



Broadband, Equity, Access, and Deployment Program (BEAD)

Frequently Asked Questions (FAQ) for Subgrantees

Arizona Commerce Authority (ACA)

March 2026

Table of Contents

Helpful Links & Information	3
Permitting and EHP Tools and Support	3
Permitting Requirements and Processes	5
NEPA Project Areas	6
NEPA and EHP Review Processes	7
Section 106	8
Reporting and Compliance	8

Helpful Links & Information

These links are referenced throughout the document:

- [The Arizona Permit Finder](#)
- [NTIA APPEIT User Guide](#)
- [NTIA Permitting and Environmental Information Application](#)

FAQs are updated regularly. Any new questions added since the last update appear in **red at the end of each relevant section.**

Permitting and EHP Tools and Support

1. Why is ACA prioritizing permitting and Environmental & Historic Preservation (EHP)?

Permitting and EHP processes are critical to ensure broadband deployment is safe and environmentally responsible. Given BEAD's scale and timelines, permitting and EHP compliance in Arizona's diverse landscape can become extensive and complex. ACA's prioritization of coordinating permitting and EHP supports subgrantees and permitting authorities meet requirements, navigate processes, and reduce delays.

2. What is the AZ Permit Finder?

A first-of-its-kind interactive tool that consolidates permitting requirements into a single, easy-to-use platform with the goal to simplify the permitting process and accelerate broadband deployment across Arizona.

Geospatial mapping helps visualize regulatory boundaries and permit requirements across public lands, tribal nations, and other relevant areas. The Permit Finder integrates mapping layers with permit details—such as type, applicability, timelines, and challenges—so subgrantees can plan routes, identify jurisdictional overlaps, and streamline applications. This reduces delays and improves coordination among agencies and stakeholders.

3. Where can I find more information related to the permitting process in Arizona?

ACA will provide information regarding the permitting process in the BEAD Subgrantee Portal, including guidance, resources, and leading practices to interact with permitting agencies and obtaining permits. This information will live in the portal, on the landing page after logging in.

4. With the NTIA ArcGIS Pro Permitting and Environmental Information Tool (APPEIT), is there a way to get locational detail on each line item or is it limited to the PDF list results?

The NTIA published a user guide for the APPEIT tool. In the APPEIT Tool User Guide Appendix, there are links to the data sources. These links can be leveraged to view the original source data. Access the [APPEIT User Guide here](#).

5. How useful are the APPEIT and Permit Finder tools in the NEPA Process?

The APPEIT and Permit Finder tools are key resources for completing the NEPA process effectively. APPEIT provides access to multiple maps from publicly available sources, including federal review, permitting, and resource agencies. It is intended to assist with the preliminary identification of areas that may require permits, mitigation measures, or planning to avoid potential impacts to environmental and historic / cultural resources.

The Permit Finder outlines the types of permits required and identifies the relevant agencies, simplifying the process of meeting regulatory requirements. Together, these tools aid project planners in maintaining compliance with environmental laws and implementing strategies to preserve historical sites.

6. Is it the responsibility of the subgrantee to identify all agencies involved in the Permitting and EHP review process?

Yes, subgrantees are responsible for identifying all agencies that need to be consulted during the review process. While knowing the land jurisdiction is important, other factors such as environmental regulations and historical preservation requirements also play a role in determining which agencies to engage with. APPEIT and the Permit Finder tools assist subgrantees in identifying additional agencies that may be relevant for consultation based on the project's location and impact. These tools provide information on potentially required permits and potential environmental and historic preservation impacts to be further assessed.

7. If NEPA project areas need to change, what is the process?

If NEPA project areas need to change before a NEPA decision memo is issued, updates may be requested and processed through NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT). Changes are handled within ESAPTT. Please contact ACA if this situation applies to your project.

8. What happens if a project changes before a NEPA decision is issued?

If a project changes before a NEPA decision memo is issued, the project documentation and ESAPTT entries need to be updated as needed prior to submitting the documentation to NTIA for a NEPA decision. It is expected that project plans might change, and ESAPTT allows for evolving design or site changes to be reflected during the process.

9. What happens if a project changes after a NEPA decision is issued?

If a project changes after a NEPA decision memo is issued, project documentation should be updated and a request submitted through ESAPTT to reopen and revise the project

documentation. NTIA will review the requested changes to determine whether a NEPA reevaluation is required.

Permitting Requirements and Processes

10. For subgrantees with existing electric Right-Of-Way agreements on Arizona State Land Department (ASLD) and federal land, is there going to be a blanket process in place with the agencies to modify those existing ROWs?

ACA is not involved in any process to modify existing ROW agreements at the federal level, but this is why it is integral for subgrantees to begin the process of agency outreach now, to begin exploring what is required for the BEAD Program with regards to existing ROWs.

With regards to state-level permitting agencies such as ASLD, ACA is happy to be involved with this process to help maintain subgrantee relationships with other state agencies. Please forward any relevant questions to the ACA Permitting Team at BEADpermitting@azcommerce.com.

11. Are subgrantees required to have ArcGIS Pro to run the APPEIT tool?

Yes, if subgrantees do not have access to ArcGIS Pro, ACA is happy to help as well. There is another tool called National Broadband Availability Map (NBAM), which is similar to APPEIT, and this gives users the ability to access the data in map form. NBAM Map can be found here: [NTIA Permitting and Environmental Information Application](#)

12. Can we submit an archaeological assessment to SHPO before applying for an ADOT permit?

Yes, you should complete your environmental and Section 106 process before submitting for an ADOT encroachment permit. This ensures compliance with the State Historic Preservation Act and speeds up the permitting process.

13. What steps should subgrantees take to prepare for efficient project deployment in Arizona?

Subgrantees should ensure that their consulting team has experience with cultural resource management specific to Arizona. Hiring consultants with Arizona State Museum Antiquities Act permits is highly recommended. Early coordination with relevant agencies, understanding land jurisdictions, and preparing documentation in advance will help streamline processes and reduce delays.

14. Do Professional Engineers (PE) need to be licensed in AZ, or can they be licensed in other states?

Subgrantees submitting permits to AZ agencies must use professionals who are properly licensed and certified in Arizona, per the subgrant agreement and Arizona Revised Statutes (A.R.S.), Title 32, Chapter 1.

15. Can you please clarify if the Permitting Plan in Milestone #1.3 is the plan on how we intend to acquire all the permits required for the build and to comply with NEPA, SHPA, etc. or does this require successful completion of those permits?

For Milestone 1.3, subgrantees are required to provide a plan outlining when and how they plan to obtain all necessary permits.

NEPA Project Areas

16. Can ACA clarify the environmental pre-screening process and the creation of NEPA Project Areas?

Subgrantees will begin by screening their initial BEAD Project Areas to flag any potential permitting issues or environmentally sensitive areas. Following this review by subgrantees, they will propose specific NEPA Project Areas to conduct the NEPA review.

These proposed NEPA Project Areas can be the same as the original BEAD Project Areas or, if necessary, subdivisions of them. The strategy for making these divisions is left to the subgrantees because they have the best understanding of their projects. If no permitting roadblocks are anticipated, the original BEAD Project Areas can be submitted as they are. However, if challenges are identified, the project areas can be divided into smaller areas for submission.

Finally, after the proposed NEPA Project Areas are submitted, the ACA will conduct a review and address any screening issues that were not flagged in the initial proposal.

17. Is the initial submission to ACA in January 2026 the full environmental screening, or just the pre-screening and the submission of NEPA Project Areas?

The initial submission to ACA by January 22, 2026, was just the pre-screening template form and the NEPA Project Areas, not the full screening.

18. Should changes to project designs that affect NEPA Project Area submissions be communicated to ACA immediately?

Yes, any changes affecting the NEPA Project Areas should be communicated to ACA immediately to ensure accurate submission documentation. Note that NEPA Project Areas should be larger areas that allow for flexibility as the project design develops. The project footprints to be evaluated for the categorical exclusion (CatEx) or environmental assessment (EA) will be more narrowly

focused on the planned project design (although still with a buffer area providing some flexibility for future design changes).

19. What is the NEPA Project Area submission deadline, and what is due by that date?

The January 22, 2026, deadline was specifically for determining NEPA Project Areas, not for the full NEPA assessment. More information will be provided to subgrantees regarding completing the full NEPA assessment.

20. How should adjustments between aerial and underground project determinations be handled for the January 22nd form submission?

Subgrantees were advised to submit the best available information by the due date and inform ACA of any modifications as soon as possible.

NEPA and EHP Review Processes

21. If subgrantees have questions throughout the NEPA process – will the ACA be available for individuals calls with the subgrantees to go over details with their environmental consultants?

Yes, please reach out to beadpermitting@azcommerce.com.

22. Our project involves fiber routes in pre-existing disturbed right-of-ways. Will a CatEx apply, and what is the state's stance?

While CatEx is a NEPA determination, Section 106 compliance is required separately. You will need to comply with Section 106 and state historic preservation requirements regardless of CatEx status.

23. Can we proceed with the environmental review prior to the grant agreement being signed or should we wait until the grant agreement is signed in order to be reimbursable.

ACA will reimburse costs incurred back to September 4, 2025, as per the Grant Agreement as long as the costs align with the applicable pre-award NEPA expenses listed within the standard terms and conditions. ACA cannot reimburse until the Grant Agreements are signed, but Subgrantees should keep their invoices for any costs incurred after September 4, 2025.

24. If a project is granted a general Categorical Exclusion, should the subgrantee expect that approval to proceed may take up to six months?

Once a CatEx is granted, the subgrantee may proceed to the permitting and construction/deployment phases. In general, projects involving greater levels of ground disturbance that require a CatEx should expect a CatEx approval timeline of approximately six

months. However, projects involving no ground disturbance could be granted a CatEx in a shorter period of time.

25. What are the tribal consent requirements for BEAD projects located on Tribal Lands?

For BEAD-funded projects proposing deployment on Tribal Lands, tribal consent is required. Subgrantees must obtain a Resolution of Consent from the applicable Tribal Government, Tribal Council, or governing body, as required under [NOFO Section IV.B.9.b.15 pg 48](#) and [NTIA FP Guidance, Req 15.1 pg 73](#). Tribal consent requirements are separate from Section 106 consultation and other EHP review processes.

Section 106

26. Will ACA provide form letters for consultations, particularly tribal consultations?

ACA will provide information regarding Section 106 guidance for cultural monitoring and discovery reports. When finalized, this will be available in the BEAD Subgrantee Portal, on the landing page after logging in.

27. Our project is within a Tribal Project Area, can we work directly with the tribe's Tribal Historic Preservation Office (THPO)?

Yes, projects within tribal lands with a THPO can work directly with the THPO for Section 106 compliance and send determinations to ACA. If the tribe does not have a certified THPO, SHPO will consult.

28. Are there situations where SHPO might help identify other consulting parties?

Yes, SHPO can help identify additional consulting parties if land managing agencies have not been fully captured in the initial assessment submitted by the subgrantee. This helps ensure all necessary consultations are conducted.

Reporting and Compliance

29. What steps should be taken if Cybersecurity Risk Management/Supply Chain Risk Management plans are not available due to pending third-party provider selection?

Submit these plans to ACA as soon as they are finalized, even if third-party providers have yet to be selected.

30. Are audited financial statements required for the past fiscal year or for the prior three fiscal years?

Audited financial statements for the prior three fiscal years, including FY2022, FY2023, and FY2024, are required.

31. Does the Professional Engineer need to be licensed in Arizona, or can they be licensed in any state?

Subgrantees submitting permits to AZ agencies must use professionals who are properly licensed and certified in Arizona, per the subgrant agreement and Arizona Revised Statutes (A.R.S.), Title 32, Chapter 1.

32. If we start ordering materials now, will they be reimbursable under BEAD?

Allowable expenses may be reimbursed retroactive to September 4, 2025. However, any expenses incurred prior to the execution of the subgrant agreement are at the provider's own risk unless they are BABA compliant materials.

33. Is there a way to export the location BSL list from the portal?

The portal will have a location export button to directly allow subgrantees to access and validate their locations without having to reference any external data files.

34. For the budget breakdown, how detailed of a description should the "Enter Cost Item Description" be?

Each cost should be accompanied by a description of how it fits within the relevant cost category and justifies its use for specific project purposes. The level of detail the subgrantees included in their Project Financial Workbook, "Capital Cost Summary" tab, will suffice.

35. Do authorized vendors need to resubmit a W-9 form if they are already approved through ABDG?

Authorized vendors are not required to resubmit a W-9 unless their banking information has changed. ACA Accounting currently has banking information on file from January 2025. If there have been no changes since that time, no update is required. Subgrantees may upload a previously submitted W-9 if available. If a copy is not available, a placeholder document indicating that a W-9 is already on file with ACA may be uploaded.

36. If a subgrantee has previously secured a performance bond for 10% of the subaward amount, may the Performance Bond template be revised to reflect this amount rather than the 100% referenced in the template?

The Arizona Commerce Authority (ACA) will permit a waiver of the standard Letter of Credit (LOC) or Performance Bond (PB) requirement, allowing for a 10% LOC or PB. ACA is currently updating the grant portal to reflect this change. A formal announcement with additional guidance will be issued once the update is complete.

37. Is there a way for subgrantees to access and export the current project location list, typically provided as a .csv file?

In addition to previously shared information, a new export function is available in the grant portal that allows subgrantees to directly download their location data. This feature enables subgrantees to access and validate their locations without relying on external data files.

38. Who should be designated as the Authorized Organization Representative (AOR) for the Protecting the BEAD Program from Defaults certification?

For BEAD purposes, the Authorized Organization Representative (AOR) must be an officer- or director-level employee of the subgrantee. This may include roles such as President, Chief Executive Officer, Chief Financial Officer, Treasurer, or an equivalent position. Each subgrantee is responsible for designating the appropriate individual to serve in this role.

39. Is the project signage requirement still applicable for BEAD subgrantees?

The project signage requirement has been removed from the most recent version of the Subgrant Agreement. ACA is currently working on a correction or workaround to address this certification language within the grant portal.