



# Wisconsin BEAD Grant Agreement Overview for Subrecipients

March 16, 2026

# BEAD Grant Agreement (GA) Overview



All terrestrial Grant Agreements include:

- The PSC BEAD Standard Terms and Conditions (same for all)
- Attachment A: BEAD Program and Performance Requirements (same for all)
- Attachment B NEPA requirements (same for all)
- Attachment C: Federal Interest Requirements (same for all)
- Attachment D: Scope of work (specific to the project)
- Attached E: Budget and match requirement (specific to the project)
- All grant agreements incorporate the following: IIJA, General BEAD guidance, BEAD NOFO, General Terms and Conditions for NTIA BEAD Program, BEAD Restructuring Policy Notice and DOC Financial Assistance Standard Terms and Conditions.
- The Grant Agreement must be signed by the AOR and returned within 60 days of the initial offer or the Grant Agreement may be withdrawn.

# Requirements Before Receiving GA



- UEI registration in SAM.gov
- Professional Engineering Certification submitted and approved
- LOI / preliminary award conditions met
- Letter of Credit
- Cybersecurity, SCRM and BABA plans submitted and approved
- Low-Cost Service Option consistent with application submitted and approved
- Project scope of work finalized
- NEPA Subproject determinations
- Tribal Consent, if applicable

With the BEAD awarding process complete, the docket 5-BD-2025 will no longer be used for filings related to specific BEAD projects.

The docket 5-BD-2025 will still be used related to BEAD letter of intent filings and some associated required documents.

The Commission has created separate dockets for each BEAD subrecipient and will use those dockets to file future documentation related to each subrecipient's respective projects, including grant agreements, reporting, amendments, monitoring and other correspondence. [viewdoc.aspx](#) (PSC REF 577167)

The PSC Grant System will be the primary way for subrecipients to document costs and match, submit reports, upload onboarding documents and indicate a milestone is complete and ready for Commission review.

# Requirements After Executing GA



The Grant Agreement outlines some general requirements that need to be completed quickly after execution.

1. Intake Questionnaire (Part of Milestone #1)
2. Protecting the BEAD Program from Defaults Certification (Section 4.0)
3. Affirmative Action Documentation (Section 27.0)
4. Pre-Construction NEPA and Permitting Timeline (Attachment B)
5. Performance Bonds (Section 8.0)
6. Environmental Impact and Documentation Screening (Attachment B)

You will receive an email with additional details about how to submit this documentation.



Protecting the BEAD program from  
Default certification (15 business days  
from Grant Agreement execution)

## Key Action Items:

- Must use the text in the Grant Agreement
- Must be on your letterhead
- Must be signed by AOR
- Upload to your BEAD project docket using document type "Attestation"

Performance Bonds due within 60 days of Grant Agreement execution, if not using a Letter of Credit.

**Key Resource:**

[BEAD Letter of Credit Waiver | BroadbandUSA](#)

- Grant Awards and any contracts in place with payments over \$50,000 are required to submit affirmative action documentation.
- Subrecipients are responsible for keeping their affirmative action documentation up to date. As new contractors are added to the project, affirmative action documentation will need to be updated.
- Required documentation may include a full affirmative action plan or exemption. Specific instructions will be sent out at Grant Agreement execution.
- Affirmative action documentation is due within 15 working days of Grant Agreement execution. We will reach out with more information at execution

# Build America, Buy America (Section 3)

Build America, Buy America (BABA) is required for all BEAD projects

- Subrecipients are responsible
- Need it from pre-award on
- Documentation is critical:
  - from all subcontractors and vendors;
  - for all products delivered to the project site;
  - for payment requests and monitoring by WBO;
  - for reporting.
- Waiver
- Reporting

## Key Action Items:

- Familiarize yourself with the equipment that must be made in the USA
- Refer to NTIA materials for the most recent guidance
- Collect self-certification letters from your manufacturers
- Prepare and submit semi-annual reports to the WBO

# Fixed Amount Subaward Milestones



Milestone #	Performance Requirement(s)	Evidence of Cost	Match	% of Award Payment
1	Executed Grant Agreement, Default certification, required Affirmative Action paperwork, Commission Onboarding Questionnaire, and LOC or bond	10%		10%
2	Submit EIDS packet and GIS files, permit attestation	20%		10%
3	NEPA Decision Memo for project or sub-project and evidence of a pre-construction meeting or meeting invitation	30%		10%
4	At least 25% of project construction is complete (service not required)	40%	25%	10%
5	At least 25% of the BSLs within the project scope of work have service	55%		15%
6	At least 50% of the BSLs within the project have service. All NEPA subprojects approved.	70%	50%	15%
7	At least 75% of the BSLs within the project have service.	85%	75%	15%
8	100% of the scope of work is completed and all required BSLs served; all grant close out reports submitted, all required inspections complete, and complete and approved network performance testing.	100%	100%	15%

# Evidence of Actual Paid Costs (Section 6)



- The evidencing of actual paid costs is a key component to reaching milestones and getting paid.
- Eligible Award and Pre-Award Costs
  - Basis for eligibility/allowability: IIJA, NTIA, 2CFR200, Grant Agreement
  - Some costs can be incurred as early as August 1, 2024 and up through the end of the period of performance.
  - Must be reasonable, necessary, allocable costs for proposed project (2CFR200 applies) and BABA compliant.
- Documentation of evidence of actual paid costs (Award funds)
  - Invoices/Receipts
  - Internal labor records (who, what, where, when)
  - Other: supplementary documentation/justification that provides a basis for determining allowability

# Evidence of Match Including In-Kind



- Match is required for this grant and required to reach some milestones
- Matching funds (1.22) – cash or in-kind contributions provided by subrecipient OR third-party contributions to meet the BEAD Program’s non-federal match requirement.
- Eligible Match Costs
  - Same as award costs, plus in-kind costs.
- Documentation of evidence of costs (Match funds)
  - Match Template – the Commission will provide a “match template” to record match expenses.
  - Matching funds expended on the grant project DO NOT require the submittal of the underlying cost documentation to the grant system but must be available upon request (i.e. invoice, labor record).
- In-kind requirements
  - Any match amounts associated with in-kind contributions requires documentation and justification of methodology used in the calculation of any in-kind contributions.

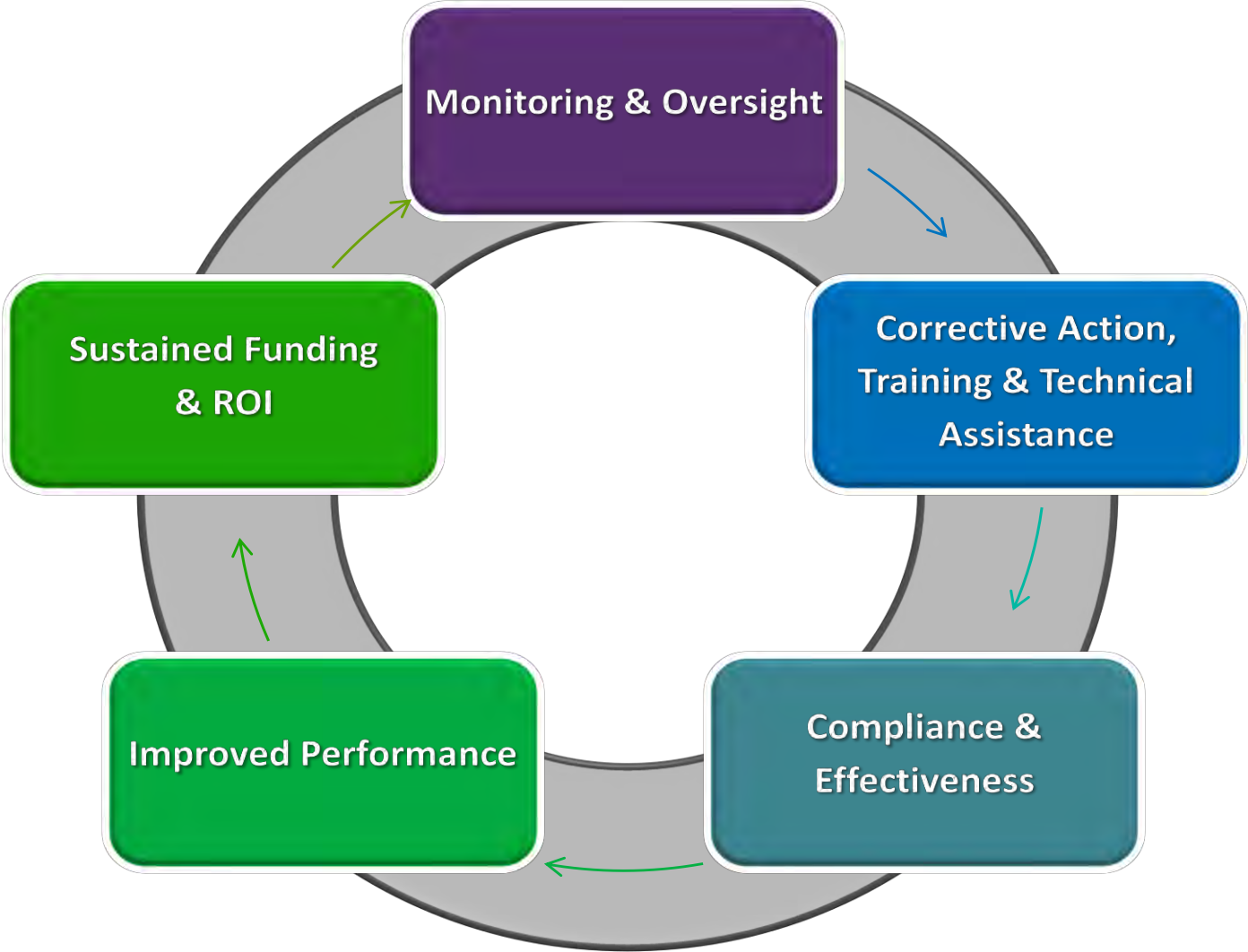
# Audit Requirement (Section 9)

- Everyone needs an audit
  - ...if they meet the criteria (\$1M+ in a fiscal year)
- Different types of audits (single audit vs. Financial or programmatic audits)

The Commission retains the right to request, examine, audit any records of the subrecipient involving the activities related to the grant award.

- Retain all records and files involving activities related to the Grant Award for duration of performance period and 4 years after project closeout.
- 10.6 - Acceptable financial records
- Inspections
  - The Commission intends to schedule inspections of funded broadband infrastructure facilities at any time
  - Guaranteed inspection prior to closing

# Monitoring Overview



# Insurance Requirements (Section 12)



- Commercial liability, bodily injury and property damage insurance against all claim(s) which might occur in carrying out this Grant Agreement. Minimum coverage is \$1 Million.
- Motor vehicle insurance for all owned, non-owned and hired vehicles that are used in carrying out this Grant Agreement. Minimum coverage is \$1 Million per occurrence combined single limit.
- Must comply with 2 CFR 200.310 to “provide the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property and equipment owned by the recipient or subrecipient” and with 2 CFR § 200.312 as applicable.

# Preventing Waste, Fraud and Abuse



The PSC Fraud, Waste and Abuse Hotline accepts tips and complaints about potential fraud, waste, abuse and mismanagement of PSC-administered federal grants. A professional staff member will review your information and determine the appropriate next steps. To report fraud, waste, abuse or mismanagement, please contact the PSC Fraud Hotline at 1-800-225-7729 or 1-608-266-2001 (Local).

Subrecipient must monitor award activities for common fraud schemes, including but not limited to: false claims for materials and labor; bribes related to the acquisition of materials and labor; product substitution; mismarking or mislabeling on products and materials; and time and materials overcharging.



# Amendments to the GA (Section 21)

- Request to the Commission for review and approval BEFORE making the change (via email: [PSCBEADGrants@Wisconsin.gov](mailto:PSCBEADGrants@Wisconsin.gov)).
- Amendments occur when there are any substantial changes, including (but not limited to):
  - Scope of work
  - Network design or any changes to technology type
  - Sources of match funding
  - Extensions to the Period of Performance
  - Change of network ownership
  - Locations being served
  - Changes to disbursement milestones

## Pre-Construction Utility meeting or Communication

- Provide notice to impacted utility owners of intent to construction the broadband facility
- Must request meeting at least 30 days prior to requesting locating utilities for project implementation
- Must provide the utility owners a project description, map and timeline of the project
- Must show proof of a meeting or declined meeting as a project milestone.

## Permitting reporting and roundtable obligations

- Must report to the Commission any delayed permits and attend any permitting roundtables as requested by the Commission or NTIA

## Low-Cost Service Offer (LCSO) Requirements

- Must offer low-cost service plan for eligible subscribers throughout federal interest period
- Must be consistent with low-cost offer in the grant agreement scope of work

## Network Capabilities and Access Requirements

- BEAD has very specific minimum technical requirements – make sure to familiarize yourself with these ([BEAD\\_Obligations\\_for\\_Subgrantees\\_Deploying\\_Network\\_Projects.pdf](#))

## Customer Connections

- **Standard installation:** Must be able to initiate broadband service within 10 business days of a request without additional charges or delays attributable to the extension of the service.
- A subscriber may not be required to make modifications to their own or surrounding property or be charged fees for the same in connection with the installation of broadband services funded by the BEAD Program.

# Penalties for Non-Performance or Non-Compliance



- Penalties can include but are not limited to: additional reporting requirements, curing, reduction in Award amount, de-obligation or claw back of funds.
- Penalties may extend through the Federal Interest Period (10 years after close).
- Grant performance includes meeting all the terms and conditions in the Grant Agreement including but not limited to constructing the network consistent with or exceeding the design, equipment and project information in the scope of work; providing qualifying, reliable broadband service to every BSLs, maintaining service quality and reliability, sufficiently marketing the broadband service, maintaining the BEAD low-cost service offering
- In the case where a Subrecipient fails to provide service to a required BSL in the scope of work the Commission may use **three times the modeled cost to build or three times the cost per location** reduce the Grant Award by the result.
- If a project fails to meet a required speed, latency, or the reliability requirement, you will be required to improve the network until the minimum performance standards are met or up to the entire Grant Award will be forfeited.
- Penalties may be waived, altered or increased based on the specific circumstances of the performance or compliance issue.

- Submit [NEPA pre-construction timeline](#)
- Submit Environmental Screening Questionnaire and GIS data:
  - [EIDS Instruction and Resources Version 2 \(March 2026\)](#)
  - [EIDS Questionnaire Version 2 \(March 2026\)](#)
  - GIS includes the entire footprint of your project, wireline routes, towers, staging areas, and any other ground disturbing activities.
    - Acceptable file formats: geodatabase, shapefiles, or map/layer/project packages.
    - Be sure to include a metadata spreadsheet describing the features in your spatial data.
- **Construction MAY NOT BEGIN until receipt of a NEPA/NHPA determination letter for project/subproject**
- Some costs are eligible to be incurred prior to NEPA determination:
  - Pre-construction planning, including collecting information necessary to complete environmental reviews
  - Applications for environmental permits, and studies including, but not limited to, Environmental Assessments (EA), wetland delineations, biological assessments, archaeological surveys, and other environmental reviews and analyses
  - Administrative costs
  - Pre-award application costs
  - Activities supporting consultations required under the NHPA, the Endangered Species Act, and the Clean Water Act; and/or
  - 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).

- Must follow own existing equipment management practices
  - If none, follow [2 CFR 200.313\(d\)](#)
- UCC-1 filing and attorney's certification
  - After acquiring equipment under award, must file a UCC-1 with appropriate state office
  - Within 15 days, must provide Commission with certified copies of filed forms
- During the estimated useful life of the Project Property, the Subrecipient shall timely file any necessary UCC-3 continuation statements (or other filings) for the subject equipment together with an attorney's certification
  - Within 15 days, must provide Commission with certified copies of filed forms following each such filing

[General Terms and Conditions for the NTIA BEAD Program Funds – Nov 2025 \(#47\)](#), [Wisconsin Legislature: Chapter 401](#). Grant Agreement Appendix C

- Lists all broadband serviceable locations (BSLs) to be constructed in the project
  - Fabric continually changing. Contact Commission if confusion regarding BSLs to serve
- Incorporates the technical details of your network design from your application
- Establishes deployment schedule for project
- As applicable, delineates NEPA subprojects
- Budget tracks type of match – request amendment if match changes
- **Review carefully and ensure all data is correct before signing.**
  
- **Changes in project scope must be communicated before they are implemented**

# Resources

- [BEAD Notice of Funding Opportunity \(NOFO\)](#)
- [June 6, 2025, U.S Department of Commerce Restructuring BEAD Policy Notice](#)
- [BEAD Technical Assistance Hub](#)
- [BEAD Build America, Buy America \(BABA\) Compliance and Self Certification](#)
  - [See Appendix A for Vendor Certification Letter Sample](#)
- [BEAD Build America, Buy America FAQs](#)
- [NTIA Permitting and Environmental Information Application](#)

- [NTIA Letter of Credit Waiver](#)
- [NTIA Programmatic Waiver of Tribal Consent Deadline](#)
- [NTIA BEAD Obligations for Subgrantees Deploying Network Projects](#)
- [BEAD Networks Performance Measures Policy Notice](#)
- [NTIA BEAD FAQ](#)
- [BEAD General Terms & Conditions](#)



# Questions?

Ask now!

*or*

**Email:** [PSCBEADGrants@wisconsin.gov](mailto:PSCBEADGrants@wisconsin.gov)

**Visit:** <https://psc.wi.gov/Pages/ServiceType/Broadband/GrantBEAD.aspx>