

# ARPA Broadband Expansion Grant Program

## Frequently Asked Questions

Last updated December 29, 2022

Most recently updated items:

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## 1. GENERAL

- a. *How often will the FAQ be updated and where will it be available?*
  - The FAQ will be updated as necessary and is linked on the PSC Broadband Expansion Grants web page. New items will be listed at the time, and each iteration is dated.
- b. *How do we contact the Commission with questions or concerns about the ARPA broadband grant program?*
  - Please contact the Commission at [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov) with questions or concerns about the ARPA broadband grant program.
- c. *What is the ARPA Broadband Expansion Grant project FAIN number?*
  - We do not yet have a FAIN assigned for the ARPA grants. Once one is assigned, we will let all subrecipients know as soon as possible.
- d. *Will my federal grant be taxable?*
  - The Commission cannot advise on taxation questions. We suggest you speak with a tax professional.
- e. *Can the Commission include more than one contact when sending ARPA 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 ARPA 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. GRANT AGREEMENTS

- a. *How long does the Grant Agreement last?*
  - The Grant Agreement identifies that the performance period is to be completed by December 31, 2024. 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
- b. *What if we cannot complete the performance period by December 31, 2024.*
  - Please contact the Commission at [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov) with concerns about meeting the performance period deadline. An extension of the performance period beyond December 31, 2024 may be available following the Commission's

standard grant amendment process. Please note, the Department of Treasury requires all federal funding to be obligated by December 31, 2024.

- c. *Does the Davis-Bacon Act (referenced in Attachment A, page 21 of the Grant Agreement) apply to my project(s)?*
- The Davis-Bacon Act applies to contracts in excess of \$2,000 for construction, alteration, or repair of public buildings or public works and which require or involve the employment of mechanics or laborers. Additionally, the Department of Treasury requires certification or reporting related to Davis-Bacon Act wage information for grant projects with a total anticipated cost of over \$10,000,000. Grant recipients and subrecipients should work with their legal counsel to determine whether the Davis-Bacon Act and Department of Treasury certification and reporting requirements apply to their grant project.
- d. *Section 24.0 (Page 11) of 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 [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@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 section 24.0 of 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.
- e. *What is the scope of the lien consent requirement in section 19.0 of the Grant Agreement?*
- Section 19.0 of the Grant Agreement applies to funding sources associated with the grant project. This includes federal funding and grant recipient matching funding. If you intend to create a new lien, you must inform the Commission of your intent to create a lien and receive written consent from the Commission prior to lien creation. Requests for lien creation consent should be submitted to [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov).
- f. *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. Section 19.0 of 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 in order to continue receiving grant funds. Requests for Commission approval should be submitted to [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov). If approved, the Commission will work with relevant parties to amend the grant agreement as necessary.

g. *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, 4.6, and 4.7?*

- o Entities excluded from complying with single audit requirements under 2 CFR 200 still need to comply with Grant Agreement Provisions 4.2, 4.3, and 4.4 but they not need to comply with 4.6 or 4.7.

h. *When is a Grant Agreement amendment needed?*

- o An amendment is required when a significant changes in the grant project’s scope, budget, or timeline occurs. Examples of potential significant changes include:
  - A change in the Project or activities, as described in Attachment B – Project Scope.
  - Any change in the list of expenses, contributions or in-kind, as described in Attachment C – Project Budget.
  - A transfer of funds among cost categories that exceeds or is expected to exceed twenty (20) percent of the approved total project Budget.
  - A significant change to the anticipated project timeline, such as to extend the performance period.

Please 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 [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov).

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

- o Direct contractors to the subrecipient will need to complete affirmative action documentation. Any organizations working as subcontractors to these direct contractors will not need to complete the documentation. See the chart below for more information on who needs to complete which documents.

DOCUMENT	DOCUMENTS NEEDED		WHO NEEDS TO COMPLETE	
	Plan	Exemption	Grantee	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

### 3. TRAINING

- a. *Will there be any webinars or trainings held for the ARPA broadband grant program?*
- Yes, the Commission will provide ARPA broadband grant program trainings in 2022. Grantees will be notified of trainings as they are scheduled. Trainings will cover topics such as reimbursement requests and reporting requirements. All training webinars will be posted on the PSC website. Please submit any requests for additional trainings to [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov).
- b. *What other kind of training/help is available?*
- If you have questions or need assistance generally, please contact our team at [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov) and we will be happy to work with you / your team to assist with your questions.

### 4. REPORTING

- a. *What reports are required for ARPA broadband expansion grants?*
- There are three different types of reports that you are required to file for your ARPA grant funded project.
  - Quarterly Reports: These will be required quarterly. More details on quarterly reports are provided below.
  - 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. When your project is nearing completion, please reach out to us at [PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov) to request a final report form.
  - Post-Project Reports: You will be required to file two of these reports. The first report will be due in the December of the calendar year following the filing of your final project status report, and the second will be due a year after that report was submitted. For example, if you complete your project in 2022, you must file a post-project report in Decembers 2023 and 2024.
- b. *Are the quarterly reporting requirements for the ARPA broadband grant projects different from previous broadband grant projects?*
- Yes, ARPA broadband grant project interim reports will require more information than previous broadband grant projects did. An outline of required information can be found in Attachment D of the Grant Agreement, on page 24.
- c. *Where can I find a copy of the quarterly report form?*
- Quarterly report forms were sent to all subrecipients in mid-June. If you have misplaced your form, please contact us at

[PSCFederalBroadbandGrantReimbursement@wisconsin.gov](mailto:PSCFederalBroadbandGrantReimbursement@wisconsin.gov) to request a new form. Copies of Quarterly Reporting Instructions and a link to an instructional webinar are posted on the PSC Website under “Resources for Current Federal Broadband Grant Recipients.”

d. *When will we need to provide quarterly reports?*

- Quarterly reports are due at 4:00 PM CST on the due dates below:

Year	Quarter	Start of Quarter	End of Quarter	Report Due Date
2022	2	April 1st	June 30th	July 8th
	3	July 1st	September 30th	October 10th
	4	October 1st	December 31st	January 10th
2023	1	January 1st	March 31st	April 10th
	2	April 1st	June 30th	July 10th
	3	July 1st	September 30th	October 10th
	4	October 1st	December 31st	January 10th
2024	1	January 1st	March 31st	April 10th
	2	April 1st	June 30th	July 10th
	3	July 1st	September 30th	October 10th
	4	October 1st	December 31st	January 10th

- NOTE: Beginning with the upcoming July 10 ARPA quarterly reports, you will be required to submit a quarterly report for your ARPA grant(s) even if no work has been completed on the project and no reimbursement requests have been submitted.

e. *Will we need to file reports with the federal government?*

- Subrecipients that are non-federal entities should submit reports to the Commission through ERF.

f. *What happens if I do not file my quarterly report(s) 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 clawback of any funds already paid out). Please refer to sections 25.0 and 26.4 of your Grant Agreement for more information.

## 5. REIMBURSEMENTS

### a. *What is cash match versus in-kind match?*

- There are two kinds of **match**, a cash match and in-kind match. A **cash match** is the direct project expense you or your non-federal partner provides as your contribution to the project – your cash expenditures for costs related to this specific project, such as project-related staff salaries, consultant’s fees, equipment rentals and travel costs. **In-kind match** are materials and services, secretarial services, space and utilities, equipment, sometimes waived fees and technical assistance provided by your organization or donated by a non-federal third party specifically for this project.

### b. *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 3.7 of your Grant Agreement for more detailed documentation requirements.

### c. *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.

### d. *How do I determine which budget category to place expense in?*

- There are seven budget categories. You can find each category and its description on the [PSC website](#) (Resources for Current Federal Broadband Grant Recipients/Reimbursement/Budget Categories)

### e. *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 hourly wages, you may use grant funds to reimburse these expenses when included in the project budget.

### f. *What if my project exceeds the application budget?*

- If your project exceeds the budget outlined in the application, it is expected that this overage will be covered by additional matching funds. Your grant award cannot be increased. These additional costs should still be reported in the match sections of your reimbursement requests.



- g. *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.
    - If the amount leftover exceeds 20% 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  
PSCFederalBroadbandGrantReimbursement@wisconsin.gov
    - If the amount leftover is below 20% 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 20% 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 20% is only considering funds that are being moved to different categories and includes both matching and grant funds.
- h. *Can I split an invoice on my reimbursement request form?*
- Yes, it is very common that a subrecipient will need to split an invoice between their grant and their matching funds in a budget category. When splitting like this, please DO NOT make any edits to the invoice number, just repeat the same invoice number. The form has built-in quality checks that will highlight the invoice number yellow. This is okay, and we will still be able to process your reimbursement.
  - However, please DO NOT split your invoice multiple times in the same category. For example, we have encountered reimbursement forms where the subrecipient populates each line of their reimbursement form with different line items off of the same invoice. This is not necessary and is discouraged, as it makes processing reimbursements more difficult and time consuming.

## 6. ACCESS AND AFFORDABILITY

- a. *Where do I find 35 CFR § 35.6(e)(2)(i)(C) that requires ARPA subrecipients to offer ACP or equivalent low-income pricing in the area I'm building out/connecting?*
- You can find the Federal Register language here 35 CFR § 31.6(e)(2)(i)(C) <https://www.federalregister.gov/documents/2022/01/27/2022->

[00292/coronavirus-state-and-local-fiscal-recovery-funds](#) and you can find the summary language of the Final Rule and the ACP or equivalent plan language at (<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule.pdf>) (page 308). This requirement will be incorporated into the CFR when it goes into effect on April 1, 2022.