

**DOC-NTIA-OTIA (US)
Tribal Broadband Connectivity Program**

**Moderator: Margaret Gutierrez
August 23, 2021**

1:03
Carole Garner Hello, and thank you for joining us. We will begin shortly.

1:07
Before we begin, I want to direct your attention to the slide on the screen. Due to the format of our webinar, we do regret that dial-in audio is not available for the first 15 minutes of this webinar when we will have some prerecorded video to show. If you would like to listen to this portion on your mobile device, you must download the GoToWebinar app in the Android or Apple store. If you are not able to download the app, rest assured that this webinar will also be available for on demand viewing at [broadbandusa.ntia.doc.gov/events/past-events] no later than August 30th. Thank you, and we'll begin shortly.

2:06
Margaret Gutierrez Hello and thank you for joining us today for BroadbandUSA's webinar. I am Margaret Gutierrez with NTIA's BroadbandUSA program. As a reminder, this webinar is being recorded and will be posted to NTIA's BroadbandUSA program website. Today's webinar focused on NTIA's Tribal Broadband Connectivity grant program.

2:25
Before we begin, I would like to review logistics for today's webinar. First, we will open up the webinar for questions after the completion of the presentations. As you hear from each presenter, please use the question box on the right-hand side of the screen to submit your questions or comments.

2:39
Second, the presentation, along with a transcript and audio recording of today's session, will be available on the BroadbandUSA website within seven days of this webinar, under the Events/Past Events tab.

2:51
Finally, please visit our BroadbandUSA website for information about our technical assistance program, including useful guides, products, publications, and other tools that can assist you with planning, funding, and implementing your broadband project. We provide updated information, including our monthly newsletter and other broadband news.

3:09
I would like to provide you with a brief background on each of our presenters today. Vanesscia Cresci is a part of our broadband USA team here at NTIA, and she's a broadband program specialist.

3:19

She's also a citizen of the Navajo Nation born and raised in Shiprock, New Mexico. She currently resides in Sacramento, California.

3:27

She has more than 20 years of experience in public health management, a Master of Social Work degree from Washington University in St. Louis, and a Master of Public Administration degree from the University of Southern California.

3:37

Crystal Hottowe comes to us from the Makah Tribe located in Washington State. For 12 years Crystal served as the grants writer for her tribe with a focus on state and federal grants. In addition to her grant writing duties, Crystal is also detailed to the Makah Tribal Broadband Project, which entailed not only a wireless network deployment, but also negotiations with industry. She was very active with the national, regional, and statewide policy groups.

4:01

Nicholas Courtney is an enrolled member of the Makah Tribe. Nick earned his Bachelor and Masters degrees from Western Washington University in Bellingham, Washington, and was raised in Auburn, Washington on Muckleshoot Tribal Lands. Before joining us at NTIA, Nicholas served as the director of policy at the National Congress of American Indians (NCAI), serving the broad interests of tribal governments and communities. Previous to working at NCAI, Nicholas served as program director for the Native American Political Leadership Program at George Washington University.

4:28

Adam Geisler is a national tribal government liaison with the First Responder Network Authority, serving western tribes in FEMA Regions 9 and 10. He is a member of the La Jolla Band of Luiseño Indians near San Diego, California, and has served in an elected leadership role with his Tribe running Tribal government and shaping national policy and public health, transportation, economic development, and housing for over a decade.

4:50

He has led his tribe through four federally-declared disasters, has served as vice chairman and founding board member of the Inter-Tribal Long-Term Recovery Foundation (a disaster response and recovery organization), and is a recipient of the International Wireless Communications Under 40 Leadership Award.

5:06

Gabe Montoya is an enrolled member of the Pueblo of Pojoaque located in northern New Mexico. He has served on Tribal council for 27 years, and on the Board of Directors for the Tribe's Economic Development. He brings over 10 years of experience in Tribal broadband to NTIA, including his service as a board member and chairman for REDINet, a regional multi-governmental JPA collaboration, which was set on bridging the digital divide to bring

broadband services at affordable prices to their constituencies for the good of their communities.

5:33

My name is Margaret Gutierrez, and I will be your moderator. I'm an enrolled member of the Citizen Pottawatomie Nation. I spent 10 years with the Agua Caliente Band of Cahuilla Indians as the director of emergency services. I'm the first Native American graduate at the Naval Postgraduate School Center for Homeland Defense and Security Program, and I hold a Master's degree in security studies. I'm an instructor for FEMA's Emergency Management Institute Tribal curriculum and a professor in the School of Criminology, Criminal Justice, and Emergency Management at California State University at Long Beach. I'm a national Tribal liaison for FirstNet, and I serve as the principal point of contact for Tribes in FirstNet FEMA regions 1-8. I am currently on detail to NTIA working on the Tribal Broadband Connectivity Grant Program.

6:10

Today's agenda, we'll review the top 10 questions regarding the Tribal Broadband Connectivity Grant Program, review the BroadbandUSA Tribal resources, and then some time for question and answers at the end.

6:21

And with that, I will turn it over to Nick to kick off our top questions and answers.

6:28

Nicholas Courtney

Thank you for that introduction, Margaret, and good morning, and good afternoon. My name is Nicholas Courtney. Our first question is: where can I find the SF-424 Forms if I choose to mail or email in my application?

6:43

The answer is: regardless of whether you email or mail in your application, you can find all the SF-424 forms by visiting the grants.gov website at grants.gov. Once you get to grants.gov, you will see on the top bar, there is a menu item called Forms, as illustrated by the red arrow on your screen. When you hover over the word Forms, a drop-down menu will appear. Once this happens, you will want to select the SF-424 Family, again, as illustrated by the red arrow on your screen. This will bring you to a menu of forms, some of which are required for the Tribal Broadband Connectivity Program (TBCP) application.

7:30

A note that the image on your screen does not show all of the forms available under the SF-424 family, and it is simply a snapshot of those that would fit in the image for this presentation. You can also access this page directly by visiting grants.gov/web/grants/forms/SF-424-family.html.

8:08

This brings us to our next question, which is, what federal forms are mandatory for the Tribal Broadband Connectivity Program?

8:17

You can see that the answer to this question depends on which project an eligible entity is applying for, which can be split into 1 of 3 options. The first option is for applicants applying for just broadband use and adoption projects. For this option, an applicant will need to fill out the SF-424, the SF-424A, the SF-424B, CD-511 and the standard form LLL. For those applying for broadband infrastructure deployment projects only, you will need to fill out the SF-424, the SF-424C, the SF-424D, the CD-511 and the standard form LLL.

9:15

For those applicants, applying for both broadband use and adoption projects and broadband infrastructure deployment projects, you'll need to fill out all forms, including the SF-424, the SF-424A, the SF-424B, the SF-424C, The SF-424D, the CD-511, and the standard form LLL.

9:48

With that, I will now turn it over to my colleague, Vanessa for the next question.

Vanesscia Cresci

9:56

Thank you, Nicholas. Now, for the third question: what programmatic and budget documents are required? So, if you're applying for only the broadband use and adoption project, you will include a project narrative, resumes of key personnel, a budget narrative and detailed budget justification, your indirect cost rate, if that's applicable, [and] documentation showing status of an as an eligible entity.

10:25

And if you're applying for only the broadband infrastructure deployment project, you will include your project narrative, your resumes of key personnel, your budget narrative and detailed justification, the indirect cost rate, if that's applicable, documentation showing status as an eligible entity, a Tribal resolution, and maps of proposed service areas. If you're planning to apply for both types of projects, you will include all of these items that are listed above on the chart.

11:01

For question number four: for the CD-511 Certification Regarding Lobbying Form, the entire Funding Opportunity Number does not fit in the award number field. What should I do?

11:14

We have knowledge that the full opportunity number may not fit within the applicable field in the CD-511 form. Applicants can do 1 of 2 things. They can (1), type out as much of the NOFO name as they can until the field is completely filled; or (2) use the abbreviation, "NTIA-TBCP-2021."

11:38

Next, I'm going to hand it off to Crystal.

Crystal Hottowe

11:44

Thanks Vanessa. Question five.

11:47

When completing federal forms and programmatic documentation, where do I enter the total project cost?

11:53

Well, the answer for this: the total federal budget amount required for the entire proposed project that has entered in SF-424, SF-424A, and SF-424C, budget narrative, and budget justification should all match. If you're applying for both the broadband infrastructure deployment and the broadband use and adoption project, the total cost project is the sum of the totals of SF-424A and SF-424C. In the SF-424 item 18 should list the total federal budget amount requested for the entire project.

12:33

Question six. If I am not required to submit one of the SF-424 forms listed under mandatory forms in grants.gov, will the system allow me to submit my application? Also, if I'm required to submit one of the forms under Optional Forms, do I still need to submit?

12:51

Well, the answer to that is yes. You're going to only submit the required forms that apply to the project type you are applying for as outlined in the NOFO. If one of the forms under Optional Forms is listed as a required form in the NOFO you must then submit it.

13:09

Thank you. And I'm going to pass it on over to Adam at this time.

Adam Geisler

13:15

All right, well thanks for that Crystal. All right. Well, let's go on to question number seven. So what is included in the administrative and legal cost classification? And what is the cap on this cost classification?

13:31

So let's talk about the answer. Administrative expenses include costs attributable to accounting, auditing, contracting, budgeting, and general legal services, facility occupancy costs (e.g., rent, utilities, insurance, taxes, and maintenance).

13:48

Also, general liability insurance that protects the organization not directly related to a program, depreciation on buildings and equipment, general office supplies, and general and administrative salaries and wages. Note: Tribal Broadband Connectivity Program grantees may not expend more than 2% of the total funds received on administrative expenses. All right, question eight.

14:16

So, how should I classify personnel time and the SF-424C budget form?

14:22

Here's the answer. If staff are completing administrative or legal functions, such as accounting, auditing, contracting, budgeting, and general legal services, their time for these activities should be listed in the admin and legal cost classification. If staff were completing activities associated directly with the project, they should account for their time in that specific cost classification.

14:43

For example, if conducting activities directly related to construction, the time spent on those activities should be listed in the construction cost classification.

14:53

Alright, I'm going to go ahead and hand it over to Mr. Gabriel Montoya. Gabe?

15:01

Thank you, Adam. Much appreciated.

Gabe Montoya

15:06

Good afternoon. My name is Gabriel Montoya. We're going to go over a couple of questions.

15:12

How should I classify my planning, sustainability, and feasibility studies in the SF- 424C budget form? What is the funding cap on this activity?

15:23

Applicants should book costs associated with the planning, sustainability, and feasibility study in the miscellaneous cost classification. The costs of planning, feasibility, and sustainability studies may not exceed more than 1% of the total project cost.

15:40

Does NTIA have a specific percentage applicants should use for contingency costs in line 13 of the SF-424C?

15:50

An applicant may include contingency in a budget estimates to the extent that they are necessary to improve the precision of those estimates. Amounts for those major project scope changes, unforeseen risks, or extraordinary events may not be included. Amounts must be estimated using broadly-accepted cost estimating methodologies specified in the budget documentation of the federal award and accepted by the federal awarding agency. Please see 2 C.F.R. 200.433(b). In order for actual costs incurred to be allowable, they must comply with the cost principles and other requirements in this part.

16:33

See also 2 C.F.R.300 and 200.403; be necessary and reasonable for the proper and efficient accomplishment of the project or program objectives, and verifiable from non-federal entity's records. See, 2 C.F.R.200.433(b) NTIA has not determined the specific percentage that applicants should use for contingencies, NTIA notes that contingencies are generally considered

reasonable if they are 10 to 15% of construction costs or less, otherwise, the applicants should provide justification for the higher costs.

17:14

Now I'm going to turn it over to Margaret so she can go over BroadbandUSA Tribal Nations resources.

Margaret Gutierrez

17:23

I want to thank our TBCP team for reviewing our top 10 questions and answers. We will now briefly go over some important resources on our BroadbandUSA website. For a full copy of the NOFO, as well as our latest FAQs and webinar recordings, transcripts, and presentations, you can visit our Tribal Broadband Connectivity webpage on our BroadbandUSA website.

17:42

You can find that by going to our homepage, going to the Grants Program tab, and selecting Tribal Broadband Connectivity, as you can see highlighted by the arrow on your screen.

17:52

We would also like to highlight our Tribal Nations page under our Resources tab. On this page, you will find information about the TBCP, additional resources of interest to Tribes looking to develop and implement their own broadband connectivity and digital inclusion programs, as well as contact information for our entire TBCP team.

18:10

We will now begin the question and answer part of the webinar, if you haven't already done so, please remember to type your questions or comments into the question box on the right-hand side of the screen. We will try to get through as many as we can.

18:38

All right, everybody hear me OK?

18:43

OK, let's start with Adam. Is the Tribal Equity Grant up to \$500,000 a part of [the] Tribal Broadband Connectivity Grant, or will it be in addition to the Tribal Broadband Connectivity grant?

18:55

Adam Geisler

Sure, Margaret, so let's talk about the \$500,000 for the equitable distribution component for the federally-recognized Tribes, you can apply for the \$500,000. You can apply for more than the \$500,000.

19:11

NTIA is only going to accept one application per applicant, and so if you're looking to apply for the \$500,000, now is the time to do that.

19:21

If you're gonna couple the \$500,000 with a broader application that is more than \$500,000, you're welcome to do that.

19:28

Also, I know some of you don't need the full \$500,000, and if you're applying for less than \$500,000, you're welcome to do that as well.

19:35

When you're looking at this program, keep in mind that our goal is for you to submit an application that meets your needs. And in some instances, you may need more than the \$500,000 and even maybe more than the soft ceilings or soft floors we've identified in the NOFO.

19:52

In addition, I do want to cover a couple of important items before we go too far down into the Q&A.

19:58

The first one I want to cover is, a lot of you have applications in the grants.gov system right now.

20:08

While we recognize that you're all working on your application, we do want to encourage you and remind you that you do need to hit the Submit Application button within grants.gov. Just because you've uploaded your forms into the system, does not mean that you have actually submitted your application.

20:24

So this is just a gentle reminder that you do need to actually hit the submit button within grants.gov.

20:31

Additionally, the extension request question has come from a lot of different places here over the last few weeks. And I first just want to say that we recognize that many of you are being faced by some very challenging circumstances.

20:48

Hurricanes out east, wildfires out west, COVID for some of your communities with the spike or the delta variant that have impacted some of your abilities to submit the application.

21:00

It brings me no pleasure in having to convey the following message, which is that the timeline for the application window is statutory. And NTIA will not be extending the application window beyond what the date is that we have today.

21:17

So the application window, the 90 days, is a firm timeline, so September 1st is the date that you need to get your application in.

21:27

With that being said, we also have a mandate to cure the applications, and you'll also notice in the NOFO that we have a section that discusses how to cure the applications.

21:39

So if you're being impacted by a wildfire, a flood, the pandemic, a hurricane, or anything else that's being thrown at your community right now, do your best to get your application in in whatever form, fashion, or function that you have.

21:54

And just know that if your application's missing some components, we're gonna call you to work to fix the application.

22:01

If you're missing some details in the narrative or maybe the description that you had for environmental in the narrative isn't quite where it needs to be, we're going to work with you to cure those issues. If you forgot a form, some of you may be in that situation, or maybe you didn't submit the right form.

22:17

Again, this program is not about trying to throw applications out. We understand it's a tight timeline.

22:23

And we just want to let you know that we are going to encourage you to get your applications in, however you can, but know that we're going to work to cure it.

22:30

With that being said, we cannot cure any applications that we do not receive by the deadline.

22:37

So, if you're submitting an application on September 2nd we will not accept the application.

22:42

And I apologize for such a hard line. But that is the message we have to convey today.

22:46

So, please, in whatever function, form, that you have your application prepared, get it submitted by the deadline.

22:55

And the last piece, and then we'll move on to the next question. For those of you that are closer, almost ready to submit your application, please get it in in the next couple of days, if you can.

23:05

There's no guarantee that that grants.gov will perform, the way we all hope it will, and to alleviate any congestion issues that we may run into. You know, if we have 200 people submitting applications on the last day, on the last hour, you may run into some issues on the system.

23:21

So, if you're close to being done or you are done, we're going to encourage you to get that application in quickly, go ahead and hit that submit button please, and get that application into us. Back to you Margaret.

Margaret Gutierrez

23:31

Thank you, Adam, for all of that clarification. Let's move to Vanessa.

23:38

Regarding standard form LLL, Disclosure of Lobbying Activities, the grants.gov Workspace requires this form to be submitted as part of the proposal package.

23:46

Even through the NOFO clearly less the form is optional, and we have no lobbying activity to report. A representative from grants.gov suggested using N/A and zeroes to complete the required sections of the web form.

23:57

From the perspective of NTIA and the proposal reviewers, is this the correct approach?

Vanesscia Cresci

24:04

Yes, it is. At this time, the standard form LLL is located under the Mandatory Forms section. And when you open up your Workspace in grants.gov. So, although the standard form LLL is optional, and it should be completed, if you have lobby activities to disclose. But if you don't have any to disclose, please put N/A or zeroes to complete the required fields in the form in order to submit.

Margaret Gutierrez

24:35

Thank you, Vanessa.

24:37

Adam – we will apply for an extension of the one-year period of performance for our proposed construction activities. Is there any time requirement to disburse or commit funds under our proposed extension?

Adam Geisler

24:50

Well, first off, for those of you that are looking at a construction project and you know now that that project timeline is going to go beyond the one year, it is OK to put your timeline and your budget if you anticipate needing an extension. And, in fact, in the application narrative, it is OK to indicate that you are requesting and seeking an extension.

25:15

With that being said, we're working on what the extension process will look like.

25:21

And with that, in terms of what the nuances are of any extensions that are provided that will be based upon the applicant and anything that may be appropriate for that specific applicant and the applicant's award conditions.

Margaret Gutierrez

25:40

Thank you.

25:42

Nick – we're proposing construction related activities, i.e; procurement, configuration, installation, commissioning, operations, and initial maintenance, alongside a sustainment program, which features a local Tribal capacity-building component to ensure long term sustainability for the program.

25:57

All proposed activities are scheduled to be completed over several years, launched by the construction related activity, which is scheduled to be completed about one year after breaking ground.

26:05

Regarding the proposed project dates for our activities, do you prefer project dates for only the construction-related activities or all program activities?

26:12

We're requesting funding for all program activities, construction, and sustainment.

26:17

Nicholas Courtney

So thank you. So I think Adam touched upon this in our last question. But for infrastructure applicants, you're going to want to use the standard Form SF-424C document. And that should describe the costs and activities required in order to deploy the proposed broadband project within the extended period of performance that the applicant proposes. If the applicant submits the petition for extension with its application submission, the applicant must describe the total proposed period of performances in this scenario. If a covered partnership receives a grant and request an extension later on, i.e.; not later than 90 calendar days in before the end of the award period, the covered partnership must submit a revised budget form with its request to describe the costs and activities required to complete the project within the extended award period of performance.

27:07

I do want to note that under the Tribal Broadband Connectivity Program's adoption and use pathway, service costs are allowable beyond the one-year timeframe as long as the costs in terms are reasonable, eligible under the NOFO, and the grantee makes full payment for that service during the grant's one-year period of performance. If an applicant intends to use grant funds in this way, the applicant must include a detailed description of the proposed costs in its application, including the proposed period of service.

27:38

We at NTIA may include a specific award condition in any such award to ensure that funds are used appropriately and to ensure that if the service is canceled or the grantee receives a refund, any grant funds returned to the grantee or sub sequentially returned to the federal government. Thank you.

27:56

Margaret Gutierrez

Thank you, Nick. Vanessa, do the simple forms need to be filled out by subrecipients as well, or just the primary recipient?

28:05
Vanesscia Cresci The required standard forms, such as the SF-424, should be completed by the primary or lead applicant, so whoever is applying for the grant. Subrecipients do not need to complete any of the required standard forms.

28:22
Margaret Gutierrez Thank you, Vanesscia.

28:24
Crystal, on page 42 of the NOFO, it is stated that if the applicant is not prepared to submit a construction schedule, the applicant may submit an application that specifies that a construction plan schedule will be produced on or shortly after a grant is made. Is this correct?

28:38
Crystal Hottowe So, if an applicant is not at the stage where it can submit a construction proposal, reviewers will consider eligible projects, such as engineering, planning, feasibility, sustainability studies, as part of the necessary steps to develop a technological solution. Reviewers will give additional consideration to applications that include workforce training for Native American, Alaska Native, Native Hawaiian communities as a component of the network planning project.

29:09
Margaret Gutierrez Thank you, Crystal.

29:10
Nick, what is a reasonable amount of free service? One year? 18 months?

29:17
Nicholas Courtney That's a great question. Within our Tribal Broadband Connectivity Program, there's no definition of reasonable, so we encourage applicants to tell us what is reasonable for your current circumstances for your eligible lands. With that said, again, under the adoption and use pathway, services and costs are eligible beyond the one-year timeframe as long as the costs are in terms are reasonable, eligible under the NOFO, and the grantee makes full payment of that service during the grant's one-year period of performance.

29:49
Margaret Gutierrez Thanks, Nick.

29:50
Adam, could you speak more to the planning feasibility study's limit of 1% of total project cost? If that is the major component of the project, it may exceed 1%.

30:00
Adam Geisler Well, sure, so let's break this up into 2 concepts.

30:04
There are some of you that are applying for feasibility, engineering, design, and the construction of that network, right? So some of you have enough details to

where you already know what the full parameters of your budget are going to be, and so that cap will apply.

30:21

For those of you that are applying to simply do a feasibility, study, engineering, or design, and you are not applying to construct at this time, the cap doesn't apply, because there's no way to put a cap on something that you don't know yet, right?

30:36

So, for those of you that are looking at feasibility to design engineering studies only, the cap will not be applicable in this instance.

Margaret Gutierrez

30:51

Thank you.

30:53

Nick, is there information sharing with the Treasury Department for the other broadband funding opportunities?

Nicholas Courtney

31:01

Thank you.

31:02

So, the Treasury CCPF is a separate program from the Tribal Broadband Connectivity Program here at the Department of Commerce. Tribal applicants or eligible applicants that are interested in receiving funding from the Treasury's Coronavirus Capital Project Fund referenced in Section B1 of our NOFO should include the following short statement either in their project narrative, or as a separate attachment giving permission for NTIA to share its complete application package with Treasury.

31:35

And the quote is, "The stated authorized representative of the eligible entity authorizes NTIA to provide its Tribal Broadband Connectivity Program application and supporting documents to Treasury for the consideration in connection with an award for the Treasury's Coronavirus Capital Projects Fund."

31:56

Once we at NTIA received this authorization, it'll then we will then transmit a copy of the application package to Treasury, which may use this information to assess more quickly the applicant's eligibility for funding under the Treasury Program.

32:10

NTIA at this time cannot comment on how the Department of Treasury will use this information or how the Department of Treasury will score potential projects.

32:21

Margaret Gutierrez

Thank you, Nick.

32:22

Vanesscia, if applying as a consortium of multiple Tribes, is one application on behalf of all partners sufficient? Or do each need to submit individual proposals?

Vanesscia Cresci

32:33

So each eligible entity may submit only one application.

32:38

So if the eligible entity, as a consortium, is applying on behalf of other partners, that eligible entity should be the one that submits one application.

Margaret Gutierrez

32:52

Gabe, despite a requested or approved extension, construction must still begin within one year, correct?

Gab Montoya

32:58

That is correct. You have one year statutorily to get the job completed. We understand there's going to be extensions requested, but you're gonna wanna get as far down that as possible.

Margaret Gutierrez

33:11

Thank you.

33:12

Vanesscia, can you submit your application in parts if you have concerns of the portal maybe full near the deadline? Can you submit what you have now and feed other parts in after you finish them?

Vanesscia Cresci

33:24

Yes, the application Workspace and grants.gov allows you to submit parts of the application and then save it, and then you can hit the submit button when you have all documentation completed and uploaded.

33:39

Just make sure you do it by the deadline.

Margaret Gutierrez

33:45

Thank you. So that is the last question at this point.

33:55

So, we'll give it a few minutes and see if any more questions come in.

34:00

Adam Geisler

So, Margaret, this is Adam, Can you hear me OK?

34:03

Margaret Gutierrez

Yes.

34:03

Adam Geisler

Yes, so, we're going to double down here on the single application discussion.

34:10

So, some of you are – there's many Tribes that are looking at applying as consortiums for the program. And if you're looking to apply as a consortium, you need to make sure that, whoever that lead applicant is going to be, [is] applying on your behalf.

34:26

If you're doing infrastructure, which I'm assuming that's, in part, where this is coming from, that you have the resolutions of consent from each of those Tribal governments that you're going to be looking to cover.

34:36

The other part is, is to make sure that whoever the applicant or eligible entity is that's applying on behalf of everybody does have an up-to-date DUN's, EIN, etc. to be able to apply in the grants.gov portal.

34:50

So, again, just keep those things in mind. I've heard some things bouncing around that there's some random entity out there that people want to use, that maybe the Tribes know, but it doesn't have an EIN and DUNS and it's not registered in grants.gov.

35:04

And it's also not an eligible entity.

35:06

So, keep in mind that it needs to start first with it being an eligible entity and then that eligible entity has the prerequisite registrations and information in order to be able to submit through grants.gov.

35:21

Also, if you're looking to submit through an alternative method, we will accept paper applications right through post mail, and we will also accept it via email if there's some certain circumstances, some of you are being impacted by different things, and that's a reality.

35:40

What I'm going to ask is that you reach out to me directly to make arrangements in order to do that.

35:45

Adam Geisler, so it's adam.geisler@firstnet.gov. My name is in the back of the NOFO, right next to Nicola Bell.

35:52

So if you are looking to submit through an alternative method, you do need to reach out to me to coordinate that. Thanks.

36:02

OK, Adam, are there instances where NTIA TBCP could be combined with funding from USDA?

Margaret Gutierrez

Adam Geisler

36:13

So let's make sure we're being really clear here.

36:16

When we use the term combined, we're not using it in the context of matching, right? You're not allowed to match other federal funding programs with NTIA funds.

36:27

However, some of you are looking to complement other activities and funding sources, [such as] USDA, Treasury, EDA, [and] FCC.

36:37

There's all kinds of alphabet soup money rolling around out there. Plus, there's probably funds that you're looking at within your respective partner states.

36:45

So, if you are looking to complement those activities, absolutely.

36:49

In fact, we encourage you thinking holistically about all the different funding that's out there to solve the digital divide for your community.

36:57

So, you can complement, you can't duplicate, and you cannot use our funds to match.

37:03

So, hopefully, that gives you some very clear guidance on how to proceed.

Margaret Gutierrez

37:10

Thank you.

37:12

Vanesscia, can you cover the page limit again, and then also resumes? And whether they are submitted as the application in the page allowance or separate?

37:27

Vanesscia Cresci

A good question. So the page limit, so if you are applying for both broadband infrastructure deployment and broadband adoption, it is a total of 40 single-spaced pages or 80 double-spaced pages, If you're applying for only one of the projects, so if you're going to submit an application for just broadband adoption as an example, that it's 20 pages single-spaced, 40 pages double-spaced. And as regards to resumes, so the resumes would be of the key personnel of the applicant, so not the subcontractors, subrecipients, and grantees, contractors, consultants, just the entity that is applying.

38:10

Resumes can be included as an attachment. There is a space in your grants.gov Workspace that allows you to add attachments and that does not count towards the page limits.

Margaret Gutierrez

38:27

Thank you.

38:28

Someone asked a question earlier and they asked for the answer to be repeated. So I'll reread the question and then, Adam, if you want to take it.

38:38

We are proposing construction related activities, i.e. procurement, configuration, installation, commissioning, operations, and initial maintenance alongside a sustainment program which features a local Tribal capacity-building component to ensure long term sustainability for the program.

38:52

All proposed activities are scheduled to be completed over several years, launched by the construction-related activity, which is scheduled to be completed about one year after breaking ground.

39:00

Regarding the proposed project dates for our activities, do you prefer project dates for only the construction-related activities or for all program activities? We are requesting funding for all program activities, construction and sustainment.

Adam Geisler

39:13

Yeah, so I think – let's be really clear about something here.

39:17

There are two legs of this application.

39:19

There's construction activities that are found on page 32 of the NOFO and then there is broadband use and adoption activities.

39:31

So everything that is tied to the construction components of the program that you're proposing, it's appropriate to put dates, times, all of that, in terms of what you're looking at for your schedule.

39:46

However, if I'm understanding this correctly, it looks as though you're also wanting to implement broadband use and adoption activities which are capped at a one year.

40:00

We've received requests like this, so let's just use a "what if."

40:04

So what if the Tribe is constructing a broadband network and it takes a year and a half?

40:08

Then the Tribe wants, or the eligible entity wants to do a workforce development program with tablets and education and all of those other components.

40:20

Because you're looking at implementing the broadband use and adoption activities after the one-year timeline, those will be unallowable expenses. OK?

40:32

So you need to be thoughtful about what it is that you're delineating, and what we will give extensions for. Construction activities, right?

40:41

With three parameters that we might as well cover one more time: that you're under construction, that you have a good plan, or that you have faced unforeseen circumstances, right?

40:54

Construction [is] where we will give it an extension. On the non-construction activities, the broadband use and adoption activities, it is a one-year firm, hard, no extensions given. I hate to be the bearer of bad news when we say this, but I guess somebody's gotta do it.

41:10

Believe me, we're not doing backflips either. The reality is that's what's within the program and within statutes. So apologies, but also appreciate your understanding with the context there, and you gotta be mindful about how you're delineating those activities between the two legs of the program.

41:32

Talking about pick up the 2% while we're here. So somebody else also asks why is there a limiting of 2% in terms of the admin, again?

41:46

Believe me, we understand a number of you have indirect cost rates well above 2% that you've negotiated and that you spend a lot of time doing that.

41:55

However, here comes the however right? The bad news.

41:59

It's a statutory element here, right? This wasn't the brainchild of anybody at NTIA. We didn't wake up one day and say 2% sounds like a good number.

42:07

The reality is that Congress actually set the 2% administrative cap in statute, and it's, again, another one of those things that we cannot change without the act of Congress.

42:18

So, that's the long and short of it. Apologies, because I know that that does create some challenges for some of you that are looking at this.

42:27

With that being said, I do want you to take a good look what we define in terms of 2% administrative expenses on page 34 of the NOFO.

42:39

Right, so some of you are thinking a little bit broader than how we're thinking about the 2% cap. Right, so again, if you need direct program support, project managers, they're gonna be doing this project every day, day in and day out, that is very different than how we are viewing, for example, the 2% cap administrative expenses for, let's just read some off here: accounting, auditing, contract budgeting, general legal services, facility occupancy costs, rent, utilities, insurance, taxes, maintenance, general, liability insurance, et cetera.

43:12

So please crack open the NOFO [and] go to page 34.

43:16

I think that should help in terms of other ways that you can think about wording what you need to put in your application to support the program.

43:31

Margaret Gutierrez

Thanks Adam, can you still hear me? I had to turn off my camera because my web was lagging. OK, perfect.

43:44

So Adam, the person who asked the question that you gave a long explanation for for sustainment and all of that stuff, they're saying it is not a use and adoption proposal, only construction activities.

44:01

Adam Geisler

It comes back to, without knowing all the details of your application.

44:08

Right, so there's the disclaimer language that we have to use.

44:11

If you have a timeline that exceeds one year, you have a budget that exceeds one year, and you know that it's going to take more than one year, you need to delineate that on your timeline that you're going to be submitting for your project.

44:24

You need to delineate the activities that fall within that timeline and you need to delineate on your SF-424C form.

44:32

You will notice that you can include more than one years' worth of financial allocations and I'm making sure Vanessa isn't kicking me under the table here.

44:44

OK. I'm right. We're on the same page.

44:47

So it's OK, guys. But you also need to look to delineate in there, right? If you notice, we're asking you to separate year one and year two, or year one, year two, and year 3 expenses. For some of you I know you're thinking big projects, because we need to be able to evaluate what is within the award period that we have for now.

45:06

And also don't forget to put in there if you are going to be seeking an extension, you can go ahead and put that language in your narrative as well.

45:13

We'll take a look at that, but note that we will likely have a separate process for that into the future based upon the three elements that we already discussed: you have a good plan, you're under construction, or there are unforeseen circumstances that are impacting your ability to meet the one-year timeline.

45:36

Hopefully that helped.

45:37

Margaret Gutierrez

Thank you, Adam.

45:41

And I think that is the last question as of right now.

45:54

Adam Geisler

Well, Margaret, with that being said, just as a reminder for everybody, please, if you haven't heard us say it 10 times, please do not forget to hit the submit button on your application. We cannot cure what we don't have.

46:08

In addition, no matter what state you're in with your application, if you're being impacted by natural disasters or whatnot, do your best to get what you can in, right? We're here to try and make this work how we can.

46:20

And then lastly, we will be back again tomorrow.

46:23

So for those of you that are working through your application this afternoon and evening, and you have a few more things that pop up, we'll be back here again tomorrow. You can also reach out to us directly, and Margaret is going to cover the contact information here on the slide.

46:37

Margaret Gutierrez

So some of you have already sent private messages to give you contact information.

46:41

If you have a lengthy question, or you need a little bit more detail than we can cover via asking questions chat, it makes a little bit more difficult when you're

asking them that way, rather than being able to just have a have a phone conversation.

46:53

For everyone else, here's the list of all of our contact numbers, or email addresses, I should say, send us an email. We will respond and set up some time to talk with you if you need a more detailed response.

47:09

Thank you for all of your questions today. Thank you for attending, and we look forward to seeing you guys back here tomorrow. Thanks for all of our speakers here today. As a reminder, our presentations, transcripts, and audio recording will be available on our website within seven days. Please check the BroadbandUSA website for updates or contact us if you have any questions. There's a generic email box that's BroadbandUSA@NTIA.gov. Thank you and have a wonderful afternoon.