

# ***Request for Applications***

**For**

## ***Nebraska Broadband Equity, Access, & Deployment (NBEAD) Last-mile Broadband Deployment Project Grants***

### ***Community Anchor Institutions (CAIs) Round***

**Date of Issuance:** **August 5, 2025**

**CAIs Round Organizational Applications Due:** **August 12, 2025**

**CAIs Round Project Applications Due:** **August 15, 2025**

Applications must be submitted to  
<https://apply.broadband.nebraska.gov/submit>



Updates to information contained in this document will be posted at  
<https://broadband.nebraska.gov/>

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## FUNDING PRIORITIES

The Nebraska Broadband Office (NBO) announces the availability of Nebraska Broadband Equity, Access, and Deployment (NBEAD) funding to support Broadband Deployment Projects targeting Community Anchor Institutions (CAIs). Funding provided to NBO under Title I of the Infrastructure Investments and Jobs Act (IIJA), the Broadband Equity, Access, and Deployment (BEAD). NBO serves as a pass-through entity for BEAD funding administered by the National Telecommunications and Information Administration (NTIA). Therefore, references below to “federal funding” or “federal awards” may be read as applicable to NBEAD subgrants.

NBO invites eligible entities to submit applications targeting Nebraska’s CAIs, described at <https://broadband.nebraska.gov>. Applications are requested to support projects that will ensure a minimum of 1 Gigabit per second (Gbps) download/ 1 Gbps upload with latency of no more than 100 milliseconds (ms) for CAIs; and that can easily scale speeds over time to support evolving connectivity needs of households and businesses and supports the deployment of 5G, successor wireless technologies, and other advanced services. Applicants may target as many CAIs as they wish with a single application.

NBEAD funding is required to prioritize Unserved Broadband Serviceable Locations (BSLs), followed by Underserved BSLs. If all unserved and underserved locations are covered by NBEAD-funded projects, NBO is allowed to offer funding for service to CAIs, which are defined as: entities such as schools, libraries, health clinics, health centers, hospitals or other medical providers, public safety entities, institutions of higher education, public housing organizations, or community support organizations that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.

NBEAD also prioritizes:

- Projects that include matching funds of greater than 25%
- [High poverty areas](#) and [persistent poverty counties](#)

The process used to subgrant funding to NBEAD projects must be competitive and is designed to maximize the public benefits achieved through the subgrant process by increasing subgrantee-provided match and reducing costs to consumers.

## AMENDMENTS TO THIS RFA

NBO reserves the right to amend the RFA at any time. In the event NBO decides to amend, add to, or delete any part of this RFA, a written amendment will be posted at <https://broadband.nebraska.gov>. Potential applicants are advised to check this website periodically for possible amendments to this RFA.

## ELIGIBILITY

Per Nebraska’s *Initial Proposal Volume II* (IPV2), NBEAD applicants must make the following attestations regarding their current business operations. Failure to make the designated attestations will disqualify them from the application process.

- A. The Applicant, under its legal, trade, or doing business as (DBA) name(s), is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participating in covered transactions by any federal department or agency.
- B. The Applicant has a current registration at SAM.gov and a Unique Entity Identifier (UEI).
- C. The Applicant is either:
  - 1. In good financial standing with the State of Nebraska, which may be evidenced via a Certificate of Good Standing from the Nebraska Secretary of State; or
  - 2. A federally recognized Native American Tribe with a Nebraska service area.
- D. Neither the Applicant organization nor any of its leadership is presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local).
- E. The Applicant is not currently involved in pending litigation in association with and pertaining to previous Nebraska-sponsored broadband infrastructure projects.
- F. Within the last two (2) years, the Applicant has not had one or more public transactions (federal, state, or local) terminated for cause or default.
- G. Within the last two (2) years, the Applicant has not been convicted of or had a civil judgment rendered against them for the commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property.
- H. Applicant certifies they have or are participating in subsidy programs to optimize digital inclusivity (i.e., Lifeline, Affordable Connectivity Program, Emergency Connectivity Fund, etc.).
- I. The Applicant has been operating in the State of Nebraska for at least two (2) years.

NBO welcomes participation from a wide variety of potential applicants that provide or will provide broadband services, including the following types of organizations. Applicants must indicate that they represent one or more of the following categories:

- Internet service providers
- Cable service companies
- Telephone service providers
- Tribal governments or other entities
- Women-owned business enterprises
- Minority-owned business enterprises
- Cooperatives
- Nonprofit organizations
- Public-private partnerships
- Private companies
- Public or private utilities
- Public utility districts
- Local governments, including any unit, subdivision, authority, or consortium of local or tribal governments
- Incorporated businesses or partnerships
- Limited liability companies

## NBEAD STAGES

The NBEAD program will be delivered in six stages.

- Stage 1: Organizational Applications (OAs)
- Stage 2: Project Applications (PAs)
- Stage 3: Documents & Technical Assistance (TA)
- Stage 4: Reporting & Reimbursement
- Stage 5: Monitoring
- Stage 6: Closeout

### **Stage 1: Organizational Applications**

The NBEAD application process will be completed in two stages, and this is the first: Organizational Applications (OAs). The focus of the OA is the pieces that would be common across all NBEAD applications from a given organization, including general and contact information, experience with federal and state funding, financial standing, compliance with federal and state law, cybersecurity and supply chain risk management, and ownership. One OA should be submitted per applicant organization, regardless of the number of DPAs targeted.

Please note that if your project will involve partners, each partner will need to submit a separate OA.

**Unless you are already an Approved Applicant (see below), to apply for NBEAD funding in the CAI Round, Applicants must submit an into the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on August 12, 2025.**

**If your organization is on the list of Approved Applicants at <https://broadband.nebraska.gov>, you do NOT need to repeat this process. You are eligible to participate in the CAI Round.**

The NBEAD portal will automatically acknowledge receipt of your OA via email to the contact named in the OA. If an OA is submitted without one or more required pieces, NBO will notify by email the contact named in the OA, and there will be a very short window (48 hours) in which the missing document(s) may be submitted. Please note that due to the truncated CAI Round timeline, curing of OAs may need to be done after the PA window closes. After this window closes, no further additions to OAs will be accepted.

Questions about the OAs must be submitted in writing to [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov). Responses to questions will be posted in writing in the FAQs document at <https://broadband.nebraska.gov> as soon as possible. Please note that answers may not be available before the OA must be submitted. The FAQs generated from the previous rounds of OAs have been compiled and updated and are available for viewing and download at <https://broadband.nebraska.gov>. NBO recommends that applicants check the existing FAQs for assistance with their questions, as NBO may not be able to timely respond to newly submitted questions.

**To avoid any actual or perceived collusion, fraud, or abuse, NBO representatives will not respond to questions outside of this process,** nor will any inadvertent answers be binding on NBO. In no case shall verbal communications override written communications. Only written

communications issued from [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov) or posted at NBO's website, <https://broadband.nebraska.gov>, will be binding on NBO. Attempts to circumvent this process may result in disqualification from NBEAD funding.

Due to the short timeline of the CAI Round, NBO will email an Authentication Code to the contact named in the OA within 24 hours of receipt of an OA. The Authentication Code will be required for use in submission of PA(s). NBO recommends that OAs be submitted at least 48 hours before the deadline to allow time for processing and sending of the Authentication Code.

Applicants will also be assigned an Abbreviated Organization Name. The Abbreviated Organization Name will be necessary for naming of your CAI Round PA(s).

NBO will use the information in the OAs to assess risk for each potential subgrantee and determine whether the Applicant will be added to the list of Approved Applicants, published at <https://broadband.nebraska.gov>.

OA requirements are detailed in Attachment 1.

### **Stage 2: Project Applications**

The second stage of the NBEAD application process is Project Applications (PAs), which are specific to single projects. A CAI-targeted project must encompass at least one CAI, but may include multiple CAIs. The CAI Round PA process will run largely parallel to the CAI Round OA process.

CAI Round PAs will address the Applicant's total requested funds, funds requested per CAI, speed to deployment, and technical capabilities. Plans specific to service to be delivered, compliance with laws, and budget will be collected from successful applicants after submission of NBO's Final Proposal and before execution of subgrants.

**CAI Round PAs must be submitted to NBO via the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on August 15, 2025. Late PAs will not be considered for funding.**

***If you are already on the list of Approved Applicants and wish to submit a PA(s) for the CAI Round***, send an email to [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov), indicating your interest. NBO will email to you an Authentication Code and assigned Abbreviated Organization Name for use in your PA(s).

The NBEAD portal will automatically acknowledge receipt of your PA via email to the contact named in the PA. There will be no opportunities for submission of missing documents during Stage 2, so NBO strongly encourages applicants to ensure they submit all required information into the NBEAD portal by the deadline noted above. Incomplete PAs will not be scored and will be rejected.

Questions about the PAs must be submitted in writing to [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov). Responses to questions will be posted in writing in the FAQs document at <https://broadband.nebraska.gov> as soon as possible. Please note that answers may not be available before the PA(s) must be submitted. The FAQs generated from the previous rounds of PAs have been compiled and updated and are available for viewing and download at <https://broadband.nebraska.gov>. NBO recommends that applicants check the existing FAQs for

assistance with their questions, as NBO may not be able to timely respond to newly submitted questions.

**To avoid any actual or perceived collusion, fraud, or abuse, NBO representatives will not respond to questions outside of this process**, nor will any inadvertent answers be binding on NBO. In no case shall verbal communications override written communications. Only written answers issued from [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov) or posted to the NBEAD FAQ's document at NBO's website, <https://broadband.nebraska.gov/>, will be binding on NBO. Attempts to circumvent this process may result in disqualification from NBEAD funding.

PA requirements are detailed in Attachment 2.

**Subsequent PA Rounds.** NBO will support projects targeting as many CAIs as funds allow. If there are CAIs for which no PAs are received and funds are still available, NBO will use direct negotiations to select the optimal mix of projects to support.

### **Stage 3: Documents & Technical Assistance**

Once NBEAD CAI and other subgrants are approved by NTIA and announced, NBO will immediately begin work with successful applicants to collect missing OA and PA items plus develop the necessary engineering plans, environmental plans, and detailed budgets with justifications. These items must be in place and approved before execution of a subgrant, which means successful applicants will have a limited amount of time from NBO's submission of its Final Proposal to provide detail sufficient to support issuance of a subgrant.

Also at this stage, subgrant documents including Terms and Conditions will be routed for signature by Subgrantees and NBO. The period of performance for each NBEAD subgrant will begin when the subgrant is fully executed, that is, signed by both parties. CAI-targeted NBEAD subgrants will have four-year periods of performance.

Formal and ongoing technical assistance will also begin with Stage 3. An initial technical assistance meeting with NBO staff will be scheduled and details posted to NBO's website (<https://broadband.nebraska.gov/>). This meeting will provide an opportunity for interaction among and between NBO and Subgrantee staff, address some broad oversight elements, and include time for questions and answers.

A schedule of subsequent technical assistance meetings will be posted to NBO's website (<https://broadband.nebraska.gov/>). Agendas for these meetings will include programmatic updates and opportunities for questions and answers.

Once subgrants are approved by NTIA and announced by NBO, the constraints to communication between NBO staff and Subgrantee staff will be ended. Beginning at this point, regular communication is encouraged and will be supported by NBO.

Finally, beginning at Stage 3, each subgrant will be assigned a Broadband Grants Manager (BGM), who will serve as the key contact for the project. Contact information for BGM's will be included in subgrant documents.

Copies of the subgrant, Terms & Conditions, and related documents are available for review at NBO's website, <https://broadband.nebraska.gov/>.



#### **Stage 4: Reporting & Reimbursement**

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Stage 4 will include procedures and processes for timely submission of reports from Subgrantees and prompt reimbursement of costs by NBO. Reimbursement requests will include narrative, financial, and data reports, and will be submitted to NBO quarterly. BGMs will assess the reports for completeness and reasonableness in the context of the project and either return them to the Subgrantee with questions or forward them with payment approval recommendations.

Once reports are determined to be complete and reasonable within the context of the project, payment approvals will be processed in the most expeditious manner available. In accordance with the Nebraska Prompt Payment Act, [Neb. Rev. Stat. § 81-2401](#) et seq. NBO has 45 days to reimburse Subgrantees once NBO receives a complete, accurate, and appropriate request.

General Reporting & Reimbursement requirements are provided in Attachment 4.

#### **Stage 5: Monitoring**

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Stage 5 will run concurrently with Stage 4, and will comprise financial, compliance, and performance monitoring efforts. The goal of Stage 5 is not to catch anyone doing anything wrong, but to ensure the rules are followed and projects progress as planned.

NBO is required to monitor NBEAD projects to ensure progress toward milestones; compliance with federal, state, local, and tribal law; and appropriate use of NBEAD funds. A variety of methods may be used to monitor projects, which will include the following:

- a. Performance monitoring: progress toward goals of the project – is the Subgrantee delivering the project as approved, within the approved timeline? If there have been variations, has that information been communicated to NBO staff and appropriate approvals secured? Has technical assistance been requested when needed?
- b. Financial monitoring: use of funds within the requirements of the NBEAD program – has the Subgrantee used the funds appropriately, within the constraints of this RFA, their approved application documents, and the subgrant documents? If there have been variations, have they been communicated to NBO staff and appropriate approvals secured, in writing?
- c. Compliance monitoring: meeting federal and state standards – is the Subgrantee and its project compliant with relevant federal, state, local, and tribal law, as applicable, including but not limited to [Build America Buy America](#), the [National Environmental Policy Act](#), and [2 CFR 200](#)?

NBO will also monitor subgrants for common fraud schemes including but not limited to false claims for materials and labor, bribes related to the acquisition of materials and labor, product substitution, mismarking or mislabeling on products and materials, time and materials overcharging, and duplication of benefits.

Subgrantee monitoring must be done at least once per subgrant per project year but may be done more frequently. Details about the timing of and requirements for monitoring will be shared with Subgrantees at the beginning of Stage 5.

#### **Stage 6: Closeout & Federal Interest Period**

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Stage 6 includes closeout and completion reporting, final monitoring, assessment of network capabilities, implementing plans for ongoing monitoring during the federal interest period, and assurance of commencement of service delivery to end users. For projects that fail to meet requirements, this phase may also include clawback and/or other penalties.

General information about monitoring during the 10-year federal interest period is included in Attachment 4. Please note that the 10-year federal interest period applies to most NBEAD subgrants, including those that are targeted at CAIs.

## PERIOD OF PERFORMANCE & FEDERAL INTEREST PERIOD

The period of performance and funding period for the subgrants awarded under this competitive RFA will begin upon execution of the subgrant, defined as the date the final signature is appended to the subgrant document, and a signed copy is emailed to the subgrantee.

Subgrantees that receive NBEAD funds for network deployment must deploy the planned broadband network and begin providing services to each targeted CAI that desires broadband service not later than four (4) years after the date of execution of the subgrant.

An extension of up to one (1) year may be requested if (a) the subgrantee has a specific plan for use of the grant funds, with project completion expected by a specific date not more than one year after the four-year deadline; (b) the construction project is underway; or (c) extenuating circumstances require an extension of time to allow the project to be completed. Extensions must be approved, in writing, by NBO and NTIA. NBO does not plan to request extensions without proof of substantive need.

Period of Performance	NBEAD subgrantees funded for CAI-targeted projects will have four (4) years from the date of subgrant execution to complete projects and begin service delivery to consumers. The period of performance for CAI-targeted subgrants is four (4) years from execution of the subgrant.
Federal Interest Period	Ten (10) years beginning the year in which the project ends, anticipated to continue through December 31, 2039.

## SUBMISSION DEADLINES & METHOD

OAs and PAs that fulfill all mandatory requirements will be reviewed and scored. NBO reserves the right to waive any deviations or errors that it determines are not material, do not invalidate the legitimacy of the application, and do not improve the applicant's competitive position.

**CAI Round OAs must be submitted into the NBEAD portal.**

**<https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on August 12, 2025.**

**CAI Round PAs must be submitted into the NBEAD portal.**

**<https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on August 15, 2025.**

OAs and PAs received after these deadlines will be considered late and will not be scored or funded. Except as described above for OAs, additions or corrections will not be accepted after the submission deadline. NBO is not responsible for applications that are late due to applicant technology inadequacies or any other reasons. All versions of the application, including attachments, become the property of NBO upon receipt and will not be returned to the applicant.

## CONFIDENTIAL & PROPRIETARY INFORMATION

NBO asserts that information provided to NBO is subject to the provisions of the Nebraska Public Records Act ([Neb. Rev. Stat. §84-712](#) et seq.). NBO expects that, to the maximum extent possible, the entity submitting an OA or PA will use “non-protected” information as the basis for statements in the documents so that the documents and the information set out in the documents may be reviewed by the public. NBO reserves the right to disclose any document or information in the OA or PA pursuant to an applicable request for access to public records without providing the entity an opportunity to review, edit, or redact such document. An entity submitting information to NBO in an OA or PA understands that the entity will be solely responsible for promptly defending its claims of confidentiality in response to a public records request, or request for information submitted to the State. Such entity will use its best efforts to promptly respond to State notice of a request for documents or information related to an OA or PA.

If an applicant claims information should be excluded from the public record, the applicant must: 1) identify on the OA or PA which responses are alleged to contain proprietary or trade secret information by indicating “Confidential and Proprietary” in the space for a response to the relevant question; and 2) at the end of the OA or PA, upload a separate document with the words “PROPRIETARY INFORMATION” in the file name and header of the document, which contains a) the claimed proprietary or trade secret information with the corresponding OA or PA response number; b) a detailed explanation of the legal basis for the claimed protection from disclosure, pursuant to State or federal public records statutes or laws; c) an explanation of how the release of the proprietary or trade secret information would give a business advantage to business competitor(s); and d) an explanation of how business competitor(s) will gain an actual business advantage by disclosure of information. The mere assertion that information is proprietary or trade secret, or that a speculative business advantage might be gained, is not sufficient (See [Nebraska Attorney General Opinion No. 92068, April 27, 1992](#)).

The State has the right, but not the duty, to determine, in its discretion, if the interests served by nondisclosure outweighs any public purpose served by disclosure (See [Neb. Rev. Stat. § 84-712.05\(3\)](#)). Absent a State determination that information is proprietary or trade secret, the State will consider all information a public record subject to release regardless of any assertion that the information is proprietary or trade secret. If the State receives a request from the public for the claimed proprietary or trade secret information, State will notify the applicant of the request. The prospective subgrantee shall respond to the State within two (2) days with an estimated time frame by which it can fully respond to and defend its position that the requested information is proprietary or trade secret. It will be the applicant’s responsibility to defend its asserted interest in non-disclosure. The State retains the right, but not the duty, to make its own determination as to whether information should be protected from disclosure.

## USE OF FUNDS

NBEAD funds may be used to supplement (add to) but not supplant (replace) other funds that would otherwise be used for the same purpose (i.e., buildout of a broadband network). All funded organizations must be good stewards of funds awarded.

Existing broadband providers and new entrants must communicate well with federal, state, local, and Tribal partners to ensure that deployments proceed as expected and that activities are designed and implemented in ways that most benefit the communities they are designed to serve.

Subgrantees are to expend funds in accordance with the approved line-item budget. If cumulative budget changes exceed 10% of the total award or would add or eliminate a line item, the Subgrantee must request, in writing, a budget or a project plan revision, depending on what needs to be changed, prior to implementation of proposed changes. It is to the discretion of NBO to approve the requested revision(s). NBO will provide written notice of approval or disapproval of the request within thirty (30) days of receipt.

Subgrantees must submit to NBO timely, accurate, and complete reports (see Attachment 4 for general requirements) using the forms, format, and timeline provided by NBO. This includes submission of all costs for which reimbursement is requested for a quarter. Subgrantees are encouraged to submit reports to NBO in a timely manner to ensure prompt payment of expenses and cash flow maintenance.

Subgrantees are required to comply with NBO's performance and subrecipient monitoring activities and schedule, which includes provision of source documentation for reimbursement requests when requested by NBO, participation in site visits, and regular communications. The documentation requested may include payroll records, receipts, time studies, or other documents to fully justify the expenses claimed on the quarterly budget report. Submission of source documents may affect quarterly reimbursement, so Subgrantees are advised to submit the documents in a timely manner.

NBEAD funding may only be used for activities outlined in the approved application, and funds must be used in accordance with the approved budget. NBEAD funding may be used for the following costs:

1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, up to the demarcation point.
2. Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.
3. Engineering design, permitting, and work related to environmental, historical, and cultural reviews.
4. Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the NBEAD Program (such as project managers, program directors, and subject matter experts).
5. Network software upgrades, including, but not limited to, cybersecurity solutions.
6. Training for cybersecurity professionals who will be working on NBEAD-funded networks.

All costs must meet necessary, reasonable, allowable, and allocable standards. Per [2 CFR 200.405](#), a cost is allocable to a (in this case) NBEAD subgrant if it is assignable to that subgrant in accordance with the relative benefits received. This standard is met if the cost satisfies any of the following criteria:

1. Incurred specifically for the subgrant;
2. Benefits both the subgrant and other work of the subgrantee and can be distributed in proportions that may be approximated using reasonable methods; or
3. Is necessary to the overall operation of the subgrantee and is assignable in part to the subgrant in accordance with the cost principles at [2 CFR 200, Subpart E](#).

To be considered allowable, costs must meet the following ([2 CFR 200.403](#)):

1. Be necessary and reasonable for the performance of the subgrant and be allocable thereto under the principles in [2 CFR Part 200, Subpart E](#).
2. Conform to any limitations or exclusions set forth in [2 CFR Part 200, Subpart E](#) or in the subgrant as to types or amount of cost items.
3. Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the applicant.
4. Be accorded consistent treatment. A cost may not be assigned to a subgrant as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the subgrant as an indirect cost.
5. Be determined in accordance with generally accepted accounting principles (GAAP), except for state and local governments and Indian Tribes only as otherwise provided for in [2 CFR Part 200](#).
6. Not be included as a cost or used to meet cost-sharing or matching requirements of any other federally financed program in either the current or a prior period.
7. Be adequately documented.

A cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost ([2 CFR 200.404](#)). To determine reasonableness, the following should be considered:

1. Whether the cost is generally recognized as ordinary and necessary for the subgrantee's operation or the proper and efficient performance of the subgrant;
2. The restraints or requirements imposed by such factors as sound business practices; arm's-length bargaining; federal, state, local, tribal, and other laws and regulations; and terms and conditions of the subgrant;
3. Market prices for comparable costs for the geographic area;
4. Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the subgrantee, its employees, the public at large, and the federal government; and
5. Whether the cost represents a deviation from the subgrantee's established written policies and procedures for incurring costs.

**Build America Buy America (BABA) Act.** NBEAD projects are subject to Build America, Buy America (BABA) Act requirements. For projects funded by NBEAD, the following requirements must be met:

- All iron and steel used in the project are produced in the US;
- All manufactured products used in the project are produced in the US; and
- All construction materials are manufactured in the US.

BABA compliance must be whole, not piecemealed: if one component is not compliant, the entire project is not compliant, regardless of funding types and/or braiding of funding from multiple sources.

Items purchased with matching funds are subject to the same BABA requirements. In addition, BABA requirements pass through from NBO to NBEAD subgrantees and to their subgrantees and subcontractors.

### **Prohibited Costs**

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Advance payments are not allowed under NBEAD funding.

Pre-award costs are not allowed under NBEAD funding. In addition, the following costs are specifically prohibited under NBEAD funding:

1. Covered communications equipment or services under the Secure and Trusted Communications Networks Act. Subgrantees (including contractors and subcontractors of subgrantees) may not use grant funds received under the NBEAD Program to purchase or support any covered communications equipment or service (as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 ([47 USC § 1608](#))).
2. Profit and fees. A profit, fee, or other incremental charge above actual cost incurred by the Subgrantee is not an allowable cost under this program. A profit, fee, or other incremental charge cannot be added to the actual allowable cost of the service or asset being constructed, purchased, or leased under this program. This prohibition does not apply to user or subscriber fees (which include a profit margin) charged for subsequent broadband service delivery.
3. Support for or opposition of collective bargaining. A Subgrantee may not use grant funds, whether directly or indirectly, to support or oppose collective bargaining.
4. Costs for efforts related to workforce development, including registered apprenticeships and pre-apprenticeships, and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.

### **Match Requirements**

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Matching funds of not less than 25% of project costs will be required for most NBEAD projects. Matching contributions demonstrate commitment to a particular project and minimize grant funding outlay, extend the reach of the program funding, and help to ensure that every unserved location and underserved location in Nebraska has access to reliable, affordable, high-speed internet.

Generally, funds from other federal programs may not be used as matching funds. However, matching funds for the NBEAD program, per the federal legislation, may come from a federal regional commission or authority or from funds that were provided to a subgrantee for the purpose of deploying broadband service under the Families First Coronavirus Response Act ([Public Law 116-127; 134 Stat. 178](#)); the CARES Act ([Public Law 116-136; 134 Stat. 281](#)), the Consolidated Appropriations Act, 2021 ([Public Law 116-260; 134 Stat. 1182](#)); or the American Rescue Plan of 2021 ([Public Law 117-2; 135 Stat. 4](#)), to the extent permitted by those laws. Please note that, if federal sources are used as match for NBEAD, the project will also have to comply with those federal programs' requirements. Loan funding issued through a federal agency, such as through the USDA ReConnect Program, may also be used as match.

A matching contribution may be provided by the subgrantee, a unit of local government, a utility company, a cooperative, a nonprofit or philanthropic organization, a for-profit company, a regional planning or governmental organization, a federal regional commission or authority, or any combination thereof.

Match may be provided in either cash or in-kind contributions. All match contributions must be made consistent with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth at [2 CFR 200](#). Match contributions must meet the same allowable, allocable, necessary, and reasonable standards as any other project expense.

In-kind contributions may include indirect costs, employee or volunteer time, supplies, computer hardware and software, use of facilities; or waivers of fees associated with access to rights of way, pole attachments, conduits, easements, or access to other types of infrastructure.

**Match Waivers.** In CAI-targeted NBEAD PAs, match of less than 25% of project costs may be proposed for any CAIs or entire projects. To request a waiver, a prospective subgrantee must submit, with their PA, a description of the special circumstances underlying the request and explain how a waiver would serve the public interest and effectuate the purposes of the NBEAD Program. The submitted request must include one or more income statements disclosing the economics surrounding the application and must incorporate multiple technical solutions and associated capital expenditure assumptions to demonstrate the special circumstances. All waivers of matching funds must be approved by NBO and are subject to review and approval by NTIA. The Match Waiver Request Form is available at <https://broadband.nebraska.gov>.

**Reimbursement Requests & Match.** Subgrantees have the option of providing the full match amount at the beginning of the project, but it is not required. NBO is able to negotiate the timing of the application of match to project costs. This may be addressed upon notification of provisional awards.

### **Program Income**

Program income may be included in NBEAD project budgets. Program income is gross income that is directly generated by a NBEAD-supported activity, or earned as a result of the NBEAD subgrant, during the period of performance, except as provided in [2 CFR 200.307\(f\)](#).

NTIA has issued a waiver specific to program income under BEAD-funded infrastructure projects: NBEAD subgrantees 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. However, profit and fees are not allowable costs, so project budgets may not include profit, fees, or similar charges.

Subgrantees will not be required to track and report program income to NBO.

### **Contingency Funds**

Per [2 CFR 200.433](#) and within certain limitations, contingency funds are allowable costs for construction projects, including NBEAD-funded projects. Contingency amounts must be estimated using broadly accepted cost estimating methodologies, specified in the budget documentation, and accepted by NBO. For actual costs incurred to be allowable, they must comply with the cost principles and other requirements (see [2 CFR 200.300](#) and [200.403](#)), be



necessary and reasonable for proper and efficient accomplishment of project or program objectives, and be verifiable from the subgrantee's records.

Contingency amounts for major project scope changes, unforeseen risks, or extraordinary events must not be included in the budget. Payments to a subgrantee's "contingency reserve" or any similar payment made for events the occurrence of which cannot be foretold with certainty as to the time or intensity, or with an assurance of their happening, are not allowable.

### **Property & Equipment**

Application budgets must include identification of any real property and equipment that is planned to be acquired with NBEAD funding. This information will be transferred to subgrant agreement documents to ensure compliance with [2 CFR 200.316](#).

In accordance with [2 CFR 200.316](#), any real property, equipment, or intangible property acquired or improved with a federal award must be held in trust by the Subgrantee as trustee for the beneficiaries of the project, other eligible activity, or program under which the property was acquired or improved. This trust relationship exists throughout the duration of the property's estimated useful life. During this time, the federal government retains an undivided, equitable reversionary interest in the property (Federal Interest).

Depreciation of real property, equipment, and intangible property shall be in accordance with [2 CFR 200.436](#).

Subgrantees must follow [2 CFR 200.313](#)(c) through (e), which requires that:

1. Equipment, including replacement equipment, be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the subgrant or, when appropriate, under other federal awards; however, the subgrantee must not encumber the equipment without prior approval of NBO and NTIA (2 CFR 200.313(c) and (e)).
2. Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the federal award and subgrant identification numbers), who holds title, the acquisition date, cost of the property, percentage of federal participation in the project costs for the federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sales price of the property (2 CFR 200.313(d)(1)).
3. A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years (2 CFR 200.313(d)(2)).
4. A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated (2 CFR 200.313(d)(3)).
5. Adequate maintenance procedures must be developed to keep the property in good condition (2 CFR 200.313(d)(4)).
6. If the subgrantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return (2 CFR 200.313(d)(5)).
7. When original or replacement equipment acquired under a federal award is no longer needed for a federal program (whether the original project or program or other activities currently or previously supported by the federal government), the subgrantee must request disposition instructions from NBO if required by the terms and conditions of the



subgrant. Items of equipment with a current per-unit fair market value of \$10,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the federal awarding agency. If the federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair market value in excess of \$10,000 may be retained or sold. The federal awarding agency is entitled to the federal interest in the equipment, which is the amount calculated by multiplying the current market value or sale proceeds by the federal agency's participation in total project costs (2 CFR 200.313(e)).

**Real Property.** Title to real property acquired or improved by non-federal entities under subgrants vests in the subgrantee subject to the obligations and conditions specified in [2 CFR 200.311](#). Real property will be used for the originally authorized purpose as long as needed for that purpose, during which time the subgrantee must not dispose of or encumber title to or other interests in the real property.

When real property is no longer needed for the originally authorized purpose, the subgrantee must obtain disposition instructions from NBO. When real property is sold, sales procedures must be followed that provide for competition to the extent practicable and result in the highest possible return. If sold, subgrantees must compensate the federal awarding agency for the portion of the net sales proceeds that represents the federal agency's interest in the real property, which is the amount calculated by multiplying the current market value or sale proceeds by the federal agency's participation in total project costs. If the property is retained, the subgrantee must compensate the federal awarding agency for the federal portion of the current fair market value of the property. Disposition instructions may also provide for transfer of title to the federal awarding agency or a designated third party, in which case the subgrantee is entitled to the subgrantee's interest in the property, which is calculated by multiplying the current market value or sale proceeds by the subgrantee's share in total project costs.

### **Indirect Costs**

Indirect costs are allowable under NBEAD funding, and are costs incurred for a common or joint purpose benefitting more than one cost objective and are not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. An applicant should describe the types of indirect costs it plans to charge to the subgrant. An applicant can never double-charge a cost as both a direct and an indirect cost. Indirect costs may be charged to the subgrant if:

- The applicant has a federally approved indirect cost rate from a cognizant agency; or
- The applicant elects to charge a *de minimis* rate of 15% of modified total direct costs (MTDC). MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subgrant (regardless of the period of performance of the subgrants). MTDC excludes equipment, capital expenditures, rental costs, and the portion of each subgrant in excess of \$50,000. Subcontracts can be included as part of the MTDC calculation, and they are not subject to the limit of the first \$50,000 to which subgrants are held.
  - If an applicant elects to employ the 15% *de minimis* indirect cost rate, it cannot claim resulting costs as a match, nor can the applicant claim "unrecovered indirect costs" as a match. Neither of these costs can be reflected as actual indirect cost rates realized by the organization and, therefore, are not verifiable in the applicant records as required by federal regulation ([2 CFR 200.306\(b\)\(1\)](#)).

## APPLICATION REVIEW PROCESS & CRITERIA

### Review of OAs

OAs will be screened for inclusion of all requirements and scored to determine the appropriate risk level for each applicant. Applicants who submit sufficient information will be added to the list of Approved Applicants, available at NBO's website, <https://broadband.nebraska.gov/>. Risk levels determined in the OA screening and scoring will be communicated to successful applicants upon execution of subgrants.

### Review of PAs

PAs will be reviewed to ensure that all required documentation has been included. PAs that fulfill all mandatory requirements will be advanced for further evaluation. PAs will be judged non-responsive if they are incomplete, inadequately developed, or otherwise unsuitable for review and funding consideration. Non-responsive applications will not be reviewed further.

Evaluation of the PAs will focus on the following.

All CAI Projects	
Max Points	Criteria
100	A. Minimal NBEAD Outlay, assessed per CAI: total NBEAD funding requested for each CAI.
30	B. Speed to Deployment: Applicant's binding commitment to provision service by a specific date that is earlier than four years after the date on which the subgrantee will receive the subgrant. Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.
20	C. Affordability: prospective subgrantee's commitment to provide the most affordable total price to the customer for 1 Gbps/1 Gbps service to the CAI, including taxes, surcharges, associated fees, equipment rental and managed service fees
150	Total Points Available

NBO reserves the right to reject any or all applications, wholly or in part. All awards will be made in a manner deemed by NBO to meet the goals of the NBEAD program.

Subgrants resulting from this RFA shall incorporate the following documents:

1. Amendment to the Subgrant with the most recent amendment having the highest priority;
2. Subgrant, excluding any attachments, with the following addenda in order of preference: NBO General Terms & Conditions; NBEAD Insurance Requirements;
3. Attachment 1;
4. All other attachments to the Subgrant.

Unless otherwise specifically stated in a subgrant amendment, in case of any conflict between the incorporated documents, the documents shall govern in the order above, with number one (1) receiving preference over all other documents and with each lower numbered document having preference over any higher numbered document.

## ORGANIZATIONAL APPLICATION REQUIREMENTS

### Organizational Application is Required

To apply for NBEAD funding, you must submit an OA for at least one CAI. Submission of an OA does not commit any organization to submitting an application nor does it commit an organization to or exclude an organization from submitting an application for any specific DPA.

The purpose of the OA is to help NBO assess risk levels to be associated with each applicant organization, and to give NBO an idea about the potential volume of applications planned to be submitted. The OA focuses on organizational pieces that will be common across all applications from a single applicant, eliminating the need for multiple submissions and repeated evaluation of the same information.

The goal is not to eliminate or prevent organizations from applying for NBEAD funds. However, it is possible that via application of the OA scoring criteria, NBO may determine that the risk of working with an individual organization is too high and decline to allow participation in NBEAD. Therefore, NBO advises that applicants carefully complete the OA.

### Submission Details

OAs, including all attachments, must be submitted to the NBO no later than 11:59 pm, Central Time on August 12, 2025 into the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>. The portal will automatically acknowledge receipt of the OA. If you do not receive acknowledgement of your submission within 12 hours, notify NBO immediately at [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov).

Within 24 hours of receipt of an OA, NBO staff will email an Authentication Code to the contact named in the OA. ***This Authentication Code is required for submission of a PA. NBO recommends that OAs be submitted at least 48 hours before the deadline, to ensure sufficient time for processing and sending of the Authentication Code.***

The email from [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov) that conveys your Authentication Code will also include an assigned Abbreviated Organization Name, which will be necessary for naming of your CAI Round PA(s).

### Naming Conventions

OA attachments should be submitted as in as few documents as possible. Please use the following naming convention for your files: Organization Name, OA, Question #. If your file includes confidential or proprietary information, ensure you also include "Proprietary Information" in the file name, as described above.

There are no file size limits associated with the NBEAD portal.

### OA Required Contents

Provide the following information. Please note that the wording of questions in the portal may differ slightly from the wording below, but the content is the same.

**Table 1: Organization Information**

1.1 Unique Entity Identifier (UEI) of Applicant
1.2 Registered name associated with the UEI record in SAM.gov
1.3 Federal Tax Identification Number
1.4 UEI of parent organization, if applicable
1.5 FRN: 10-digit Federal Communications Commission (FCC) Registration Number of the Applicant, with leading zeroes
1.5.a. 6-digit Provider Identification Number, assigned by the FCC
1.6 Nebraska Secretary of State registration/account number
1.7 List any DBAs
1.8 Legal address of Applicant
1.9 Contact person for questions about this OA
1.10 Phone number for Contact person
1.11 Email address for Contact person
1.12 Fiscal year dates
1.13 Average annual budget
1.14 Is your accounting system cash or accrual?
1.15 State of Incorporation
1.16 Year of Incorporation
1.17 Classification of Applicant organization (select all that apply)
<ul style="list-style-type: none"> <li>▪ Women Business Enterprise (WBE), as defined at <a href="#">15 USC 1691c-2(h)(6)</a></li> <li>▪ Minority Business Enterprise (MBE), as defined at <a href="#">15 USC 1691c-2(h)(5)</a></li> <li>▪ Small business (as defined by the <a href="#">Small Business Administration</a>)</li> <li>▪ Non-Traditional Broadband Provider <ul style="list-style-type: none"> <li>- Electric cooperative</li> <li>- Nonprofit organization</li> <li>- Public-private partnership</li> <li>- Public or private utility</li> <li>- Public utility district</li> <li>- Tribal entity</li> <li>- Local government (including any unit, subdivision, authority, or consortium of local governments)</li> </ul> </li> </ul>
1.18 Type of Service Provider (select all that apply)
<ul style="list-style-type: none"> <li>▪ Incumbent Local Exchange Carrier (ILEC)</li> <li>▪ Non-ILEC Service Provider</li> <li>▪ Cooperative</li> <li>▪ Municipality</li> <li>▪ Tribal organization</li> <li>▪ None of the above</li> </ul>
1.19 Webpage
1.20 Authorized Official name
1.21 Email address of Authorized Official
1.22 Signature of Authorized Official:

By signing this Organizational Application, the Applicant guarantees compliance with the provisions stated in the NBEAD Request for Applications (RFA) and certifies that all information contained in this Organizational Application is accurate and complete. The Applicant hereby approves the usage of electronic signatures pursuant to [Neb. Rev. Stat. §86-](#)

[611](#) and [Nebraska Administrative Code, Title 437, Digital Signatures Act](#). This Organizational Application is submitted pursuant to the terms of the RFA, and if the Applicant is awarded funding, it will be incorporated into the subgrant between the parties. Applicant understands that if anything in this Organizational Application conflicts with the RFA or with the subsequent subgrant, the subgrant and RFA shall govern as set forth in the subgrant.

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**Table 2: Organizational Capacity**

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2.1 Provide licensing information for state and federal governing bodies.

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2.2 Within the past five (5) years, has the Applicant, under its legal, trade, or DBA name(s) or any of its affiliates been debarred or suspended from any contracting or subgranting process or been disqualified from any government procurement?

☐ Yes ☐ No

If yes, attach explanation.

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2.3 Within the past five (5) years, has any individual previously identified, any other key employees not previously identified, or any individual having the authority to sign, execute, or approve bids, proposals, contracts, or supporting documentation with the State of Nebraska been subject to an investigation, whether open or closed, by any government entity for a civil or criminal violation for any business- related conduct?

☐ Yes ☐ No

If yes, attach explanation.

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2.4 Within the past five (5) years, has any individual previously identified, any other key employees not previously identified or any individual having the authority to sign, execute, or approve bids, proposals, contracts or supporting documentation with the State of Nebraska been subject to an indictment, grant of immunity, judgment, or conviction of any business related conduct constituting a crime including, but not limited to, fraud, extortion, bribery, racketeering, price fixing, bid collusion, or any crime related to truthfulness?

☐ Yes ☐ No

If yes, attach explanation.

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2.5 Has the Applicant had any agreements executed within the last five (5) years with federal awarding agencies or pass-through entities (either as grant agreements, cooperative agreements, subgrants, or contracts) that either were terminated for cause; or that resulted in the placement of Specific Conditions on the Applicant (see [2 CFR § 200.208](#) or [45 CFR § 75.207](#))?

☐ Yes ☐ No

If yes, attach explanation.

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2.6 During the past three (3) years, has the Applicant failed to file documentation requested by any Nebraska state agency, public authority, or other quasi-state entity, with the Attorney General of the State of Nebraska, or with any other local, state, or federal entity that has made a formal request for information?

☐ Yes ☐ No

If yes, indicate the year(s) affected and the current status of the matter.

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2.7 Other than financial statements, has any aspect of the Applicant's activities been subject to an audit, examination, or monitoring within the last five (5) years by a governmental agency (e.g., Inspector General, state or local auditors)?

☐ Yes ☐ No

If yes, attach explanation of any findings or deficiencies with respect to a grant(s) or subgrant(s) to conduct programs similar to those covered by the NBEAD program.

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2.8 In the last 12 months, has the Applicant hired new senior management personnel and/or program personnel who would be working on your NBEAD project?

☐ Yes ☐ No

If yes, which positions were affected?

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2.9 Has the Applicant received a grant award under any of the following federal funding programs in the last 10 years, either for work in Nebraska or in another state?

- Rural Digital Opportunity Fund (RDOF)
  - USDA ReConnect
  - Enabling Middle Mile Broadband Infrastructure Program
  - Tribal Broadband Connectivity Program
  - Broadband Infrastructure Program (BIP)
  - Connecting Minority Communities (CMC) Program
  - 5G Fund for Rural America
  - Enhanced Alternative Connect America Cost Mode (E-ACAM)
  - Connect America Fund
  - Other (specify)
- 

2.10 Does the Applicant have any experience with receiving federal funds?

☐ Yes ☐ No

If yes, provide two or three examples of the Applicant's experience receiving federal funds as a grantee or a subgrantee and demonstrate knowledge of the Uniform Grant Guidance at [2 CFR § 200](#).

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2.11 Has the Applicant ever received grant funds (federal or state) from the State of Nebraska?

If yes, when, what was the name of the grant program(s), and with which agency(ies) did you work?

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2.12 If the Applicant has received federal funding either directly or through a pass-through entity, when was a desk audit last completed?

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2.13 If the Applicant has received federal funding either directly or through a pass-through entity, when was a site visit last completed?

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2.14 Which of the following policies and procedures does the Applicant have in place?

- Authorizing and accounting for the disposal of property and equipment
  - Authorizing and approving capital expenditures
  - Compliance with Build America, Buy America
  - Conflict of Interest
  - Drug-free Workplace
  - Fiscal/Internal Controls
  - Staff code of conduct
  - Purchasing/procurement
  - Records retention
  - Tracking of property (e.g., checking property list against physical inventory)
  - Whistleblower protections
- 

2.15 Has the Applicant had any financial audits completed in the last five (5) years.

☐ Yes ☐ No

If yes, indicate any significant findings.

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2.16 In the past five (5) years, did the Applicant conduct a single audit in accordance with [2 CFR Part 200, Subpart F](#)? If yes, attach a copy of the audit report.

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2.17 Have any similar subgrants awarded to the Applicant been audited as a major program? If yes, what were the results?

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- 2.18 Does the Applicant have new or substantially changed accounting or other systems?  
If yes, provide description.
- 2.19 Provide a description of the Applicant's experience in planning, designing, engineering, and constructing broadband networks and duration of experience.
- 2.20 Provide a description of the Applicant's experience in operating and maintaining broadband networks and duration of that experience.
- 2.21 Provide a description of the Applicant's experience in successfully implementing projects of similar size and scope, including capital requirements and locations passed.

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**Table 3: Attachments**


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- 3.1 Attach a PDF copy of the Applicant's SAM.gov profile, ensuring the active dates of the account are visible.
- 3.2 Attach a PDF copy of the Nebraska Secretary of State's Certificate of Good Standing for the Applicant organization.
- 3.3 Attach a copy of the certificate of organization (e.g., incorporation) for the Applicant and copies of any amendments.
- 3.4 Attach résumés for up to 10 key management personnel that include information about their length of service in their current roles, current organization, and the field. Provide a summary of their anticipated roles in the NBEAD project(s).
- 3.5 Attach a copy of financial statements from the prior two fiscal years that have been audited by independent certified public accountants. If audited financial statements are not available, attach unaudited financial statements and initial and the following statement:  
\_\_\_\_\_ A copy of the Applicant's audited financial statements will be submitted to NBO prior to execution of a subgrant. A subgrant may not be issued before receipt and assessment of audited financial statements. NBO will provide a specific deadline in award documents.
- 3.6 Attach a description of the Applicant's physical presence and personnel able to respond to network outage events in Nebraska.

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**Table 4: Certifications**


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- 4.1 Applicant certifies that they are financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the subgrant, and that they will comply with all program requirements, including service milestones.
- 4.2 Applicant certifies they have and will continue to have sufficient financial resources to cover its eligible costs for the project until such time as NBO authorizes reimbursements.
- 4.3 Applicant certifies their understanding of the financial conditions and the performance standards including project milestones.
- 4.4 Applicant certifies that they will maintain their registration with the System for Award Management at SAM.gov for the duration of the subgrant project period.
- 4.5 Applicant certifies that they will comply with [Nebraska Executive Order 23-05](#), Enhancing Broadband Security.
- 4.6 Applicant certifies they will not use NBEAD funding to purchase or support any covered communications equipment, services, or systems, as defined at [2 CFR 200.216](#).
- 4.7 Applicant certifies that it is:
- Technically qualified to complete and operate the project, and
-



- 
- Capable of carrying out the funded activities in a competent manner, including that it will use an appropriately skilled and credentialed workforce.
- 

4.8 Applicant must certify one of the following:

- a. Applicant certifies that they have provided a voice, broadband service, and/or electric transmission or distribution service for at least the two (2) consecutive years prior to the date of this application submission or it is a wholly owned subsidiary of such an entity and possesses the operational capability to qualify to complete and operate a NBEAD project. If this is the case, initial here: \_\_\_\_\_ and enter the number of years the Applicant or its parent company has been operating here: \_\_\_\_\_
  - b. Applicant certifies they have not provided a voice or broadband service for at least the two (2) consecutive years prior to the date of its application submission or is it a wholly owned subsidiary of such an entity and possesses the operational capability to qualify to complete and operate a NBEAD project. Initial here: \_\_\_\_\_.
- 

4.9 Applicant must certify one of the following:

- a. Applicant certifies they have provided a voice and/or broadband service and that it has timely filed [Commission Form 477s](#) and the [Broadband DATA Act](#) submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.
    - i. If the Applicant is unable to certify timely filing of Commission Form 477s and Broadband DATA Act submissions plus compliance with the Commission's rules and regulations, initial here: \_\_\_\_\_ and attach an explanation of any pending or completed enforcement action, civil litigation, or other matters in which it failed to comply or was alleged to have failed to comply with Commission rules or regulations.
  - b. Applicant certifies they have operated only electric transmission/ distribution services and has attached qualified operating or financial reports\* filed with relevant financial institutions for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution. If this is the case, initial here: \_\_\_\_\_.
  - c. Applicant certifies that they are a new entrant to the broadband market and has attached evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities. Such evidence should include résumés from key personnel, detailed project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience, or other comparable evidence underlining operational proficiency. If this is the case, initial here: \_\_\_\_\_.
- 

\*Qualified operating or financial reports may be the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 719, n. 202.

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**Table 5: Attestations: Applicants must attest to the following:**

**Cybersecurity Attestations**

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5.1 The Applicant has a cybersecurity risk management plan in place that is either:

- a. operational, if the prospective subgrantee is providing service prior to the award of the subgrant; or
  - b. ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the subgrant award;
-

5.2 The cybersecurity plan reflects the latest version of the National Institute of Standards and Technology (NIST) [Cybersecurity Framework \(CSF\) 2.0](#) and the standards and controls set forth in [Executive Order 14028](#) and specifies the security and privacy controls being implemented;

5.3 The cybersecurity plan will be reevaluated and updated on a periodic basis and as events warrant; and

5.4 The cybersecurity plan must be submitted prior to allocation of funds. \_\_\_\_ Initial here to indicate that the plan is attached

\_\_\_\_ Initial here to indicate the plan will be submitted prior to execution of the subgrant. NBO will provide a specific deadline in award documents.

If any substantive changes are made to the plan, a new version will be submitted to NBO within 30 days. NBO is required to provide a copy of the plan to NTIA upon NTIA's request.

5.5 If the Applicant relies in whole or in part on network facilities owned or operated by a third party (e.g., purchases wholesale carriage on such facilities), the Applicant will obtain the cybersecurity attestations from its network provider and make them available to NBO upon request.

#### **Supply Chain Risk Management (SCRM) Attestation**

5.6 The Applicant has a SCRM plan in place that is either:

- a. operational, if the prospective subgrantee is already providing service at the time of the subgrant; or
- b. ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of subgrant award;

5.7 The plan is based upon the key practices discussed in the NIST publication [NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry](#) and related SCRM guidance from NIST, including [NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations](#) and specifies the supply chain risk management controls being implemented;

5.8 The plan will be reevaluated and updated on a periodic basis and as events warrant; and

5.9 The SCRM plan must be submitted prior to allocation of funds.

\_\_\_\_ Initial here to indicate that the plan is attached

\_\_\_\_ Initial here to indicate the plan will be submitted prior to execution of a subgrant. NBO will provide a specific deadline in award documents.

If any substantive changes are made to the plan, a new version be submitted to NBO within 30 days.

5.10 Does the Applicant rely in whole or in part on network facilities owned or operated by a third party (e.g., purchases wholesale carriage on such facilities)?

\_\_\_ Yes \_\_\_ No

If "yes" is indicated, Applicant attests it will obtain the SCRM attestation from its network provider and make it available to NBO upon request.

#### **Table 6: Ownership Disclosure Requirements**

Per [47 CFR 2.112](#), the following shall be fully disclosed by applicants for NBEAD funding:

6.1 List the real party or parties in interest in the Applicant or application, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the applicant;

6.2 List the name, address, and citizenship of any party holding 10% or more of stock in the applicant, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held;

- 
- 6.3 a. If the Applicant organization is a limited partnership, initial here \_\_\_\_\_ and provide the name, address, and citizenship of each limited partner whose interest in the applicant is 10% or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses)
- b. If the Applicant organization is a general partnership, initial here \_\_\_\_\_ and provide the name, address, and citizenship of each partner, and the share or interest participation in the partnership
- c. If the Applicant organization is a limited liability company, initial here \_\_\_\_\_ and provide the name, address, and citizenship of each of its members whose interest in the applicant is 10% or greater
- d. If none of these apply, initial here \_\_\_\_\_
- 
- 6.4 List all parties holding indirect ownership interests in the applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10% or more of the applicant, except that if the ownership percentage for an interest in any link in the chain exceeds 50% or represents actual control, it shall be treated and reported as if it were a 100% interest; and
- 
- 6.5 List any FCC-regulated entity or applicant for an FCC license, in which the applicant or any of the parties identified in Table 6, items 1 through 3, above, owns 10% or more of stock, whether voting or nonvoting, common or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant (e.g., Company A owns 10% of Company B (the Applicant) and 10% of Company C, then Companies A and C must be listed on Company B's application, where C is an FCC licensee and/or license applicant).
- 
- 6.6 Provide information about the structure of the Applicant organization, including organization charts detailing parent, subsidiaries, and affiliates. Attach copies of organization charts as necessary.
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**Table 7: Other Public Funding**

Applicants and their affiliates\* must fully disclose all applications it has submitted or plans to submit; under their legal, trade, and/or DBA name(s); and every broadband deployment project funded by public sources. For each application, provide the following information. Include but do not limit your responses to funds provided under: the Families First Coronavirus Response Act ([Public Law 116-127; 134 Stat. 178](#)); the CARES Act ([Public Law 116-136; 134 Stat. 281](#)), the Consolidated Appropriations Act, 2021 ([Public Law 116-260; 134 Stat. 1182](#)); or the American Rescue Plan of 2021 ([Public Law 117-2; 135 Stat. 4](#)), any federal Universal Service Fund high-cost program (e.g., [Rural Digital Opportunity Fund](#), [Connect America Fund](#)), or any State of Nebraska or local universal service or broadband deployment funding program.

\*Per the BEAD NOFO, “affiliate” refers to a person who directly or indirectly owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10%.

Please add columns as necessary. If no applications, as defined above, have been submitted or are planned to be submitted, indicate so in the Application/Project 1 column.

		<i><b>Application/ Project 1</b></i>	<i><b>Application/ Project 2</b></i>	<i><b>Application/ Project 3</b></i>	<i><b>Application/ Project 4</b></i>	<i><b>Application/ Project 5</b></i>
<i><b>Applicant or affiliate legal, trade, or DBA name</b></i>						
<i><b>Public funding source</b></i>						
<i><b>Service speed and latency</b></i>						
<i><b>Geographic coverage area</b></i>						
<i><b>Number of unserved and underserved locations project is committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage)</b></i>		Unserved:	Unserved:	Unserved:	Unserved:	Unserved:
		Underserved:	Underserved:	Underserved:	Underserved:	Underserved:
		% of locations to be served:	% of locations to be served:	% of locations to be served:	% of locations to be served:	% of locations to be served:
<i><b>Amount of public funding used</b></i>						
<i><b>Consumer service costs</b></i>	<i>Cost of the service(s), on a per speed offer basis</i>					

	<i>Cost of maintenance fees/packages</i>					
	<i>Cost of equipment rental (if applicable)</i>					
	<i>Estimated taxes on a per speed offer basis</i>					
	<i>Other costs (specify)</i>					
<b>Matching commitments</b>						

## PROJECT APPLICATION REQUIREMENTS

Complete each section of the PA in the NBEAD portal. All sections and questions are required. Please note that the wording of the questions in the portal may differ slightly, but the content is the same.

PAs, including all attachments, must be submitted to the NBO no later than 11:59 pm, Central Time on August 15, 2025 into the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>. The portal will automatically acknowledge receipt of the PA. If you do not receive acknowledgement of your submission within 12 hours, notify NBO immediately at [NBO.grants@nebraska.gov](mailto:NBO.grants@nebraska.gov).

PA attachments should be submitted in as few documents as possible. Please use the following naming convention for your files: Organizational Abbreviation, PA, Question #. If your file includes confidential or proprietary information, ensure you also include "Proprietary Information" in the file name, as described above.

### Table 1. Applicant Information

P1. Authentication Code sent to the contact named in your OA via email from <a href="mailto:nbo.grants@nebraska.gov">nbo.grants@nebraska.gov</a> .
P2. Assign a name to your PA, using the naming convention "Abbreviated Organization Name – CAI."
S1. Conditions: What conditions, if any, does the Applicant place on this PA?
1.1 Applicant name and Unique Entity Identifier (UEI)
1.2 Person to contact with questions about this PA
1.3 Contact person's email address
1.4 Contact person's phone number
1.5 Brief description of the project (1,000 characters or less, with no commas or special characters)
1.6 When do you plan to complete construction and begin offering broadband service to customers in the targeted DPA? Please be aware that your organization will be held to and assessed against this deadline.
1.7 Will your project focus on or pass through tribal lands? If yes, describe and provide documentation of your efforts to secure a Resolution of Consent or other formal consent document from the relevant tribal government(s), including the present status of the discussions.
<i>Please note: If the project is approved for funding, you will have a limited amount of time to submit the required consent documentation. Requirements of the Resolution of Consent are listed in the FAQs.</i>

### Table 2. CAIs Targeted

1. Download and complete the CAIs file to include: <ol style="list-style-type: none"> <li>indication of each CAI for which you are applying for funding;</li> <li>planned cost for CAI.</li> </ol>
<i>Please note: If there are any CAIs listed in the file for which you have planned deployment with private funding, assign to them a cost of \$1.00.</i>

Table 3. Basic Project Details
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3.1 How much NBEAD funding is requested for your project?
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3.2 How much match is offered for your project?
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3.3 Irrevocable letter of credit (ILOC): Using Attachment 3, below, as a reference, indicate which of the options (A, B, C, D, E, or F) is preferred by the Applicant to address the ILOC requirements; and attach the required documentation as defined in Attachment 3.
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3.4 Provide an estimate of the proportion of the planned project costs attributable to each of the following categories of cost. If a cost category does not apply to your project, enter zero for that category.
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| <ul style="list-style-type: none"> <li>a. Facilities &amp; Equipment: Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, and multi-tenant buildings.</li> <li>b. Long-term Leases: Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.</li> <li>c. Design, Permitting, &amp; Environmental: Engineering design, permitting, and work related to environmental, historical, and cultural reviews.</li> <li>d. Personnel: Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the NBEAD Program (such as project managers, program directors, and subject matter experts).</li> <li>e. Software Upgrades: Network software upgrades, including, but not limited to, cybersecurity solutions.</li> <li>f. Cybersecurity Training: Training for cybersecurity professionals who will be working on NBEAD-funded networks.</li> <li>g. Middle Mile Infrastructure: Middle mile infrastructure in or through any area required to reach interconnection points or otherwise to ensure the technical feasibility and financial sustainability of a project may be included.</li> </ul> |
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## LETTER OF CREDIT/PERFORMANCE BOND REQUIREMENTS

- I. **Options:** Applicants are required to select one of the following:
- A. Irrevocable Letter of Credit (ILOC) from a bank in an amount of not less than 25% of the subgrant amount;
    1. If you choose option A, submit with your PA a letter from a bank that meets the requirements detailed at *II. Bank Eligibility*, below. The letter must meet the following:
      - a. Commits to issue an irrevocable standby letter of credit;
      - b. Is in the required form (a template is available for download at <https://broadband.nebraska.gov>);
      - c. To the subgrantee upon award of the NBEAD subgrant;
      - d. Provides the dollar amount of the ILOC, which must be at least 25% of the subgrant amount; and
      - e. Includes the bank's agreement to follow NBO's Terms & Conditions.
    2. Before NBO issues a subgrant for the project, you will be required to submit:
      - a. The ILOC for at least 25% of the subgrant amount; and
      - b. An opinion letter from legal counsel indicating the ILOC will not be treated as bankruptcy estate property.
    3. The ILOC may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
  - B. ILOC from a credit union in an amount of not less than 25% of the subgrant amount;
    1. If you choose option B, submit with your PA a letter from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section II., below. The letter must meet the following:
      - a. Commits to issue an ILOC;
      - b. Is in the required form (a template is available for download at <https://broadband.nebraska.gov>);
      - c. To the subgrantee upon award of the NBEAD subgrant;
      - d. Provides the dollar amount of the ILOC, which must be at least 25% of the subgrant amount; and
      - e. Includes the bank's agreement to follow NBO's Terms & Conditions.
    2. Before NBO issues a subgrant for the project, you will be required to submit:
      - a. The ILOC for at least 25% of the subgrant amount; and
      - b. An opinion letter from legal counsel indicating the ILOC will not be treated as bankruptcy estate property.
    3. The ILOC may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
  - C. Performance bond from a company holding a certificate of authority as an acceptable surety on federal bonds for 100% of the subgrant amount;
    1. If you choose option C, submit with your PA a letter from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., below. The letter must meet the following:

- a. Be a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the US Department of Treasury [Circular 570](#);
  - b. Commits to issue a performance bond;
  - c. To the subgrantee upon award of the NBEAD subgrant;
  - d. Provides the dollar amount of the performance bond, which must be 100% of the subgrant amount; and
  - e. Names NBO the primary beneficiary.
- 2. Before NBO issues a subgrant for the project, you will be required to submit a performance bond for no less than 100% of the subgrant amount.
- 3. The Performance Bond may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
- D. Alternative Letter of Credit Percentage: Letter of Credit from a Bank
  - 1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept an ILOC for from a bank that meets the requirements detailed at *II. Bank Eligibility*, below, for 10% of the subgrant amount, with the following caveats:
    - a. If you choose option D, submit with your PA a letter on Applicant organization letterhead committing to maintain the ILOC in the amount of 10% of the subgrant amount until NBO indicates, in writing, agreement that the buildout is complete to 100% of locations to be served by the project or until the period of performance of the subgrant ends, whichever occurs first.
    - b. Before NBO issues a subgrant for the project, you will be required to submit an ILOC from a bank that meets the requirements detailed at *Bank Eligibility* in section II, below; the letter must meet the following:
      - i. Commits to issue an ILOC;
      - ii. In the required form (a template is available for download at <https://broadband.nebraska.gov>);
      - iii. To the subgrantee upon award of the NBEAD subgrant;
      - iv. Provides the dollar amount of the ILOC, which be at least 10% of the subgrant amount; and
      - v. Includes the bank's agreement to follow NBO's Terms & Conditions.
    - c. ILOCs secured under this option are not subject to revision or renewal at lower values.
- E. Alternative Letter of Credit Percentage: Letter of Credit from a Credit Union
  - 1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept an ILOC from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section II., below, for 10% of the subgrant amount, with the following caveats:
    - a. If you choose option E, submit with your PA a letter on Applicant organization letterhead committing to maintain the ILOC in the amount of 10% of the subgrant amount until NBO indicates, in writing, agreement that the buildout is complete to 100% of locations to be

served by the project or until the period of performance of the subgrant ends, whichever occurs first.

- b. Before NBO issues a subgrant for the project, you will be required to submit a letter from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section III., below. The letter must meet the following:
  - i. Commits to issue an ILOC;
  - ii. In the required form (a template is available for download at <https://broadband.nebraska.gov>);
  - iii. To the subgrantee upon award of the NBEAD subgrant;
  - iv. Provides the dollar amount of the ILOC, which be at least 10% of the subgrant amount; and
  - v. Includes the bank's agreement to follow NBO's Terms & Conditions.
- c. ILOCs secured under this option are not subject to revision or renewal at lower values.

F. Alternative Performance Bond Percentage

1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept a Performance Bond from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., for 10% of the subgrant amount, with the following caveats:
  - a. If you choose option F, submit with your PA a letter on Applicant organization letterhead committing to maintain the Performance Bond in the amount of 10% of the subgrant amount until NBO indicates, in writing, agreement that the buildout is complete to 100% of locations to be served by the project or until the period of performance of the subgrant ends, whichever occurs first.
  - b. Before NBO issues a subgrant for the project, you will be required to submit a letter from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., below. The letter must meet the following:
    - i. Commits to issue a performance bond;
    - ii. To the subgrantee upon award of the NBEAD subgrant;
    - iii. Provides a dollar amount of the performance bond, which must be at least 10% of the subgrant amount; and
    - iv. Names NBO the primary beneficiary.
  - c. Performance Bonds secured under this option are not subject to revision or renewal at lower values.

II. **Bank Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Any US bank that:
  1. Is insured by the [Federal Deposit Insurance Corporation](#) (FDIC);
  2. Is "well capitalized" as determined by federal bank regulations promulgated by the Federal Deposit Insurance Corporation, the Federal Reserve, and the Office of the Comptroller of the Currency;

3. Is rated BBB- or higher by a Nationally Recognized Statistical Rating Organization (NRSRO), as recognized by the Securities and Exchange Commission (SEC); or
- B. [CoBank](#), as long as it meets requirements at the time of issuance; or
- C. [National Rural Utilities Cooperative Finance Corporation](#), if it meets requirements at the time of issuance; or
- D. Any non-US bank;
  1. That is among the 100 largest non-US banks in the world;
  2. Has a branch office;
    - a. In the District of Columbia; or
    - b. New York City, New York;
  3. Has a long-term unsecured credit rating equivalent to BBB- or better by [Standard & Poor](#); and
  4. Issues the ILOC payable in US dollars.

**Credit Union Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Any US credit union that:
  1. Insured by [National Credit Union Administration](#).

**Performance Bond Issuer Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Performance bonds issued by company holding a certificate of authority as an acceptable surety on federal bonds as identified in the [Department of Treasury Circular 570](#).

**III. Reduction of Letters of Credit or Performance Bonds**

- A. Non-Low Earth Orbit (LEO) Projects: Per the [BEAD Letter of Credit Waiver Notice](#), if option A, B, or C is selected above, and upon completion of each service milestone and written approval by NBO, the Subgrantee may obtain and submit to NBO a revised ILOC or Performance Bond or renew its existing ILOC or Performance Bond with a reduced value in accordance with the following schedule:

Milestone	ILOC/PB may be reduced to
Provider certification and NBO completion of a technical and compliance audit that the provider has reached the following subscription milestones:	
1. Detailed engineering plan: NBO approval of detailed project budget, engineering plan, and schedule as an addendum to the executed subgrant agreements.	
2. Permitting/make ready: Proof that necessary permits have been requested filed with the NBO. Fully executed contracts by all required parties must be submitted to NBO to consider this milestone achieved.	
3. Material & equipment procurement: Proof of binding agreement to acquire BABA-compliant equipment prior to start of construction.	
4. Network deployment: <ol style="list-style-type: none"> <li>a. Locates completed</li> <li>b. Middle mile secured</li> <li>c. Installation to cabinet</li> <li>d. Pedestals installed</li> <li>e. Drops installed and tests and turnups complete</li> </ol>	

5. Program closeout submission: Confirmation of all completed construction and activation based on testing data, as-builts, and NBO field verification.	
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## REPORTING REQUIREMENTS

The following is a summary of NBEAD reporting requirements. Final details are under development, pending decisions from NTIA. NBO is working to ensure reporting is not heavier than absolutely necessary, as simple as possible to complete, and meets federal requirements.

**One-Time: *items on which subgrantees should only need to report once***

- a. Resolution of consent from Tribal governments, if applicable
- b. Broadband Facility Agreements
- c. Initial Irrevocable Letter of Credit/Performance Bond
- d. Submission of audited financial statements
- e. Cybersecurity plan submission
- f. Supply chain risk management plan submission

**Quarterly: *items necessary for quarterly reports and reimbursement requests.*** Please note that a number of these items will serve merely as reminders. For example, if you did not update your cybersecurity plan in the reporting period, you will indicate so and move to the next topic. In addition, some items may not apply to all projects, so may be skipped.

- a. Budget reporting and reimbursement request, including tracking against the approved budget, match, and program income
- b. Submission of source documents as requested
- c. Federal financial reports
- d. Subcontractor information, including number and dollar amounts of subcontracts
- e. Build American Buy America compliance
- f. Cybersecurity attestation
- g. Supply chain risk management attestation
- h. Right of way permitting and pole attachments
- i. Acknowledgement of funding
- j. Whistleblower protections
- k. Progress update/performance reporting
- l. Inspection and testing of materials
- m. Service data by CAI
- n. Filings with the Federal Communications Commission
- o. Conduit access points
- p. Mandatory disclosures
- q. Tribal consultations
- r. Communication and outreach activities
- s. Public awareness campaign
- t. Purchases of real and tangible property
- u. Disposition of real and tangible property
- v. Irrevocable Letter of Credit/Performance Bond updates

**Annual: *items on which reporting is necessary only annually. There are overlaps in topics with quarterly report requirements, but the questions are different.***

- a. Updates to UEI, Secretary of State registration
- b. Negotiated Indirect Cost Rate Agreement (NICRA) or *de minimis* updates
- c. Copies of audits

- d. Middle mile interconnections
- e. Updates to certifications regarding drug-free workplace, avoidance of conflicts of interest, etc
- f. Inventory of real and tangible property
- g. Copies of procurement and other policies
- h. Labor and workforce efforts
- i. Executive compensation reporting
- j. Risk assessment – annual update
- k. Duplication of benefits sign-off

**Post-deployment: *items on which reporting will commence once deployment is complete.***

Requirements for post-deployment reporting are still evolving, but will likely include:

- a. Completion report
- b. Service obligations
- c. Service details
- d. Communication and outreach
- e. Public awareness campaigns
- f. Real and tangible property