

ConnectMT BEAD Program

Project Monitoring Guide

July 2026

Version History

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1.0	2/2026	Initial draft created
2.0	7/2026	Language added to define the quarterly report process. Euna Grants section with instructions updated.

Montana Department of Administration



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OVERVIEW

Introduction

The Broadband Equity, Access, and Deployment (BEAD) Program administered by the National Telecommunications and Information Administration (NTIA), provides \$42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment, and adoption programs. BEAD provides the State of Montana with over \$300 million in funding to improve broadband coverage across the state and to connect all unserved and underserved locations with reliable and affordable internet. The ConnectMT Office oversees these BEAD funds.

The purpose of this BEAD Monitoring Guide is to help subgrantees understand the requirements for maintaining adherence to the terms of their ConnectMT BEAD award.

This document is intended as a guide, not as a substitute for thorough knowledge of the state and federal laws and regulations referenced herein. This guide is not binding, exhaustive, or final, and may be updated at any time. The guide should be reviewed in conjunction with applicable law, NTIA's BEAD Restructuring Policy Notice,¹ the BEAD Notice of Funding Opportunity,² the latest BEAD Terms and Conditions,³ ConnectMT's BEAD Final Proposal,⁴ ConnectMT's BEAD Initial Proposal Volume 2,⁵ Performance Measures for BEAD Last-Mile Networks Policy Notice,⁶ and BEAD program guidance issued by NTIA.

If assistance is needed in interpreting any information provided in this guide, please contact the ConnectMT team via email at connectmt@mt.gov.

Roles and Responsibilities

The Montana BEAD program is managed and administered by the Montana Department of Administration (DOA) through the ConnectMT Office.

ConnectMT Office

The ConnectMT Office manages all monitoring and oversight activities. ConnectMT will ensure that subgrantees comply with all BEAD program requirements, federal regulations, and state laws. This includes conducting risk assessments, providing technical assistance, and actively monitoring both financial and performance outcomes to ensure the successful implementation of the BEAD

¹ "BEAD Restructuring Policy Notice," NTIA, June 6, 2025, <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>.

² "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, [Notice of Funding Opportunity for BEAD - May 2022](#)

³ "BEAD Terms and Conditions," November 2025, [General Terms and Conditions for the NTIA BEAD Program Funds - Nov 2025](#).

⁴ "BEAD Final Proposal," ConnectMT, https://doa.mt.gov/_docs/connectmt/MT-BEAD-Final-Proposal-1.5.26.pdf and attachments at [the ConnectMT website](#).

⁵ "BEAD Initial Proposal Volume 2," ConnectMT, https://doa.mt.gov/_docs/connectmt/2024.04.23_MT-BEAD-Initial-Proposal-Volume-II_Clean1.pdf.

⁶ "Performance Measures for BEAD Last-Mile Networks Policy Notice," NTIA, Sept. 19, 2025, [Performance Measure's Policy Notice - September 2025](#).

program. The ConnectMT team also includes specialized contractor support for technical tasks, audits, and certain program-related functions.

Subgrantee

This Project Monitoring Guide outlines subgrantee's obligations during the period of performance for their BEAD award and provides detailed information about these requirements. In general, the subgrantee is responsible for the following obligations:

- Execute agreed-upon award requirements.
- Participate in meetings with ConnectMT Team.
- Submit timely and complete reporting through Euna Grants.
- Comply with local, state, and federal regulations, including environmental and historic preservation requirements.
- Submit timely and complete disbursement requests and required documentation.
- Identify and resolve project risks.
- Complete project closeout requirements.
- Maintain grant records and documents.

MONITORING AND OVERSIGHT FRAMEWORK

The BEAD funds are managed in compliance with the Infrastructure Investment and Jobs Act (IIJA), [2 CFR Part 200](#) (Uniform Guidance), [Department of Commerce Standard Terms and Conditions](#), BEAD Notice of Funding Opportunity ([BEAD NOFO](#)), BEAD [Terms and Conditions](#), [BEAD Restructuring Policy Notice](#), BEAD grant agreements, and other guidance released by the NTIA throughout the award's period of performance.

The BEAD Monitoring and Oversight Framework is a comprehensive approach to verifying project milestones and ensuring fiscal accountability for subgrantees. This strategy ensures that all subgrantees adhere to the federal and state requirements of the BEAD program.

Comprised of four components, this framework provides a risk-based structure for monitoring fixed amount subaward recipients tied to milestone completion. Monitoring and oversight activities that ConnectMT will employ are described in Table 1 below.

Table 1: Monitoring and Oversight Activities

Monitoring and Oversight Activity	Description
 Regular Reporting	Subgrantees are required to submit quarterly and annual reports to ConnectMT. ConnectMT will submit semiannual and annual reports to NTIA on the BEAD awards and subgrantees. Alongside quarterly report submissions, subgrantees will participate in regular quarterly update calls with ConnectMT.
 Milestone Disbursement	ConnectMT has implemented a milestone disbursement process for BEAD, releasing funds to each subgrantee only after the successful and verified completion of predefined project milestones.
 Risk Assessment	ConnectMT will conduct initial risk assessments based on both objective and subjective criteria to evaluate projects and potential risk factors. Subgrantees will also be required to complete annual questionnaires so ConnectMT can regularly assess potential project risks.
 Additional Monitoring Activities	Dependent on the subgrantee reporting submissions, subgrantees may also be subject to additional activities, including desk audits, field validation, and project site visits.

Regular Reporting

The BEAD program establishes comprehensive reporting requirements to ensure accountability, track progress, and verify subgrantee's compliance throughout the deployment life cycle. These requirements create a structured framework for transparency and enable the NTIA to monitor the effective use of federal funds in achieving universal broadband access.

Subgrantee's shall submit quarterly and annual reports to ConnectMT using the reporting templates provided in ConnectMT's online grant management portal, Euna Grants. These forms

include the information necessary for ConnectMT to comply with the reporting requirements established by NTIA.

Included below in Figure 1: Subgrantee reporting timeline overview summarizes the required reporting cadence. Subgrantees must submit quarterly project reports in January, April, July, and October and participate in quarterly calls following each reporting period. An annual performance report is submitted once per year in January.

Figure 1: Subgrantee Reporting Timeline Overview

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Quarterly Reports												
Quarterly Calls												
Annual Report												

Subgrantees shall submit these reports to ConnectMT through the Euna Grants portal within seven calendar days after each quarter and the annual reporting period. Subgrantees will receive automated reminders and notifications from Euna Grants for each report.

After project completion, the subgrantee will submit a final closeout report as described in the section below.

Quarterly Project Reports

Quarterly project reports must include detailed information describing the project (including the start and completion dates), updates on the percentage completed for project milestones, actual costs for the current period, financial reports, and a narrative assessment of performance metrics for the respective reporting period. ConnectMT will use quarterly reporting to track interim progress and identify potential risks. Subgrantee's shall maintain records to substantiate all information at ConnectMT's request. The quarterly project reporting template can be found on the [ConnectMT website](#).

Subgrantee's quarterly project reports are required to be submitted by January 7, April 7, July 7, and October 7. Subgrantee's must complete and submit the report in Euna Grants within seven days after the end of each quarter. ConnectMT will review submissions for completeness and accuracy, validate supporting documentation, and aggregate approved data for respective submission to the NTIA via the NTIA Grants Portal (NGP). If curing of the subgrantees' quarterly project requirements is required, subgrantees will have 3 business days to address all curing indicated by ConnectMT and resubmit the quarterly project report.

The quarterly project report will be available to subgrantee's in Euna Grants to collect the following information:

- A high-level overview of subgrantee's expenditures and project activities
- A narrative describing the major activities and accomplishments, best practices, and significant challenges
- Compliance and certification requirements

- Other performance metrics as required

LEO subgrantees are responsible for filing the LEO Quarterly Report with ConnectMT for ten (10) years from the date that the LEO subgrantee certifies to the Department that broadband is available to every location covered by the project.

The LEO Quarterly Report will, at a minimum, contain:

- The number of subscribers at the end of the reporting period
- The number of CPEs shipped to project BSLs during the reporting period

These reports may be accompanied by ConnectMT-required performance test results to validate certifications regarding continued BEAD obligations. In particular, ConnectMT is required to validate the certified availability to all BEAD locations upon the end of deployment and that the obligations continue to be fulfilled during the period that ConnectMT holds the Letter of Credit ensuring continued infrastructure capacity for BEAD-compliant connectivity.

Quarterly Calls

Subgrantees will participate in quarterly check-ins with ConnectMT to maintain continuous oversight throughout the BEAD project life cycle. Quarterly check-ins provide an opportunity for subgrantees to discuss project progress, financial status, and challenges. These calls will take place after the subgrantee's quarterly report, ensuring the discussion is timely and grounded in the most recent programmatic and financial data.

Subgrantees will receive a detailed agenda for the call, including an overview of the topics to be discussed. On conclusion of the call, ConnectMT will provide a summary of the potential next steps. Subgrantees should use this time to ask questions, address noncompliance issues, and ensure alignment with the overall project goals.

Annual Performance Reports

The annual performance report provides comprehensive, year-end performance data that demonstrates compliance with NTIA's BEAD program standards and statutory requirements, including [BEAD Policy Notice: Performance Measures for BEAD Last-Mile Networks](#) (2025), which covers network performance, reliability, and service availability reporting. Subgrantee's must submit the report in Euna Grants with documentation supporting performance test results and service-level verification.

The annual performance report will be available to subgrantees in Euna Grants to collect the following information:

- A copy of the most recently completed single financial audit or a project-specific audit
- Information to show compliance with all state and federal program requirements
- Project data, including the following:
 - Speed Testing
 - Latency Testing

- Other performance metrics as required

ConnectMT will review and validate all subgrantee data submissions and submits the consolidated annual performance report and CSV files along with the semi-annual report (SAR) submitted to NTIA in January.

Semi-Annual Report

Subgrantees are required to submit quarterly and annual reports through Euna Grants. Subgrantees do not submit semi-annual reports; however, ConnectMT uses data and information provided through reporting submissions to fulfill its semi-annual reporting (SAR) obligations to NTIA.

To support these requirements, subgrantees must ensure to submit timely and accurate information in their quarterly and annual reports.

Testing Requirements

Subgrantee's shall conduct testing using the performance measures outlined by NTIA in its *Performance Measures for BEAD Last Mile Networks Policy Notice*⁷ and any subsequent testing guides that NTIA or ConnectMT may provide. Additionally, subgrantee's shall conduct testing and submit test data to ConnectMT in conjunction with applicable milestone-based reimbursement requests. ConnectMT may also conduct its own testing to confirm BEAD-compliant service levels and the completion of physical deployment, including annual project-level speed tests to verify project sufficient capacity compliance with provider-reported capacity reservations.

Closeout Report

When projects reach completion, subgrantee's must submit comprehensive closeout reports documenting final outcomes and any unobligated funds. Subgrantee's shall submit a final closeout report to ConnectMT via the Euna Grants portal no later than 15 days after the project's completion.

The closeout process for terrestrial subgrants includes final site visits and network acceptance testing to verify that the infrastructure is fully operational and meets all technical requirements. In addition, subgrantee's must document that all required certifications have been obtained, all subcontractor obligations have been fulfilled, and all equipment has been properly installed and activated.

The closeout process for LEO subgrants is 10 years after when the subgrantee certifies to ConnectMT that broadband is available to every covered BSL in the project area. Subgrantees must submit their final performance measures results report by the due date for the final report prior to project close-out and final payment. The Letter of Credit may be closed out once the LEO subgrantee certifies it can initiate service within 10 business days of a request to any covered BSL in the project area OR when subscription rate in the project area reaches 50 percent.⁸

⁷ "Performance Measures for BEAD Last-Mile Networks Policy Notice." NTIA, Sept. 19, 2025, [Performance Measures Policy Notice - September 2025](#).

⁸ "BEAD Restructuring Policy Notice." NTIA, June 2025, <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>.

Financial closeout requires the reconciliation of all funding sources, the return of unused BEAD funds, and certification that matching fund requirements have been fully satisfied. ConnectMT will review closeout submissions before authorizing final payments.

While NTIA has yet to publish BEAD-specific closeout guidance, NTIA's National Institute of Standards and Technology (NIST) Recipient Closeout Guidance⁹ provides general grant closeout information for NTIA programs and is expected to be largely applicable to BEAD projects. Closeout generally covers multiple topic areas with a focus on financial, performance, property, and record retention documentation.

ConnectMT will finalize the criteria required of the subgrantee in the closeout report prior to submission to ensure the report satisfies current state and federal requirements from NTIA.

The closeout report may include, at a minimum, the requirements imposed on ConnectMT according to BEAD NOFO VII.E.1.¹⁰

Subgrantee's shall also comply with any U.S. DOC or additional Montana DOA reporting requirements, which may include the following:

- A comparison of actual accomplishments to the objectives set forth in the Project Budget and Timeline.
- A description of problems, delays, or adverse conditions that occurred or affected the attainment of overall project objectives, prevented the meeting of time schedules or objectives, or precluded the attainment of particular goals.
- Project work elements during established time periods, as well as how the parties resolved the problem to the satisfaction of ConnectMT and NTIA.
- Financial closeout requires reconciliation of all funding sources, the return of unused BEAD funds, and certification that matching fund requirements have been fully satisfied. ConnectMT will review closeout submissions before authorizing final payments.
- A final NTIA-approved Location List in the format requested by ConnectMT, confirming the project has been completed as proposed in the application.
- Evidence of maximum download and upload speeds at each location (defined by FCC location ID) or the state's CAI identifiers, as stated in the Project Budget and Timeline, must comply with the most current performance monitoring guidance. It should include speed tests conducted in a manner consistent with industry best practices to account for the actual speeds delivered during peak use times in the given area.

⁹ "NIST Recipient Closeout Guidance: NTIA Grant Programs (for awards made prior to October 1, 2024)," NTIA, Version 1.1, April 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-04/ntia_oicg_recipient_closeout_guidance_4.11.25.pdf.

¹⁰ "BEAD Notice of Funding Opportunity (NOFO)," NTIA, May 12, 2022, [Notice of Funding Opportunity for BEAD - May 2022](#)

- Certification from the subgrantee, in writing to ConnectMT pursuant to 2 CFR 200.201(b)(3), that the project was completed in compliance with their grant agreement and placed into service, as defined in 47 USC 1702(h)(4)(C), for last-mile broadband deployment.
- Summary of evidence that the subgrantee is marketing the project and that it is operational, as well as providing other attachments or documents required by the NTIA in the closeout process.

Milestone Disbursement Process

Overview

All awards will be classified as fixed amount subawards, which “is a type of subgrant agreement where payments are based on meeting specific requirements of the federal award (e.g., performance and results), rather than actual costs incurred”²³ with funding disbursed on a predefined milestone basis for BEAD. Funds will be released to each subgrantee only after the successful and verified completion of the predefined project milestones outlined in each project’s grant agreement. Subgrantees must submit disbursement requests through the Euna Grants portal.

LEO subgrants will receive fixed-schedule disbursements during the extended period of performance. Fifty percent (50%) of the funds awarded through the BEAD subgrantee selection process will be advanced to the LEO subgrantee upon certifying that service is available to each location in the project area. The remaining fifty percent (50%) of BEAD grant funding shall be distributed in equal disbursements over the subsequent ten (10) year Agreement Performance Period. These installment disbursements shall be made by ConnectMT the end of each quarter, following the submission of the LEO Quarterly Report. Disbursement to LEO subgrantees is contingent upon receipt and approval of the LEO Quarterly Report.¹¹

Subgrantee’s may submit a request for disbursement on completion of a milestone, as specified in the grant agreement. Disbursement of grant funds is based on the review and acceptance of documentation evidencing milestone completion and project performance as proposed in the project application. Additional project documentation may be requested to validate costs and progress against established milestones and to ensure compliance with federal, state, and programmatic requirements.

Each subgrantee will have a milestone-based budget and disbursement schedule specific to their project, which will be submitted and approved as part of the first milestone.

Five milestone categories help differentiate components of the project, and each category corresponds to an allowable percentage of the BEAD award amount. These high-level categories and percentages are fixed for all non-LEO subgrantees:

- Project plan—5% of the award amount
- Engineering and permitting—10% of the award amount

¹¹ “MT BEAD Disbursement Process Guide,” ConnectMT, <https://doa.mt.gov/ConnectMT/ijja/>.

- Pre-Deployment—15% of the award amount
- Deployment—60% of the award amount
- Network activation and program closeout—10% of the award amount

Milestones for LEO subgrants are intended to promote early completion of progress in extending LEO service to subscribers by allowing earlier disbursement of grant funds. Because performance testing relies on activated subscribers, network tests may need to await a sufficient sample of customers to test or consolidation of testing across projects to validate BEAD-compliant capacity reservation and performance.

Additional guidance on the disbursement process, including templates and a detailed budget and disbursement milestones breakdown, can be found in the MT BEAD Disbursement Process Guide¹² on the [ConnectMT website](#).

Risk Assessment

Overview

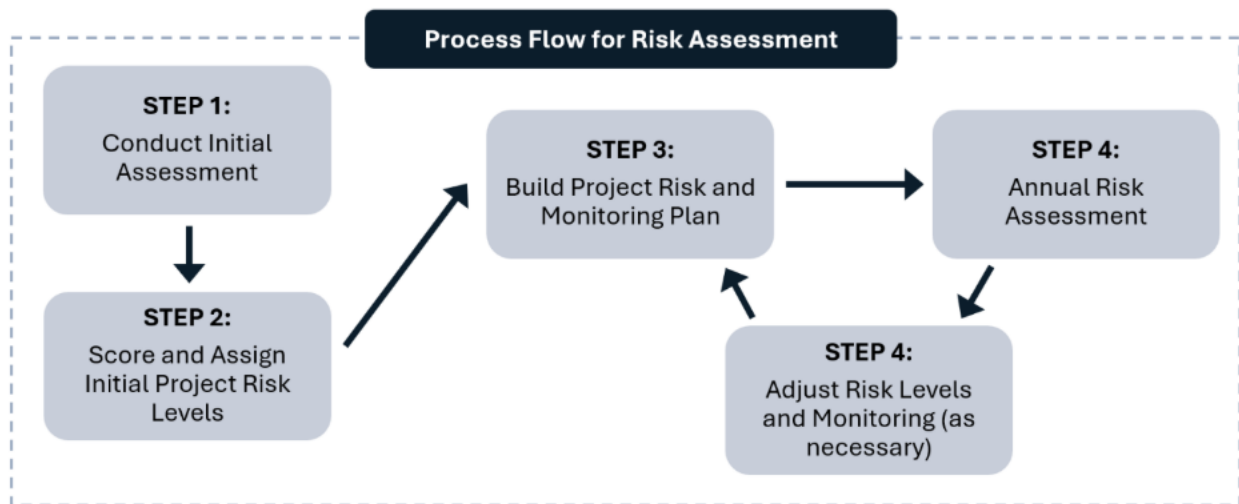
A systematic risk assessment process is part of ConnectMT's monitoring and oversight for BEAD subgrantees. BEAD grants are subject to the terms and conditions of their project's grant agreements, as well as the applicable federal, state, and local laws and regulations.

The goal of the risk assessment process is to ensure that federal funds are used for authorized purposes, in compliance with laws, regulations, and the provisions of the BEAD program, and that performance goals are achieved. Monitoring is risk-based, proactive, and ongoing, supporting early issue detection and ensuring compliance.

The level of risk associated with each individual project, will be based on key differences that may emerge within a subgrantee's project portfolio, including award size, construction scope, permitting requirements, and other relevant factors. Project risk will be evaluated using both objective indicators such as financial stability and audit results and subjective factors (such as management responsiveness and project complexity). Based on findings each project will be assigned a risk level of low, medium or high. This assigned level will guide the intensity and frequency of monitoring and inclusion of any necessary follow-up actions and/or corrective measures. ConnectMT will follow the process for evaluating each BEAD project outlined in Figure 2.

Included below in Figure 2 is the process flow for risk assessment used by ConnectMT to monitor BEAD projects. Following the initial assessment and assignment of risk levels, ConnectMT develops a project-specific risk and monitoring plan. Risk levels are reviewed on an annual basis and may be adjusted in response to updated project, financial, or operational information.

¹² "MT BEAD Disbursement Process Guide," ConnectMT, <https://doa.mt.gov/ConnectMT/ijja/>

Figure 2: Process Flow for Risk Assessment

Subgrantee's will participate in ConnectMT's risk assessment process by providing information from their application, executed grant agreement, and any initial financial and technical reviews to support the initial risk assessment. Based on this information, projects are assigned a risk level (Low, Medium, or High), which determines ongoing monitoring expectations.

Subgrantees will submit regular quarterly reports and participate in required monitoring activities, including quarterly calls, desk reviews, field inspections to validate milestones, and site visits as requested. On an annual basis, subgrantees will complete a risk questionnaire and provide updated project, financial, and operational information to support reassessment. Throughout the award period, subgrantees will respond to follow-up requests, provide additional documentation as needed, and participate in any enhanced monitoring activities. If a project's risk level changes, subgrantees will comply with updated monitoring requirements and implement any required corrective actions.

Additional Monitoring Activities

Desk Reviews

Desk reviews are a monitoring tool used to develop an understanding of subgrantee progress and performance. ConnectMT personnel will undertake a review of information provided by the subgrantee to substantiate its progress; demonstrate compliance with key requirements, terms, conditions, or milestones; and show achievement of reported outcomes or other measures. Subgrantees may also be contacted by ConnectMT staff and its contractors by phone or email to obtain answers to specific questions identified through desk reviews.

Subgrantees will receive an email notification in advance of the desk review outlining expectations, goals, and deadlines. The email will include a desk review checklist outlining the topics the subgrantee can expect to be covered during the desk review, as well as the information and documents the subgrantee must provide beforehand.

In response to the notification email, the subgrantee must complete the checklist in preparation for the desk review and collect all requested information and documentation. All requested materials

must be shared by email or [secure file transfer](#) no later than 30 days before the desk review's engagement date.

Each project will be monitored through periodic desk reviews. Where issues are found, ConnectMT may initiate an issue-specific desk review. In an issue-specific desk review, a subgrantee will provide additional information and documentation as required (e.g., BABA compliance).

The review process and its resolutions will be documented. Corrective actions may include additional guidance, webinars, or technical assistance from ConnectMT to all subgrantees; specific technical assistance recommendations; or other corrective measures.

Administrative desk reviews may include the following activities:

- **Documentation review.** Request records that demonstrate compliance with award terms and conditions, project progress, expenditures, and any change orders or amendments.
- **Budget monitoring.** Examine reported expenses and validate alignment with the project budget; review invoices, receipts, contracts, and time sheets; confirm that matching share is documented, used, and accounted for proportionally.
- **Procurement.** Confirm procurement follows state and federal regulations ([2 CFR Part 200 Subpart D](#)); evaluate [Build America, Buy America \(BABA\)](#) Act/[Buy America Preference \(BAP\)](#) compliance and documentation for purchases; evaluate conflict of interest disclosures and verify that disclosures were filed and no prohibited relationships exist.
- **Labor standards.** Review certified payroll reports and prevailing wage certifications; confirm that contractors have signed required compliance statements, as applicable.
- **Subgrantee monitoring.** Review subgrantee agreements, monitoring policies, and risk assessments.
- **Audit and risk review.** Confirm audit type, review status/timeline and filing, and evaluate audit findings.

Technical desk reviews may include the following information:

- Written evidence or itemized receipts for purchases
- Detailed engineering plans
- Project Design Shapefiles
- Project Bill of Materials (BOM)
- Permitting reviews
- Review of status of National Environmental Protection Act (NEPA) and cultural resources documentation
- List of served locations
- Operational certification document

- As-built data (e.g., shapefiles) and supporting documentation
- Active subscriber test results and list of active subscribers
- Test data for locations requested by ConnectMT, per FCC testing requirements

Based on the desk review discussion, subgrantees may receive a compiled list from ConnectMT of issues to be resolved. ConnectMT will follow up by email, summarizing the review and, if applicable, outlining any immediate corrective action plans required to address any enforcement actions. ConnectMT may schedule a follow-up meeting to discuss all review documentation.

Field Validation

Field validation will be conducted to confirm that milestones were completed through a required physical inspection of a deployed network or service area. Working with a third-party engineering firm, ConnectMT will complete field inspections using a mix of risk-based and other approaches to ensure subgrantees are meeting reported milestones, applying safety standards, restoring sites, and more. While field inspections may be similar to site visits, they will likely occur at network sites and be used to confirm network documentation and performance.

This step will be crucial to verifying that the reported milestones from subgrantee grant agreements have been accurately completed and meet the required technical standards. ConnectMT reserves the right to initiate field inspections at any time, including during construction, after milestone reporting, or in response to performance concerns.

These inspections are designed to verify the presence, accuracy, and quality of deployed broadband infrastructure compared to reported data and program requirements. They may also involve spot checks, review of construction methods, photographic documentation, or confirmation of as-built conditions. Depending on the project status and any identified risks, inspections may range from basic field verification to in-depth audits that include detailed as-built and material verifications and monitoring checks.

Subgrantees are expected to cooperate fully with field inspection requests by providing timely access to project sites, relevant documentation, and technical points of contact. If access is needed to cabinets, enclosures, or other secured infrastructure, the subgrantee must ensure that a knowledgeable representative is available to provide access and escort inspectors as necessary.

The field engineering team will also perform closeout inspections and review the final network acceptance testing before ConnectMT accepts the closeout materials.

Site Visits

In addition to desk audits and field validation, subgrantees may be subject to site visits, as needed. Site visits will generally follow a standardized agenda and may occur during the period of performance, at closeout, or be triggered when a risk assessment indicates increased risk related to project compliance.

Site visits may be prioritized based on factors such as:

- Monitoring level assigned at start of project
- Unresolved issues and questions

- Missed milestones
- Key personnel changes

These visits are used to observe construction progress and confirm that the work is proceeding according to schedule and reflects the reported milestones. Site visits may include the following activities:

- **Documentation review.** Examine subgrantee records, including procurement standards, contracts with vendors, subgrantee monitoring plans (if applicable), audit findings, required insurance, and property management records.
- **Compliance oversight.** Review documents and procedures to evaluate compliance with BABA/BAP, prevailing wage and applicable labor standards, and environmental review documentation and concurrences.
- **Physical inspection.** Inspect materials, equipment, and supplies purchased with grant funds; interview project managers, employees, contractors, and workers to verify their understanding of program rules and labor and wage standards; and review progress and expectations with specialized vendors (auditors, accountants, outside counsel, EHP).
- **Performance monitoring.** Evaluate project progress, budget, and schedule; assess whether the project is delivering the anticipated outcomes.
- **Reporting and follow-up.** Prepare a site visit report summarizing findings, status, and recommendations. Define action items and assign responsibilities for any issues identified during the site visit.
- **Risk assessment update.** Incorporate site visit findings into an updated risk assessment for the project to guide future monitoring activities.

After a site visit, subgrantees will receive a standard report documenting findings and conclusions, with supporting data attached. Where site visits identify or confirm significant issues, ConnectMT may specify corrective actions to be taken by the subgrantee based on observations and conclusions drawn from the site visit. ConnectMT may adjust monitoring levels based on a site visit.

The closeout process includes final site visits and network acceptance testing to verify that the infrastructure is fully operational and meets all technical requirements.

Corrective Action Plan (CAP)

Technical assistance will be provided to subgrantees to enable the successful completion of projects. If ConnectMT identifies issues considered to be material to the award or chronic unresolved performance problems, subgrantees may coordinate with ConnectMT to develop a Corrective Action Plan (CAP).

A CAP is a formal document that outlines specific issues of noncompliance or performance deficiencies. A CAP can be used to formally record a required subgrantee action of programmatic concern (e.g., schedule adherence or timely reporting) or to address and officially document

significant noncompliance or chronic, unresolved performance issues. Any unresolved significant issues identified may lead to enforcement action.

CAPs can take many forms and are regulated by 2 CFR Part 200 under Remedies for noncompliance.¹³ Depending on the issues to be resolved, remedies could include the requirement that subgrantee submit additional supporting documentation, imposing reporting requirements, and holding regular meetings with ConnectMT to track project progress.

CAPs will be communicated in writing to the subgrantee through an official letter that specifies how the nonresolution of identified performance issues may trigger additional and more serious remedies, such as the suspension of award payments and the suspension or termination of the award, as determined by ConnectMT.

As-Needed Monitoring Checks

Subgrantees may be subject to unscheduled monitoring checks or assessments in response to specific indicators of risk or noncompliance. Non-scheduled compliance check for various factors that indicate additional review is warranted may be conducted, including if the subgrantee presents variances in reporting or if there are unresolved findings from a previously submitted audit. These reviews will be more narrowly focused on addressing the specific issue.

Subgrantees will be notified in advance of any such monitoring activity and provided sufficient time to respond to the request. If a subgrantee does not rectify the matter of noncompliance, ConnectMT may impose corrective action. ConnectMT may also refuse to disburse additional funds and may require the return of all or part of the funds already disbursed.

¹³ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR86b76dde0e1e9dc/section-200.339>

ADMINISTRATIVE REQUIREMENTS

This section outlines the standard approach that ConnectMT recommends subgrantees adopt to meet the grants management and recordkeeping requirements of the BEAD program.

Recordkeeping Obligations

Under 2 CFR § 200.334¹⁴, subgrantees must retain all records related to federal awards for at least three years following final payment and award closeout. Montana law establishes a longer, Montana-specific records retention requirement, which governs in practice: subgrantees must retain all records for seven years from the date ConnectMT notifies the subgrantee that the final required BEAD report has been submitted.¹⁵ This seven-year requirement replaces the shorter federal minimum for purposes of compliance with the grant agreement.

In addition to these requirements, records associated with real property, equipment, or facilities acquired with federal funds are subject to a distinct federal interest period¹⁶. NTIA has established a 10-year federal interest period for BEAD-funded broadband infrastructure, beginning in the year of project completion. This requirement does not apply to LEO Capacity subgrants because these subgrants reserve capacity rather than fund infrastructure and therefore do not establish a federal interest¹⁷.

Exceptions to the standard three-year record retention requirement apply in cases involving litigation, claims, or audit findings. In these instances, records must be retained until all issues have been fully resolved. Records must also be retained beyond the standard period if NTIA, the U.S. Department of Commerce, or another authorized federal agency directs an extended retention timeframe¹⁸.

Grants File

For subgrantees to comply with recordkeeping requirements, ConnectMT recommends that subgrantees set up a repository or “grant project file” to store all relevant grant-related documents during the record retention period.

Relevant staff should have access to the grant file, and records should be organized for prompt location and production, if needed. ConnectMT also recommends that subgrantees implement a file naming convention to indicate whether a document is “draft” or “final” and in the relevant chronological order. A variety of technologies can be used to manage a grant file, such as a shared folder or Microsoft SharePoint. The key requirement is organization, as many documents will accumulate in the repository throughout the grant’s life cycle.

¹⁴ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR4acc10e7e3b676f/section-200.334>

¹⁵ “Draft MT BEAD Grant Agreement 3/2/2026,” ConnectMT, https://doa.mt.gov/_docs/connectmt/BEAD-Grant-Agreement-Non-LEO-Template_Final.pdf

¹⁶ eCFR :: 2 CFR Part 200 Subpart D - Property Standards

¹⁷ BEAD Guidance on NEPA and NHPA for LEO Satellite Service - October 2025

¹⁸ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR4acc10e7e3b676f/section-200.334>

Reviewing the grant file is a common requirement during audits and site visits as part of ConnectMT's oversight.

Recommendations for Records Maintenance

The following types of records should be preserved in the grant files:

- Grant application and all attachments (including narrative, budgets, maps, and other supporting documents)
- Award documents (including terms and conditions or special award conditions)
- Any modifications to the application or award, including budget or scope
- Signed grant agreement and amendments, as applicable
- Meeting/project notes from check-in calls and other informal monitoring activities
- Grant-related process documentation
- Grant-related procurements and contracts, including evidence of flow-down requirements
- Financial documents regarding expenses and income
- Copies of disbursement or payment requests and supporting documentation associated with those requests, along with any curing, corrective action, or payment records
- All project-related key correspondence
- Copies of annual single audits or program-specific audits submitted during the period of performance
- Evidence of compliance with all award terms and conditions, including lobbying disclosures, System for Award Management (SAM) reporting on compensation, whistleblower protections, and other grant terms and conditions
- Evidence of compliance with environmental and historic preservation (EHP) requirements; any correspondence with federal, state, or tribal entities; and any concurrences, no effect determinations, or other records of decisions from federal, state, or tribal entities
- Records demonstrating property management, maintenance, and use
- Prevailing wage documentation, including announcements, certified payrolls, and other documentation associated with the Davis-Bacon Act
- Copies of all programmatic and financial reports submitted during the period of performance, including monthly, quarterly, annual, performance testing, and closeout reports
- Copies of all technical materials submitted as part of grant oversight and implementation, such as design and engineering, permitting records, bills of materials, as-built drawings, and testing and verification results

- Documentation from desk reviews, site visits, and field inspections
- Any formal corrective action associated with an award, if applicable
- Evidence of project completion and accomplishments
- Final closeout documentation and letter

Waste, Fraud, and Abuse

Subgrantees must meet BEAD program requirements related to ConnectMT’s monitoring of fraud, waste, and abuse.

As a general rule, 2 CFR § 200 (Uniform Guidance) establishes measures at each stage of the grant life cycle to protect federal funds from risk.¹⁹ In addition, Section IX.G of the BEAD NOFO, “Transparency, Accountability, and Oversight Required,” requires that Eligible Entities such as ConnectMT implement BEAD in a manner that will “[m]inimize the opportunity for waste, fraud, and abuse.”²⁰ To satisfy this requirement, the Notice of Funding Opportunity requires Eligible Entities to conduct audits of grantees, develop and implement monitoring and oversight plans, and impose necessary conditions on BEAD awards as required to mitigate the risk of nonperformance.

Therefore, ConnectMT will monitor subgrantees for indications of falsifying information, lying, cheating, misappropriating funds, or stealing. To assess risk and monitor for instances of fraud, waste, or abuse, ConnectMT will evaluate each subgrantee for the following criteria:

- Financial stability
- Quality of management systems
- History of performance
- Submission of audit reports
- Ability to comply with program requirements

ConnectMT has incorporated this requirement into the procedures described in this guide and its overall approach to BEAD grant monitoring and oversight. The objective is to ensure the subgrantee uses BEAD funds for their statutory purpose and complies with the Infrastructure Act, BEAD NOFO, 2 CFR § 200, award terms, and applicable law.

Allegations of fraud, waste, abuse, and mismanagement may be made anonymously by calling 1-800-222-4446 (or 406-444-4446 in Helena) or by submitting a report on [ConnectMT’s website](#).²¹ Potential fraud, waste, or abuse should be reported as soon as possible so the allegations can be investigated, any problems can be stopped, and remedies can be pursued.

¹⁹ “Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD program,” NTIA, https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Notice_of_Part_200_Exceptions_Related_Issues.pdf.

²⁰ “BEAD Notice of Funding Opportunity (NOFO),” NTIA, May 12, 2022, [Notice of Funding Opportunity for BEAD - May 2022](#).

²¹ “Fraud Hotline,” Montana Legislative Audit Division, <https://www.legmt.gov/lad/fraud-hotline/>.

Build America, Buy America Oversight and Monitoring Activities

Per NTIA's Build America, Buy America (BABA) Compliance and Documentation Requirements and Procedures,²² the BABA Act established a domestic content procurement preference (Buy America Preference) for all federal financial infrastructure assistance obligated after May 14, 2022. The Buy America Preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure be produced in the United States, subject to specific definitions, thresholds, and waiver provisions. Covered infrastructure includes structures, facilities, and equipment used to provide broadband internet service. BABA obligations flow from NTIA through state broadband offices to subgrantees through grant and subgrant terms, creating binding procurement requirements that apply throughout project implementation. The requirements apply to infrastructure deployment activities including network construction, equipment installation, and related civil works, while administrative costs and non-construction activities generally fall outside BABA's scope.

BABA establishes distinct requirements for material categories with varying domestic content standards. Iron and steel products must be produced entirely in the United States, meaning all manufacturing processes (from initial melting to final product formation) occur domestically, with no foreign content permitted. Manufactured products must be produced in the United States and contain components mined, produced, or manufactured domestically such that domestic component costs exceed 55% of total component costs. This threshold increases to 60% for FY2025–2026, 65% for FY2027–2028, and 75% for FY2029 and beyond.

Construction materials must be manufactured in the United States but have no minimum domestic content requirement for constituent components or raw materials. For BEAD projects, these categories encompass structural steel components, fiber optic cables, network electronics, conduit systems, concrete, and other materials incorporated into broadband infrastructure.

Subgrantee's bear responsibility for ensuring BABA compliance throughout procurement and construction,²³ which requires integrating domestic content requirements into solicitation documents, specifications, and contract terms. Procurement procedures must communicate BABA requirements to contractors and suppliers, obtain certifications or representations regarding domestic content, and maintain documentation demonstrating oversight.

Procurement documents should identify applicable categories for each material type and state each material's required domestic content thresholds. For manufactured products subject to domestic content thresholds, detailed component cost documentation may be necessary to verify compliance, particularly for complex products like fiber optic cables or network electronics where domestic content percentages approach the required threshold.

Contractor and supplier certifications provide the primary compliance verification mechanism, identifying the applicable BABA category for each product, confirming the manufacturing location,

²² "Build America Buy America," U.S. Department of Commerce, <https://www.commerce.gov/oam/build-america-buy-america>.

²³ "BABA Compliance and Self Certification," NTIA, https://broadbandusa.ntia.gov/technical-assistance/BABA_Compliance_and_Self_Certification.

and, for manufactured products, certifying the domestic content percentage based on verifiable cost records.

BABA establishes three statutory waiver categories that permit the use of foreign-sourced materials when specific conditions exist:

- *Public interest waivers* may be granted when applying BABA requirements would be inconsistent with the public interest, based on factors such as infrastructure deployment timelines or national policy objectives.
- *Nonavailability waivers* apply when required materials are not produced in the United States in sufficient, reasonably available quantities or of satisfactory quality. The subgrantee shall document market research demonstrating the absence of acceptable domestic alternatives.
- *Unreasonable cost waivers* may be granted when BABA compliance would increase overall project costs by more than 25%, calculated on a project-wide basis rather than for individual products.

Subgrantee waiver requests must be submitted through ConnectMT to NTIA with comprehensive supporting documentation. Procurement cannot proceed using foreign-sourced materials until NTIA grants the waiver, necessitating advance planning and early identification of potential waiver needs. Note that waiver requests to NTIA should only be pursued in extraordinary circumstances, as NTIA has finalized its BABA guidance. Any waiver request is likely to significantly delay and put project completion at risk.

NTIA has issued BEAD-specific guidance²⁴ addressing implementation challenges unique to broadband deployment, recognizing that certain telecommunications equipment may have limited domestic manufacturing capacity. NTIA has granted categorical waivers for specific product types where domestic manufacturing cannot meet nationwide deployment timelines. These waivers are published on Department of Commerce's website²⁵ and provide blanket authorization without requiring individual project-level waiver requests.²⁶ Fiber optic cable is categorized as a manufactured product subject to domestic content thresholds of greater than 55% of the cost, rather than the all-domestic requirement applied to iron and steel, while electronics and active equipment present ongoing compliance challenges due to global supply chains and limited domestic telecommunications component manufacturing. The subgrantee should monitor NTIA guidance for updates on categorical waiver availability and initiate early dialogue with ConnectMT regarding equipment compliance strategies.

BABA requirements operate in conjunction with other federal procurement and security requirements applicable to BEAD projects. The Secure and Trusted Communications Networks Act prohibits the use of federal funds to purchase equipment or services from covered companies, including Huawei, ZTE, Hytera, Hikvision, and Dahua, creating an independent restriction that

²⁴ <https://www.ntia.gov/programs-and-initiatives/build-america-buy-america>

²⁵ <https://www.commerce.gov/oam/build-america-buy-america>

²⁶ "Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of BEAD," Department of Commerce. [https://www.commerce.gov/sites/default/files/2024-02/BABA Waiver Signed.pdf](https://www.commerce.gov/sites/default/files/2024-02/BABA%20Waiver%20Signed.pdf)

applies regardless of BABA compliance status. Equipment that satisfies BABA domestic content requirements must still comply with supply chain security prohibitions. ConnectMT will monitor BABA compliance through the review of procurement documentation, site visits, and audits. Noncompliance may result in disallowed costs, required replacement of noncompliant materials at the subgrantee's expense, repayment of federal funds, or other remedial actions, including grant suspension or termination.

Subgrantee's should integrate BABA compliance into project planning from the earliest stages by conducting market research to identify available compliant products, engaging suppliers regarding domestic content capabilities, and identifying waiver needs well in advance of procurement deadlines. The subgrantee should establish ongoing communication with ConnectMT regarding compliance questions and emerging guidance, as NTIA continues to refine BABA implementation through new categorical waivers, compliance guidance, and requirement modifications.

Subgrantee's should note NTIA's guidance regarding BABA compliance and enforcement actions, such as the clawback of federal funds, for subgrantees that do not abide by the BABA requirement. In particular:

“b. Failure to provide necessary BABA compliance documentation could result in a violation of the terms and conditions of a recipient's financial assistance agreement.

i. Corrective action for this and other BABA violations may entail removing and replacing improperly purchased foreign-manufactured goods, reducing the amount of an award, or withholding future funds and terminating an award. In cases of fraud, it could result in criminal investigation and prosecution.²⁷

Post-Award Requirements

Federal regulations provide specific requirements regarding internal controls, accounting records, performance measurement, allowable costs, source documentation, budget controls, cash management, financial reporting, and audits. Additional requirements are discussed in the following sections.

Financial Management

Financial management requirements ensure subgrantee's receiving federal funds have a financial management system that can meet the following criteria:

- Provide effective control over all funds, property, and other assets.
- Identify the source and application of funds for federally sponsored activities.

²⁷ [Build America, Buy America Compliance and Documentation Requirements and Procedures](#)

Allowable Costs

Ineligible or undocumented expenditures may result in your organization's forfeiture of or repayment of grant funds to the federal government. According to these guidelines, a cost is allowable if it meets the following criteria:

- The expenditure is necessary, reasonable, and directly related to the purposes of the grant.
 - This standard applies equally to items such as salaries, administrative services contracts, real property and equipment purchases or leases, travel, and other administrative expenditures.
 - In determining whether the given cost is reasonable, consideration will be given to specific factors, including whether the cost is generally recognized as ordinary and necessary for the operation of the organization or the performance of the program. General operations costs are not eligible unless they can be tied specifically to the grant-funded facilities.
- The expenditure has been authorized by ConnectMT through the approval of the project budget for the activities outlined in the grant agreement.
- Subgrantee's apply Generally Accepted Accounting Principles (GAAP) in calculating costs, using the same procedures as for its non-federally assisted activities.
- Project expenditures are properly documented and incurred during the approved Project Timeline outlined in the grant agreement.
- The cost is allocable to the BEAD program.
- The cost is allocated to a particular project in proportion to the relative benefits received for that objective, such as the following:
 - If a fiber cable is providing service to both a BEAD-eligible area and a non-eligible area, only the portion or capacity of the fiber cable and the associated prorated cost providing service to the BEAD area can be attributed to the BEAD project.
 - The same expense cannot be claimed against more than one grant (double billing is prohibited).

More information regarding eligible and ineligible program costs can be found on the [ConnectMT website](#).

Budget Controls

The BEAD program and 2 CFR § 200 require subgrantees to maintain rigorous, project-specific accounting practices throughout project implementation to ensure compliance with federal requirements and proper documentation of both federal expenditures and matching contributions. Understanding how to properly account for actual costs and matching contributions is essential for successful project closeout and audit defense.

Subgrantee's must have procedures in place to monitor obligations and expenditures as outlined in the approved project budget(s) for BEAD-funded activities, including an accounting system that conforms to Generally Accepted Accounting Principles (GAAP), as specified in each grant agreement, Section 22.1. To fulfill the requirements of 2 CFR § 200.302(b), the subgrantee's accounting system must be capable of generating itemized reports on an individual project basis to verify total project expenditure and match expenditure throughout the period of performance.

Subgrantee's must track all project expenditures as they occur, recording actual costs incurred rather than budgeted or estimated amounts. This actual cost accounting serves as the foundation for all grant funding requests and compliance reports. Every expenditure must be supported by source documentation, such as invoices, payroll records, timesheets, and receipts, that demonstrate the cost was actually incurred and paid, properly allocated to the BEAD project, and allowable under federal cost principles.

The subgrantee's accounting system must be capable of tracking receipts and expenditures separately to ensure each contract or grant is managed independently, preventing the comingling of grant disbursements and expenses, and verifying that grants are not incurring duplicate costs. This process typically requires establishing dedicated cost centers, project codes, or general ledger accounts by program. The system should capture sufficient detail to track costs by budget category (e.g., construction, labor, materials, equipment, professional services) to facilitate budget-to-actual comparisons and variance analysis during monitoring reviews.

ConnectMT is under no obligation to disburse funds for expenditures that exceed approved budget line items or the overall budget for BEAD-funded activities. Therefore, subgrantee's must have an ongoing system for comparing actual receipts, encumbrances, and expenditures against the BEAD agreement budget to promptly ascertain whether the project is on track or if it will be necessary to initiate a Change Order Request (COR).

Additionally, the project budget reflects the subgrantee's best estimate of the resources necessary to complete the scope of work outlined in the grant agreement. Any pattern of line-item overruns should prompt a careful reassessment of whether the available resources will still be sufficient to achieve the agreed-upon objectives.

To compare and control expenditures against approved budgets, subgrantees must practice the following:

- Maintain accounting records that include the amounts budgeted for eligible activities and costs.
- Include unexpended or unobligated balances for budgeted categories, as well as obligations and expenditures.
- Periodically compare actual obligations and expenditures-to-date against planned obligations and expenditures and against accomplishments for project activities.

Change Order Request (COR)

In the event a subgrantee seeks to make certain types of changes to its project, subgrantee's must request a change order, which is a revision to the subaward agreement that requires written approval from ConnectMT and, in some cases, an amendment to the grant contract.

A subgrantee may request different types of change orders such as a revision to project budget, project schedule, or project scope, and a contact change. The subgrantee may submit a COR in ConnectMT's grant management system (Euna Grants). Requests that assign the subgrant or some of its assets to another party, substantively change award amount or construction methods, change technology type, change matching fund categories or valuation methods, or substantially reduce the number of certain types of locations will also require NTIA approval and may require NIST approval.²⁸

If the change order request is approved and if it is determined to require an amendment to the contract, this process will require legal oversight and approval by ConnectMT's Counsel and will include the negotiation, drafting, and signing of an amendment to the initial subaward agreement. The contract amendment will be drafted by ConnectMT's General Counsel and signed by the Authorized Organization Representatives of both ConnectMT and the subgrantee.

Audit Requirements

Subgrantees are required to undergo an annual audit of federal fund expenditures; failure to comply will result in penalties. Audits must meet the following criteria:

- **Single or project-specific audit threshold.** In any year that the subgrantee expends \$1,000,000 or more in U.S. Department of Commerce (DOC) funds during the fiscal year (as defined by 2 CFR §200.1), and the subgrantee is a commercial enterprise not subject to the audit requirements contained in Subpart F of 2 CFR §200, the subgrantee will annually provide ConnectMT with either: (1) a financial-related audit of the Project conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS); or (2) if a project-specific audit guide is available, a project-specific audit conducted in accordance with the requirements contained in 2 CFR §200.507. The subgrantee will provide ConnectMT with a copy of the audit within 30 calendar days after receiving the audit report or within nine months after the end of the audit period.
- **Annual financial statement audit.** Each year, regardless of the amount expended, the subgrantee shall provide ConnectMT with a financial statement audit performed under Generally Accepted Auditing Standards (GAAS) within 30 calendar days after receipt of the audit report or nine months after the end of the audit period, whichever comes first. The scope of the audit must cover the subgrantee; ConnectMT will not rely on a Parent's financial statement audit.
- **Audit standards.** Audits must be conducted in accordance with [Generally Accepted Government Auditing Standards \(GAGAS\)](#).

Match Requirements

The matching fund requirement for BEAD awards is outlined in Section III.B of the BEAD NOFO and Section 21 of the Department of Commerce's Notice of Award. Matching funds are required to be

²⁸ BEAD Scope Change and Budget Modification Guidance For Eligible Entities," NTIA, https://broadbandusa.ntia.gov/sites/default/files/2026-05/NTIA_Eligible_Entity_Guidance_Scope_Change_and_Budget_Modification_05_26.pdf

paid out at the same general rate as the award amount for the life of the award or before any award funds are expended.

Subgrantees are required under the NTIA BEAD program to provide a nonfederal match of at least 25% of project costs, which can be a cash match, an in-kind match, or some combination of the two. An awarded project's specific match requirement percentage is outlined in Section 9.3 of their individual grant agreement. Under their Montana BEAD awards, subgrantees are required to track and report to ConnectMT match expenditure and that matching funds to the project are in proportion to the disbursement of the BEAD award using the "Evidence of Match Obligation Tracking Template."²⁹

If the match is satisfied with a cash infusion from a third party, please note that the cash must be deposited into the awardee's account prior to expenditure and can only be used to provide services to eligible BSLs.

If the match is satisfied with in-kind facilities, the awardee must submit evidence that the in-kind facilities are directly related to providing service to the eligible BSLs identified in the BEAD application. In-kind facilities used for matching purposes must be owned by the awardee:

- If an indefeasible right-of-use (IRU) is used to satisfy the match, the awardee must submit the IRU agreement between the third party and the awardee, along with evidence that clearly demonstrates the amount of the IRU that will be used to provide service to eligible BSLs. The proportional value of the IRU will be applied to the matching requirement once the IRU agreement is submitted and approved by the ConnectMT Office.
- If in-house staff, materials, or equipment will be used to satisfy the match, the following evidence must be submitted:
 - For staff hours, provide timesheets indicating staff salary and hours, along with an explanation detailing how those hours support the provision of services to eligible BSLs.
 - For materials, provide invoices showing the original cost and purchase date of the materials.
 - For equipment, provide a description of the equipment used, the hours it was used, an industry average for the hourly cost of using the equipment, and a description of how the equipment facilitated service to eligible BSLs.

Below are the options available to awardees to satisfy their matching requirements, as detailed in their grant agreement.

Option 1: Awardees can satisfy the required matching funds by expending the full amount of the match on providing services to eligible BSLs prior to the disbursement of any award amount. For example, if the total cost of the BEAD project is \$1,000,000 (consisting of a \$750,000 grant and a

²⁹ "Evidence of Match Obligation Tracking Template," ConnectMT, <https://doa.mt.gov/ConnectMT/ijja/>

\$250,000 match), the awardee must submit evidence that \$250,000 has been expended to provide service to eligible BSLs before any grant funds can be advanced.

Option 2: Awardees can satisfy the matching requirements at the time of each disbursement of award funds by demonstrating that the amount of the match applied to the disbursement request is equal to or greater than the percentage of the total match requirement compared to the total award amount identified in the award documents. If the match percentage is greater than the percentage of total match to total award, the excess match can be applied to the next disbursement request.

Example: If the total match or total award equals 25% and the disbursement request is \$2,000,000, then the amount of the match that must be supported is \$500,000 ($\$2,000,000 \times 0.25 = \$500,000$).

Please note that if a disbursement request is submitted without the supporting evidence required for the matching component, ConnectMT will contact the awardee and explain that award funds cannot be disbursed without the supporting evidence for the matching funds component.

The amount of matching funds expended must be reported in the Quarterly Progress Reports submitted to ConnectMT. This amount should correspond to the matching funds accounted for in the disbursement process.

ConnectMT reserves the right to withdraw a subaward and terminate the grant agreement if the subgrantee fails to secure the necessary matching funds.

According to [NTIA](#), applicable match expenditures must meet the following criteria:

- Verifiable from the nonfederal entity's records
- Not included as contributions for any other federal award
- Necessary and reasonable to carry out project or program objectives
- Allowable under subpart E of CFR 200.306
- Not paid by the federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost-sharing requirements of other federal programs
- Provided for in the approved budget when required by the federal awarding agency
- Conform to other provisions of 2 CFR 200.306, as applicable

PROJECT CLOSEOUT PROCESS

Project closeout is the final phase of ConnectMT's compliance and monitoring process for BEAD. It determines whether the subgrantee has completed all applicable administrative and financial requirements for their grant awards. Subgrantee's must submit a final project closeout report to ConnectMT through the Euna Grants portal no later than 15 days after the completion of the project, termination of the award, or expenditure of all awarded program funds, whichever event occurs first.

A failure by any party to resolve outstanding findings or to submit complete, accurate, and timely closeout documentation will delay or prevent the formal closure of the award. ConnectMT will not consider a project complete until all milestones and closeout activities are satisfied.

As of this writing, NTIA has not issued any closeout requirements specific to EHP. The closeout process is subject to change as ConnectMT receives further guidance from NTIA.

Required Closeout Documents

Closeout requires satisfactory submission of all final performance, technical, and financial reports, as well as documentation of real property and the apportioned federal interest. Subgrantees should submit the final closeout form in Euna Grants, along with additional documentation for review. ConnectMT will create a standard closeout checklist to help subgrantees and ConnectMT confirm project completion. Specific fields in the closeout form will prompt the subgrantee to upload files for the required documentation. The following requirements apply to terrestrial subgrants. LEO subgrants may be subject to some of these closeout provisions, pending further guidance from NTIA.

Final Build-Out Map

Subgrantee's must submit a final build-out map indicating that all construction has been completed as proposed in their grant agreement. If parts of the approved project service area have not been constructed, ConnectMT may require a portion of the award to be rescinded or repaid.

Final Disbursement Request

Subgrantee's must submit their final disbursement request along with their project closeout form.

The final disbursement of funds depends on approval of the subgrantee's closeout report and supporting documentation.

Technical Closeout Items

Active Subscriber Locations List

Subgrantee's will submit an updated locations list template through the Euna Grants portal prior to closeout. This list contains all active subscriber locations within the project area that are currently connected and receiving service. From this list, a minimum of 10 locations will be selected for testing.

Active Subscriber Testing

The Active Subscriber Test Results template submission demonstrates that the subgrantee has completed the deployment of a functioning network capable of providing service that meets or exceeds the program performance requirements. The required testing is consistent with well-established FCC practices and is designed to reduce administrative burden for the subgrantee. Requirements for Active Subscriber Testing are posted on the ConnectMT website.

Project Design Shapefiles/As-Built Requirements

Subgrantee's will provide Project Design Shapefiles or "as-built" technical documentation that verifies project completion and demonstrates that the deployed infrastructure, service area, and equipment match those in the grant agreement and are capable of consistently delivering the minimum proposed speeds, as described in the grant agreement, to all potential customers in the project area. Subgrantee's will perform field markups of engineering or as-built drawings during construction or repairs, and all related documentation must be submitted in Euna Grants.

Subgrantee's must identify any differences between the network design in the application, the grant agreement, and the "as-builts," and explain the reasons for these differences, as well as any impacts or changes to the project budget in the grant agreement resulting from them. Additionally, subgrantees must validate the performance characteristics of any deployed infrastructure and equipment that differ from the specifications in the application and grant agreement.

ENVIRONMENTAL AND HISTORIC PRESERVATION PROCESS AND REQUIREMENTS

Overview

As documented in “General Terms and Conditions” for the BEAD program, the subgrantee is responsible for complying with all applicable environmental and historic preservation (EHP) requirements as a condition of their BEAD awards before any grant-funded implementation activities can be initiated.³⁰ NTIA will require comprehensive subgrantee documentation to determine the appropriate level of NEPA³¹ analysis required for each BEAD-funded project and to ensure the analysis and any required consultations are conducted satisfactorily.³²

The subgrantee shall provide detailed project descriptions that include deployment procedures, potential impacts associated with those procedures, and the photos and maps required to evaluate whether a Categorical Exclusion (CATEX), Environmental Assessment (EA), or Environmental Impact Statement (EIS) is necessary to determine potential impacts in compliance with NEPA, the National Historic Preservation Act (NHPA) Section 106, and other relevant federal, state, and local regulations.³³ Additional subgrantee EHP milestone activities are illustrated in Figure 3 below.

ConnectMT is the joint lead agency, alongside NTIA, responsible for meeting NEPA obligations (including NHPA obligations) and minimizing potential NEPA-related project delays in the state while implementing the BEAD program. Accordingly, as described below, ConnectMT will provide oversight and guidance to help the subgrantee prepare for and achieve NEPA and NHPA compliance.³⁴

The subgrantee should play a proactive role in all EHP-related activities. ConnectMT’s primary role is to provide supervision and administration of grant awards; the subgrantee should not expect ConnectMT to perform any project-specific activities. Thus, the subgrantee must review and understand the EHP requirements of their BEAD awards.

Because the EHP process must be completed to ConnectMT’s and NTIA’s satisfaction prior to any deployment activities, the subgrantee is strongly encouraged to retain the services of an experienced and appropriately credentialed firm with expertise in environmental compliance and

³⁰ “General Terms and Conditions for NTIA BEAD Program Funds,” NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2026-01/BEAD_GTCs_11_18_2025.pdf.

³¹ “Guidance on NTIA National Environmental Policy Act Compliance,” NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/NTIA_NEPA_Procedures_June_2025.pdf.

³² “Streamlined Environmental Review & Permitting for Broadband: A Roadmap,” NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-11/NTIA_Streamlining_Environmental_Review_and_Permitting.pdf.

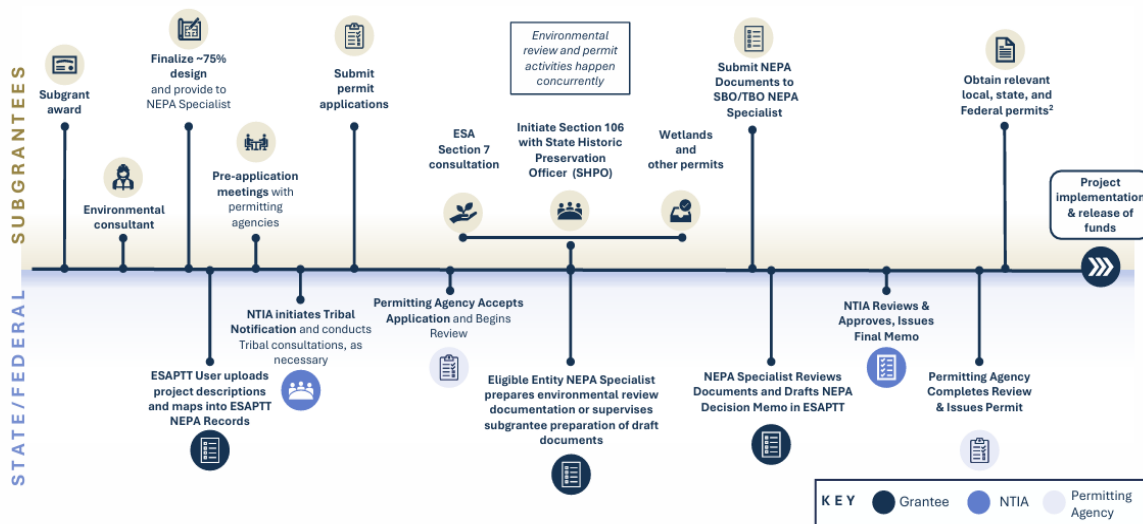
³³ “National Historic Preservation Act (NHPA) Consultation Process Fact Sheet,” NTIA, April 2024, https://broadbandusa.ntia.gov/sites/default/files/2025-08/EHP_NHPA_Sect_106_Consultation_Process_Fact_Sheet_2025.pdf.

³⁴ “NEPA for BEAD: Smart Start Part II: How to Approach and Implement BEAD Subgrant Permitting Conditions,” NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_NEPA_Smart_Start_II_BEAD_Subgrant_Permitting_Conditions.pdf.

impact analysis, and in the planning, research, and review of historic properties and cultural resources.

Included below in Figure 3 is the sequence of environmental and permitting activities required for BEAD projects, beginning with project initiation and design development and progressing through tribal coordination, environmental reviews (including ESA and Section 106), and permitting. The process includes NEPA level determination, completion of required documentation, and receipt of relevant approvals prior to project implementation. Environmental review and permitting activities may occur concurrently and should be coordinated to avoid delays in project timelines.

Figure 3: Subgrantee Milestone Schedule Considerations



Source: “NEPA for BEAD: Milestone Schedule & NEPA Timeline,” NTIA, https://broadbandusa.ntia.gov/sites/default/files/2026-05/NEPA_for_BEAD_Milestone_Schedule_Timeline_05_26.pdf.

Both ConnectMT and the subgrantee will use tools administered by NTIA throughout the EHP compliance process. The subgrantee and their EHP consultants should familiarize themselves with these NTIA tools and procedures.

Subgrantee tools: As a first step toward understanding the BEAD program’s environmental, historic preservation, and permitting requirements, the subgrantee should review NTIA’s ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package.³⁵

NTIA created APPEIT to help subgrantees with permitting planning and environmental review preparation efforts. The tool includes access to multiple maps from publicly available sources, including federal review, permitting, and resource agencies. The tool can be used to support the preliminary identification of areas that may require permits or planning. By considering NTIA best practices for mitigation in engineering and route designs, APPEIT can help the subgrantee avoid potentially significant impacts to environmental resources subject to NEPA and other statutory requirements.

³⁵ ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package, [APPEIT Project Package - Nov 2025](#).

ConnectMT's tools: ConnectMT will also use an NTIA compliance tool throughout these processes—the Environmental Screening and Permitting Tracking Tool (ESAPTT).³⁶

NTIA developed ESAPTT to support paperless environmental reviews and expedite NEPA approvals for the BEAD program. ESAPTT integrates environmental screening questionnaires to identify projects that can be categorically excluded, which then determines the EHP-related activities the subgrantee must engage in. The tool includes Permitting Tracking Dashboards to validate, monitor, and manage resource and right-of-way permits. ESAPTT also supports escalation of permitting challenges to NTIA so ConnectMT can help the subgrantee resolve complex permit delays.³⁷

ConnectMT will use ESAPTT to screen projects for environmental effects; send and maintain NEPA documents; and track subgrantee permitting requirements and timelines to support NTIA review and approval of final NEPA decisions.

ConnectMT will use details from the subgrantee's application (including the project's BSL, preliminary route maps, and facility locations) to develop the state's ESAPTT submissions. ConnectMT will also require the subgrantee to submit project details in ConnectMT's BEAD Subgrantee EHP Questionnaire³⁸.

Note: For additional information, please reference the [Environmental and Historic Preservation \(EHP\) Guide](#) and [EHP Questionnaire](#) and other Environmental and Permitting resources located on the [ConnectMT Website](#).

BEAD EHP Submission for ESAPTT Form Instructions

To support ConnectMT's Environmental and Historic Preservation (EHP) review and submission through NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT), subgrantees are required to complete the BEAD EHP Submission for ESAPTT Form in Euna Grants.

Following execution of subgrantees' grant agreement, this EHP Form will be made available within the subgrantee's award in Euna Grants. The subgrantee shall complete and submit the form before initiating construction or any ground-disturbing activities. The subgrantee shall provide complete and accurate responses describing:

- Project scope, including construction and installation activities, infrastructure components, and any modifications to existing facilities.
- Ground disturbance, including the extent and location of disturbance and whether activities will occur within previously disturbed areas.
- Potential impacts to historic properties, including structures that may be eligible for listing on the National Register of Historic Places, and provide details related to work within or outside existing rights of way.

³⁶ "Environmental Screening and Permitting Tracking Tool (ESAPTT) Overview," NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/ESAPTT_Overview.pdf.

³⁷ "Frequently Asked Questions (FAQ): NEPA for BEAD Version 2.0," NTIA, July 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf.

³⁸ "EHP Questionnaire," ConnectMT, [ConnectMT-BEAD-EHP-Questionnaire.xlsx](#).

ConnectMT will review the submitted information and may request additional details or clarification to support completion of the ESAPTT review and determination of applicable categorical exclusions or other environmental requirements.

EUNA GRANTS

Overview

ConnectMT will manage its BEAD subgrants through the grants management platform Euna Grants, formerly known as AmpliFund. The subgrantee shall submit all reporting, project documentation, and change requests within the Euna Grants award.

Quarterly and annual reporting templates will be provided in Euna Grants and posted on the [ConnectMT website](#).

ConnectMT ensures program compliance with federal and state reporting policies by collecting, validating, and submitting required data in accordance with NTIA's BEAD guidance. Reporting through Euna Grants allows for consistent documentation, automated reminders, and data integration across financial, programmatic, and performance areas. ConnectMT maintains all records and source documentation in Euna Grants in compliance with 2 CFR § 200.334 through 2 CFR § 200.338 (Retention and Access Requirements) and applicable state recordkeeping policies.

How-to-Guides

ConnectMT will post additional guidance materials for navigating Euna Grants to the [ConnectMT website](#).

How to Access the Euna Grants Portal

Following execution of the grant agreement, the Authorized Organizational Representative (AOR) will receive an award activation email from Euna Grants. Using the link provided, the AOR can log in, set or reset credentials using the “Forgot Password” option if needed, and update account details within user settings.

How to Navigate to the BEAD Award

To locate the BEAD award, subgrantees should navigate to Grant Management in the left menu, select Grants, and open the assigned award. The award dashboard provides access to status, reporting requirements, budget information, and available actions.

How to Add Users

User management is available under Administration → System Security → Users. This page displays all active users and provides the option to add new users using the plus (+) icon in the top right-hand corner.

When creating a user, the following configurations are available:

- User Information: Option to subscribe to daily or weekly emails from Euna Grant Solutions.
- Security: From the list, check the boxes of information the subgrantee want this user to have access to.

- **Staff Information:** Personnel details that correspond to the user, such as name, address, and other contact information.

Select the Create button in the bottom right-hand corner to save this user's information. After saving, an invitation can be sent to the user through the email icon in the top right corner.

How to Access and Manage Tasks

Tasks can be accessed by navigating to the award (Grant Management → Grants → BEAD Award) and selecting Tools (top tab) > Tasks. Tasks are automatic or manually created. The Tasks page displays required and system-generated items, including upcoming reporting deadlines. Tasks may also appear in email notifications if subscription settings are enabled. Tasks can be marked complete individually or in bulk using the checkbox and checkmark icon.

- Option 1: [select Task name] > Mark as Complete icon > Confirm
 - By viewing the Task individually, the Description field is viewable
- Option 2: [select 1 or more Task box] > Mark as Complete icon (under Actions)

How to Complete and Submit a Custom Form

Custom forms are located under the Custom tab within the award. Select the applicable custom form, use the add (+) option to create a new entry, complete all required fields, and upload supporting documentation as applicable and submit. Forms are submitted through Euna Grants for review and are used to collect required program and compliance information.

How to Access Budget, Expenses, and Reporting Periods

Financial and reporting information is available under the Post-Award tab:

- Management → Reporting Periods to view reporting timelines
- Financial → Budget to review approved budgets
- Financial → Expenses to track costs

These sections provide visibility into financial performance and reporting requirements.

How to Create a New Payment Request

Log in to Euna Grants from the landing page, click on Grant Management and then click Grants in the dropdown. Click on the award for which you are adding a payment request to enter the Award Details page. From the top navigation bar, open Post-Award > Cash Flow > Payment Requests. Click on the + (Create Icon) in the top right to create a new payment request.

How to Complete the Payment Request

1. Confirm the Funder Organization and Grant Name.
2. Enter a Payment Request Name in the following format: [Award Number] – [Milestone(s) for which you are submitting the payment request].

3. Leave the Date Created field as is.
4. This field automatically populates with the date the payment request is opened.
5. To set the expense range, select the beginning and end dates expenses were incurred for this payment request as Expenses From and Expenses To.
6. **NOTE:** *When you create the expense(s) for the milestone(s) in this request, **the expense date(s) must fall within this date range to be associated with the payment request.** Ensure you set the expense range accordingly.*
7. Do not change the Payment Type.
8. Click on **Create New Expense**. This will open a form with three tabs.
9. In the **General** tab:
 - For the budget Category, select the milestone category for which you are submitting the payment request.
 - If you are including multiple milestones within the payment request, create one expense for each milestone.
 - Select the budget Line Item. The budget line item name must match the name of the milestone for which you are submitting the payment request. Enter the Direct Cost of the expense.
 - For the Direct Cost, enter the total grant-funded cost incurred for this milestone, excluding the match amount.
 - Only create one expense per milestone.
 - Check the box next to the Exclude from Match option.
10. Enter the Expense Date.
11. **The Expense Date must be within the expense range for the payment request you set above.** *If the Expense Date falls outside that date range, the expense will not be pulled into the payment request.*
12. Leave the expense status as “Reviewed.” **NOTE:** *Only expenses with a status of “Reviewed” will be associated with the payment request.*
13. Leave the Payee section as is.
14. In the **Attachments** tab:
 - Upload invoices and proof of payment for the expense.

- Note that any other documentation required for the milestone by your grant agreement will be uploaded separately in the Additional Evidence section below.
 - Select Create to finalize the expense.
15. A table will automatically populate on the Payment Request page with your expense information.
 16. Once you have entered your expense(s), **copy the Total from the last row of the Grant Funded column** in the table and paste it into the Requested Amount field.
 17. This is the amount you are requesting for disbursement from ConnectMT.
 18. Scroll to the Additional Evidence section at the bottom of the page. If your grant agreement requires any documentation for the milestone(s), such as engineering information, upload that information where prompted under Additional Evidence. **(Do not include invoices and proof of payment in this upload;** as noted above, these should be uploaded when you create the expense under Financial Details.)
 19. Enter any applicable comments under the Additional Information section in the Comments field (this step is optional).
 20. Scroll to the Match Information section, below Additional Information. Select the Match Tracking Template to download the template. Complete the Match Tracking Template and upload to the payment request by selecting Choose File, next to Upload Match Tracking Template.
 21. Click **Create** to save the payment request.
 22. Click **Submit** to send the payment request for approval.
 23. Verify the Requested Amount displayed in the pop-up message is correct before clicking Submit in that window.
 24. No changes can be made to the payment request after selecting Submit.
 25. When a payment request is approved, you will receive a notification email from Euna Grants indicating the request is approved.

How to Cure a Payment Request

1. If a payment request is rejected, you will receive a notification email from Euna Grants indicating that the request was rejected. The request will be reopened in the portal for you to edit, with a comment containing instructions on what to cure.
2. Go to the reopened payment request in the portal to view the instructions.
3. Edit the request as directed.

4. When you are done, click **Submit** to send the revised payment request for approval.

How to Access Technical Support

The Euna Grants Resource Center, available through bottom of left navigation, provides user guides and step-by-step walkthroughs. Euna Grants user guides are also made available to download on the [Euna Grants website](#). Program-related questions should be directed to ConnectMT. Technical issues should be submitted through the Euna Grants support site or the designated support email.

TECHNICAL ASSISTANCE AND GUIDANCE

Technical Assistance

Overview

ConnectMT will provide ongoing technical assistance to support subgrantees in understanding and meeting award requirements throughout the lifecycle of their projects. Technical assistance will address a wide range of programmatic, compliance, and implementation topics as needed to support subgrantee success, including, but not limited to, quarterly and annual reporting, milestone-based disbursement, environmental and historic preservation compliance, and permitting.

ConnectMT will deliver this support through a combination of written guidance, live and recorded webinars, direct support channels, and regularly updated resources on the [ConnectMT website](#).

Frequently Asked Questions (FAQ): ConnectMT regularly updates its [frequently asked questions](#) on its website. The FAQ compiles relevant updated guidance and answers to subgrantee questions providing subgrantees with the latest information regarding the Montana BEAD program.

Webinars: ConnectMT provides a series of live webinars that are recorded, transcribed and posted to the [ConnectMT website](#). Webinar topics include “Welcome to BEAD,” and program orientation, milestone disbursement, quarterly and annual reporting requirements, permitting and NEPA compliance, along with additional topics based on subgrantee needs and program updates from ConnectMT and/or NTIA. See <https://doa.mt.gov/ConnectMT/events>

Guidance Materials: Guides, how-to’s and general Montana BEAD program tutorials are developed on a regular basis to provide subgrantees with additional program materials. Find the latest resources at <https://doa.mt.gov/ConnectMT/ijja/>.

Email: Subgrantees may submit questions or request additional information or support by emailing connectmt@mt.gov.

APPENDIX A: GLOSSARY

The following acronyms and terms appear in this Program Guide. The definitions presented here are a general guide; subgrantees should conduct additional research on terms as necessary.

ACHP – Advisory Council on Historic Preservation. Federal agency that provides guidance on historic preservation review under NHPA Section 106

ADSS – All Dielectric Self-Supporting. Type of aerial fiber optic cable infrastructure support

AOR – Authorized Organizational Representative. Individual with authority to certify plans and documents on behalf of the subgrantee organization

APPEIT – ArcGIS Pro Permitting and Environmental Information Tool. NTIA tool to help subgrantees with permitting planning and environmental review preparation

BABA – Build America, Buy America. Federal requirement establishing domestic content procurement standards for BEAD-funded infrastructure projects

BAP – Buy America Preference. A mandate under the Build America, Buy America Act (BABA) requiring that all iron, steel, manufactured products, and construction materials used in federally funded infrastructure projects be produced in the United States.

BEAD – Broadband Equity, Access, and Deployment) Program – Federal program designed to expand high-speed internet access by funding planning and infrastructure deployment

BIA – Bureau of Indian Affairs. Federal agency involved in permitting for projects on tribal lands ([bia.gov](https://www.bia.gov))

BLM – Bureau of Land Management. Federal land management agency ([blm.gov](https://www.blm.gov))

BOM – Bill of Materials. Documentation of material types and quantities needed to deploy the proposed network

BOR – Bureau of Reclamation. Federal water management agency ([usbr.gov](https://www.usbr.gov))

BSL – Broadband Serviceable Location. Locations that subgrantees have committed to serve as part of the BEAD program

CAI – Community Anchor Institutions. Facilities such as schools, libraries, and health care facilities requiring high-speed broadband

CATEX – Categorical Exclusion. Type of NEPA analysis for projects with minimal environmental impact

COR – Change Order Request. Formal request for a revision such as a change to Project Budget, Schedule, Scope, or Contact information

CAP – Corrective Action Plan.

CPE – Customer Premises Equipment. user-installed hardware that connects end-user locations to an internet service provider, such as a low Earth orbit (LEO) satellite provider

DOA – Montana Department of Administration (doa.mt.gov)

DOC – U.S. Department of Commerce (commerce.gov)

EA – Environmental Assessment. Mid-level NEPA environmental analysis document

EC – Extraordinary Circumstances. Conditions that may preclude use of a Categorical Exclusion and require additional NEPA review

EFH – Essential Fish Habitat. Protected aquatic habitat requiring assessment under NMFS review

EHP – Environmental and Historic Preservation. Collective term for environmental and cultural resource compliance requirements

EIS – Environmental Impact Statement. Most comprehensive level of NEPA environmental analysis

ESA – Endangered Species Act of 1973. Act that establishes protections for fish, wildlife, and plants that are listed as threatened or endangered.

ESAPTT – Environmental Screening and Permitting Tracking Tool. NTIA tool for paperless environmental reviews and expedited NEPA approvals

FCC – Federal Communications Commission. Federal agency regulating communications (fcc.gov)

FEMA – Federal Emergency Management Agency. Federal agency providing floodplain mapping (fema.gov)

FTE – Full-Time Equivalent.

FWA – Fixed Wireless Access.

GAAP – Generally Accepted Accounting Principles.

GAAS – Generally Accepted Auditing Standards.

GAGAS – Generally Accepted Government Auditing Standards. U.S. Government Accountability Office (GAO) standards, commonly referred to as the “Yellow Book,” that apply to entities that receive government awards (gao.gov/yellowbook)

GAO – U.S. Government Accountability Office. (gao.gov)

IIJA – Infrastructure Investment and Jobs Act. Federal legislation that established the BEAD program

IPaC – Information for Planning and Consultation. U.S. Fish and Wildlife Service tool for endangered species consultation (<https://ipac.ecosphere.fws.gov/>)

IRU – Indefeasible Right-of-Use. Long-term lease agreement for telecommunications facilities

IXP – Internet Exchange Point. Public internet gateway with active interface to a qualifying Internet Autonomous System

LEO – Low Earth Orbit. Satellite technology type eligible for BEAD funding with a 10-year performance period

NEPA – National Environmental Policy Act. Federal law requiring environmental impact analysis for federally funded projects

NGP – NTIA Grants Portal. (<https://grants.ntia.gov/grantsPortal/>)

NHPA – National Historic Preservation Act. Federal law protecting historic and cultural resources, particularly Section 106 requiring consultation

NIST – National Institute of Standards and Technology. Federal agency partnering with NTIA on BEAD implementation (nist.gov)

NMFS – National Marine Fisheries Service or NOAA Fisheries. Federal agency responsible for marine species and habitat protection (fisheries.noaa.gov)

NOFO – Notice of Funding Opportunity. Federal document announcing grant funding availability and requirements

NTIA – National Telecommunications and Information Administration. Federal agency administering the BEAD program (ntia.gov)

PEIS – Programmatic Environmental Impact Statement. Comprehensive environmental analysis that can support tiered reviews

PTE – Part-Time Equivalent.

SAC – Specific Award Conditions. Special conditions placed on individual awards to address identified risks

SAM – System for Award Management. [SAM.gov](https://sam.gov), an official website of the U.S. Government

SAR – Semi-Annual Report. Report submitted by ConnectMT to NTIA twice per year documenting program progress

SHPO – State Historic Preservation Officer. State official responsible for historic preservation review

TA – Technical Assistance.

TBCP – Tribal Broadband Connectivity Program. NTIA program that supports tribal governments in bringing high-speed Internet to tribal lands

THPO – Tribal Historic Preservation Officer. Tribal official responsible for historic preservation on tribal lands

USACE – U.S. Army Corps of Engineers. Federal agency managing water resources and issuing permits for waterway crossings (usace.army.mil)

USAC – Universal Service Administrative Company. Organization that administers universal service programs (usac.org)

USFWS – U.S. Fish and Wildlife Service. Federal agency responsible for endangered species and wildlife habitat protection (fws.gov)

APPENDIX B: ADDITIONAL RESOURCES

Subgrantees are strongly encouraged to regularly review the resources available on the [ConnectMT website](#), which serves as the State's primary hub for BEAD program information. For questions or technical assistance, subgrantees may contact ConnectMT directly at 406-444-4099 or via email at connectmt@mt.gov.

Montana BEAD Guidance

[ConnectMT BEAD Disbursement Guide](#): Montana BEAD's Milestone Disbursement process.

[Reporting and Disbursement Templates](#): Specific templates with instructions subgrantees are required to submit as part of their milestones and reporting.

[ConnectMT Environmental and Historic Preservation \(EHP\) Guide](#): An overview of the BEAD EHP requirements as a condition of the BEAD Montana subgrantee awards.

[Euna Grants Support Guide](#): Euna Grants is ConnectMT's grants management platform. Euna provides tutorials and user guides for subgrantees to help navigate the site.

[Montana BEAD Frequently Asked Questions](#): Frequently updated with Montana BEAD guidance.

[Technical Assistance Past Webinars](#): Recordings and presentations from previously help webinars.

NTIA Resources

Subgrantees should also reference NTIA's BEAD program website for federal guidance, including:

[BEAD Notice of Funding Opportunity \(NOFO\)](#)

[BEAD Terms and Conditions](#)

[BEAD Restructuring Policy Notice](#)

[Build America, Buy America \(BABA\) Act Refresher](#): BABA NTIA reference document with links to BABA-related materials for the BEAD program.

[NEPA Resources for BEAD](#): NTIA NEPA Resources for the BEAD Program

[NTIA BEAD FAQs](#): Frequently asked questions compiled and regularly updated by NTIA.