

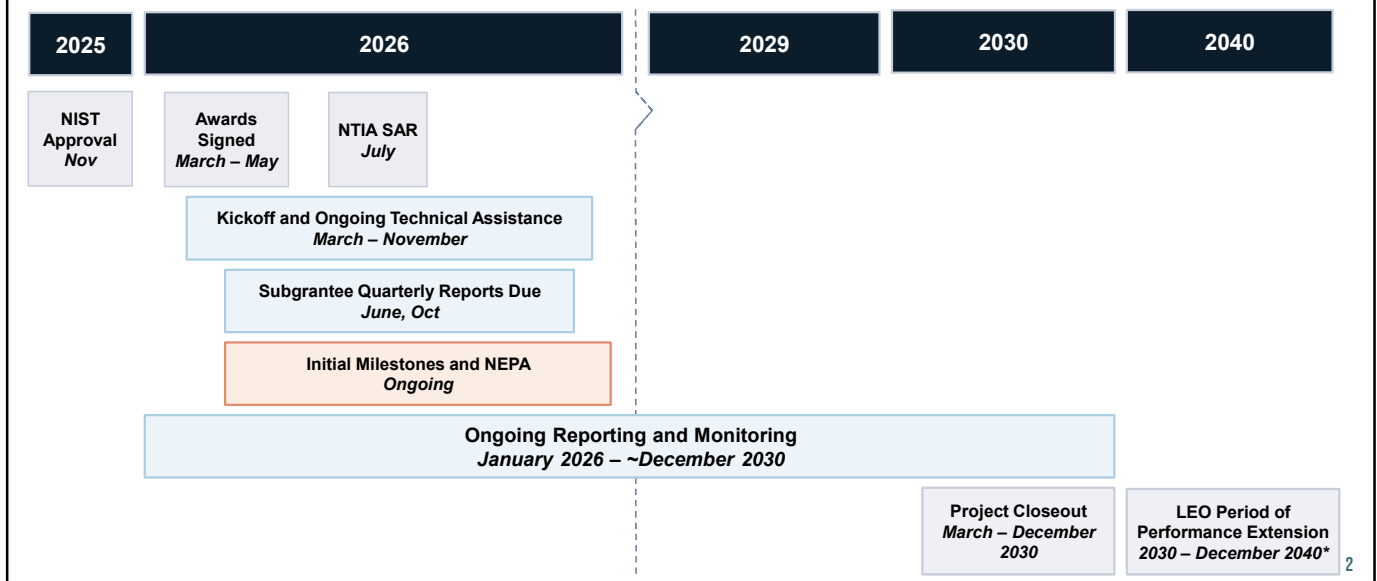


BEAD MILESTONES AND REPORTING

March 31, 2026

1

POST-AWARD TIMELINE OVERVIEW



2

Contents

1. Milestone overview
2. Project Plan Milestone
3. Reporting requirements
4. Post award requirements

3

3

1

MILESTONE OVERVIEW

4



UNDERSTANDING MILESTONE REIMBURSEMENTS

1

Fixed-amount subawards

1. Recommended by NTIA for broadband subgrants
2. Payments are based on meeting pre-defined objectives instead of actual costs
3. Several methods for subrecipient payment

2

Milestones & phasing

1. WBO has created program milestones to better benefit subrecipients
2. Subrecipients can define their own project phases to optimize how program milestones are achieved

3

NTIA program requirements

1. WBO must reimburse subgrantees in accordance with the objectives met
2. WBO can't reimburse any funds upfront or before the pre-defined milestone is met

4

Required documentation

1. Subrecipients are not required to submit proof of individual expenditures
2. Instead, they will submit documentation demonstrating completion of each milestone

5

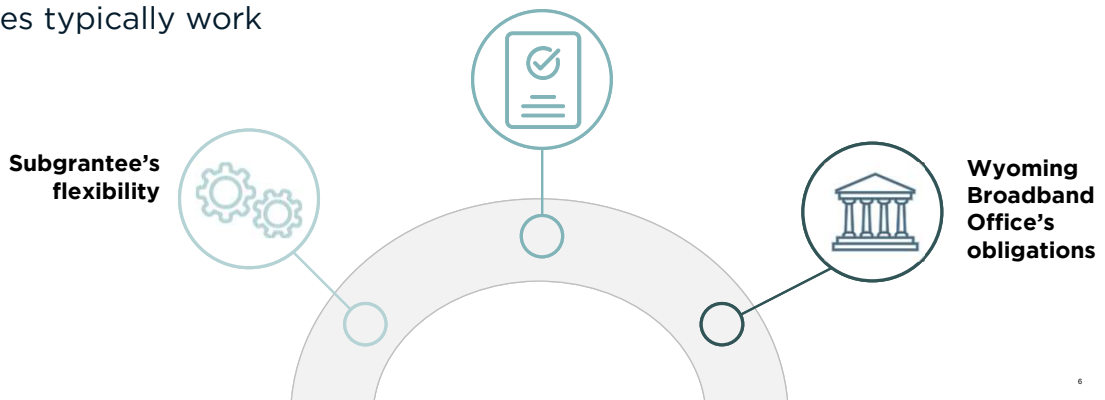
5



BALANCING OBLIGATIONS

WBO designed its BEAD Program to meet federal and state requirements while still aligning with the way subgrantees typically work

NTIA's program requirements



6

6



MILESTONE REIMBURSEMENTS

Reimbursement for terrestrial projects

Milestone categories	Reimbursement
Project plan	5%
Engineering and permitting	10%
Pre-deployment	15%
Deployment	60%
Network activation and program closeout	10%
Total	100%

Reimbursement for low-Earth orbit (LEO) projects

Milestone categories	Reimbursement
Project plan	3%
Environmental and historic preservation (EHP)	2%
Capacity verification (availability)	30%
Capacity verification (take-rate)	15%
Semi-annual equal installment reimbursements	50% (20 semi-annual disbursements of 2.5% each)
Total	100%

7

7

INDIVIDUAL MILESTONE THRESHOLDS – TERRESTRIAL

Reimbursement for terrestrial projects

Disbursement example:

A Deployment request that includes 37% of project BSLs is only eligible for 20% disbursement; however, a request that includes 62% of project BSLs is eligible for 60% reimbursement

Milestone	Reimbursement (%) by Milestone	Percent Completion for BSLs	Reimbursement (%) by Task
Project plan	5	Completion for 100% of BSLs	5
Engineering & permitting	10	Completion of 20% of BSLs	2
		Completion of 40% of BSLs	2
		Completion of 60% of BSLs	2
		Completion of 80% of BSLs	2
		Completion of 100% of BSLs	2
Pre-deployment	15	Evidence for 20% of BSLs	3
		Evidence for 40% of BSLs	3
		Evidence for 60% of BSLs	3
		Evidence for 80% of BSLs	3
		Evidence for 100% of BSLs	3
Deployment	60	Completion of 20% of BSLs	12
		Completion of 40% of BSLs	12
		Completion of 60% of BSLs	12
		Completion of 80% of BSLs	12
		Completion of 100% of BSLs	12
Network activation & program closeout	10	Completion of 20% of BSLs	2
		Completion of 40% of BSLs	2
		Completion of 60% of BSLs	2
		Completion of 80% of BSLs	2
		Completion of 100% of BSLs	2
Total	100		

8

8

MILESTONE DISBURSEMENT DOCUMENTATION

As part of each milestone request, subgrantees must submit the following documentation (terrestrial)



Required Documentation	Milestone				
	Project Plan	Engineering & Permitting	Pre-Deployment	Deployment	Network Activation & Program Closeout
Location List	X	X	X	X	X
EHP Questionnaire	X				
Project Timeline	X				
Project Design Shapefiles	X	X		X	X
Detailed Design Drawings		X			
Permit Status Summary	X	X			
Evidence of Approved Permits		X			
Bill of Materials		X	X	X	X
Executed Contract(s) for Construction Labor			X		
Evidence of Material Procurement			X		
Evidence of Staging and Material Delivery			X		
Evidence of Environmental Approval			X		
Active Subscriber Test Results					X
Evidence of Expense Tracking, Match Obligation, and Record Retention	X				
Evidence of Match Obligation	X	X	X	X	X
FWA Design Template (wireless projects only)	X	X		X	X

INDIVIDUAL MILESTONE THRESHOLDS – LEO

Reimbursement for LEO projects

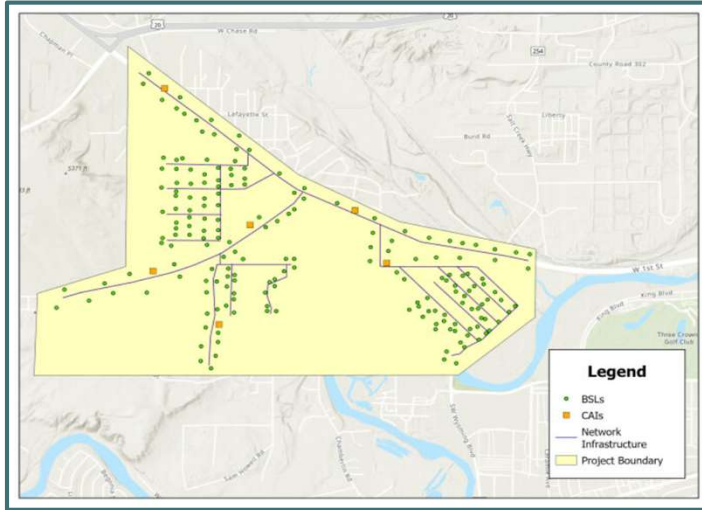


Milestone	Reimbursement (%) by Milestone	Percent Completion for BSLs	Reimbursement (%) by Task
Project plan	3	Completion for 100% of BSLs	3
EHP	2	Completion of 50% of BSLs	2
Capacity verification - availability	30	Evidence for 35% of BSLs	10
		Evidence for 65% of BSLs	10
		Evidence for 100% of BSLs	10
Capacity verification - take-rate	15	Completion of 17.5% of BSLs	5
		Completion of 32.5% of BSLs	5
		Completion of 50% of BSLs	5
Semi-annual installment reimbursements	50	Certifications	20 semi-annual reimbursements of 2.5% each
Total	100		



PROJECT DESIGN SHAPEFILES

- The submission of these files should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the subaward agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations
- As part of this submission, subgrantees should identify any required project phasing



PERMIT STATUS SUMMARY


- This document demonstrates that the subgrantee has adequately identified and is prepared to execute all required permits needed for network deployment meeting their program obligations within the dates specified in their contract agreement
- As part of this milestone the template shall identify all anticipated permits required to complete the proposed project and must indicate the project phase and other key details

Awarding Authority: _____ Program: _____ Subrecipient Name: _____ Project ID: _____										
Project Phase	Permit Name	Permitting Authority	Type of Permit	Estimated Permit Submission Date	Actual Permit Submission Date	Estimated Permit Execution Date	Actual Permit Execution Date	Permit Expiration Date	Permit Status	Notes
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										
24										
25										
26										
27										
28										
29										
30										
31										
32										
33										
34										
35										
36										
37										
38										
39										
40										
41										
42										
43										
44										
45										
46										
47										
48										
49										
50										
51										
52										
53										
54										
55										
56										
57										
58										
59										
60										
61										
62										
63										
64										
65										
66										
67										
68										
69										
70										
71										
72										
73										
74										
75										
76										
77										
78										
79										
80										
81										
82										
83										
84										
85										
86										
87										
88										
89										
90										
91										
92										
93										
94										
95										
96										
97										
98										
99										
100										



EVIDENCE OF EXPENSE TRACKING

- This document demonstrates that the subgrantee is in compliance with BEAD Program requirements, including accounting for required matching funds and tracking the expenditure of these funds proportionally with federal funds



Evidence of Expense Tracking, Match Obligation, and Record Retention

Subgrantees must submit the following required documentation for the Project Plan Milestone.

- Detail the subgrantee's applicable internal policies, procedures, and controls to manage expenses and matching contributions for the project.

EVIDENCE OF MATCH OBLIGATION

- This document demonstrates that the subgrantee is meeting BEAD requirements by accounting for their required matching funds and tracking the expenditure of these funds proportionally with federal funds
- The template captures details at a high level; detailed records are not required for this submission

Project Information and Summary	
Project Information	
Eligible Entity (State/Territory)	
Subgrantee Legal Name	
BEAD Project ID / Subgrant #	
Reporting Period (Start-End)	
Reimbursement Request #	
Approved BEAD Share (%)	75%
Approved Match Share (%)	25%
Prepared By / Date	
Totals	
Eligible Costs (\$) Summary	\$ 200,000.00
BEAD Portion (\$) Summary	\$ 75,000.00
Match Portion (\$) Summary	\$ 125,000.00
Match by Source (Cash) (\$) Summary	\$ 110,000.00
Match by Source (In-Kind) (\$) Summary	\$ 15,000.00
Total Match (\$) Summary	\$ 125,000.00
Approved BEAD Share (%) in Award	75%
Approved Match Share (%) in Award	25%
Calculated BEAD Share (%)	38%
Calculated Match Share (%)	63%
Pass/Fail Checks	
BEAD ≤ Approved %	PASS
Match ≥ Approved %	PASS
Certifications & Attestations	
<i>Subgrantee Certification: I certify that the expenses listed are paid, eligible, reasonable, allocable, and in compliance with BEAD Program requirements and 2 C.F.R. Part 200. Supporting documentation, including match proportionality, is true and correct.</i>	
Authorized Signatory (Name/Title):	
Signature:	
Date:	



REPORTING OVERVIEW

Subgrantees must complete the following reports:

- 1 Quarterly reports**
 - Submission in the portal
 - Milestone progress will be reviewed and payments issued if milestones are met
 - Reporting starts at time of subgrant award and continues through ongoing service provision
- 2 Semi-annual reports**
 - May not coincide with quarterly report schedule
 - Subgrantees provide input for WBO to submit to NTIA
 - Other check-ins for high-risk projects as needed
- 3 Annual reports**
 - Fiscal management including audited financial statements
 - Updates on deployment timelines and milestone schedules
- 4 Closeout reports**
 - Final outcomes outlined and amount of unobligated funds allocated to subgrantee



QUARTERLY REPORT COMPONENTS

Subgrantees must include these elements in their reports:

- Terrestrial projects**
 - Design progress
 - Permit application progress
 - Permit approval progress
 - Construction progress
 - Route completion
 - BSL locations and related service completions
 - Recordkeeping, including accounting for expenses and application of matching funds
 - Other data required by NTIA
- Low-Earth orbit (LEO) projects**
 - Area coverage progress
 - Permit application progress, where required
 - Permit approval progress, where required
 - Capacity availability at BEAD-qualifying broadband speeds
 - Subscriber take rate and evidence
 - Recordkeeping, including accounting for expenses and application of matching funds
 - Other data required by NTIA

**WBO will review for completeness and consistency
Templates will be provided**

QUARTERLY DESK REVIEWS



These sessions that cover:

Deployment milestones

- Number of locations passed
- Serviceable locations established
- Subscribers activated
- Geographic data which identifies specific areas where deployment occurred

Financial status

- BEAD funds used
- Required matching contributions
- Submitted through grant management system via Match Tracking Template

Other areas that will be discussed are challenges and obstacles (such as permitting delays, supply chain disruption and workforce shortages)

23

23

WASTE, FRAUD, AND ABUSE



Subgrantees must meet BEAD Program requirements related to WBO's monitoring of waste, fraud, and abuse

- Uniform Guidance establishes measures at each part of the grant lifecycle to protect federal funds from risk
- The BEAD NOFO requires that Eligible Entities implement BEAD in a manner that will minimize the opportunity for waste, fraud, and abuse by:
 - Conducting audits of subgrantees
 - Developing and implementing monitoring and oversight plans
 - Imposing necessary conditions on BEAD awards as may be required to mitigate the risk of nonperformance

24

24



WASTE, FRAUD, AND ABUSE

WBO will monitor subgrantees for indications of falsifying information, lying, cheating, misappropriating funds, or stealing. To assess risk and monitor against instance of waste, fraud, or abuse, WBO will evaluate subgrantees for:



Allegations of fraud, waste, abuse, and mismanagement may be made anonymously through the Office of Inspector General (OIG) Hotline at 1-833-791-2262 or submitted to WBO's website. Potential fraud, waste, or abuse should be reported as soon as possible so the allegations can be investigated, any problems can be stopped, and remedies can be pursued.

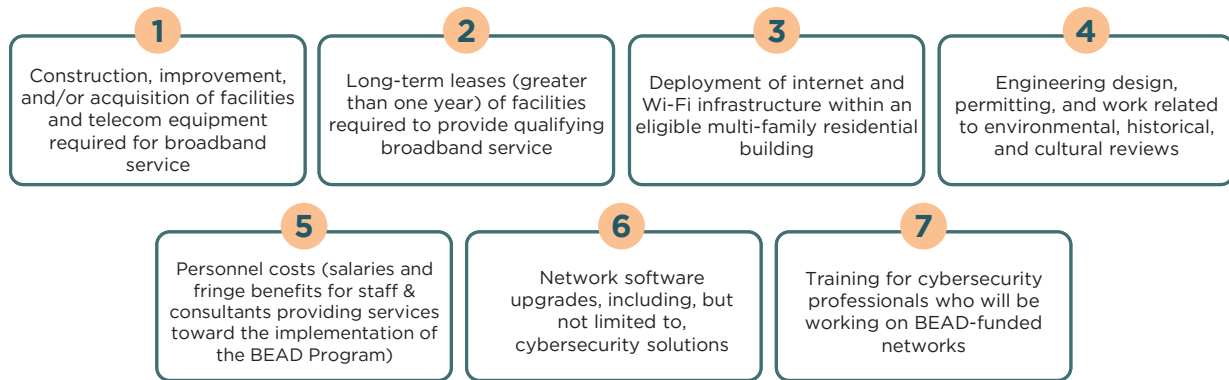
4

POST AWARD REQUIREMENTS



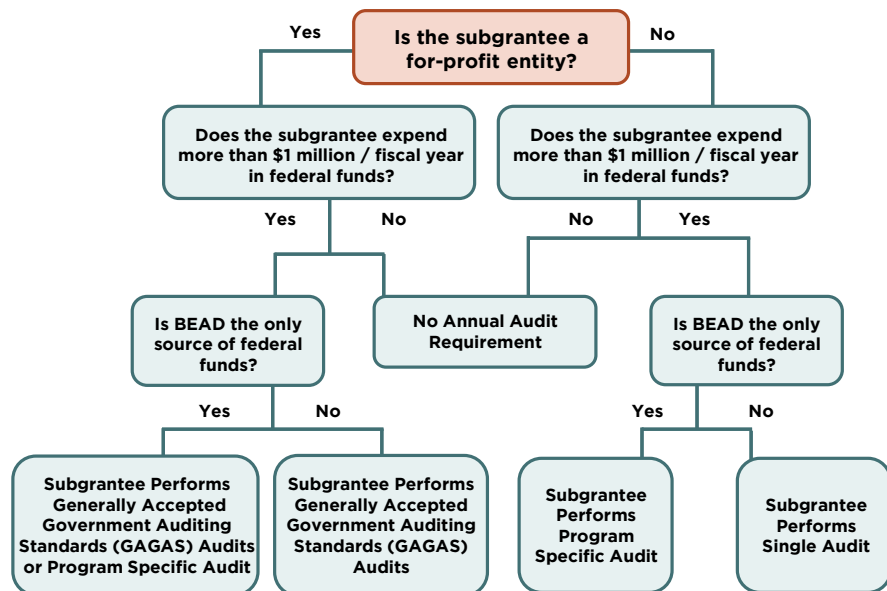
ELIGIBLE PROGRAM EXPENSES

Subgrantees must document all eligible expenses. The BEAD NOFO, modified by the BEAD Restructuring Policy Notice, specifies the following eligible uses of funding for last-mile deployment under the program:



AUDIT OVERVIEW

Audit requirements follow 2 CFR § 200 with specific modifications tailored to the unique nature of broadband infrastructure projects



RECORD RETENTION



NTIA established that the Federal Interest Period for BEAD-funded broadband infrastructure is 10 years after the year the project is completed

- Subgrantees must retain all records related to federal awards for at least three years after final payments and the award is closed out
 - LEO Capacity Subgrants will have a 10-year extended period of performance
 - LEO capacity subgrantees must retain all records for 13 years (10-year period of performance + three-year record retention)
 - NTIA clarified that LEO Capacity Subgrants do not create a federal interest, because those subgrants are only reserving capacity for service delivery
 - Non-LEO subgrantees will have a standard four-year period of performance
 - Subgrantees must retain all records for seven years (four-year period of performance + three-year record retention) total
- There is a separate record retention requirement for any real property, equipment, or facilities acquired with federal funds

Exceptions to the three-year retention requirement include litigation, claims, or audit findings involving the records, in which case records must be retained until all litigation, claims, or audit findings have been resolved; or notification by NTIA, the Commerce Department, or any other relevant federal agency to extend the retention

29

29

COMPLIANCE DOCUMENTS AND RULES



For in-depth information on the BEAD program, please consult the following documents:

- [2 CFR § 200 Uniform Guidance](#)
- [General Terms & Conditions \(GTC\)](#)
- [BEAD Restructuring Policy Notice \(RPN\)](#)
- [BEAD Notice of Funding Opportunity \(NOFO\)](#)
- [BEAD Performance Testing Requirements](#)
- [NTIA FAQs](#)
- [NTIA BEAD resources](#)

Where to find key documents for Wyoming:

- [Wyoming website for BEAD](#)
- [Final Proposal for Wyoming](#)
- **Subgrantee Program Guide**
(to be posted on the WBO BEAD page)

30

30

QUESTIONS?



**For general questions about the BEAD program in
Wyoming
please email Wyoming Broadband Manager
Chad Bolling at chad.bolling@wyo.gov**

31