

# **IDAHO BEAD SUBGRANTEE FREQUENTLY ASKED QUESTIONS**

Version 5

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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 **Updated**.

The first section is dedicated to Subgrantee Agreement Questions, and the second section includes the questions from FAQ versions 1-4.

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

# Subgrantee Agreement Questions

## General Office Hours Questions

**New!** 1. **Section 11 of the Subgrantee Agreement (SGA) references a Risk Mitigation, Monitoring, and Compliance Plan that will be developed in the future. When will that be provided?**

- The SGA establishes governing standards for risk assessment and monitoring and compliance. The forthcoming Risk Mitigation and Monitoring, and Compliance Plans will operationalize those standards by providing the process and procedures for subgrantees rather than introduce new substantive obligations beyond those already required under the SGA, applicable federal law, NTIA requirements, and other governing regulations.

IOB has developed a draft Monitoring and Compliance Plan that is currently undergoing internal review and has not yet been formally released. That work is ongoing, and additional procedural guidance and implementation resources will be shared as they are finalized.

**New!** 2. **Page 80 of the SGA refers to a Covenant of Purpose, Use, and Ownership that must be prepared and recorded to document the federal interest. Will this covenant be a separate agreement? If so, will subgrantees have the opportunity to review and agree to its terms before it is recorded?**

- The Covenant of Purpose, Use, and Ownership and the related property standards provisions in the SGA track the NTIA's requirements in its BEAD [General Terms and Conditions](#) (Paragraphs 46-48) and the applicable Property Standards requirements under 2 CFR Part 200, as modified by NTIA. The Covenant is a separate agreement that the subgrantee will be required to draft and record in compliance with federal regulations. IOB and NTIA will provide technical assistance and a standard template.

NTIA has not yet issued specific Property Standards guidance for the BEAD Program or a BEAD-specific Covenant of Purpose, Use, and Ownership. Previously, NTIA issued a sample Covenant template for its Broadband Infrastructure Program in 2025 under similar rules, [https://broadbandusa.ntia.gov/sites/default/files/2025-11/BIP\\_Fact\\_Sheet\\_Federal\\_Interest\\_Documentation\\_Requirements.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-11/BIP_Fact_Sheet_Federal_Interest_Documentation_Requirements.pdf). NIST also has a sample Covenant posted here, <https://www.nist.gov/system/files/documents/2017/05/09/sample-NIST-NCGP-covenant-of-purpose-use-and-ownership.pdf>. *These samples are provided as information only. The Covenant template required under the BEAD Program may be updated or revised by NTIA.*

- New!** 3. **Reading the SGA, on page 11 of the draft, it states "Where harmonization is not reasonably possible, the Parties agree to prioritize the language contained in authorities enumerated above in the order of precedence set forth above (I.A.1-12), from highest to lowest priority, and in a manner that maintains the integrity of this Agreement", however, I do not see a I.A 1–12. Where can I find that list?**
- The quoted language refers to the list of authorities in the first paragraph of Section I, numbered a)-l) on Page 11. The outdated numbering reference has been corrected.

### ***Environmental and Historic Preservation Review***

- New!** 4. **What is the EHP process going to look like moving forward after SGA execution?**
- Following execution of the SGA, subgrantees will begin the Environmental and Historic Preservation (EHP) monitoring and compliance process. To support implementation, the Idaho Office of Broadband (IOB) will host office hours and workshops to provide technical assistance and walk subgrantees through NTIA's EHP requirements and documentation process.

Similar to the SGA Request for Information (RFI) process, IOB will issue an EHP-specific RFI. The EHP RFI will be the first step in a multi-step process for subgrantees to complete their EHP obligations by working with IOB to:

- Identify potential NEPA Project Areas within each funded project;
- Complete the required environmental and historic preservation documentation with each applicable agency's reviews;
- Submit documentation to IOB for review prior to submission to NTIA for final approval; and
- Demonstrate that all required permits, right-of-way agreements, easements, and other access authorizations necessary for the initial phase of construction have been obtained.

Additional guidance, templates, and implementation details will be provided through the EHP workshops, office hours, and future technical assistance materials as the process moves forward.

Subgrantees **MUST ENSURE** that they complete all EHP obligations before construction activities begin. Construction may not commence within a NEPA Project Area until NTIA has completed and approved the required EHP documentation and the necessary permits and access rights for the first phase of construction have been secured. *Starting construction prior to environmental permitting and analysis will result in impacts to the subgrantee's BEAD award.*

**New!**

**5. Given concerns about SHPO’s reduced capacity and the staffing reduction beginning July 1, along with the suspension of expedited Section 106 reviews outside the existing MOUs, we wanted to ask whether the Department has been able to coordinate with SHPO on review support for BEAD, similar to what was done for CPF, to help keep subgrantee timelines on track with the federal deadline?**

- Under the BEAD Notice of Funding Opportunity (NOFO), NTIA requires each Eligible Entity (state or territory) to conduct permitting and environmental review coordination. The SGA provides further discussion and commitments for this coordination effort. This effort will include convening permitting “roundtables” or similar engagements with federal, state, local, and Tribal permitting agencies. These roundtables are intended to identify permitting barriers, improve interagency coordination, and develop strategies to streamline environmental and historic preservation (EHP) reviews and other approval processes. IOB will be holding these roundtables to help reduce delays and accelerate broadband deployment.

As part of this coordination effort, IOB will continue to work with both subgrantees and applicable state agencies, including Idaho’s SHPO. IOB is in direct contact with the SHPO to support BEAD-related reviews. However, given the Office’s current resource limitations, IOB encourages subgrantees to plan for additional time for these reviews, up to the full 30-day timeline allowed under the regulations.

### ***Disbursements and Budgets***

**New!**

**6. Can IOB confirm that these are fixed-amount subawards so that if a provider completes the approved project, meets the milestones, and satisfies BEAD requirements, will it receive 100% of the approved grant even if actual costs come in below budget?**

- BEAD subawards under the Idaho Program are fixed-amount subawards as defined by 2 CFR 200 and modified by NTIA’s BEAD rules.

If a subgrantee successfully completes the approved project, satisfies all required milestones, and complies with the terms of the SGA and applicable BEAD requirements, the subgrantee will receive the full approved grant award. If the subgrantee’s actual project costs are less than the approved total project cost, the subgrantee is not required to expend any unused matching funds solely to reach the original budget. Completion of the approved scope of work and compliance with all Program requirements—not actual project expenditures—determine payment of the fixed-amount subaward.

**New!****7. Are indirect costs rates applied to the different cost categories as they are incurred or are they maintained separately? What rates do we use, the default rate of 15% or our own internally calculated rate?**

- *There is no officially approved indirect cost rate under the BEAD Program.* Because BEAD subgrants are structured as fixed amount subawards, NTIA has exempted the Program from the Cost Principles in 2 CFR Part 200, Subpart E. As a result, neither NTIA nor IOB requires or has approved a specific indirect cost rate.

Rather than applying a standard indirect cost rate to individual budget categories or maintaining indirect costs as a separate budget category, indirect expenses should be reasonably incorporated into the applicable budget categories within the approved project budget.

For quarterly reporting, subgrantees will report actual expenditures against their approved budget using the same budget categories included in their submitted budget. These categories align with the reporting format that the State of Idaho is required to use for the status of subgrantee projects in its NTIA semi-annual reports, which does not include a separate indirect cost category or require the use of a specific indirect cost rate.

**New!****8. For match documentation before signing, does IOB require the full match to be segregated, escrowed, or held in a separate account, or is reasonable proof of financial capacity sufficient? Reference this statement from SGA: “Subgrantee shall have committed and documented the full amount of Matching Funds to the Department prior to the execution of this Agreement.”**

- Subgrantees were required to commit and document the match amounts for each project as part of the application process. Final match commitments were approved by NTIA on January 26, 2026, with the Idaho Final Proposal. These match commitments- of cash, in-kind, or both- are binding commitments under the SGA. Failure to contribute the required match funding during the period of performance could be considered “non-compliance” under the SGA.

However, there is no obligation for subgrantees to have collected and set aside the total amount of match dollars or in-kind assets up front at the beginning of the period of performance. Instead, reasonable proof of financial capacity is sufficient, including the approved commitment as documented in the SGA and ongoing documentation of the expenditure of match funding at a proportional rate to its other budgeted expenses during the period of performance.

**New!** 9. **Must a subgrantee spend their match amount in proportion to the expenditures of the fixed award amount?**

- Subgrantees are expected to contribute their required matching funds throughout the project and generally in proportion to expenditures under the approved project budget. The matching fund expenditures do not need to follow the percentages under the disbursement milestone schedule. Instead, matching contributions should be made concurrently with the expenditures for all ongoing project costs rather than deferred until the end of the period of performance.

The purpose of the federal matching requirement is to ensure that both the federal and the subgrantee's investments support project implementation throughout the period of performance. Subgrantees will report both grant-funded expenditures and matching contributions against the approved budget categories through the required reporting process. IOB will monitor these expenditures to ensure that the subgrantee contributes the required match throughout the project in accordance with the Department of Commerce Financial Assistance Terms and Conditions and other applicable federal requirements.

Under a fixed-amount subaward, however, if a subgrantee successfully completes the approved project, satisfies all applicable Program requirements and deliverables, and its actual total project costs are less than the approved total project budget, the subgrantee is not required to expend the full originally committed match amount.

**New!** 10. **Does the proportional match requirement also apply to the initial 10% payment request before any work has been done?**

- No.

**New!** 11. **What expenses will Subgrantees be required to submit to receive the initial 10% and the following 15%?**

- Under a fixed-amount subaward structure, subgrantees are not required to demonstrate a specific type of expense or a particular level of expenditures to receive disbursements. Instead, disbursements are based on the successful completion of defined project milestones and the required documentation supporting those milestones.
  - **Initial 10% Disbursement**  
To receive the initial 10% disbursement, the subgrantee must execute the Subgrant Agreement. Execution of the Agreement is sufficient to authorize release of the initial payment. If a subgrantee wishes to submit eligible pre-

award expenses, it may do so. IOB will provide guidance on the documentation and review process for those expenses.

- **Next 15% Disbursement**

To receive the subsequent 15% disbursement, the subgrantee must:

- Complete all required Environmental and Historic Preservation (EHP) obligations;
- Receive the necessary NTIA approvals; and
- Demonstrate that all required access permits, rights-of-way, easements, and pole attachment agreements necessary to begin construction have been obtained.

The Subgrant Agreement identifies the required elements of each Request for Funds. IOB will provide additional instructions, templates, and technical assistance regarding the Request for Funds process and the documentation required to support each milestone disbursement

**New!** **12. Can IOB confirm how eligible pre-agreement costs incurred after January 26, 2026 will be handled, and whether materials, equipment, engineering, and design costs above the first milestone amount can support later milestones? "any costs incurred by Subgrantee prior to the Effective Date of this Agreement (pre-award costs) shall not be eligible for disbursement absent specific written approval by the Department" Can those expenses be listed and pre-approved in the signed agreement?**

- Subgrantees may request reimbursement for eligible pre-award costs incurred after January 26, 2026, in accordance with the SGA and applicable federal requirements. Because the SGA provides that pre-award costs are not eligible for reimbursement absent specific written approval by the Department, subgrantees must submit documentation supporting those costs as part of a Request for Funds after execution of the SGA. These costs will not be listed or pre-approved in the executed SGA itself. Instead, IOB will review the documentation and determine whether the costs are eligible and allowable before approving the disbursement payment.

Pre-award costs do not increase the total grant award or provide additional payment beyond the established milestone amounts. Instead, approved pre-award costs are applied against the maximum disbursement available for the milestone under which they are submitted. For example, if submitted with the initial disbursement request, approved pre-award costs will count toward the 10% milestone payment described in Section VI.A. If the amount of eligible pre-award costs exceeds the available amount for a particular milestone, the remaining eligible costs may be submitted with subsequent milestone disbursement requests, subject to the maximum disbursement amount available for each milestone.

## SGA Requirements

**New!** 13. Can IOB clarify that ordinary staffing, contractor, or subcontractor changes do not require approval in advance, and that unplanned key personnel changes can be handled with prompt notice and reasonable replacement approval?

- BEAD Program requirements require subgrantees to apply applicable SGA and Program obligations to contractors and subcontractors performing work on the project. Accordingly, IOB must maintain current information regarding project contractors and subcontractors to support monitoring and compliance activities. IOB has collected information from subgrantees about their contractors and subgrantees will have an opportunity to update that information on an ongoing basis through the monitoring and compliance reporting process. Under the SGA, subgrantees are required to separately notify IOB as soon as they become aware of any changes or additions to contractors or subcontractors. This can be done via email to [IdahoBEAD@mbakerintl.com](mailto:IdahoBEAD@mbakerintl.com) or through the planned monitoring and compliance portal once established.

Regarding staffing changes, the SGA requires prior approval for changes involving designated "Key Personnel," as defined in the SGA. In the event of an unplanned departure or other unforeseen change affecting Key Personnel, the subgrantee should notify IOB as soon as it becomes aware of the change and propose a qualified replacement. IOB will review those situations on a case-by-case basis, with the objective of ensuring the subgrantee continues to meet the intent and requirements of the SGA while minimizing unnecessary disruption to project implementation

**New!** 14. Section III. A requires completion documentation 120 days before the Period of Performance ends, which effectively shortens the build window. Can subgrantees test and submit incrementally as locations finish and will the annual testing (XI.B) and quarterly reports (Attachment 10) roll up to satisfy completion, so the data isn't reassembled at the end?

- The requirement to complete a project 120 days prior to the end of the Period of Performance will allow IOB to complete the Closeout and Reporting Process in a timely manner. More information and guidance will be provided about the Closeout Process and required performance testing, but the SGA (Section III, Section V and Attachments 4 and 10) provides the legal framework for the process.

IOB will design its Closeout and testing processes to be as streamlined and efficient as possible for both it and for the subgrantee. As part of that process, IOB will consider incorporating the prior submissions of the subgrantees' annual performance testing under the NTIA Performance Measurement requirements,

posted here, [https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Performance\\_Measures\\_Policy\\_Notice](https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Performance_Measures_Policy_Notice) and described by NTIA in its Frequently Asked Questions document (Section 11), which can be found here, [https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD\\_FAQs\\_v22.pdf](https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD_FAQs_v22.pdf).

IOB will also consider incorporating the data and evidence of the “proof of passings” that subgrantees submitted for each disbursement milestone into the Closeout process.

**New!** **15. Section IX.B.3 of the SGA says that “Any work involving laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals.” Who determines what qualifies as “interspersed” and when will that be determined?**

- The requirement for subgrantees to provide "interspersed conduit access points at regular and short intervals" is established by the BEAD statute and the NTIA BEAD Notice of Funding Opportunity. To implement this requirement, subgrantees submitted network designs as part of their BEAD application (and updated designs, where applicable, through the SGA RFI) demonstrating the planned placement of conduit access points. IOB and NTIA reviewed and approved those designs as part of the project approval process.

Accordingly, determination of what satisfies this requirement is made through the approved network design and project plans, informed by industry-standard engineering practices for conduit access point placement and interconnection. IOB does not intend to establish a separate statewide spacing requirement beyond those approved plans and applicable federal requirements.

During the monitoring and compliance process, subgrantees will report progress on constructing these conduit access points, and IOB will conduct site visits on selected projects to verify compliance with the approved design and applicable BEAD requirements.

### ***Other Federal Funding***

**New!** **16. Can BEAD funds overlap with other federal funding?**

- No. NTIA rules and the SGA prohibit subgrantees from using multiple sources of federal funding for the same activities, or to satisfy the same obligations, under the BEAD awarded grants.

The SGA prohibits “duplication of funding” and requires documentation of non-duplication to demonstrate that only BEAD funds and earmarked matching funds are used for the BEAD Program. The Project Budget and ongoing compliance

reporting will satisfy this documentation requirement. The SGA also prohibits using BEAD award funds for expenditures that are already allocated or covered by other federal or state funding sources. This prohibition applies during the period of performance and during the federal interest period.

Subgrantees should carefully review the signed attestation in the SGA (Attachment 7) regarding limitations on applying any additional federal funds or subsidies, including using Universal Service Fund subsidies, to support the build out and operations of new BSLs funded under the BEAD grant. Further discussion and explanation of this NTIA requirement is in the NTIA Frequently Asked Questions (Section 5, v.22), which can be found here, [https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD\\_FAQs\\_v22.pdf](https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD_FAQs_v22.pdf)

**New!****17. Can a BEAD Subgrantee receive Universal Service Funds, including Connect America Fund-Broadband Loop Support, High-Cost Loop Support, and ACAM subsidies, to build or serve BSLs funded by the BEAD award?**

- The NTIA BEAD Rules impose limits on the use of USF funding, including CAF-BLS, ACAM, and Enhanced ACAM programs, to support network deployment and operations for BEAD-funded BSLs. The requirement for subgrantees not to rely on additional federal funding or subsidies prohibits a Subgrantee from expanding or increasing USF funding to support the additional BEAD funded BSLs in their network. IOB will develop requirements through its monitoring and compliance processes to confirm ongoing compliance with this requirement.

***Subgrantees currently receiving USF funding to support their networks should consult NTIA guidance directly and be aware of the following NTIA conditions.***

NTIA notes that most locations already receiving federal broadband support were not eligible for BEAD; however, where a provider is already receiving support or was already specifically committed to receiving support prior to its BEAD application, the provider may continue receiving such support under the existing terms of the other federal program to serve the BEAD-funded location. This would include some types of ACAM/Enhanced A-CAM funding and “Legacy” USF funds, as long as costs reported under the USF program fully and accurately account for the funding received pursuant to BEAD to avoid duplication of funding. See, NTIA Frequently Asked Questions (Section 5, v.22), which can be found here,

[https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD\\_FAQs\\_v22.pdf](https://broadbandusa.ntia.gov/sites/default/files/2026-06/BEAD_FAQs_v22.pdf)

NTIA further specifies that this restriction on other federal funding is intended to be:

- Forward looking only
- Applies only to federal funds for network deployment and operations
- Does not apply to any state universal service programs
- Does not apply to Lifeline funding

## ***RFI Questions***

### ***General***

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

**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](mailto: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](mailto:broadband@commerce.idaho.gov) and/or [IdahoBEAD@mbakerintl.com](mailto: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](mailto: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*

### **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—
  - (I) 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](https://broadbandusa.ntia.gov/technical-assistance/BABA%20Compliance%20and%20Self%20Certification).

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*

**Updated** **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 request for funds as part of the initial 10% disbursement milestone payment 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.

**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.

**Updated** 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 request for funds as part of the initial 10% disbursement milestone payment for the IOB's review. 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.

**Updated** 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 used to demonstrate compliance with 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 the match allocation, 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?**

**Updated**

- Federal Uniform Guidance rules require subgrantees to spend matching funds in roughly the same proportion as they incur expenditures under their budget categories for BEAD award funds. So, for example, at the point in a project that a subgrantee has incurred expenses for 50% of its BEAD Project budget, 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.

**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

**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\\_Note\\_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\\_Note\\_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](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*

### **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](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](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.

**Updated 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 all required federal, state, and local access permits, for a given area of the project as it starts construction, approved and in hand before starting construction, 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.

In addition, subgrantees must have all NTIA EHP obligations and NTIA's approvals in hand prior to starting construction in any part of the project area. There may be exceptions if a subgrantee's project is divided into NTIA-approved NEPA project areas.

**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_NEPA_Procedures_June_2025.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](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 the 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](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?

#### Updated

- 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. 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. All returns or changes will need to be reviewed and approved, and most requests will require approval from both NTIA and the IOB..

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. IOB has a portal and instructions that will be provided to the subgrantee after IOB has done an initial review of the request. Additional guidance and requirements for scope change requests or amendments during the period of performance will be forthcoming.

### 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 but should still be submitted to IOB for review.

## 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 complete project, or partial number of BSLs in a project, to a new subgrantee;
  - 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.