

BROADBAND EQUITY, ACCESS, AND DEPLOYMENT PROGRAM

Project Plan/Narrative Sample

This guidance document is for informational purposes only and is intended solely to assist grant recipients in better understanding the NTIA BEAD program, and the requirements set forth in the program's NOFO. This guidance does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific requirements set forth in the program's NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the program's NOFO, shall prevail over any inconsistencies contained in the guidance below.

NTIA developed this sample at the request of Eligible Entities who wish to request all their BEAD allocation at the submission of the Initial Proposal. The narrative below is an example of what a request for 100% of the BEAD allocation funds at the submission of the Initial Proposal may look like. The Project Plan/Narrative Sample below is for illustrative purposes only; actual details will vary by State/Territory.

The State Broadband Office is submitting this Broadband Equity, Access, and Deployment (BEAD) Program Initial Proposal Funding Request to support our pursuit of increasing equitable and universal broadband access and adoption in our service area. Our efforts will be conducted in collaboration with community stakeholders and are informed by our prior/existing efforts detailed in the BEAD Five-Year Action Plan and State Digital Equity Plan. Our program includes the following eligible activities:

- Funds to be used, directly or indirectly, for the administration of the grant (and thus subject to the statutory two percent cap);
- Funds to be used for administrative purposes, other than the administration of the grant;
- Funds to be used to implement the Challenge Process and Subgrantee Selection Process;
- Eligible uses of funding in connection with last-mile broadband deployment projects, subject to the limitations related to unserved locations and high poverty areas for deployment prior to approval of the Final Proposal as outlined in the NOFO, Section IV.B.8;
- Eligible non-deployment uses, subject to the requirement of demonstrating a plan to ensure deployment to all unserved and underserved areas as outlined in the NOFO, Section IV.B.8; and
- Funds to be used upon approval of the Final Proposal.

Please note that these costs exceed the 20 percent of the total allocation; however, based on the BEAD NOFO, Section IV.B.8, the State Broadband Office requests that the Assistant Secretary make approximately 100% of the total allocation available at the Initial Proposal state of the BEAD Program. The State Broadband Office requests that the Assistant Secretary make the total allocation of funds to be obligated at the Initial Proposal stage of the BEAD Program due to [state justification, e.g., state's anti-deficiency laws/promotion of a robust, fair, and competitive Subgrantee Selection Process by giving industry confidence in the full allocation and availability of funds].

1. Funds to be used, directly or indirectly, for the administration of the grant

The State Broadband Office intends to use funds as part of the Initial Proposal Funding Request for the administration of the grant; specifically, to operationalize and increase efficiency of the State Broadband Office. The below costs do not overlap with those funds requested during the Initial Planning stage; however, they may represent a continuation of those costs vital to the administration of our State Broadband Office. These funds include:

- **Grant Manager:** Funds will be utilized to hire a Grant Manager for the remaining period of performance (i.e., four (4) years). The Grant Manager, who has yet to be identified, will be housed in the State Broadband Office. The Grant Manager will be responsible for completing BEAD grant reports; archiving grant-related documents and documentation; preparing for, and supporting, any activities related to grant monitoring, audit or compliance requests; compiling, reconciling, and managing the submission of subgrantee reports and documents.
- **Legal Services:** A contractor to be determined will be procured to support legal services. The costs include drafting, execution, and filing fees of legal agreements and Memorandum of Understandings (MOUs) between organizations involved in the grant, including subgrantees. Legal hours also include time to conduct legal reviews for all contracts.
- **Travel:** Funds are requested to attend two occurrences of the State Broadband Leaders Network (SBLN). Attendance at SBLN is important for learning about emerging telecommunications policy issues and priorities, as well as for the mutual sharing of best practices related to broadband adoption and deployment.
- **Office Materials:** Funds are requested to operate the State Broadband Office and carry out activities necessary for the administration of the BEAD Program. These include a high-capacity printer, an office setup, laptop computers, and general office supplies to cover a three-year period (36 months). Funds will also be used to cover project management training for three office staff so that they may better implement and manage the BEAD project activities.
- **Indirect Costs related to the administration of the grant:** Funds that are attributable to the indirect costs “related to the administration of the grant” are calculated by [using our negotiated indirect cost rate and using the base in our NICRA as modified to include only those costs “related to the administration of the grant”] [OR] [using a de minimis rate and using as the base the Modified Direct Total Costs as modified to include only include modified direct costs “related to the administration of the grant”].

2. Funds to be used for administrative purposes, other than the administration of the grant.

The State Broadband Office intends to use funds as part of the Initial Proposal Funding Request for indirect costs. We intend to apply the 10% de minimis indirect cost rate on personnel (salaries and fringe), travel, materials and supplies, services (including contracts), and up to \$25,000 of each subaward to cover various associated overhead costs. In calculating the indirect costs, we have not included any indirect costs that have already been captured as the indirect costs related to the administration of the grant (see #1 above).

3. Funds to be used to implement the Challenge Process and Subgrantee Selection Process

The State Broadband Office will contract with [ABC Corporation] to implement the Challenge Process outlined in the Initial Proposal. The intended outcomes of the contract are a successfully run Challenge Process that improves the accuracy of our last-mile broadband deployment projects, ensures that activities funded by the BEAD Program reach the areas that need funding the most, and improves transparency and trust in our initiatives. The work is expected to begin as soon as Volume I is approved and Volume II is submitted, and the results of the Challenge Process are expected to be provided to the Broadband Office within three (3) months of award in order for the Subgrantee Selection Process to begin.

In order to support the successful Challenge Process, the State Broadband Office will utilize funds through the Initial Proposal Funding Request to facilitate five (5) in-person local coordination events across the state in order to increase awareness of the Challenge Process--in line with the proposed Challenge Process in the Initial Proposal--in order to increase participation in the Challenge Process and to ensure public buy-in for the activities funded by the BEAD Program. Funds are also requested to cover travel costs related to attending five Challenge Process-related local coordination events across the state. These events will take place once Volume I is approved through the end of open period of the Challenge Process.

In order to support the Subgrantee Selection Process, the Broadband Office will fund time of a Digital Equity Specialist through a Memorandum of Understanding with a separate State agency to support the reviews of applications as part of the BEAD Subgrantee Selection Process. The Digital Equity Specialist is based in the State Broadband Office and their time will be sought in order to provide timely support to ensure that a digital equity perspective is incorporated effectively in the process. The Digital Equity Specialist is expected to be dedicated on a part-time basis (i.e., hourly estimated at 20 hours a week for 10 weeks) throughout the Subgrantee Selection Process.

4. Eligible uses of funding in connection with last-mile broadband deployment projects, subject to the limitations related to unserved locations and high poverty areas for deployment prior to approval of the Final Proposal as outlined in the NOFO, Section IV.B.8

At the time of the Initial Proposal Funding Request, the Broadband Office has also requested funding to carry out eligible last-mile broadband deployment projects identified in the BEAD NOFO, Section IV.B.5.b. The State Broadband Office has determined that, based on NTIA tools and studies conducted as part of the preparation of the 5-Year Action Plan, the estimated cost of deployment projects to cover all areas that consist of at least 80 percent unserved locations and are in a location in which the percentage of individuals with a household income at or below 150 percent of the poverty line, applicable to a family of the size involved, that is higher than the national percentage of such individuals is approximately \$25,000,000. The details of these projects are to be determined; however, will be specified following the completion of the Challenge Process and the Subgrantee Selection Process. These deployment projects will be carried out by subgrantees to be determined. The State Broadband Office will require a minimum of 25% cost match for each subgrantee project that requires a match. The type of match (cash or in kind) will be determined, by project, during the subgrantee selection process.

5. Eligible non-deployment uses, subject to the requirement of a plan to ensure deployment sufficient to serve all unserved and underserved areas as outlined in the NOFO, Section IV.B.8

At the time of the Initial Proposal Funding Request, the Broadband Office has also requested funding to carry out non-deployment uses identified in the BEAD NOFO, Section IV.B.5.b. Based on a planning study completed on April 15, 2023, by [ABC Corporation], and as outlined in the Initial Proposal, the Broadband Office is expected to be able to meet all of the unserved and underserved location broadband deployment commitments. Accordingly, the Broadband Office expects to allocate remaining funds to conduct activities identified in the State Digital Equity Plan. These funds will supplement, but not duplicate or supplant, funding for activities funded in connection with the Digital Equity Act of 2021 or other Federal funds. The details of these projects are to be determined; however, will be specified following the completion of the Challenge Process and the Subgrantee Selection Process. They will be carried out by subgrantees to be determined.

6. Funds to be used upon approval of the Final Proposal

As noted above, the State Broadband Office requests that the Assistant Secretary make the total allocation of funds to be obligated at the Initial Proposal stage of the BEAD Program due to [state's anti-deficiency laws] [promote a robust, fair, and competitive Subgrantee Selection Process by giving industry confidence in the full allocation and availability of funds]. The State Broadband Office proposes that the use of these funds would be contingent upon Final Proposal approval. These funds will cover eligible last-mile broadband deployment projects identified in the BEAD NOFO, Section IV.B.7.a.ii, eligible non-deployment uses identified in the BEAD NOFO, Section IV.B.7.a.iii, and the remaining funds available for the administration of the grant.