

Post-Award Frequently Asked Questions (FAQs): Capital Projects Fund (CPF) Broadband Infrastructure Grant Program

Scope: This Post-Award FAQ provides answers to common questions regarding the CPF Broadband Infrastructure Grant (5-CPF-2023).

Most recent update	Content updated
04.2024	v. 2 published Scope/Note edited “Mapping, Spatial Data” section removed “Grant Application” section removed Questions added: 2.4, 6.11 Questions Updated: 6.10
10.2023	v. 1 published

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1. General questions

- 1.1. **What is a UEI from SAM.gov? Do I need one? How do I get one?**
 - o Beginning April 4, 2022, the Federal Government transitioned from the DUNS number to the Unique Entity Identifier (UEI). At that point, entities doing business with the Federal Government must use the UEI number assigned in

SAM.gov and will no longer be able to use a third-party website to obtain their identifier number.

- Entities can manage organizational information, such as legal business name and physical address associated with a UEI number, directly from SAM.gov.
- All Entities can obtain a Unique Entity Identifier (UEI) number on the Sam.gov website and register for an account if needed. New SAM.gov registrants will be assigned a UEI number as part of their SAM registration. You do not need a SAM.gov account to get a UEI.
- Recipients are responsible for keeping their SAM.gov information updated and ensuring all identification numbers provided are active throughout the entire CPF grant period of performance.
- For more information, please visit SAM.gov.

1.2. Will there be further rounds of CPF grant funding?

- No future rounds are planned.

1.3. Will my federal grant be taxable?

- The Commission cannot advise on taxation questions. We suggest you speak with a tax professional.

1.4. What is the CPF Broadband Infrastructure Grant project FAIN number?

- The FAIN for the ARPA CPF is CPFFN0201.

1.5. How do we contact the Commission with questions or concerns about the CPF broadband infrastructure grant program?

- Email the PSC Capital Projects Team: PSCCapitalProjectsFund@Wisconsin.gov

1.6. Does the Davis-Bacon Act or Davis-Bacon Act related provisions apply to projects funded solely with award funds from the Capital Projects Fund?

- No, but the U.S. Department of the Treasury encourages Recipients to ensure that Capital Projects incorporate strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions, not only to promote effective and efficient delivery of high-quality infrastructure projects but also to support the economic recovery through strong employment opportunities for workers. We recommend you consult with your legal counsel regarding labor standards.
- Recipients may be subject to the requirements of the Davis-Bacon Act, when Capital Projects Fund grant funds are used on a construction project in conjunction with funds from another federal program that requires enforcement of the Davis-Bacon Act. We recommend you consult with your legal counsel

regarding the applicability of the Davis-Bacon Act or Davis-Bacon Act related provisions to your project due to use of other federal funding.

- Source: GUIDANCE FOR THE CORONAVIRUS CAPITAL PROJECTS FUND ([treasury.gov](https://www.treasury.gov)), E: Strong Labor Practices

1.7. Is my project subject to NEPA?

- Generally, the National Environmental Policy Act **does not** apply to Projects funded by the Capital Projects Fund. Projects supported with payments from the Capital Projects Fund may still be subject to NEPA review if they are also funded by or otherwise involve actions from other federal programs or agencies. We recommend you consult with your legal counsel if you have questions about the applicability of NEPA.
- Source: SLFRF-Compliance-and-Reporting-Guidance.pdf ([treasury.gov](https://www.treasury.gov)), B: Compliance Guidelines for Construction (and footnote 12).

1.8. How is the PSC verifying that funding recipients are putting in the fiber as they promised?

- All PSC grant-funded projects must comply with state and federal laws and are managed under grant agreements that lay out the terms and conditions of the proposed project to ensure good performance and accountable use of public funding. We monitor compliance through regular quarterly or semi-annual reporting, detailed review of financial and cost documentation, collection of geospatial data, and closeout programmatic reviews of each grant, which sometimes involve site visits. On top of this, there are also reporting requirements for providers to the Federal Communications Commission.

1.9. Will the same compliance rules be in effect for the Capital Projects Fund as are in effect for ARPA Grants?

- No, while the two programs are very similar, they are not identical. The Capital Projects Fund (CPF) was created by the American Rescue Plan, the compliance guidelines will be similar for both the CPF Broadband Infrastructure and ARPA Broadband Access grant programs. The grant agreement is the first place to look for compliance measures. As with the ARPA awards, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards will apply to CPF as well.

2. PSC Grants System

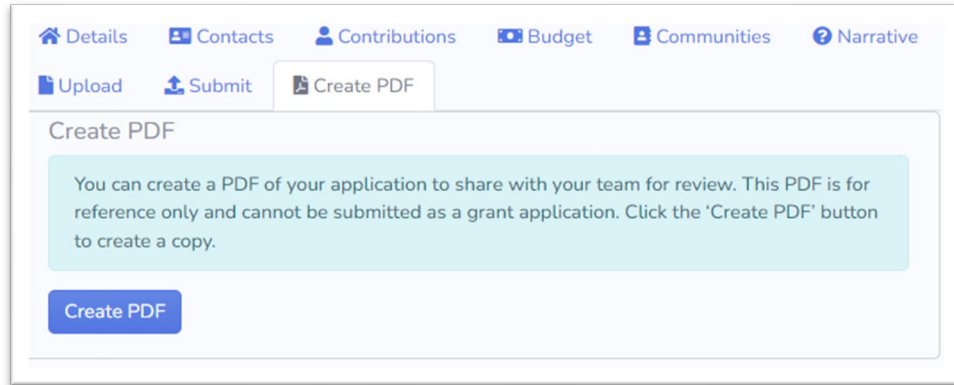
Applicants are required to submit applications using the [PSC Grants System](#). Detailed instructions on submitting an application are available as part of the Application Instructions [PSC Capital Projects Broadband Infrastructure \(wi.gov\)](#).

2.1. How do I access the PSC Grant Management System?

- Access the [PSC Grants System \(wi.gov\)](#)
<https://psc.wi.gov/Pages/GrantsSystem.aspx>
- PSC Grants System users must also have an account on the PSC's ERF system:
 1. Navigate to Login page: <https://apps.psc.wi.gov/apps/grants>.
 2. If you have an ERF account, follow the link to validate your ERF Account.
 3. If you do not have an ERF account, follow the link to create an ERF Account, then return to the login page and follow the link to validate your ERF Account.
 4. Validate your ERF account.
 5. Register as new user to PSC Grants System
- Resources for assistance include [PSC Grant Management System User Guide](#) and the Grants Management System: Getting Started webinar and PowerPoint.

2.2. Does the new PSC grants system allow for multiple users on a single application?

- At this time the Grants System does not have functionality to allow multiple individuals to access an application to make edits or changes. We encourage the person who will be responsible for finalizing and submitting the application be the one to create a Grants System account and application within the system. To work collaboratively, we recommend you collaborate with others involved in preparing the application by using the "Create PDF" tab of the application to export a PDF of the current state of your application. This can allow the application owner to share a copy of the application for review before it is submitted. Please see the below screenshot. Also, the narrative questions and required information are also available in our grant application instructions.



2.3. Can the Commission include more than one contact when sending CPF grant related materials/updates?

- As our team has many grants to manage and keep track of, we are limiting all subrecipients to one point of contact for all of their CPF grants. It is the responsibility of this point of contact to field any Commission requests or updates to the appropriate person within their organization.

2.4. How do I update (or remove) contact(s) in the Grants System?

- Log in to the [Grants System](#). Under the “My Grant Projects” section of the landing page, click on the project that you want to change/edit the contact for. Navigate to the “Contacts” tab. Here you can edit/delete an existing contact or ‘Add New Contact’. The system one ‘Primary’ contact, at minimum.

3. Grant Agreement

3.1. How long does the Grant Agreement last?

- The Grant Agreement identifies that the performance period is to be completed by November 1, 2026. The terms and conditions of the Grant Agreement remain in effect until the grant recipient has completed all grant agreement requirements, such as reporting requirements after the performance period. As a result, the terms and conditions of the Grant Agreement extend beyond the completion of the performance period.

3.2. What if we cannot complete the project by the end of the performance period?

- Please contact the Commission at PSCCapitalProjectsFund@wisconsin.gov with concerns about meeting the performance period deadline. An extension of the performance period beyond November 1, 2026, may be available following the Commission’s standard grant amendment process.

- 3.3. The Grant Agreement states that we must notify the Commission of public statements, press releases, marketing or promotional materials describing the grant project. What is the notification and review process? How long will review take?
- Please submit a copy of public statements, press releases, and marketing or promotional materials to PSCCapitalProjectsFund@wisconsin.gov prior to publication.
 - The Commission will review the material and will request changes if necessary. You *do not* need to wait for review and approval prior to publication.
 - Statements, press releases, and marketing or promotional materials describing the grant project must comply with the provisions in the Grant Agreement. The calculation of the percentage of the total cost of the project financed with federal funds should be based on the projected total cost of the grant project identified in the Grant Agreement at the time of the statement.
- 3.4. If my company merges with or is purchased by another company, does the Grant Agreement still stand?
- No, the Grant Agreement does not automatically transfer to a new company. The Grant Agreement requires prior written consent of the Commission for transfer of the grant project to a new company. You must notify the Commission if your company is to merge with or be purchased by another company to continue receiving grant funds. Requests for Commission approval should be submitted to PSCCapitalProjectsFund@wisconsin.gov. If approved, the Commission will work with relevant parties to amend the grant agreement as necessary.
- 3.5. My entity is excluded from complying with single audit requirements under 2 CFR 200. Do I still need to comply with Grant Agreement provisions 4.2, 4.3, 4.4, 4.6?
- Entities excluded from complying with single audit requirements under 2 CFR 200 still need to comply with Grant Agreement Provisions 4.2 through 4.6.
- 3.6. When is a Grant Agreement amendment needed?
- An amendment is required when certain changes in the grant project's scope, budget, or timeline is being requested. Examples of potential changes include:
 1. A change in the Project or activities, as described in Attachment B – Project Scope.
 2. Any change in the list of expenses, contributions or in-kind, as described in Attachment C – Project Budget.

3. A transfer of funds among cost categories that exceeds or is expected to exceed ten (10) percent of the approved total project budget.
4. A significant change to the anticipated project timeline, such as to extend the performance period.
5. Work with the Commission to determine whether changes to a grant project’s scope, budget, or timeline are significant and require an amendment. Questions and requests relating the Grant Agreement amendment should be submitted to PSCCapitalProjectsFund@wisconsin.gov

3.7. Do contractors/subcontractors need to complete the affirmative action documentation?

- Direct contractors to the subrecipient will need to complete affirmative action documentation. Any organizations working as subcontractors to these direct subcontractors will not need to complete the documentation. See the chart below.

DOCUMENT	DOCUMENTS NEEDED		WHO NEEDS TO COMPLETE	
	Plan	Exemption	Grantee	Direct Subcontractor
DOA-3784 WISCONSIN AFFIRMATIVE ACTION PLAN CONTRACTOR DATA	X		X	X
AFFIRMATIVE ACTION PLAN	X		X	X
DOA-3024 REQUEST FOR EXEMPTION FROM SUBMITTING AFFIRMATIVE ACTION PLAN CONTRACT COMPLIANCE PROGRAM		X	X	X
DOA-3023 CONTRACTOR'S SUBCONTRACTOR LIST	X	X	X	X

4. Webinars

4.1. Will webinars be offered for grant recipients?

- As we continue through the grant cycle, we may offer further webinars on particular topics like reimbursement or monitoring.
- Please submit any requests for additional webinars to PSCCapitalProjectsFund@wisconsin.gov.

5. Reporting

5.1 What reports are required for CPF Broadband Infrastructure Grants?

- At this time there are two types of required reports:
 1. Quarterly Reports: These will be required quarterly. More details on quarterly reports are provided below.
 2. Final Reports: Final reports will be due no later than 30 days after project completion. A project is considered complete when all construction is done, and service is available for customers and all requests for reimbursement have been submitted.

CPF Reporting Deadlines

Year	Quarter	Period Covered	Due to PSC
2024	Q2	April 1 - June 30	July 10, 2024
	Q3	July 1 - September 30	October 10, 2024
	Q4	October 1 - December 31	January 10, 2025
2025	Q1	January 1 - March 31	April 10, 2025
	Q2	April 1 - June 30	July 10, 2025
	Q3	July 1 - September 30	October 10, 2025
	Q4	October 1 - December 31	January 9, 2026
2026	Q1	January 1 - March 31	April 10, 2026
	Q2	April 1 - June 30	July 10, 2026
	Q3	July 1- September 30	October 9, 2026
	Q4	TBD	TBD
Final Report		End of Project*	Within 30 Days of Project Completion

*Final reports are due when the project is completed; may be prior to end of performance period. [Source: SLFRF-Compliance-and-Reporting-Guidance.pdf \(treasury.gov\)](#)

5.2 How do I file my reports?

- File your reports through the [PSC Grant Management System](#)

5.3 What happens if I don't file my report on time?

- If you fail to complete a report on time, you will not be paid out any reimbursements until you do file. You must be caught up on ALL quarterly reports to receive reimbursement. We will send a reminder email on the first business day after the due date if you have not submitted a report. If a complete report is not submitted in a timely manner, the PSC may file an official cure letter on ERF. This letter would give you 30 days to either upload the completed report, provide the PSC with a sufficient explanation on why the report has not been submitted yet, or withdraw from the grant agreement (including a claw back of any funds already paid out). Please refer to your Grant Agreement for more information.

6. Reimbursement

6.1 What kind of documentation does the PSC require for reimbursement?

- With each request for payment, you must include a copy of an invoice or receipt for each Eligible Cost item. **No funds will be reimbursed without proper documentation that funds have actually been spent.** The same level of documentation is also required for all cash match claimed. See Section 3.0 of your Grant Agreement for more detailed documentation requirements.

6.2 How do we represent cash and in-kind matches on the reimbursement request?

- Each budget category will have a section for grant funds and a section for matching funds. Both in cash match and in-kind match invoices should be listed in the match section. You will not need to differentiate between cash and in-kind match on the reimbursement request form. However, you will need to report and differentiate between the two on quarterly reports.

6.3 How do I determine which budget category to place an expense in?

- There are seven budget categories. You can find each category and its description on the [CPF Budget Categories reference sheet](#).
- *Fiber construction will be contracted out to a 3rd party construction firm. Should all associated labor costs be categorized under "Contractual"?*

- i. Yes – all associated third-party labor should go under “Contractual, Consulting Fees” budget category. However, if any materials are purchased by the grantee (not the contractor); those costs would be reflected in the equipment or supplies budget category.
- *Fiber and various associated materials don’t have “unit costs” exceeding \$5000. How should they be categorized. As “Supplies”?*
 - i. Yes – these types of costs can be categorized as “Supplies”. - RD FAQ Email
- *What level of granularity is desired? A single or multiple line items per category? For materials, how specific does our BOM need to be? Can we aggregate small items?*
 - i. The grant application requires a summation of all costs within a budget category; a granular breakdown of materials costs is not being requested.

6.4 Can grant funds be used to reimburse labor expenses of the owner?

- Recouping of salary is limited to actual wages paid. If you own your business and pay yourself wages, you may use grant funds to reimburse these expenses when included in the project budget.

6.5 What if my project exceeds the application budget?

- The PSC will not increase your original award. Any over budget funds would need to come from match (which can include third party contributions). These additional costs should still be reported in the match sections of your reimbursement requests.

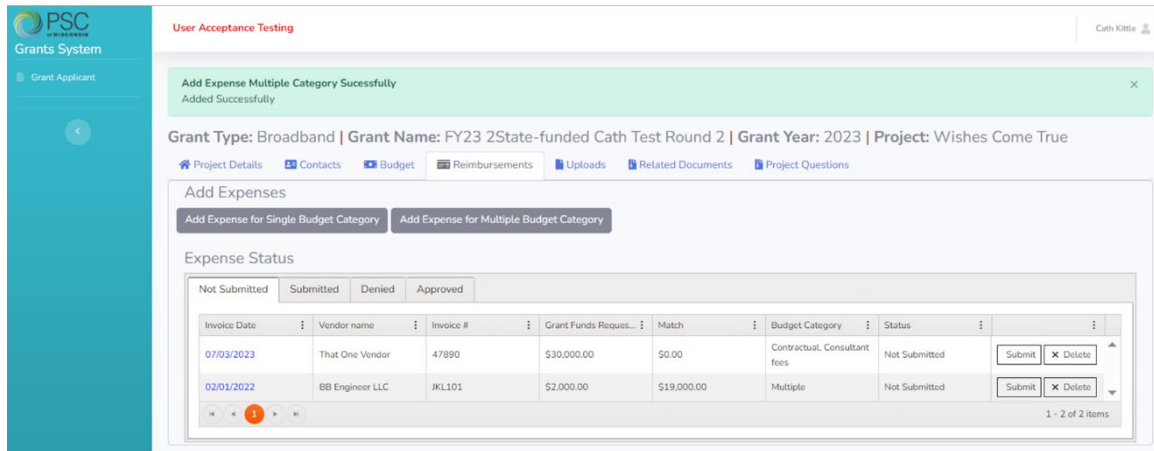
6.6 If I will not be spending out my budget in a specific category, can I still spend the funds in a different category?

- There are a few options in this situation:
 1. If the amount leftover exceeds ten percent of the approved total project budget, the agreement will require an amendment to update the approved budget. Reach out to the Federal Grants Team to request an amendment PSCCapitalProjectsFund@wisconsin.gov.
 2. If the amount leftover is below ten percent of the approved budget, you are free to spend those funds across different categories. To account for these changes, you should input additional charges/invoices in the applicable section (grant or match) in the budget category that you want to spend the funds in. The balance for the section will show that there is an overage (font will turn red), which is okay as long as the total amount of overages across ALL sections does not exceed that ten percent of the total approved budget.

These overages will be balanced out by a deficit of the same amount in another section. For example, if there is an invoice that puts the grant sections of your Contractual, Consultant Fees over by \$5,000, it would be expected that another grant category of yours would be under by at least that same amount. Note, this ten percent is only considering funds that are being moved to different categories and includes both matching and grant funds.

6.7 Can I split an invoice on my reimbursement request?

- Yes, expenses from a single invoice can be split across budget categories and/or across grant and match. In the ‘reimbursements’ section of the grants system (within your awarded project), there are options to “Add expense for Single Budget Category” and “Add Expense for Multiple Budget Category”. Within each of those is the option to split reimbursements expenses across grant and match.



6.8 How often can I file Reimbursement Requests (RRs)?

- As often as you like.

6.9 Can you provide a template/example for “Attachment C”? “Project Budget”

- “Attachment C – Project Budget” is automatically generated on our end based on the information provided in the budget section of the grant application. Nonetheless, here’s an example of what that will look like:

ATTACHMENT C - PROJECT BUDGET

BUDGET & INCOME SUMMARY

Grant Summary

Awardee:	#N/A
Project:	#N/A
Award UID#:	#N/A

Budget	Total Award	Total Match	Total Project
Amount	#N/A	#N/A	#N/A

Budget Detail

Budget Category	Grant Funds	Matching Funds	Total
Contractual, Consultant fees	\$ -	\$ -	\$ -
Equipment	\$ -	\$ -	\$ -
Labor (Salary, Fringe)	\$ -	\$ -	\$ -
Other	\$ -	\$ -	\$ -
Permitting, Licensing fees	\$ -	\$ -	\$ -
Supplies	\$ -	\$ -	\$ -
Travel	\$ -	\$ -	\$ -
Total	\$ -	\$ -	\$ -

Pledged Contributions

Entity	Entity Type	Pledge	Pledge Type
Total		\$ -	

6.10 Are pre-award Costs eligible for reimbursement?

- Limited expenditures for pre-award planning costs (incurred prior to the date the Commission issued the order approving awarding grant funds) may be eligible as long as they are used exclusively for the project. For example: expenditures for community planning and pre-engineering ([CPF FAQ 4.10](#)).
- Costs associated with materials are eligible pre-award costs: costs incurred prior to an ISP receiving an award are reimbursable to the extent that they would have been allowable if incurred after the date of the federal award or subaward

(for example, if an ISP purchased fiber or other broadband equipment in advance of being awarded a subaward or contract). [SLFRF and CPF Supplementary Broadband Guidance p.3](#)

- Costs associated with the actual building of broadband infrastructure are not considered eligible pre-award costs.