



Federal Broadband Grant Monitoring, Compliance, and Documentation

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Wisconsin Broadband Office

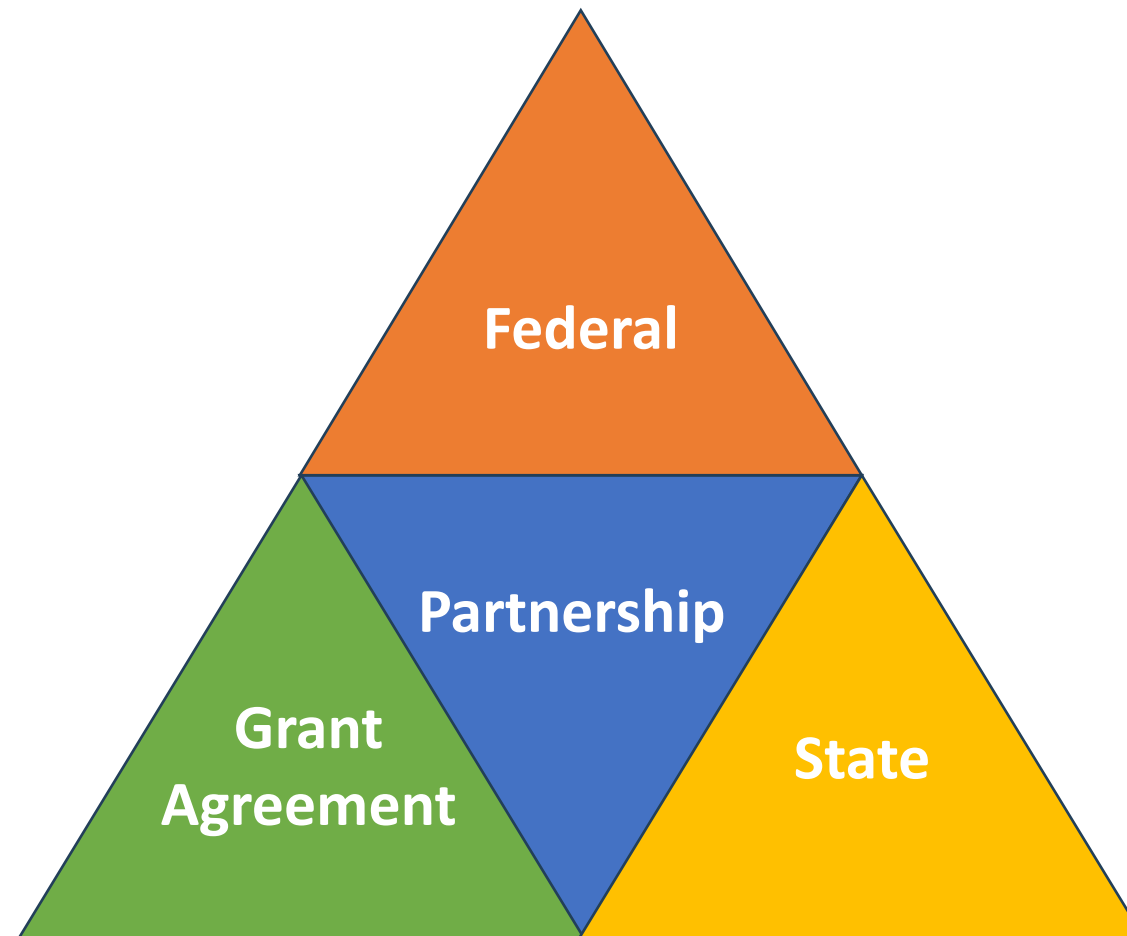
Information contained in this webinar is specific to the Capital Projects Fund (CPF) Broadband Infrastructure (BI) Grant Program

1. Monitoring Purpose and Process
2. Types of Monitoring
3. Monitoring Report Overview
4. Monitoring Resources
5. Desk Review Survey Documentation
6. Preparing for Desk Reviews

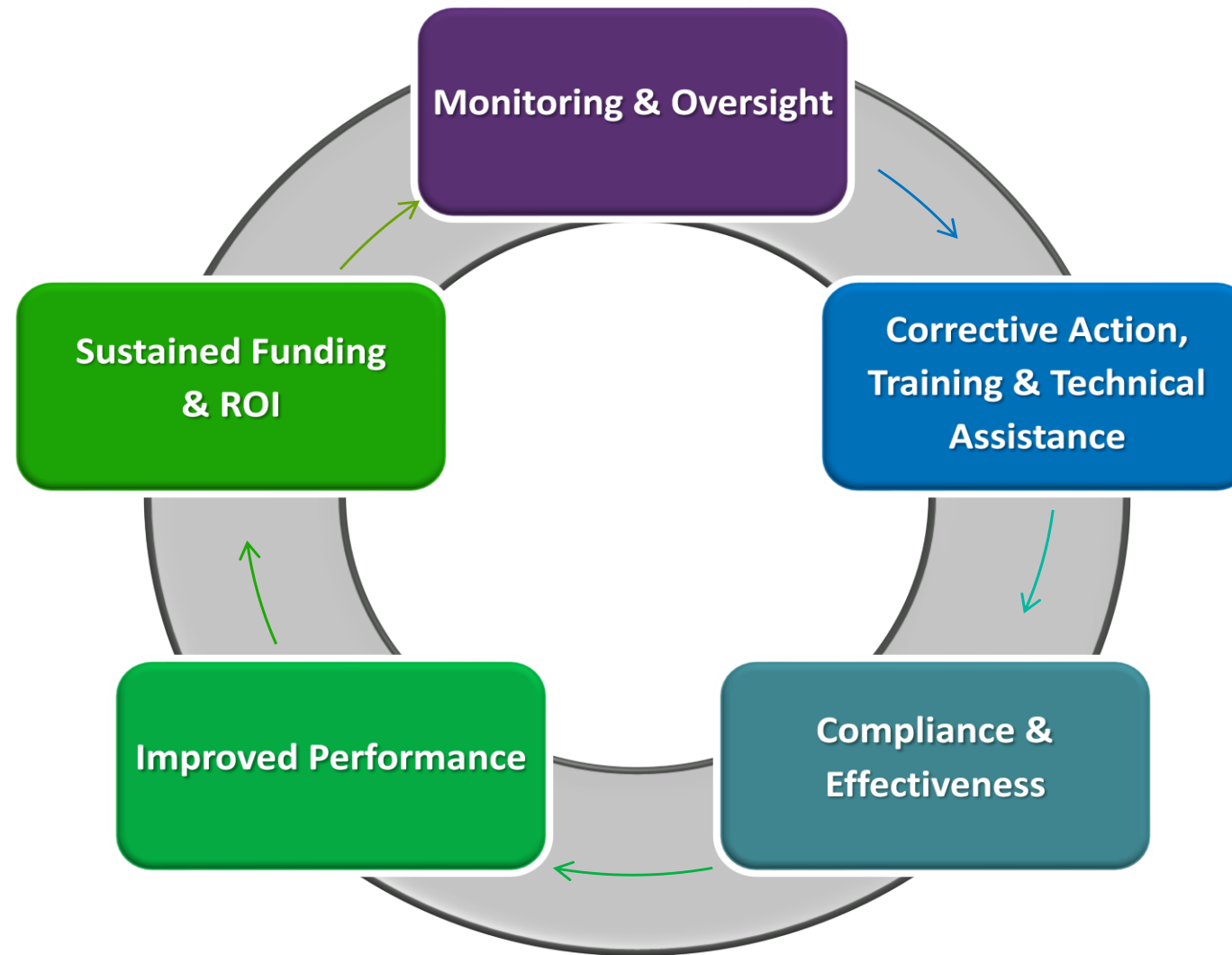
1. Identify why grant compliance and monitoring are important
2. Gain understanding of monitoring procedures
3. Build knowledge and awareness to implement policies/procedures related to applicable requirements

Why Monitor Grant Compliance?

Grant compliance and monitoring provides the opportunity for training and support to help grantees feel more empowered to manage federal awards and seek future broadband funding.



Monitoring Drives Continuous Improvement



[CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

At this time, the Capital Projects Fund (CPF) Grants will be monitored based on the Uniform Guidance available prior to October 1, 2024. This is subject to change and the PSC will continue to update subrecipients.

Uniform Guidance Updates



https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

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Title 2

Displaying title 2, up to date as of 10/23/2024. Title 2 was last amended 10/02/2024. [view historical versions](#)

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PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

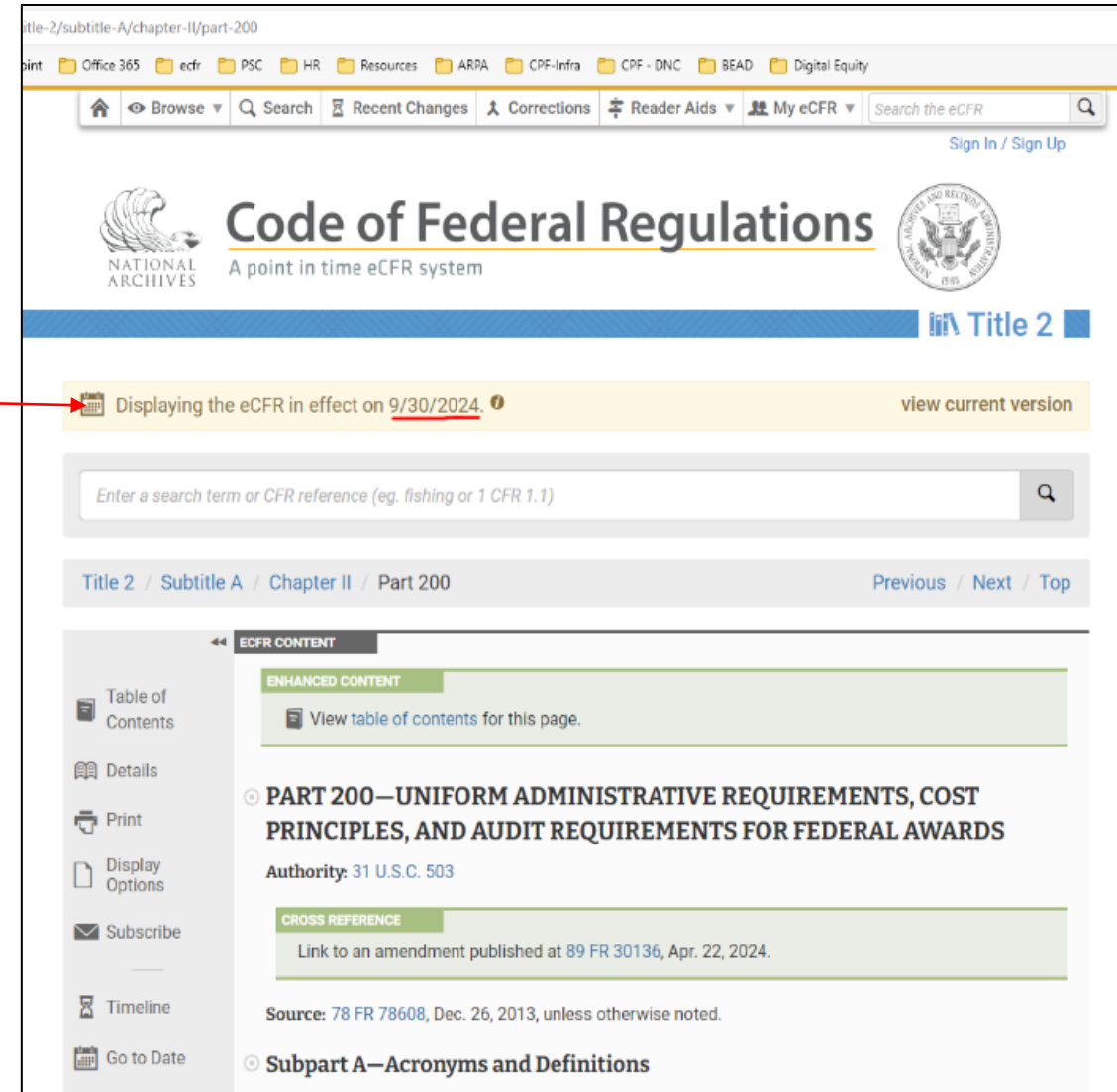
Authority: 31 U.S.C. 503; 31 U.S.C. 6101-6106; 31 U.S.C. 6307; 31 U.S.C. 7501-7507.
Source: 89 FR 30136, Apr. 22, 2024, unless otherwise noted.

Subpart A—Acronyms and Definitions

ACRONYMS

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PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

Authority: 31 U.S.C. 503

CROSS REFERENCE

Link to an amendment published at 89 FR 30136, Apr. 22, 2024.

Source: 78 FR 78608, Dec. 26, 2013, unless otherwise noted.

Subpart A—Acronyms and Definitions

Types of Monitoring



**Quarterly, Final &
Post-Award
Reporting**



**Reimbursement
Request Reviews**



Intake Questionnaire



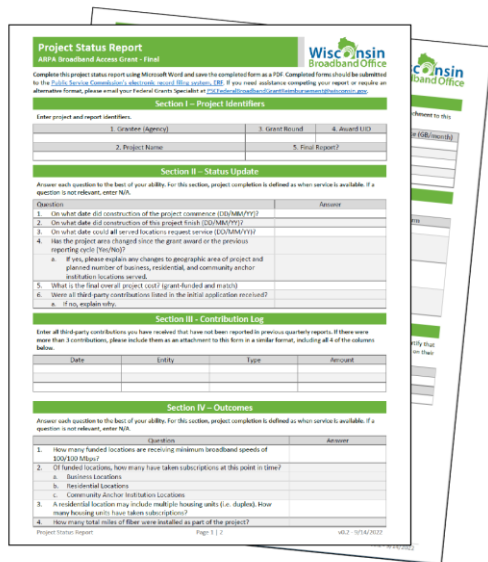
Desk Review



Site Review



**Program Review &
Spatial Reporting**



Project Status Report
Add a Broadband Service Report - Final

Complete this project status report using Microsoft Word and save the completed form as a PDF. Completed forms should be submitted to the Public Service Commission, Attention: Broadband Office, PSC, 1000 Wisconsin Street, Madison, WI 53703. If you need assistance completing your report or require an alternative format, please email your Project Growth Specialist at CPF@psc.wisconsin.gov.

Section I - Project Identifiers

Enter project and report identifiers.

1. Grant Agency	3. Grant Period	4. Award EID
2. Project Name	5. Final Report?	

Section II - Status Update

Answer each question to the best of your ability. For this section, project completion is defined as when service is available. If a question is not relevant, enter N/A.

Questions:

- On what date did construction of the project commence (DD/MM/YYYY)? Answer
- On what date did construction of the project finish (DD/MM/YYYY)?
- On what date could all served locations request service (DD/MM/YYYY)?
- Has the project been changed since the grant award or the previous reporting cycle (Yes/No)?
 - If yes, please explain any changes to geographic area of project and planned number of business, residential, and community anchor institution locations served.
- What is the final cost of project (total grant funded and match)?
- Were all third party contributions listed in the initial application received?
 - If no, explain why.

Section III - Contribution Log

Enter all third party contributions you have received that have not been reported in previous quarterly reports. If there were more than 3 contributions, please include them as an attachment to this form in a similar format, including all 4 of the columns below.

Date	Entity	Type	Amount

Section IV - Outcomes

Answer each question to the best of your ability. For this section, project completion is defined as when service is available. If a question is not relevant, enter N/A.

Question	Answer
1. How many funded locations are receiving maximum broadband speeds of 100/20 Mbps?	
2. Of funded locations, how many have taken subscriptions at this point in time? <ol style="list-style-type: none">Business LocationsResidential LocationsCommunity Anchor Institution Locations	
3. A residential location may include multiple housing units (i.e. duplex). How many housing units have taken subscriptions?	
4. How many total miles of fiber were installed as part of the project?	

Project Status Report Page 1 of 2 v6.2 - 10/14/2022

- Quarterly: Inform WBO of the status of your project
- Final (end-of-project): Includes the final report form, location data file in addition to optional submissions of photos, press releases, and CPF engagement programs
- Post-Award: Gathers information on additional subscribers over two years post project close
- Additional Reporting information can be found on the CPF Broadband Infrastructure webpage at [PSC Capital Projects Fund Broadband Infrastructure \(wi.gov\)](https://www.wisconsin.gov/CPF)

- Provides verification of allowable costs and budget category spending
- Submitted with supporting documentation, such as receipts, invoices, and labor information
- Report filings must be up-to-date to receive reimbursement
- Additional Reimbursement information can be found on the CPF Broadband Infrastructure webpage at [PSC Capital Projects Fund Broadband Infrastructure \(wi.gov\)](https://www.wisconsin.gov/cpf/broadband)



- Conducted after the grant agreement is signed
- Important tool used to identify program risks
- Aids in prioritizing grantees for technical assistance and monitoring



Desk Reviews:

- Conducted virtually for all grantees selected for monitoring
- Determine compliance with administrative, financial management, and programmatic operation requirements
- Each Desk Review Survey is tailored to the grantee's project and specific needs

Site Reviews:

- Prompted when the intake questionnaire, desk review concerns, or other risk indicator arise regarding capacity to administer the award
- Conducted in-person
- May include: Interviews, tours, additional document requests & other items as needed

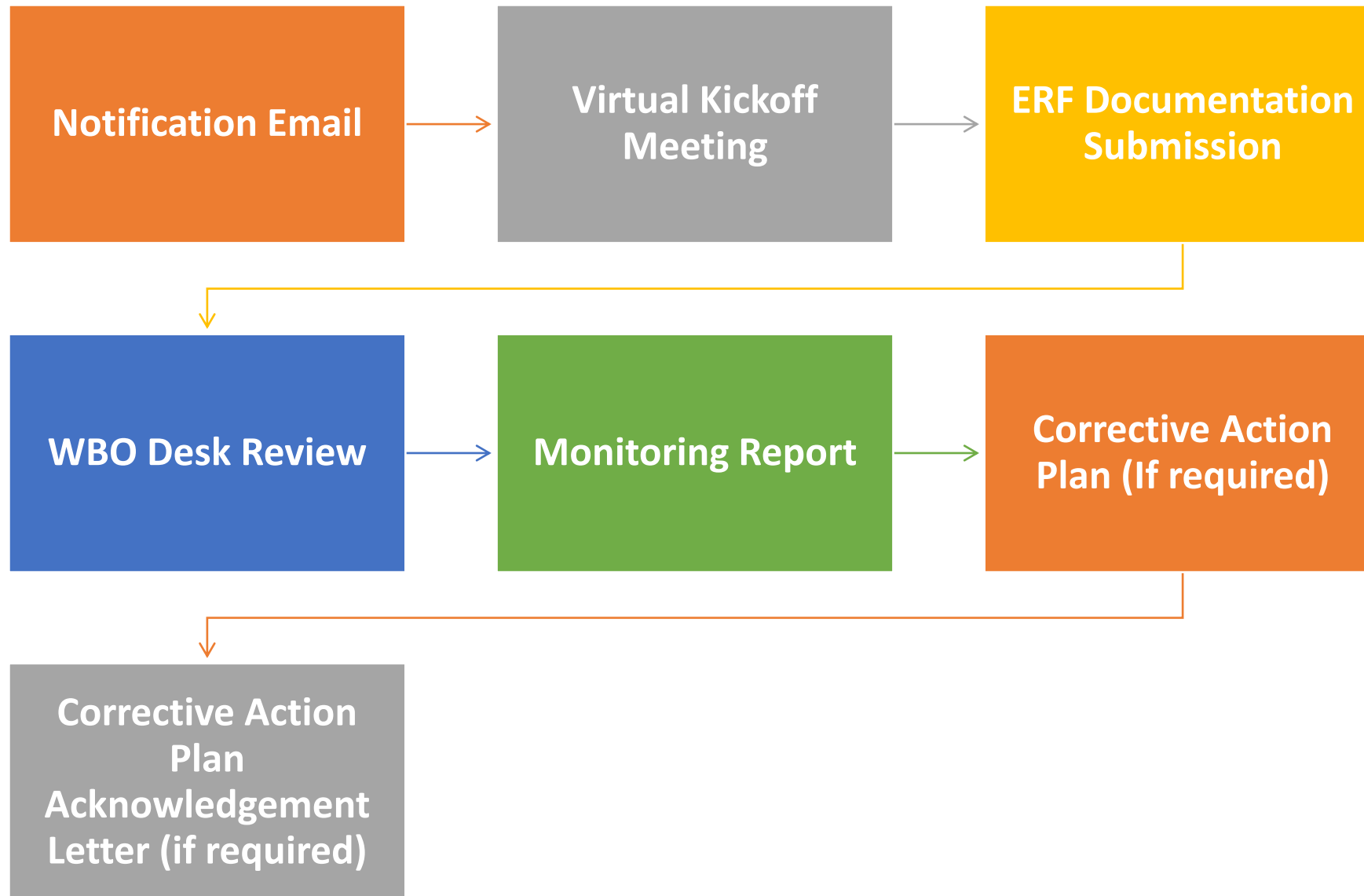
Program Reviews:

- Conducted at time of final reporting and includes contacting customers subscribed to service funded by the federal award to ensure project outcomes and completion

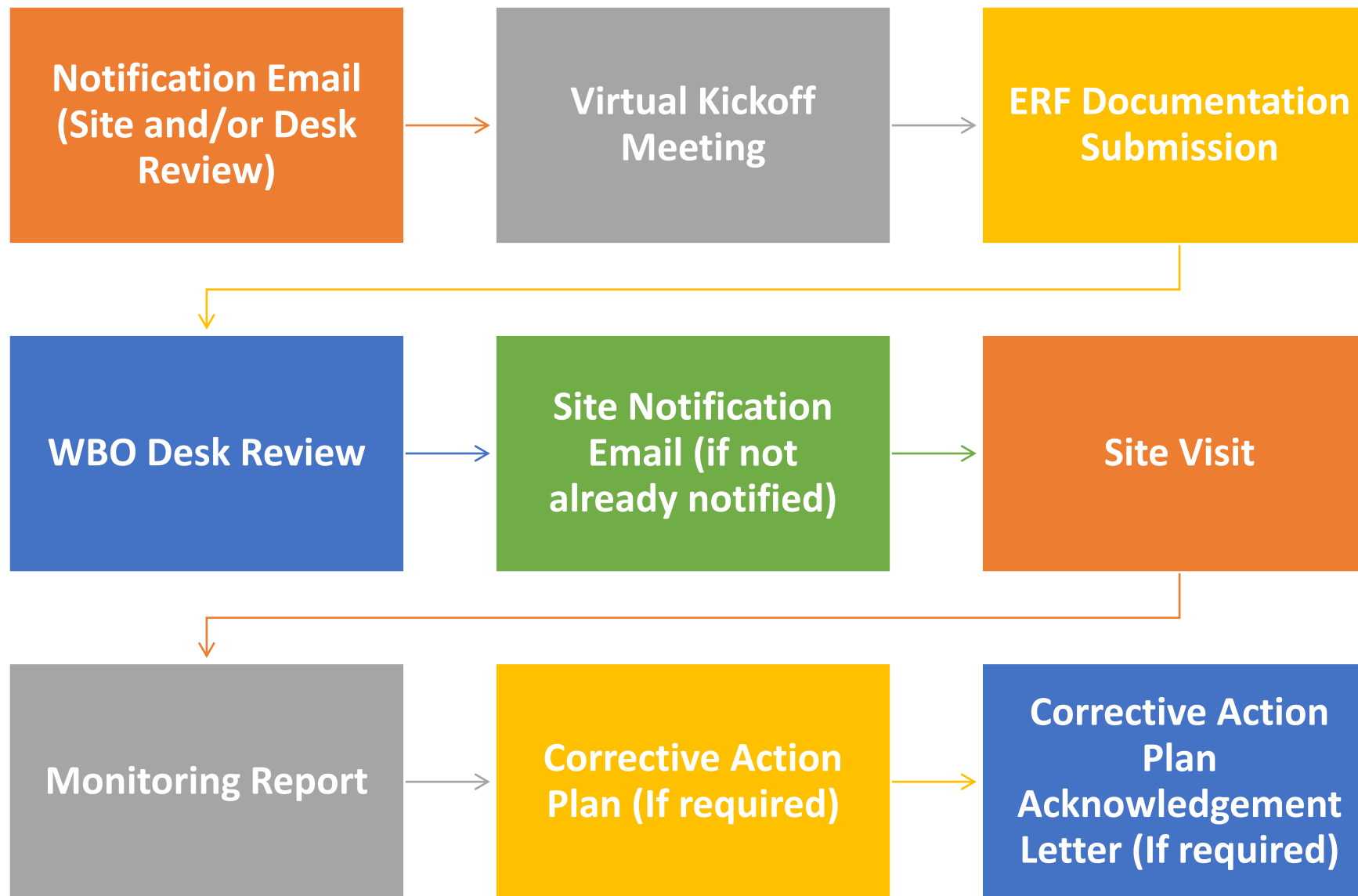
Spatial Reviews:

- Conducted during application process and final reporting to determine if final location count, geographic area, and Broadband Serviceable Locations (BSL) matches the original application or project scope amendment

Types of Monitoring: Desk Review Process



Types of Monitoring: Site Review Process

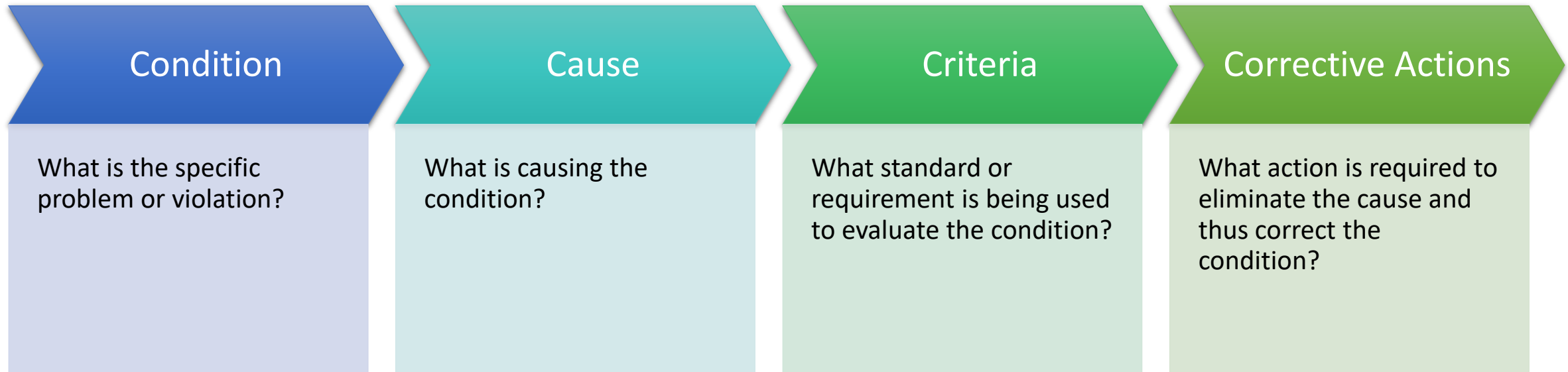


Finding

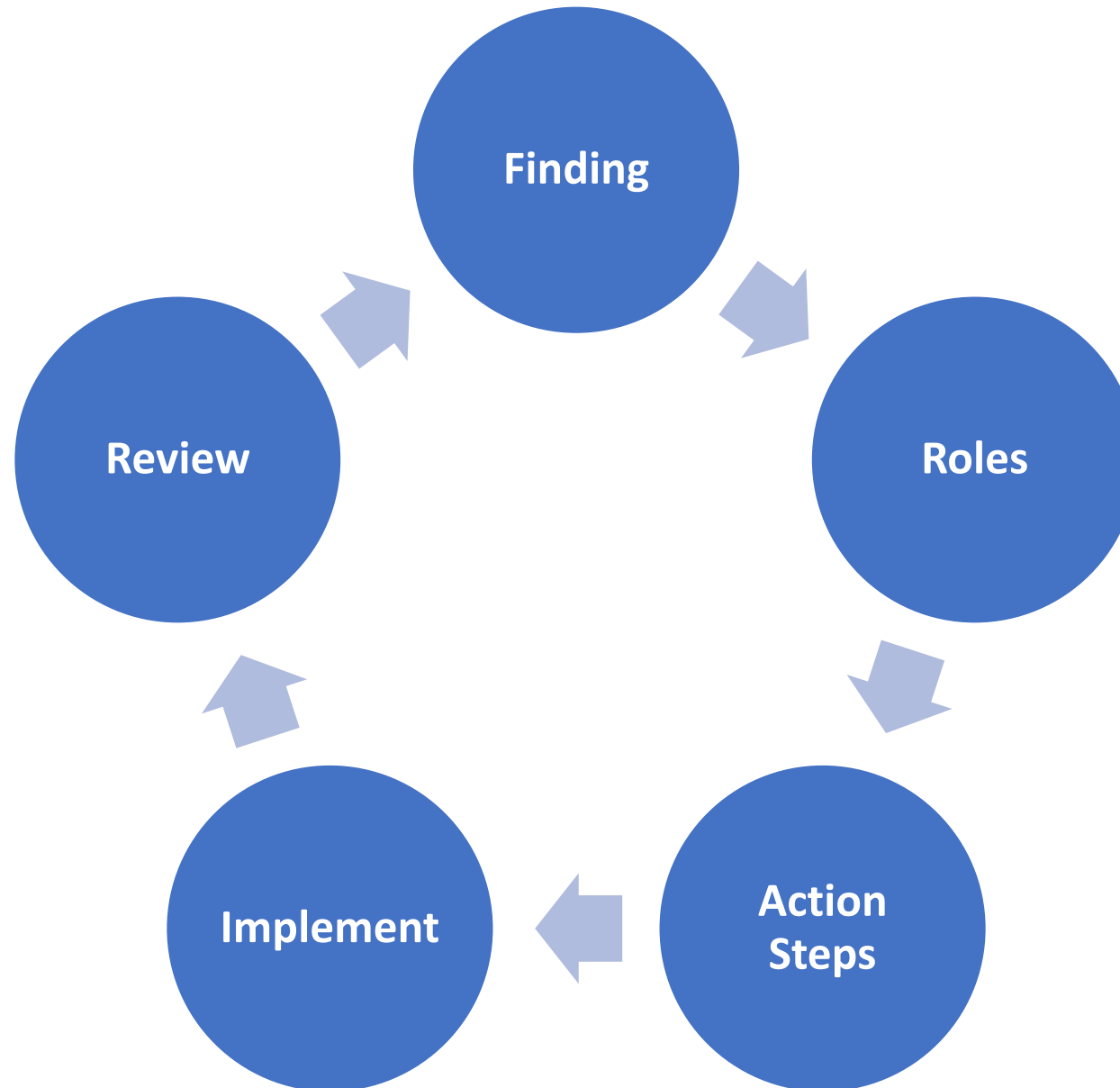
- An area of concern which presents a failure to meet internal control standards, a requirement of regulations, or grant agreement terms and conditions; findings will usually require further follow-up actions by the subrecipient and WBO

Observation

- Is not a specific compliance violation but may have negatively impacted the program or could lead to a finding in the future if not addressed. Typically, no corrective action is required but may instead include suggestions for improvement



Corrective Action Plan (CAP)



Records Management

- Record retention schedules that meet Grant Agreement requirements

Property Management

- Identify and account for inventory/equipment purchased through federal funding
- Address security of facilities and equipment

Internal Controls

- Do not rely on common practice
- Have written policies and procedures

- Monitoring reviews **DO NOT** encompass all areas of the Grant Agreement or related state and federal regulations
- Provide a compliance check on a subset of items
- Grantees should rely on the Grant Agreement and applicable state and federal regulations when developing policies and procedures related to their projects

Service Design and Delivery

- ✓ Implementation
- ✓ Program Services

Program Operations

- ✓ Budget
- ✓ Property Management
- ✓ Contract Administration
- ✓ Performance Management
- ✓ Records Management
- ✓ Personnel
- ✓ Civil Rights and Notices

Financial Management

- ✓ Internal Controls
- ✓ Payment and Cash Management
- ✓ Allowable Costs and Cost Classification
- ✓ Audits

Documentation	Requirement	Tips for Your Desk Review
Provide any statement, press releases or any marketing or promotional materials describing the project	Grant Agreement	<ul style="list-style-type: none">CPF Infrastructure specific language requirements, “This project [is being] [was] supported, in whole or in part, by federal award number CPFFN0201 awarded to [name of Recipient] through \$[grant award amount] of funds from the U.S. Department of the Treasury through the American Rescue Plan Act and the State of Wisconsin, acting by and through the Public Service Commission of Wisconsin.”
Organization Chart	Grant Agreement	<ul style="list-style-type: none">An organization chart helps with understanding the ownership and management structure.

Documentation

Requirement

Tips for Your Desk Review

Proof of receipt of third-party pledged contributions

Grant Agreement

- At the time of monitoring provide proof of any third-party contribution received. If none have been received explain that in the desk review survey.
-

Documentation	Requirement	Tips for Your Desk Review
Equipment/Property Control Policy and/or Inventory Procedures	Grant Agreement 2 CFR 200.313	Procedures to account for federal property / equipment. This includes but is not limited to: <ul style="list-style-type: none">• Procedures for safeguarding property such as security of facilities, receiving procedures, and insurance.• Physical inventory procedures.
Certificate of Liability Insurance showing proof of motor vehicle insurance	Grant Agreement	
Supplies Policy and/or Procedures	Grant Agreement	

Documentation

Requirement

Tips for Your Desk Review

Contractor Agreement

Grant Agreement

Entities should have written contracts, agreements, and/or agreed upon pricing covering the scope of work with their subcontractors.

Documentation

Requirement

Tips for Your Desk Review

Record Retention Policy

Grant Agreement

Retain grant related records and files for at least five years following final payment of the Grant Award.

Documentation	Requirement	Tips for Your Desk Review
<p>Personnel Policies and Procedures, Employee Handbook</p> <p>If including Labor in award budget, also must keep qualification requirements documented for grant-award related positions</p>	<p>2 CFR 200.300 Grant Agreement</p>	<p>Personnel policies and procedures in place that align with state statute, federal regulations, and the grant agreement.</p> <p>If a grantee includes labor in their grant budget, they must have position descriptions or other documentation which includes qualification requirements for positions funded in part by grant funding.</p>
<p>Conflict of Interest Policy</p> <p>In addition to the policy provide proof that directors and staff have received and reviewed the policy</p>	<p>2 CFR 200.318(c) Grant Agreement Wis. Stat. §§ 180.0831, 180.1911(1), and 181.0831</p>	<p>Written standards of conduct covering the actions of employees engaged in the selection, award, and administration of contracts.</p>

Documentation	Requirement	Tips for Your Desk Review
Picture of Know Your Rights: Workplace Discrimination is Illegal	Grant Agreement 2 CFR 200.300	Personnel policies and procedures in place that align with state statute, federal regulations, and the grant agreement.
Drug Free Workplace Statement and Posted Notice	Grant Agreement 31 CFR Part 20	
Picture of posted Wisconsin Contract Compliance Law Poster	Wisconsin Statute § 16.765 Wisconsin's Contract Compliance Law	
Protections for Whistleblowers	Grant Agreement	

Documentation	Requirement	Tips for Your Desk Review
Accounting Manual/ Financial Management Procedures	2 CFR 200.302 2 CFR 200.303	<p>Ensure there are standards for internal control in place, supported by approved policies. This includes but is not limited to:</p> <ul style="list-style-type: none">• Processes used for recording and reporting of financial transactions• Segregation of duties• Consistent journal and account reconciliation• Standard approval processes for paying invoices and vouchers• Chart of Accounts• Detailed accounting procedures.
Purchase Order Balance Sheet & Chart of Accounts		
Timesheet(s) with corresponding fringe calculations, as applicable	Grant Agreement 2 CFR 200.430	
Bank account reconciliation(s) and corresponding bank statement(s)	2 CFR 200.302 2 CFR 200.400(a)	

Documentation

Most recent single audit report, which is required of a non-Federal entity that expends \$750,000 or more in federal awards during the non-Federal entity's fiscal year

If a single audit report is not required, must submit any other type of audit or financial management review conducted by a third party including any schedule of findings and responses

Requirement

[2 CFR 200.501](#)

Grant Agreement

Tips for Your Desk Review

Determination of whether the audit report contains any findings or questioned costs related to the federal grant project(s). If so, has there been resolution to the conditions found in the audit report.

- Submit via [Electronic Records Filing System \(ERF\)](#) using your monitoring specific docket number provided in your Desk Review Notification
 - If monitored during ARPA you will use the same docket number
 - *Please note that this process is subject to change and the PSC will update grant recipients if changes occur.*
- Use the document naming convention outlined in your Desk Review Survey
 - Example: CPF, 1. Publicity
- Convert each documented associated with a specific data element identified in the Desk Review Survey Checklist into a PDF and upload separately.
 - Do not upload one PDF with all supporting documentation

- Must be a reasonable basis to conclude that the record, or portion of a record, is confidential such as trade secrets
- Upload the confidential file for WBO staff and a public redacted copy
- Notary is required as part of confidential requests
- More information can be found in the [ERF User Manual](#)

- Confidentiality Reasons:

- The record contains trade secrets as define dis Wis. Stat. 134.90
- The record contains information which would aid a competitor of a **public utility** in competition with the public utility making the request under Wis. Stat 196.14
- The record is an accident report under Wis. Stat 196.72
- The record is protected business information under Wis. Stat 196.795(9)
- The record may otherwise be exempt from disclosure under the Public records Law, Wis. Stat. 19.31 to 19.39

- More information can be found in the [ERF User Manual](#)

- Read the grant agreement and applicable federal and state regulations
- Ensure policies are up to date, in place, and comply
- Train staff on new or updated policies and procedures
- Reach out to WBO staff



Questions? Connect with Us

PSCCapitalProjectsFund@wisconsin.gov

[PSC Capital Projects Fund Broadband Infrastructure \(wi.gov\)](https://www.wisconsin.gov/PSC/CapitalProjectsFund/BroadbandInfrastructure)

Thank you for your partnership!