



# BEAD Program Technical Assistance Resource

## Pre-Award Costs

### Resource Version:

Version	Date
1	5/13/2026

### Resource Details:

Category	Allowable Costs, Match, Cost Evidencing
Summary	Definition of pre-award costs that will be approved by the Public Service Commission (PSC) for WI BEAD subrecipients.
WI BEAD contact:	<a href="mailto:PSCBeadGrants@wisconsin.gov">PSCBeadGrants@wisconsin.gov</a>

Disclaimer: This document is intended solely to assist subrecipient in better understanding the Wisconsin BEAD program and associated policies/processes. This document does not supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the Grant Agreement. In all cases, statutory and regulatory mandates, the terms and conditions of the award, and NTIA policies and guidance shall prevail over any inconsistencies contained in this document.

## Pre-Award Costs

Consistent with 2 CFR 200.458 and the BEAD Grant Agreement, the PSC approves all pre-award costs that are allowable, allocable, reasonable and specific to the awarded project scope in the Grant Agreement within the time period indicated in the Grant Agreement and not otherwise prohibited.

All requirements related to the documentation and records of these expenses are subject to the regular Commission review and approval process.

Subrecipients cannot recover for project areas or application costs where no award was granted.

Pre-award costs will be reviewed in accordance with BEAD guidance and the PSC BEAD Grant Agreement and PSC payment review practices for eligible costs. Pre-award costs are incurred at the subrecipients risk and payment will not be made without an executed grant agreement.

**This technical assistance document serves as written authorization approving pre-award costs for BEAD grant projects.**

## Related Guidance

### BEAD Grant Agreement

**1.29. Pre-award or Pre-subgrant Costs** are those eligible costs incurred before the start date of the Grant Agreement and incurred directly pursuant to the negotiation and in anticipation of the Grant Agreement. The Commission may consider these Eligible Costs based on the definition in this Agreement and allows Subrecipients to charge these costs only if the costs would have been allowed if incurred after the start date of the subgrant and are necessary for efficient and timely performance of the project. A Subrecipient may not incur implementation costs for a project or sub-project prior to a complete NEPA review and NTIA has approved any necessary decision document.

### B3.0. Allowable use of Award Funds: Pre-Implementation

The allowable use of Award Funds prior to beginning implementation includes, but is not limited to, activities necessary for the completion of the following, beginning no earlier than August 1, 2024. Those expenditures must always be Eligible Costs. Reasonable, permissible nonconstruction activities such as completing studies, surveys, and other reviews necessary to apply for environmental permits or preliminary procurement such as the purchase or lease of equipment are generally permitted. Subrecipients may also allow Contractors to claim reimbursement for pre-subgrant costs in certain circumstances in accordance with 2 CFR 200.458. The following pre-implementation costs are allowed:

B3.1. Pre-construction planning, including collecting information necessary to complete environmental reviews;

B3.2. Applications for environmental permits;

B3.3. Studies including, but not limited to, EAs, wetland delineations, biological assessments, archaeological surveys, and other environmental reviews and analyses;

B3.4. Certain administrative costs;

B3.5. Certain pre-award application costs;

B3.6. Activities supporting consultations required under the NHPA, the Endangered Species Act, and the Clean Water Act; and/or

B3.7. Limited, preliminary procurement, including the purchase or lease of equipment (including fiber), or entering into binding contracts to do so; the purchase of applicable or conditional insurance; and/or funds used to secure land or building leases (including right-of-way easements).

### Additional Resources:

- [General Terms and Conditions for the NTIA BEAD Program Funds - Nov 2025](#) (p. 11)
- [BEAD Frequently Asked Questions and Answers - Version 20](#) (3.13)
- Wisconsin BEAD Grant Agreement Pre-award or Pre-subgrant costs, defined (1.29) and referenced in Attachment B(3)