refer to Grant Number.
Project Officials	Key personnel managing a Grant Award, including but not limited to the Project Director and Financial Officer.
Project Period	The time span for which a project is active, as defined in the Grant Award.
Project Title	The name given to a Grant Award, typically chosen by the Grantee during application.
Public Record	Documentary material in any physical form, prepared, utilized, or maintained by a public entity in the course of routine agency operations under the laws of the State of Georgia.
Purchase Order	A legal contract between two parties that are signed only by the payer and incorporate a layered approach. This means they depend on various supporting documents which together create a complete contract. This process involves re-appropriated funds.
Recipient	An organization receiving a Federal award directly for the implementation of program activities.

Reconciliation	The process of comparing grant transactions to documentation and addressing discrepancies.
Reimbursement	Compensation to a Recipient for incurred costs under a Grant Award.
Request for Application (RFA)	An announcement, either public or private, informs potential applicants about the opportunity to apply for grant funding. This is also referred to as an Announcement of Available Funding (AAF) or a Request for Proposal (RFP). For more details, refer to the Funding Opportunity Announcement.
Request for Proposals (RFP)	A publication by an agency or company requests proposals from potential suppliers for the procurement of goods, services, or assets through a formal bidding process.
Request for Qualifications (RFQs)	A bidding request in which an entity invites vendors to submit price estimates for supplying goods or services. A request for qualifications (RFQ) specifically seeks engineering or architectural services.
Retention Period	The specified duration for maintaining records, regardless of format.
Retention Schedule	A catalog of records kept by an entire organization or specific programs, detailing the duration each record should be retained. Record retention schedules cover all forms of records, including paper, photographs, videos, emails, and other digital formats like scanned documents, word processing files, spreadsheets, database entries, and digital photos and videos.
Risk Assessment	Refer to Financial Risk Assessment.
Schedule of Expenditures of Federal Awards (SEFA)	The Schedule of Expenditures of Federal Awards (SEFA) is a required financial report for organizations that spend \$750,000 or more in federal funds during their fiscal year. It details all federal assistance received and spent by the organization, and is essential for the Single Audit process under Uniform Guidance.
Secretary of State	Agency responsible for supervising the approval of record retention schedules for state and local entities.
Section 70917 materials	Cement and materials similar to cement; aggregates like stone, sand, or gravel; or binding agents or additives used with aggregates.
Shapefile	A file format used for saving, displaying, and analyzing geospatial data that shows broadband coverage, consisting of multiple component files.
Signature Authority	An individual empowered to legally bind the Grantee in agreements.
Simplified Acquisition Threshold (SAT)	The dollar amount of \$250,000 under which a Nonfederal entity is allowed to acquire property or services through micro-purchase and small purchase procedures.
Single Audit	A comprehensive audit for entities spending \$750,000 or more in Federal awards per fiscal year, as per §200.514.
Special Conditions	Award terms applied on a case-by-case basis and included in the Grant Agreement, possibly derived from Federal Award conditions.

State Agency	An administrative division of the State government.
State Historic Preservation Offices (SHPO)	A State-level office that manages the preservation of historical sites and buildings, ensuring compliance with federal and state historic preservation laws.
Statement of Work (SOW)	A document that outlines the project's purpose, goals, and expected performance requirements.
Subaward	Funds given by a Pass-through Entity to a Subrecipient to conduct part of a Federal program, not including Contractor payments.
Subcontractor	Third parties engaged by a Grantee to assist with work under an Award.
Subgrantee	An entity that receives a Subaward to help implement a Federal Program but is not an individual beneficiary of such a program.
Subrecipient Reporting	The process by which Subrecipients document and report their use of federal assistance to the Grantee for monitoring purposes.
Subledger	A detailed record supporting the General Ledger, with entries for specific transactions.
Subrecipient	A non-Federal organization that gets a subaward through an intermediary to execute a part of a Federal program is responsible to the granting body for the funds' usage, excluding individuals who benefit from the program. This organization might also directly receive other federal awards from an awarding agency.
Supplanting	Supplanting involves intentionally reducing state or local funding due to the acquisition of Federal funds. Federal funds should enhance, not replace, funds already designated for program activities. Reviews to detect supplanting may occur at various stages: during the application, pre-award, post-award, and audit phases. If supplanting is suspected, the applicant or grantee must provide proof that any decrease in non-federal funds was due to reasons unrelated to the acquisition or anticipated acquisition of Federal funds.
System for Award Management (SAM)	An online system where Grantees must register and comply with 2 CFR § 25, providing a central location for Federal award information.
Technical Field Auditors	Contractors experienced in broadband deployment will conduct technical reviews to monitor and document the actual versus planned progress of projects. The Technical Field Auditors will oversee field audits and various technical evaluations to verify that the projects comply with the terms outlined in the Grant Agreements between OBDC and ISPs.
Terms and Conditions	The rights and duties of all parties within a grant contract.
Time and Effort Reporting	Documentation required for salaries and benefits charged to Federal awards, as stipulated by Federal regulation.
Unallowable Costs	Expenses not permitted for reimbursement under a Grant or Cooperative Agreement by law, Federal cost principles, or award conditions.

Underserved Location	An underserved location is defined as a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to Reliable Broadband Service offered with - (i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.
Uniform Guidance	A set of regulations consolidating federal guidance on administrative requirements, cost principles, and audit requirements for Federal awards.
Unique Entity Identifier (UEI)	A unique identifier required for all entities to systematically register for Federal awards.
Unserved Location	An unserved location is defined as a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to Reliable Broadband Service offered with - (i) a speed of not less than 25 Mbps for downloads; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.
Vendor	A business or individual that sells goods or services necessary for a project or program financed by a specific award but is not the main recipient or a subcontractor. Vendors are not bound by the terms and conditions associated with the Federal award, and the program's compliance requirements do not apply to them. A vendor is also commonly referred to as a contractor.
Waste	Mismanagement or insufficient supervision of resources or equipment, resulting in avoidable expenses due to negligence or inefficiency.