

IDAHO BEAD SUBGRANTEE FREQUENTLY ASKED QUESTIONS

Version 4

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IDAHO DEPARTMENT OF COMMERCE |
Office of Broadband



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FAQ Document Overview

The Idaho Office of Broadband (IOB) will regularly post an updated Frequently Asked Questions (FAQs) document throughout the BEAD Subgrantee Agreement process. The cover will include the date the document is posted to the Link Up Idaho website. The document sections will reflect the Request for Information (RFI) Guide topics and/or other common topics. The new or updated questions will appear at the top of each section and will be noted as **New!** or **Update**.

If you have questions about the BEAD Subgrantee Agreement that are not currently addressed in the FAQs, you may email IdahoBEAD@mbakerintl.com. Both the question and answer will be added to the next iteration of the FAQs.

General

Topics Include: Low Cost Plans, Map Requirement, Communications, Request for Information, Salesforce, Defining Projects, Construction, Subcontractors

New!

1. When does the construction shot clock for subgrantees start?

- The shot clock for BEAD subgrantees for the 4-year construction period begins at the time of signing and execution of the Idaho BEAD Subgrantee Agreement. We expect most to be signed in May through June, with a deadline of June 30, 2026.

2. What information do subgrantees need to include in the description of the low-cost service plan? Will the pricing be treated as confidential?

- Subgrantees must submit the speeds, pricing, data caps, and eligibility requirements for their low-cost service plan, plus any other relevant terms and conditions, and the methodology to be used to change the cost of the plan over time ([NTIA FAQ 3.16](#)).

NTIA requires the IOB to track these offerings over the period of performance and the federal interest period, including any changes to the pricing of these plans.

Subgrantees can mark their responses "confidential" for the IOB review to determine whether they meet Idaho Public Records Law requirements for withholding.

3. What file format do you want the updated map in? How much detail are you looking for in the map?

- The map uploaded to Salesforce must be a PDF. The map will be included as an attachment to the subgrantee agreement and should show the network route and APA boundaries, with BSL locations shown as points on the map. Additional guidance about what to include in the map is as follows:
 - Marking routes, the placement of towers, and/or the placement of satellite ground equipment or stations, distinguishing between new and existing infrastructure.
 - Noting the existing or planned backhaul and middle-mile routes, designating the technology.

- Showing planned open access routes that will be constructed as part of the project, designating the technology for each.
 - Showing planned locations where the applicant must obtain right-of-way permission or easement access.
 - Indicating the location of the interconnection points and the planned conduit access points.
 - Identifying the location of key elements such as outside plant placement of terminals and hubs, points of presence, huts, and central offices.
- 4. Salesforce is assigning new application numbers for my responses to the Project Specific Questions portal. Is it possible to have the application number match the Project ID being used for the responses?**
- No. Salesforce automatically assigns APP# naming conventions. A new APP# is assigned for Project Specific Questions as well as for Company Specific Questions. These APP#s are separate from the APP# assigned with the Project ID.
- 5. Am I able to update our organization's EIN, UEI, and FRN?**
- Yes. The Salesforce portal that contains the company-specific questions includes the EIN, FRN, and UEI numbers. Salesforce prepopulated these numbers based on what was used in the BEAD application. There is a certification question that follows each prepopulated number. To update your EIN, FRN, and/or UEI, provide the correct value in the response field of the question that follows the certification question. The EIN, UEI, and FRN numbers included in this Salesforce portal will be used moving forward.
- 6. Is it acceptable to have different people sign parts of the subgrantee agreement, as long as each person is authorized to sign on behalf of our company?**
- Yes, this is acceptable. But subgrantees must ensure that signatories of any subgrantee agreement documents, including attestations for this RFI, are authorized to sign on behalf of the subgrantee and can legally bind the company.

- 7. How do I complete the "Amount Requested" and "Title of Proposed Project" fields on the Overview page in both Salesforce portals?**
 - These two fields are part of every portal developed by the Department of Commerce. Please enter 0.00 for the "Amount Requested." For the "Title of Proposed Project," enter N/A.
- 8. Is the IOB using a single point of contact for communications with the subgrantee throughout the life of the project?**
 - Yes, the individual identified in Salesforce as the primary point of contact will be the person who receives communications.
- 9. We understand that official communications from the IOB will go to the primary point of contact. What should we do if someone is out of the office for a period of time?**
 - If the primary point of contact is unavailable and you need communications to be directed to someone else, please contact us at broadband@commerce.idaho.gov.
- 10. Has the IOB assigned project managers to subgrantees?**
 - Not at this time. Questions can be directed to broadband@commerce.idaho.gov and/or IdahoBEAD@mbakerintl.com.
- 11. When can we start working on the templates that are part of the Request for Information?**
 - You can start working on the templates now. They are all posted to the BEAD Awardees section of the Idaho BEAD Subgrantee Selection process page at <https://linkup.idaho.gov/beadsubgrantee/>.
- 12. When are the templates due?**
 - The templates must be completed and uploaded to their respective Salesforce portal by COB on April 22, 2026.
- 13. Are all elements of the Request for Information due on April 22, 2026?**
 - Some of the required documentation is on a separate track and will have separate due dates. These requirements include the Letter of Credit or Performance Bond, Tribal Consent documentation, and Certificate of Insurance. The Salesforce questions for the upload of the Letter of Credit/Performance Bond and the Certificate of Insurance are marked

“optional.” Subgrantees are required to upload this documentation to the Salesforce portal by:

- June 1, 2026, for the Letter of Credit and Certificate of Insurance.
- Within 30 days of signing the subgrantee agreement for Performance Bond documentation

The Tribal Consent Resolution must be emailed to IdahoBEAD@mbakerintl.com by June 1, 2026. Subgrantees cannot finalize their subgrantee agreements until they submit this required documentation to the IOB.

14. What link should I use to access the Salesforce portals?

- You should use <https://idahocommerce.my.salesforce-sites.com/grants/>. After using your company’s assigned username and password to log in, click “Apply” and look for links to RFI BEAD Subgrantee: Company Specific Questions and RFI BEAD Subgrantee: Project Specific Questions.

15. How is the IOB defining a "project"?

- A "project" is the entire network and all related planning and construction funded by an awarded BEAD grant. The scope of the awarded projects was included in the Fact Sheet attached to the March 9, 2026, Welcome Email. All RFI templates should be completed with information about the subgrantee’s entire project. If a subgrantee has information about the segments or phases of an awarded project, they may include it if the template allows for more information.

16. When can we start construction?

- Subgrantees cannot start any construction-related activities, including site preparation, demolition, construction, ground disturbance, or fixed installation, until after the Subgrantee Agreement is signed and all NTIA approvals regarding EHP requirements are received and formally processed. The Limited Permissible Pre-Implementation Activities are listed in Section 13E of the [BEAD General Terms and Conditions](#).

17. If we don't have a final list of subcontractors that we will use, what should we include in our response to the question about subcontractors?

- The IOB recognizes that you may not yet know the subcontractors for your project. You can enter up to five subcontractors for a given project, whether they are confirmed or anticipated. If you do not know what subcontractors you will use, it's acceptable to enter "TBD," and if you will not use any subcontractors for a project, enter "N/A." Salesforce contains two questions about subcontractors. The first question requests the information details, and the second question asks for the scope of work each will perform.

Template Guidance

Topics Include: Federal Funding Accountability and Transparency Act Disclosure Form, BABA, Labor Expenses, EBITDA Margin, Lobbying Disclosure and Attestation, Milestones Templates, Milestones and Phases

New!

18. Does every type of EHP review listed in the Template need to have a date assigned?

- No. The template lists the most common EHP review requirements that **might** apply to a BEAD project. If a subgrantee already knows that a project will not require one or more of the listed review types, the template can have N/A in the date fields.

19. Does every subgrantee have to submit a Federal Funding Accountability and Transparency Act Disclosure Form?

- Yes. Every subgrantee must complete this template and upload it via the company-specific Salesforce portal. However, only subgrantees that meet the criteria listed on the template need to report executive compensation. If you do not meet the criteria, please check the box on the form confirming that you do not.

The criteria are:

- (i) the entity in the preceding fiscal year received—
 - (l) 80 percent or more of its annual gross revenues in Federal awards; **and**

- (II) \$25,000,000 or more in annual gross revenues from Federal awards: **and**

- (ii) the public does not have access to information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986.

20. If a subgrantee is having trouble sourcing materials and equipment that are BABA compliant, are there any alternatives or additional waivers? Is there guidance for completing the template?

- NTIA's Build America/Buy America requirements, including the waiver and self-certified vendor list, can be found here:

https://broadbandusa.ntia.gov/technical-assistance/BABA_Compliance_and_Self_Certification.

There is also a helpful BABA FAQ here,

<https://www.commerce.gov/sites/default/files/2024-02/BEAD%20FAQs%202-22-24.pdf>.

These BABA requirements apply to all components of a BEAD network, even if the equipment is not purchased with BEAD funds or matching funds. **NTIA may entertain limited requests from states for additional waivers for non-BABA equipment, but subgrantees should make purchases that comply with the current rules.** Subgrantees must complete the BABA Template for the RFI if they plan to use non-BABA electronics allowed under the waiver.

The template must be filled out with as much information as possible about the specific equipment the subgrantees currently have. Subgrantees will be required to update the list of BABA-waived equipment and submit the required manufacturer certification letters during quarterly reporting.

21. How does IOB want labor expenses for construction to be included in the Project Budget Template?

- The IOB has updated the Project Budget Template as of April 3, 2026, to clarify that all construction labor expenses not explicitly included on other lines will be part of Line 19 "Construction Services," and that Line 21 "Outside Plan, Towers, and Poles" will include only budget items for materials.

22. Does IOB want the EBITDA Margin on line 27 of the Pro Forma Template to be expressed as a percentage?

- Yes, the margin will be expressed as a percentage, but the other figures on lines 28-32 are expressed in dollar figures.

23. Do all subgrantees have to submit both the Byrd Anti-Lobbying attestation and the Lobbying Disclosure Form (Standard Form LLL) by April 22?

- Subgrantees only have to sign and submit the Byrd Anti-Lobbying Attestation as part of this RFI. This attestation tells the IOB that your company will comply with the requirement to report any lobbying activity throughout the period of performance.

Only subgrantees with lobbying activity to report at this time need to complete the Lobbying Disclosure Form by April 22. Subgrantees should keep this form on file and must submit it to the IOB whenever the company has lobbying activity to report during the period of performance.

Guidance on lobbying reporting requirements can be found here:
<https://lobbyingdisclosure.house.gov/IdaGuidance.pdf>.

24. Can you explain the milestones templates I see on the website?

- You'll see a Permitting Milestone & EHP Template, which is for environmental review and permitting plans, and just below is the Construction Milestone (Project Schedule) Template.
 - The Permitting Milestone & EHP Template is required by NTIA to track the environmental review and permitting progress of each project, but will not be an attachment to the Subgrantee Agreement. This template provides key milestone dates for each element of the required environmental and historic preservation (EHP) review processes under federal and state law for the funded project. It is also for you to provide key milestone dates for each federal access permit.

The Construction Milestone (Project Schedule) Template will be used by the IOB to monitor progress throughout the project's period of performance. This will be included in the Subgrantee Agreement as Attachment 2. Subgrantees will update their progress and track milestone completion using a similar template during quarterly reporting. The template identifies project phases and provides fields for you to include a description, forecasted

start date, and forecasted completion date.

25. When subgrantees are providing estimated dates for the milestones in the RFI templates, is it OK to show overlapping timelines for different parts of the project?

- Yes, when filling out the Permitting Milestone & EHP Template or the Project Schedule (Construction Milestone) Template, the IOB would expect to see overlapping ranges of dates. These projects will require many concurrent activities throughout the different phases of the project and segments of the network construction to ensure successful completion in the committed timeframe.

26. Should the Project Budget Template be completed to reflect the entire project or project phases?

- The Project Budget Template should be completed based on the most current, accurate information available and is intended to gather details about the project's Projected Total Cost for the entire period of performance. You'll see columns for Pre-Award Costs and Years 1 – 4.

27. When subgrantees are providing estimated dates for the project phases in the Project Schedule RFI Template, should we provide milestones broken up by phases or segments of the project, or do you want an overall timeframe for the entire project?

- The RFI Templates require subgrantees to provide the schedule for the entire project, broken down by year; subgrantees could provide notes or indicate specific segments of the network or phases of a project within the overall timeline if there is room on the template to do so. More detailed reporting on project progress for segments of the network may be requested during quarterly reporting.

Financial

Topics Include: Eligible Expenses, Budget, Disbursements, Valuation, Match, Milestones, 2 CFR 200, 10% Hold Back

New!

28. Would the IOB consider environmental and permitting work to be an eligible expense for planning as part of an early milestone payment?

- Subgrantees can incur environmental and permitting planning expenses prior to signing the contract or receiving NEPA approval. If these are pre-contract expenses, documentation must be submitted with the signed subgrantee agreement for the IOB's review.

An approved reimbursement would be included in the first 10% milestone payment, and any portion of the expense exceeding the 10% cap would be included in milestone #2, once NEPA approvals are received.

Update

29. Will the IOB withhold 10% of each disbursement to subgrantees until final closeout?

- No. The IOB will make full disbursements of the specified percentage of the award funds at each progress milestone. The Final Milestone listed in both IOB Non-LEO Project Disbursement Milestones (see FAQ 36 v.4) will be at least 10% of the BEAD award funds. Please note the updates and clarification to the Disbursement Milestone Schedule in FAQ 36 v.4.

30. When can subgrantees begin incurring expenses to be paid with BEAD award funds?

- BEAD eligible expenses incurred after January 26, 2026, but prior to contract signing, for equipment, materials, planning, and design can be reimbursable from the subgrantee's BEAD award as part of the first milestone payment of 10% of the award payable after signing the subgrantee agreement. These pre-contract expenses are subject to strict documentation requirements and review by the IOB. Documentation of these expenses must be submitted with the subgrantee's signed subgrantee agreement. The subgrantee incurs them at its own risk prior to signing the agreement and receiving IOB approval.

Additional guidance on the documentation requirements and the reimbursement process for these expenses will be forthcoming.

Subgrantees will also receive disbursements from BEAD award funds as they satisfy project completion milestones specified in the subgrantee

agreement. These disbursements will be linked to percentages of the subgrantee's BEAD award and will apply to any BEAD-eligible materials or equipment used during BEAD project implementation and construction.

31. Can inventory purchased prior to January 26, 2026, that is BABA-compliant, be included in our in-kind matching or be eligible for reimbursement with BEAD award funds?

- The IOB will only allow reimbursement requests for eligible expenses incurred after January 26, 2026, as part of the first milestone payment. This is the date that NTIA and NIST approved each project.

Subgrantees can use BABA-compliant equipment and materials purchased prior to this date in their project, but only as approved in-kind matching funding or as a network component that is part of the project completion milestones and paid for through the disbursement schedule of the award.

If a subgrantee needs to request changes to its in-kind match amount to incorporate BEAD-eligible materials and components purchased prior to January 26, 2026, it must submit the request to the IOB for review and approval and must include documentation of the valuation of this additional in-kind match. Please note that the total amount of approved matching funds (cash plus in-kind) cannot be changed without further NTIA approval.

32. When will subgrantees be reimbursed for BEAD-eligible expenses that are purchased between January 26, 2026, and the first milestone payment?

- BEAD eligible expenses incurred after January 26, 2026, will be eligible for reimbursement. However, reimbursement requests for these expenses will not be accepted or processed until after the subgrantee agreement is signed and will be paid as part of the initial 10% milestone payment. Please note that these expense requests may be subject to additional documentation requirements and caps on expenditure amounts.

Alternatively, subgrantees may use BEAD-eligible materials and equipment purchased prior to contract signing for their project implementation and construction activities and receive reimbursement based on the project completion milestones specified in the subgrantee agreement.

33. Do subgrantees have to match their budgets and budget categories from the original application proposals when completing the Project Budget

Template? Will there be a template for subgrantees to provide valuations for in-kind match funding?

- The Budget Template(s) must match the total project cost, matching funds, and BEAD award for the approved project(s) as summarized in the March 9, 2026, Welcome Email. The budget does not have to match the budget categories or allocations from the original project application(s).

Subgrantees completed a Match Breakdown Template during curing that was emailed on October 2, 2025. The IOB does not include an additional match valuation template in this RFI. If a subgrantee is unsure whether they were one of the seven or wants to change their match allocations, please contact the IOB.

34. How will subgrantees provide the valuation information and documentation for their in-kind match amounts?

- Subgrantees are required to provide their own valuation of the match asset, documentation, and explanation for the valuation that the IOB and NTIA will review for accuracy and reasonableness. Subgrantees should have already completed this valuation work during project curing. If you have changes to make, please contact the IOB.

35. Are there requirements regarding how subgrantees can spend matching funds?

- Federal Uniform Guidance rules require subgrantees to spend matching funds in roughly the same proportion as they request disbursements of their BEAD award funds. So, for example, at the point in a project that a subgrantee has received 50% of its BEAD award funds, the subgrantee must also demonstrate that it has spent approximately 50% of its matching funds. Some exceptions may apply for an in-kind match when the equipment or materials are required for construction. The rules do not require or allow prioritization of matching funds over BEAD award funds.

Update**36. Has the IOB developed the project completion milestones for fixed amount subawards? How frequently can a subgrantee submit a disbursement request?**

- Yes, every subgrantee agreement will be considered a fixed amount subaward under the NTIA Rules. The disbursement schedules will be standardized across all projects and will apply to the subgrantee project based on the type of letter of credit or performance bond the subgrantee submits. The disbursements will be a percentage of the award and will not

be directly linked to “reimbursement” of specific expenses for that reporting period.

- For subgrantees with a 25% letter of credit or 100% performance bond, the disbursement schedule is tied to documentation of project completion milestones. Once a subgrantee has satisfied a project completion milestone, it can submit a disbursement request.

Non-LEO Project Disbursement Milestones	Percentage of the Award
1. Subgrantee and IDC finalize and fully execute this Agreement, LOC/Bond is submitted	10%
2. Subgrantee provides documentation that all required EHP reviews and applicable permits have been completed and approved	15%
3. 20% of total broadband serviceable locations (BSLs) have completed construction	15%
4. 50% of total BSLs have completed construction	20%
5. 75% of total BSLs have completed construction	15%
6. 100% of the scope of work is completed, and all required BSLs have completed construction	15%
7. Certificate of Project Completion is issued	10%

- For subgrantees with a 10% letter of credit or performance bond, the disbursements are still tied to documentation of project completion and percentages of the award. A maximum of one request may be submitted every six months, and disbursements are prorated based on the number of BSLs that have completed construction.

Non-LEO Six-Month Disbursement Increments	Percentage of the Award
1. Subgrantee and IDC finalize and fully execute this Agreement	5%
2. Subgrantee provides documentation that all required EHP reviews and applicable permits have been completed and approved	5%
3. Each six-month increment during the four-year period of performance (maximum of 1 every 6 months, and up to a maximum of 80% of the grant amount)	Pro-rated based on # of BSLs passed, or 10% of the award, whichever is higher
4. Certification of Project Completion is issued	Remaining amount, if any, plus final 10% from withheld funds, whichever is greater

37. Do subgrantees have to comply with all 2 CFR 200 Federal Uniform Guidance procurement and cost principle requirements?

- NTIA has exempted BEAD projects from certain requirements in 2 CFR 200 Uniform Guidance, including certain procurement requirements and the Cost Principles requirements.

Please review NTIA Uniform Guidance Policy Notice [https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD Policy Notice of Uniform Guidance Part 200 Exceptions Related Issues.pdf](https://broadbandusa.ntia.gov/sites/default/files/2023-12/BEAD_Policy_Note_of_Uniform_Guidance_Part_200_Exceptions_Related_Issues.pdf), and this helpful Primer, [https://broadbandusa.ntia.gov/sites/default/files/2025-05/Uniform Guidance Policy Notice Primer BEAD.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-05/Uniform_Guidance_Policy_Note_Primer_BEAD.pdf).

Letter of Credit & Performance Bond

- 38. Which entity should subgrantees list as the "beneficiary" for our Letter of Credit or Performance Bond?**
- The beneficiary should be identified as the State of Idaho – Department of Commerce.
- 39. Can the costs to obtain, finance, and hold a Letter of Credit or Performance Bond be included in the project budget for our BEAD award?**
- Yes. Subgrantee expenditures to comply with the BEAD letter of credit/performance bond rules are an allowable expense and can be included in the budget for each awarded project. The costs can be reflected under the Professional Services category of the Project Budget Template. 2 CFR 200.427 allows these costs if they are required by the grant program's rules, and that provision may be used as guidance by subgrantees.
- 40. Can subgrantees submit a different type of Letter of Credit or Performance Bond than is specified in the letter of commitment submitted as part of a BEAD funding application?**
- Yes. As long as the Letter of Credit or Performance Bond complies with the requirements in all other respects, including the eligibility of the financial institution issuing the instrument, it can be different than what was specified in the letter of commitment.
- 41. Does a subgrantee have to request permission to issue a 10% Letter of Credit or Performance Bond prior to submitting on June 1?**
- No. Pursuant to updated guidance from NTIA, the IOB will not require subgrantees to request permission to use this option.
- The IOB encourages subgrantees to submit documentation well before the deadline to allow the IOB time to conduct a thorough review. The IOB will reject non-compliant submissions, which could delay the signing of the subgrantee agreements and the start of the period of performance.
- 42. Are there alternatives to satisfying the letter of credit or performance bond requirements, such as holding money in an escrow account?**
- Subgrantees are required to submit either an irrevocable letter of credit (and an attorney letter) or a performance bond, in the required amount, issued by an eligible financial institution. NTIA has provided options for

subgrantees to satisfy this requirement in its waivers and guidance, including a smaller letter of credit or performance bond and a broader set of eligible financial institutions. However, subgrantees must submit one of those two types of instruments; escrow accounts or other methods are not acceptable.

43. Are subgrantees required to submit a separate Letter of Credit or Performance Bond for each awarded project, or can they submit a single Letter of Credit or Performance Bond for all of their projects?

- The IOB requires a separate Letter of Credit or Performance Bond for each awarded project.

44. What are the options for subgrantees to comply with the letter of credit and performance bond requirements?

- Subgrantees can choose to submit:
 - (1) Letter of credit for 25% of the BEAD Award amount with reductions over time as the project progresses;
 - (2) 100% performance bond of the BEAD Award amount with reductions over time as the project progresses; or
 - (3) 10% letter of credit or performance bond of the BEAD Award amount that is held during the entire project, with disbursement requests required every six months/twice per year.

45. If a subgrantee elects to provide a 10% letter of credit or performance bond and is required to submit disbursement requests every six months, will the Subgrantee Agreement still be considered a fixed amount subaward under the NTIA rules?

- Generally, IOB will be using fixed amount subawards. The NTIA rule requires that holders of the 10% Performance Bond or Letter of Credit must have "reimbursement periods of no more than six months." Therefore, under this option, reimbursements will be made on a 6-month basis or upon completion of a milestone(s), whichever occurs first.

Reporting & Testing

46. How often will subgrantees be required to submit progress reports and disbursement requests for each of their projects?

- Idaho BEAD subgrantees will submit quarterly progress reports and will submit disbursement requests on a milestone basis or a six-month cadence. Reporting requirements are still in development, but will include construction progress, financial information, subcontractor information, organizational information, barriers and challenges, permitting, environmental review, and other information.

47. What will the IOB require for the performance testing?

- The IOB will require all subgrantees to comply with NTIA's performance measurement testing requirements during construction and at closeout. See NTIA Guidance here, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Performance_Measures_Policy_Notice. The IOB encourages subgrantees to familiarize themselves with these requirements.

At this time, required testing for annual reporting and closeout will only be required for locations with subscribers, but other types of testing may be required for monitoring and compliance where necessary.

The IOB may develop additional testing obligations for proof of passings and closeout testing.

EHP & Permitting

Topics Include: Permit and Timeline Updates, NTIA Guidance, NEPA-NHPA Specialists, Environmental Requirements and Reviews, Construction Start, NTIA Review Timeline, ESAPTT, APPEIT, Categorical Exclusions, Tribal Historic Preservation Office Consultations

New!

48. How will the IOB and NTIA support subgrantees with any required consultations with the Idaho State Historic Preservation Office under the National Historic Preservation Act?

- The IOB will issue further guidance on the specific EHP requirements, including historical preservation requirements. Subgrantees are also responsible for researching and understanding the requirements themselves and for contacting the ID SHPO if the project will require a SHPO review. To start, go here: https://broadbandusa.ntia.gov/technical-assistance/NHPA_Consultation_Process_Fact_Sheet.

Once the subgrantee has completed its consultation with the SHPO and obtained all necessary SHPO approvals, the subgrantee will submit its documentation to the IOB. The IOB will upload all documentation into NTIA's ESAPTT for NTIA review and approval.

49. Will subgrantees have an opportunity to update their permit list and timelines in the Permitting Milestone and EHP template, as well as any construction timelines, after they have submitted the templates to the IOB?

- Yes. Subgrantees will be required to update the list of permits and timelines from the Permitting Milestone and EHP Template, add state and local permits, and update overall construction timelines during quarterly reporting. The Permitting Milestone Template for the RFI requests only a list of expected permits and timelines for access to federal land. Subgrantees may also add any state and local permits to this template that they already know will be required for the early phases of the project. The IOB expects subgrantees to update this information and the impact on construction timelines on an ongoing basis as more information about permitting becomes available.

50. Is there a good resource for NTIA guidance on EHP and Permitting BEAD obligations?

- NTIA has posted its guidance documents on the Broadband USA website, here: <https://broadbandusa.ntia.gov/funding-programs/broadband-equity-access-and-deployment-bead-program#beadnepa>. And they have recently issued a guidance document that provides QR codes for many of the most relevant documents. The IOB encourages subgrantees to look here, https://broadbandusa.ntia.gov/sites/default/files/2026-03/NTIA_BEAD_Key_Permitting_Resources.pdf.

51. Are subgrantees responsible for obtaining their own NEPA-NHPA specialists and experts for the required EHP reviews and documentation?

- Yes, it will be the responsibility of each subgrantee to engage their own environmental review specialists and experts. This can be an eligible planning expense. Subgrantees will be responsible for conducting all required environmental review activities and will submit the results to the IOB for review. The IOB will provide technical support for subgrantees to complete EHP obligations.

52. Will all projects, regardless of technology or construction techniques, be required to go through an environmental review process?

- Yes, all subgrantee projects must document compliance with the NTIA EHP requirements and receive NTIA EHP approval prior to the start of construction. Every project will go through an environmental review process, but some projects will likely complete the review quickly, where the subgrantee can document that environmental impacts will be minimal. Further guidance and technical support on EHP review processes will be forthcoming.

53. Do subgrantees have to wait for all federal, state, or local access permits to be in place and approved for the entire project before starting any construction activities, or can the permitting be obtained in segments or phases?

- Subgrantees must provide the IOB with a list of all anticipated federal permits in its Permitting Milestones and EHP Template, but they do not have to have all the permits in hand right now. However, subgrantees must have NTIA EHP approval and all required federal, state, and local access permits approved and in hand before starting construction in a given area, and they must update the IOB on their permitting progress as

they move on to construct different parts of the network. So, while subgrantees do not need to have all the required access permits for the entire project before starting construction, all the necessary permits are required for any location where construction occurs.

54. Will subgrantees be required to conduct their environmental reviews for the entire project at the same time, or can the reviews be done using a smaller geographic unit, such as the Application Project Area level?

- Most Subgrantee environmental reviews will be conducted at the same time for the entire project area. The IOB will not use the Application Project Areas to phase or stagger environmental reviews or to identify sub-project environmental review areas.

However, NTIA has developed a process that could allow a subgrantee to break up its project into NEPA Project Areas. Projects with multiple NEPA Project Areas could receive EHP clearance from NTIA and start construction faster in the parts of the project where the NEPA Project Areas have simpler environmental review requirements.

NTIA has developed specific rules and criteria to guide states and subgrantees on identifying NEPA Project Areas within a project. Many projects will not have NEPA Project Areas. This NTIA Guidance provides a high-level description of the process in the following document:

[https://broadbandusa.ntia.gov/sites/default/files/2025-12/NEPA Project Areas CSV Instruction Guide 12292025.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-12/NEPA%20Project%20Areas%20CSV%20Instruction%20Guide%2012292025.pdf). The IOB will issue an additional EHP Request for Information and provide further technical support to carry out NTIA's NEPA Project Area guidance.

55. Has NTIA provided dates or committed to a timeline for its environmental review and sign-off on BEAD projects?

- The timeline for subgrantees to complete the required EHP review and receive NTIA approval will vary based on a variety of factors. NTIA has not committed to specific dates or timelines, but has stated that some projects may receive NTIA EHP approval within a few months, while others may take longer. To ensure a timely review process, subgrantees are encouraged to prioritize these EHP requirements and familiarize themselves with the specific environmental impacts of their projects.

Subgrantees can consult the NTIA ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) here,

<https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about>.

Subgrantees can also review other NTIA Guidance to get started, [https://broadbandusa.ntia.gov/technical-assistance/Guidance on NTIA NEPA Compliance](https://broadbandusa.ntia.gov/technical-assistance/Guidance%20on%20NTIA%20NEPA%20Compliance)

56. Will the IOB rely on NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) for the environmental reviews of each project? Will it also use the ESAPTT for tracking federal, state, and local access permitting?

- Yes, the IOB will use the NTIA ESAPTT for EHP documentation, reporting, and NTIA review. The IOB is also researching the possible use of ESAPTT to track federal, state, and local "access" permitting for right of way, traffic control, easement access, and other related permits. All anticipated federal access permits should be listed on the Permitting Milestone & EHP Template.

57. Will the IOB be applying NTIA-developed environmental review processes and categorical exclusions?

- Subgrantees will be responsible for conducting the environmental and historical resources review for each project and proposing any applicable Categorical Exclusions. The IOB will review the subgrantee's documentation and submit it to NTIA for its review and approval. The NTIA has created a set of Categorical Exclusions that may apply to BEAD projects and has publicly stated that most BEAD deployment projects will qualify for a Categorical Exemption, which streamlines the environmental review process. See the NTIA NEPA Guidance here, [https://broadbandusa.ntia.gov/sites/default/files/2025-06/NTIA NEPA Procedures June 2025.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-06/NTIA%20NEPA%20Procedures%20June%202025.pdf).

58. Can subgrantees use the NTIA APPEIT to begin their environmental review process in Idaho?

- Yes, the IOB encourages subgrantees to review NTIA's APPEIT to start the environmental review process, <https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about>. The NTIA controls this tool and has populated it with relevant information, focusing on federal-level requirements for each state. Some state-level requirements are also in APPEIT. However, APPEIT is not intended to substitute for the subgrantees' own independent review of potential environmental impacts of each project.

You can review Idaho-specific environmental information on Link Up Idaho on the Application Project Areas Map 4.0,

https://experience.arcgis.com/experience/3a16e756139948888232570168c86f72/#data_s=id%3AdataSource_1-197b2fb18f6-layer-90-197eab125f7-layer-94%3A460965.

59. How will the IOB and NTIA support subgrantees with any required consultations with Tribal Historical Preservation Offices?

- Once it is determined that a subgrantee will need to conduct a consultation with a Tribal Historic Preservation Office, NTIA guidance states that NTIA and the IOB will facilitate the required Section 106 consultations with the Tribal Historic Preservation Offices.

Subgrantees will be responsible for conducting and documenting the consultation after NTIA has made the initial contacts, and subgrantees must submit the documentation to the IOB for review. See, Q. 3.5 in the NTIA NEPA FAQ, https://broadbandusa.ntia.gov/sites/default/files/2026-01/NTIA_NEPA_for_BEAD_FAQs_v2.0.pdf.

Project Scope

60. How do I request a change in a funded project?

- While scope changes to awarded projects or return of awarded projects are not encouraged, the IOB and NTIA will consider requests from subgrantees to return, change, or update their projects. After NTIA approves projects, subgrantees will be required to put all requested changes, no matter how small, in writing and include detailed documentation and justifications for each requested change. Although subgrantees have not yet signed Subgrantee Agreements, all returns or changes will need to be reviewed and approved, and most requests will require approval from both NTIA and the IOB. Further guidance and requirements for scope change requests will be forthcoming.

Any subgrantee considering a scope change to an approved project should contact IOB with a brief description of the proposed change as soon as possible. Changes should be reviewed, approved, and implemented prior to finalizing a subgrantee agreement. This is especially true for changes related to the number of BSLs to be served or any changes to budgets and matching funds.

61. What types of changes will be considered?

- Subgrantees may request a change in scope for different reasons, including:
 - There are BSLs in the project area that are newly identified as not eligible for funding or should not have been approved as eligible for funding.
 - There is a desire to serve some or all BSLs in the project with a different technology type than originally committed to using.
 - More time is needed to complete the project.
 - Some or all BSLs will need to be removed from the project because they cannot be served for the awarded amount, or the project is at risk of default.
 - Other changes, such as changes to key personnel, changes to subcontractors, or changes to corporate structure, must be reported to the IOB for review, but may not be considered a “scope change” and may not need approval.

62. Will the IOB be able to review and approve scope change requests without NTIA approval?

- NTIA BEAD rules allow IOB to review and approve some types of scope change requests without NTIA approval. However, the IOB will have to report **any** scope changes to NTIA as part of its regular reporting. Once approved, all documentation must be updated before a scope change can take effect. Examples of changes that the IOB can approve include:
 - A change that results in an increase in served BSLs with no budget modifications;
 - A route change or change in the project area that will have no impact on the budget, number of BSLs being served, or on the environmental review and permitting work previously approved by NTIA;
 - Project schedule changes or extensions of the subgrantee’s committed period of performance for up to a year, and no longer than four years, with no budget modifications;
 - Re-designation of approved BSLs as “no BEAD locations” under NTIA Mapping Reason Codes 1 (No Broadband Connection),

Reason Code 2 (No Demand for Mass Market Service), and Reason Code 3 (Removal from FCC's Fabric);

- Re-designation of approved BSLs as “no BEAD locations” under Reason Codes 4-7, including new enforceable commitments, but only where the change does not result in the removal of over 20% of the approved BSLs or 200 approved BSLs from a single project (whichever number is smaller).

63. What types of scope changes will require NTIA approval?

- Most changes, if not discussed above, will require NTIA review and approval in addition to the IOB's approval. NTIA has requested that States consult on any scope change requests so that NTIA can determine the level of approval required. At a minimum, NTIA will be required to approve scope changes that include:
 - Requests to assign a new subgrantee or transfer the project to a different subgrantee for a partial or total approved project;
 - Requests for a budget modification – including matching funding amounts changes to the type and source of matching funds, including allocation between cash and in-kind match, may only need IOB review, approval, and documentation, but will be reported to NTIA;
 - Requests to remove BSLs from the project for any reason other than identifying them as “no BEAD locations;”
 - Requests to deploy a different technology type from the original commitment in the application for any of the funded BSLs;
 - Requests for an extension of more than a year from the subgrantee's committed construction timeline or for a period of performance longer than four years.