



BEAD Match Primer

Broadband Equity, Access, and Deployment Program

May 2024



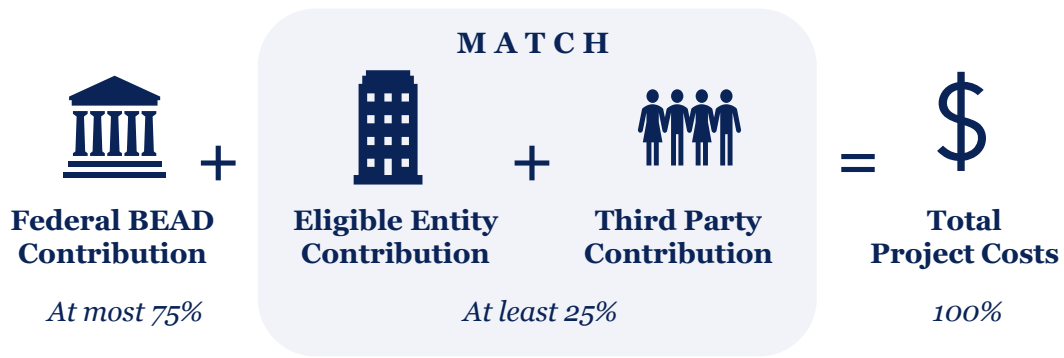
The following resource provides Broadband Equity, Access, and Deployment (BEAD) Program Eligible Entities with guidance on matching funds.¹



WHAT IS MATCH?

Match, also known as cost share, is the portion of a project’s cost not paid by federal funds (see ‘[Using Other Program Funds As Match](#)’ for BEAD Program exceptions). As seen in **Figure 1**, the BEAD Program requires a minimum 25% match for **deployment projects**, exclusive of “high-cost areas.” Any funds provided as match for deployment projects **must stay with the project** and cannot be allocated to other program activities (i.e., match cannot be aggregated). Note that the Program’s **match requirement is waived** for “[high-cost area](#)” [deployment projects](#) and **does not apply to non-deployment projects**. For BEAD, a matching contribution can either be a cash match or an in-kind match. For all matches, Eligible Entities must adhere to the requirements in [2 CFR 200.306](#), listed in **Figure 2**.

Figure 1: BEAD Project Match



Cash Match: Cash match, or cash contribution, includes cash spent for project-related costs. Cash is the Eligible Entity’s own funds or funds from a third party.

In-Kind Match: In-kind matches, also known as in-kind contributions, are non-cash donations of property, goods, or services which benefit a federally assisted project, and may count toward satisfying the non-federal matching requirement of a project’s total budgeted costs when such contributions meet certain criteria. In-kind contributions must be allowable and allocable project expenses and may come from a third party.

¹ This document is intended solely to assist applicants in better understanding the Broadband Equity Access, and Deployment (BEAD) grant program and the requirements set forth in the Notice of Funding Opportunity (NOFO) and follow-on policies and guidance for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.



Figure 2: Match Criteria

All matches must meet the following criteria:

1. Verifiable from the non-federal entity's records;
2. Not included as contributions for any other federal award;
3. Necessary and reasonable to accomplish project or program objectives;
4. Allowable under [subpart E of CFR 200.306](#);
5. Not paid by the federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost sharing requirements of other federal programs. Note, see [‘Using Other Program Funds As Match’](#) for BEAD Program exceptions.
6. Provided for in the approved budget when required by the federal awarding agency; and
7. Conform to other provisions of 2 CFR 200.306, as applicable.



WHEN DOES MATCH OCCUR?

Eligible Entities can calculate their minimum required match based on BEAD funding allocated to eligible deployment projects (see section [What Is Match](#)). While Eligible Entities should provide match at the same general rate as the federal share, nothing prohibits contributing the full match up front if desired.



WHO CAN PROVIDE MATCH?

Eligible Entities are encouraged to require match from the subgrantee. When feasible, Eligible Entities should incentivize matches of greater than 25 percent from subgrantees. Eligible Entities are expected to follow the processes and procedures outlined in Volume II of their Initial Proposal related to how they will encourage subgrantees to provide the maximum feasible match. Match can be provided from the following sources, as shown in **Figure 3**.

Figure 3: Who Can Provide Match

	THE SUBGRANTEE		THE ELIGIBLE ENTITY
	PHILANTHROPIC ORGANIZATION		FEDERAL REGIONAL COMMISSION OR AUTHORITY
	UNIT OF LOCAL GOVERNMENT		FOR-PROFIT COMPANY
	UTILITY COMPANY		REGIONAL PLANNING / GOVERNMENT ORGANIZATION
	NON-PROFIT ORGANIZATION		COOPERATIVE

OR ANY COMBINATION OF THE ABOVE



HOW CAN ELIGIBLE ENTITIES VERIFY MATCH? —

While NTIA will collect data on subgrantee match from each Eligible Entity during semi-annual reporting, the Eligible Entity is responsible for **verifying match**. The following list provides strategies an Eligible Entity may consider employing to confirm match from subgrantees:

ALL MATCH

- Ensure records include the source, amount, quantity, time, and delivery of each match service
- Retain records through the life of the grant and grant closeout
- Ensure match submission requires a legally binding attestation
- Consider Letters of Commitment for match and then compare actual match against stated commitments

CASH MATCH

- Request bank or financial statements, showing available and expended funding
- Require receipts from disbursements

IN-KIND MATCH

- For volunteer services where the rate must not exceed fair market value, use federal tools such as the Bureau of Labor Statistics to determine wage rate information. To the extent feasible, require similar methods to record time as an organization would for paid labor, such as timesheets and timecards.
- For reduced rates from consultants and other individuals, consider comparing current charges against standard or set labor category rates.
- For facility in-kind match verify amount against current mortgage statements or rental rates.

Eligible Entities may choose use different methods of match verification; therefore, match will look different for each grantee.



HIGH-COST AREAS

Match is not required for areas that are considered “high-cost areas.” A high-cost area is an unserved area in which the cost of building out broadband service is higher, compared to the average cost of building out broadband service in unserved areas in the United States (as determined by the Assistant Secretary, in consultation with the Federal Communications Commission).

Incorporating factors for determining “high-cost area” include:

1. The remote location of the area;
2. The lack of population density of the area;
3. The unique topography of the area;
4. A high rate of poverty in the area; or
5. Any other factor identified by the Assistant Secretary, in consultation with the Federal Communications Commission (FCC), that contributes to the higher cost of deploying broadband service in the area.



NON-DEPLOYMENT PROJECTS

Match is not required of non-deployment projects. **Figure 4** provides a non-exhaustive list of non-deployment activities referenced in the BEAD NOFO.

Figure 4: Non-Deployment Activities



PROGRAMS THAT PROVIDE DIGITAL LITERACY/UPSKILLING



COMPUTER SCIENCE, CODING AND CYBERSECURITY EDUCATION PROGRAMS



REMOTE LEARNING OR TELEHEALTH SERVICES/FACILITIES



TRAINING ON CYBERSECURITY, PRIVACY, AND OTHER DIGITAL SAFETY MATTERS



MATCH FOR FIXED AMOUNT SUBAWARDS

Generally, per 2 CFR 200.201, traditional fixed amount subawards cannot be used for projects that require match. However, under BEAD, certain fixed amount subawards are allowed even though a match requirement exists, each Eligible Entity must review the terms and conditions of its award to understand how it may use this type of fixed amount subaward.

Figure 5 provides the **minimum requirements** Eligible Entities must meet, in coordination with their subgrantees, for compliance with the BEAD Program. Note, Eligible Entities may choose to add additional requirements beyond the minimum.

Figure 5: Minimum Fixed Amount Subaward Match Requirements

- Subgrantee award agreements written by the Eligible Entity **must** include confirmation of the project's match requirement and **how** the subgrantee will provide the match.
- Match **must** be reported to the Eligible Entity at each project milestone and/or unit built and verified through documentation and subgrantee statements.
- The Eligible Entity **must** report on match and drawdowns to NTIA as part of their grant monitoring requirements and verify match through FPO monitoring.

USING OTHER PROGRAM FUNDS AS MATCH

Funds from other federal programs (including funds from the FCC's Universal Service Fund programs) generally may not be used as matching funds. However, the Infrastructure Investment and Jobs Act expressly provides that matching funds for the BEAD Program may come from a federal regional commission or authority or from funds, to the extent permitted by law, that were provided to an Eligible Entity or a subgrantee for the purpose of deploying broadband service under:

- The Families First Coronavirus Response Act of 2020;
- The Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020;
- The Consolidated Appropriations Act, 2021 or;
- The American Rescue Plan Act of 2021

Figure 6: Requirements for Projects with Other Program Match



As seen in **Figure 6**, Eligible Entities must consider requirements associated with other program funds used for match, and how they will impact projects. For example, if an Eligible Entity uses federal regional commission funding as a match, the project must comply with **all** BEAD programmatic requirements **and** any requirements imposed by the federal regional commission.



ADDITIONAL QUESTIONS

Please reach out to your assigned Federal Program Officer regarding any additional match questions.