

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

Arizona Commerce Authority
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1 Overview of Reporting Requirements

This document is part of a series of guides designed to help subgrantees navigate the administrative requirements of the Broadband, Equity, Access, and Deployment (BEAD) program. This guide specifically focuses on the purpose, content, and submission deadlines for all required programmatic reports, including the Quarterly and Semiannual Reports.

For instructions on how to submit the separate package of documentation required to request a milestone payment, please refer to the **BEAD Milestone Disbursement Guidelines**.

For details on how the ACA will use these reports as part of its oversight activities, such as desk reviews and site visits, please consult the **BEAD Compliance & Monitoring Guidelines**.

1.1 Purpose

This document provides subgrantees with practical guidance and instructions for meeting the reporting obligations of the BEAD program. Its purpose is to serve as a user-friendly manual for preparing and submitting the reports required under the executed Subgrant Agreement.

1.2 Disclaimer

These guidelines are for informational and operational purposes only. They summarize requirements but do not supersede or modify any terms of the Subgrant Agreement.

- The Subgrant Agreement is the controlling legal document. All subgrantees must refer to their individual, executed Subgrant Agreement for the complete, specific, and authoritative list of their obligations.
- In the event of any discrepancy between this guide and the Subgrant Agreement, the terms of the Subgrant Agreement shall govern.

1.3 Reporting Framework

Source of Requirements: All reporting obligations stem from federal regulations (specifically 2 C.F.R. Part 200) and mandates from the National Telecommunications and Information Administration (NTIA). These requirements are incorporated into the Subgrant Agreement.

Dynamic Nature of Reporting: The BEAD program is subject to ongoing federal oversight. Therefore, the ACA and NTIA reserve the right to update reporting requirements, templates, and data fields throughout the project lifecycle. The ACA will provide official notification of any such changes.

Submission Platform: Subgrantees will utilize the [BEAD Subgrantee Portal](#) platform to complete and submit all reports outlined in this guide, unless otherwise instructed in writing by the ACA. Specific templates and detailed instructions for each report will be provided by the ACA.

1.4 Summary of Reporting Obligations

Timely and accurate reporting is a critical component of BEAD program compliance. As a subgrantee, regular reporting provides the ACA and NTIA with essential data to monitor project progress, ensure fiscal responsibility, and measure program outcomes. This section provides a high-level summary of the different types of reports a subgrantee is required to submit throughout the project lifecycle.

A Note on Payment-Related Submissions: This document covers programmatic and compliance reporting only. All submissions required to trigger milestone payments, including the Project Completion Report, are detailed in the separate BEAD Milestone Disbursement Guidelines.

A Note for Low Earth Orbit (LEO) Providers: LEO subgrantees are subject to the same programmatic reporting requirements outlined in the table below (Monthly Permit Status Report (if applicable), Quarterly, Semiannual, etc.). However, the specific milestone certifications required for payment disbursement are unique and are detailed exclusively in the BEAD Milestone Disbursement Guidelines.

The table on the following page summarizes the primary reporting requirements. Each report has a distinct purpose and submission frequency.

Table 1 Summary of Reporting Obligations

Report Type	Purpose	Submission Frequency	Key Information Required
Monthly Permit Status Report	To comply with NTIA GT&C provisions regarding the tracking of permit applications to a 90-day benchmark for completion.	Monthly: Due no later than the 15 th of each month until all required permits have been obtained or the ACA confirms in writing that reporting is no longer needed.	<ul style="list-style-type: none"> Status of all federal, state, tribal, and local permit applications required for the performance of the Project.
Quarterly Progress Report	Subgrantees to provide the ACA with regular, more frequent updates on project progress, risks, and key performance indicators (KPIs).	Quarterly: Due no later than fifteen (15) calendar days following the end of each reporting period.	<ul style="list-style-type: none"> Financials (invoiced vs. budget). Construction progress (e.g., miles of fiber laid). Broadband serviceable locations (BSLs) passed. Project risks, schedule/timeline updates, and safety events.

Report Type	Purpose	Submission Frequency	Key Information Required
Semiannual Progress Report	Subgrantees to submit a comprehensive, formal update on the project's financial and operational status for federal oversight purposes, following NTIA guidance and formatting.	Semiannually: Due no later than twenty (20) calendar days following the end of each reporting period (ending June 30 and December 31).	<ul style="list-style-type: none"> Detailed financial reports (e.g., SF-425). Performance data (speeds, pricing). Formal officer certifications.
Final Performance (Technical) Report	Subgrantees to provide the ACA with a final, post-project report of financial and performance data to support the ACA's closeout reporting to NTIA.	One-Time: Due within ninety (90) calendar days after the expiration of the project's Period of Performance.	<ul style="list-style-type: none"> Final SF-425, SF-428, and SF-429 reports. Real Property and Tangible Personal Property Reports and Requests for Disposition. Final comprehensive technical report summarizing the project's overall outcomes.
Fraud, Waste, & Abuse (FWA) Reporting	Subgrantees to immediately report any credible evidence of potential misuse of federal funds or violations of federal law to the ACA and relevant authorities.	As Needed: Required immediately upon discovery.	Written disclosure of credible evidence of potential instances of fraud, waste, and abuse (e.g.) conflict of interest, bribery, or other violations of federal criminal law.

In addition to fulfilling the specific reporting deliverables outlined above, subgrantees are responsible for observing a set of overarching standards that apply to the entire reporting process. These core requirements are detailed below.

- **BSL Eligibility Monitoring and Reporting:**
 - I. Proactively monitor BSL eligibility status in their project area.
 - II. Regularly review the latest FCC Fabric data for comparison against BEAD locations.
 - III. Immediately report any identified changes or errors that render a location ineligible to the ACA.
 - IV. Provide sufficient documentation and NTIA- or FCC-recognized reason/non-service codes for such changes.

- V. Clarify the implication that ineligible locations will not be counted as BEAD-funded BSLs
- **Data Integrity:** Subgrantees must maintain sufficient internal records to substantiate all data submitted in these reports. The ACA or federal agencies may request this backup documentation at any time for audits or desk reviews.
 - **Report Certification:** All formal reports (, Quarterly Reports, Semiannual Progress Reports, Final Performance Report, etc.) must be certified by an officer or director of the subgrantee organization who can attest to the accuracy of the information provided.
 - **Dynamic Requirements:** Reporting templates and specific data fields may be updated by the ACA to comply with new guidance from NTIA. Subgrantees will be notified of any such changes and are required to use the most current templates provided.

2 Monthly Permit Status Report

The Monthly Permit Status Report provides a regular update on the progress of necessary regulatory approvals. It allows the ACA to track project progress, identify potential delays and bottlenecks, and support projects to remain on schedule for construction.

2.1 Purpose

The purpose of this report is to provide the ACA with consistent updates on the status of all federal, state, tribal, and local permit applications required for the performance of the Project. This report ensures compliance with NTIA General Terms and Conditions (GT&C) provisions, specifically tracking permit applications against a 90-day benchmark for completion, and supports the ACA in identifying and assisting with potential delays.

2.2 Submission Deadline

The Monthly Permit Status Report is due no later than the fifteenth (15th) calendar day of each month following the end of each reporting period. For example, the report for the period ending March 31st would be due by April 15th. The submission must reflect the most recent data as of the end of the preceding calendar month.

This is a recurring obligation that begins after the first full month following the Subgrant Agreement's Effective Date. Monthly permit status reports shall continue until all required permits have been obtained or the ACA confirms in writing that reporting is no longer required.

2.3 Key Information to Provide

The ACA will provide a template that subgrantees must use for this report. The required information is established in Attachment 10 of the Subgrant Agreement and includes, but is not limited to the following key data points:

- **Permit Identification:**
 - Type of permit required (federal, state, tribal, or local).
 - The specific permitting agency or authority.
 - The project segments or locations dependent on the permit.
- **Application Status & Timelines:**
 - Date or initial application submission.
 - Current status of the application (e.g., pending review, requests for additional information, approved, denied).
 - Number of days elapsed since submission.

Roadblocks & Risk Management:

- A description of any delays or outstanding requests from the permitting agency.
- A summary of risks these permit statuses pose to the overall project schedule and forecasted completion dates.

2.4 Submission Method

Subgrantees must complete and submit the Monthly Permit Status Report using the official template provided by the ACA. The submission must be made electronically via the BEAD Subgrantee Portal, unless the ACA provides alternative instructions.

2.5 Responsibility and Certification

The subgrantee's designated project manager or regulatory compliance lead is typically responsible for compiling the data and submitting the Monthly Permit Status Report. While this report does not require a formal officer-level certification like the Semiannual Progress Report, the individual submitting the report is responsible for ensuring the accuracy and completeness of the data provided, particularly regarding application dates. The ACA may follow up with questions or proactively engage if permits are approaching or exceeding the 90-day benchmark without resolution.

Quarterly Progress Report

The Quarterly Progress Report is a key component of the ACA's ongoing project monitoring. It provides a regular, data-driven snapshot of a project's health, allowing for proactive engagement and timely support to remediate potential risks.

2.6 Purpose

The purpose of this report is for subgrantees to provide the ACA with consistent, proactive on project progress, financial status, risks, and key performance indicators (KPIs). This regular flow of information enables the ACA to effectively monitor the entire BEAD portfolio, identify potential issues early, and ensure projects remain on track.

2.7 Submission Deadline

The Quarterly Progress Report is due no later than fifteen(15) calendar days following the end of each reporting period. For example, the report for the period covering October 1st through December 31st would be due by January 15th. The submission must reflect the most recent data as of the end of the preceding quarter.

This is a recurring obligation that begins after the first full quarter following the Subgrant Agreement's Effective Date and continues for the duration of the project's construction period, until all Project Completion Criteria have been met.

2.8 Key Information to Provide

The ACA will provide a template that subgrantees must use for this report. The required information is detailed in Attachment 10 of the Subgrant Agreement and includes, but is not limited to, the following key data points:

- **Financial Status:**
 - Original and current total project price (subgrant and match amounts).
 - Grant amounts invoiced (previous quarter, current quarter, and cumulative).
 - Reimbursement amount received to date and total grant match expended to date.
- **Project Schedule & Progress:**
 - Current forecasted project completion date.
 - Overall project completion percentage.
- **Construction & Service Metrics:**
- **For Terrestrial Providers:** Physical progress (e.g., miles of project network constructed) compared to the project's initial plan.

- **For LEO Providers:** Service activation progress (e.g., number of new subscribers activated within the project area).
 - A list of new addresses/locations where service is now available.
 - An aggregate percentage of customers taking service at newly passed locations.
- **Compliance & Risk Management:**
 - A list of all engaged subcontractors.
 - A list of all middle mile interconnection agreements requested and their current status.
 - Status of all permits (completed and pending).
 - A description of any safety events affecting project completion.
 - A summary of any new or ongoing risks facing the project.
 - A record of all known damage to existing underground utilities that occurred during construction (as applicable).

2.9 Submission Method

Subgrantees must complete and submit the Quarterly Progress Report using the official template provided by the ACA. The submission must be made electronically via the [BEAD Subgrantee Portal](#), unless the ACA provides alternative instructions.

2.10 Responsibility and Certification

The subgrantee's designated project manager is typically responsible for compiling the data and submitting the Quarterly Progress Report. While this report does not require a formal officer-level certification like the Semiannual Progress Report, the individual submitting the report is responsible for ensuring the accuracy and completeness of the data provided. The ACA may follow up with questions if the data appears inaccurate or incomplete.

3 Semiannual Progress Report

The Semiannual Progress Report is a formal, comprehensive compliance deliverable that provides insight into the project's financial and operational health. It is more detailed than the Quarterly Progress Report and is a primary tool for federal oversight.

3.1 Purpose

Pursuant to NTIA guidance and the BEAD NOFO, the ACA is required to submit the Semiannual Progress Reports to the federal government. To fulfill this mandate, subgrantees are required to submit a Semiannual Progress Report to the ACA.

This report allows the ACA to collect and verify detailed data on project progress, financial status, and compliance with federal regulations. It ensures close monitoring of project performance and alignment with the BEAD program's goals.

3.2 Submission Deadline

This report is due semiannually, no later than twenty (20) calendar days following the end of each six-month reporting period. The two reporting periods are:

- **Period 1:** January 1 – June 30 (report due by July 20)
- **Period 2:** July 1 – December 31 (report due by January 20)

This is a recurring obligation that continues throughout the project's entire Period of Performance as defined in the Subgrant Agreement. Subgrantees are responsible for timely submission even if a reminder is not received.

3.3 Key Information to Provide

The ACA will provide an official template that subgrantees must use. This comprehensive report requires detailed project information as specified in Attachment 10 of the Subgrant Agreement, including the mandatory submission of federally required standard forms.

- **Project Status and Performance:**
 - A summary of activities completed during the reporting period.
 - An update on new or existing challenges, risks, and safety events.
 - The overall project completion percentage.
 - A description of the types of facilities constructed and installed.
 - A list of addresses or BSL Fabric IDs served, identifying each as residential, commercial, or a Community Anchor Institution (CAI).
 - Data on customer adoption, including new locations served and the aggregate percentage of customers taking service.

- A list of all engaged subcontractors.
- **Network and Service Data¹:**
 - A description of peak and off-peak actual network speeds.
 - The maximum advertised speed of the service being offered.
 - A description of the non-promotional prices and service tiers.
 - An updated list of all middle-mile interconnection agreements made during the reporting period and their current status (if applicable).
- **Formal Federal Reporting Forms:**
 - **SF-425 (Federal Financial Report):** Details the financial status of the award.
 - **SF-429 (Real Property Status Report):** Reports on any real property acquired or improved with grant funds, if applicable.
 - **SF-428 (Tangible Personal Property Report):** Reports on equipment and other tangible property acquired with grant funds, if applicable. **Additional Compliance Data**
 - Performance testing data in the ACA/NTIA-prescribed template and format (consistent with the NTIA “Performance Measures for BEAD Last-Mile Networks” Policy Notice, as subsequently or further updated).
 - Any right-of-way, permit, or franchise fees paid in connection with the Project during the reporting period and, if applicable, the cumulative total to date; and a description of any right-of-way delays encountered (nature, duration, and entities from which permission was sought).
 - Executive compensation information required under 2 C.F.R. Part 170 and the Federal Funding Accountability and Transparency Act of 2006 (FFATA), unless an exception applies under 2 C.F.R. § 170.110.

3.4 Submission Method


Subgrantees must complete and submit the Semiannual Progress Report and all associated federal forms using the official templates provided by the ACA. The submission must be made electronically via the [BEAD Subgrantee Portal](#) unless the ACA provides alternative instructions in writing.

3.5 Responsibility and Certification

This is a formal compliance report that must be certified by an officer or director of the subgrantee organization. This individual must have the legal authority to sign on behalf of the organization and formally attest that all information provided in the report is true and accurate.

The signature verifies that the subgrantee has reviewed the information and affirms its correctness. This formal attestation includes certifying compliance with all applicable federal requirements, including the

¹ Information provided by the Subgrantees will be required to follow the NTIA’s *Performance Measures for BEAD Last Mile Networks Policy Notice and Primer*, along with utilizing any templates and format required by the NTIA and ACA.



Contract Work Hours and Safety Standards Act and the Federal Fair Labor Standards Act, as specified in the Subgrant Agreement.

4 Final Performance (Technical) Report

This is the subgrantee's final, formal reporting deliverable. It provides a conclusive summary of the project's overall outcomes and is used by the ACA to support its own final closeout reporting to the federal government.

4.1 Purpose

As the primary grant recipient, the ACA is required to submit a comprehensive Final Report to NTIA after all program funds are expended. To meet this federal obligation, subgrantees are required to provide the ACA with a final summary of their project's financial and performance data. This submission is essential for formally closing out the subgrant and ensuring the complete and accurate accounting of the BEAD program's overall impact.

4.2 Submission Deadline

This is a one-time report. In accordance with Section X.F. of the Subgrant Agreement, it is due no later than ninety (90) calendar days *after* project completion or the expiration of the project's Period of Performance.

This deadline is distinct from the completion of construction. It is a post-project administrative requirement tied to the end of the grant's formal lifecycle.

4.3 Key Information to Provide

The ACA will provide an official template that subgrantees must use. The information required directly supports the ACA's federal reporting and includes, but is not limited to:

- Final Financial Accounting:
 - A Final SF-425 (Federal Financial Report) detailing how all grant and matching funds were expended over the entire project lifecycle.
- Formal Federal Reporting Forms:
 - SF-428 (Tangible Personal Property Report): Reports on equipment and other tangible property acquired with grant funds.
 - SF-429 (Real Property Status Report): Reports on any real property acquired or improved with grant funds.
- Final Performance Summary:
 - A summary of each service provided with the grant funds.
 - Final performance testing data in the ACA/NTIA-prescribed template and format (consistent with NTIA's "Performance Measures for BEAD Last-Mile Networks" Policy Notice, as subsequently or further updated)

- A final list of all locations where broadband service was made available.
- Data on service utilization and the comparative demographics of the populations served.
- Certificate of Compliance:
 - A signed certificate demonstrating the subgrantee's compliance with all BEAD program requirements throughout the project. Subgrantees must also be prepared to return any funds not obligated or expended on eligible uses within the project's eligible cost timeframe.

4.4 Submission Method

Subgrantees must complete and submit the Final Performance (Technical) Report using the official template provided by the ACA. The submission must be made electronically via the [BEAD Subgrantee Portal](#), unless the ACA provides alternative instructions in writing. Subgrantees must respond to any follow-up questions in a timely manner.

4.5 Responsibility and Certification

This final report must be certified by an officer or director of the subgrantee organization. This individual must have the legal authority to sign on behalf of the organization and formally attest that all information provided is true and accurate, and that all BEAD requirements have been met.

5 Fraud, Waste, and Abuse

Beyond scheduled programmatic reporting, subgrantees have a critical and ongoing legal duty to serve as responsible stewards of public funds. This includes both actively preventing and immediately reporting any potential misuse of grant funding.

5.1 Purpose

The purpose of FWA reporting is for subgrantees to fulfill their legal obligation to protect public funds by ensuring transparency and accountability. In accordance with 2 C.F.R. § 200.113 and the Subgrant Agreement, subgrantees must immediately disclose any credible evidence of potential criminal misconduct or misuse of federal funds to the proper authorities.

5.2 Submission Timing

FWA reporting is required immediately upon discovery of credible evidence of a potential violation. Unlike programmatic reports, there is no grace period. This is an "as-needed" reporting requirement triggered by a specific event.

5.3 Information to Report

Subgrantees must submit a formal, written disclosure containing any credible evidence of the following:

- Violations of federal criminal law involving fraud, conflict of interest, bribery, or gratuity, as found in Title 18 of the U.S. Code.
- Violations of the civil False Claims Act (31 U.S.C. §§ 3729-3733).
- Any other allegations of BEAD-related waste, fraud, abuse, or mismanagement.

5.4 Submission Method

In accordance with 2 C.F.R. § 200.113 and the Subgrant Agreement, the written disclosure must be submitted in a timely manner to all three of the following entities:

- 1. The Arizona Commerce Authority (ACA):**
 - The disclosure should be sent to your ACA at broadband@azcommerce.com. An optional Fraud Reporting Form is also available on the ACA website for convenience.
- 2. The Assigned NTIA Federal Program Officer:**
 - A disclosure must also be sent directly to the NTIA Federal Program Officer assigned to the ACA's BEAD award. Contact information for this individual will be provided by the ACA.
- 3. The U.S. Department of Commerce Office of Inspector General (OIG):**
 - Reports can be made directly to the OIG through its official channels. Anonymous reporting is an option.

- OIG Hotline: 1-800-424-5197
- OIG Website: <https://www.oig.doc.gov/pages/hotline.aspx>

5.5 Compliance Monitoring and Reporting

Subgrantee shall publicize the telephone numbers and email addresses for:

- ACA compliance programs, including the ACA policies to promote ethics and report waste, fraud, and abuse (<https://www.azcommerce.com/about-us/aca-policies/>) (complaints@azcommerce.com) (602.845.1200);
- the U.S. Department of Commerce Office of Inspector General Hotline (<https://www.oig.doc.gov/pages/hotline.aspx>), including its toll-free number (1.800.424.5197); and
- Subgrantee's internal mechanisms for reporting waste, fraud, abuse, and mismanagement.

Subgrantee must maintain, and upon request promptly produce, copies of all materials used for such purposes.

5.6 Responsibility

The ultimate responsibility for ensuring a disclosure is made rests with the subgrantee organization. The report should be initiated by any employee, officer, or agent who discovers the credible evidence. The formal written disclosure would typically be executed by an authorized representative of the organization, such as a compliance officer, legal counsel, or senior manager.

6 Submitting a Report

The [BEAD Subgrantee Portal](#) is the official online portal that subgrantees will use to complete and submit all required programmatic reports to the ACA. This platform is designed to streamline the reporting process, provide a secure channel for communication, and serve as the central repository for all project documentation.

For detailed instructions on the initial, one-time process of setting up an account in the [BEAD Subgrantee Portal](#), subgrantees must refer to the BEAD Milestone Disbursement Guidelines, which covers all onboarding procedures. This section focuses on how to use the platform for ongoing report submission *after* an account has been established.

6.1 Key Functions of the Platform

- **Centralized Reporting:** All report templates—from the Quarterly Progress Report to the Final Performance (Technical) Report – will be accessed and submitted through [BEAD Subgrantee Portal](#).
- **Deadline Alerts:** The platform will send automated alerts and email notifications for upcoming report submission deadlines. However, subgrantees remain responsible for meeting all deadlines regardless of receiving an alert.
- **Secure Document Uploads:** Subgrantees will upload all required supporting documentation directly within the platform.
- **Communication Channel:** The platform will be used for official communications from the ACA regarding report submissions, such as requests for additional information.

6.2 How to Submit a Report

Subgrantees must submit required reports and supporting documentation electronically through the BEAD Subgrantee Portal, using the official templates and instructions provided by ACA. ACA may update templates and data fields from time to time to reflect NTIA guidance; subgrantees must use the latest templates. ACA will conduct an implementation meeting within thirty (30) calendar days of the Subgrant Agreement's Effective Date and will make reporting templates and instructions available at or shortly after that meeting.

6.3 Subgrantee Responsibility

It is the subgrantee's responsibility to ensure they are familiar with the [BEAD Subgrantee Portal](#) monitor it for upcoming deadlines, and submit all reports completely and on time. If a subgrantee believes a report or notification is missing, they should proactively inquire with the ACA to ensure they remain in full compliance with all federal and state reporting guidelines.

Record Retention: Subgrantees must maintain financial and performance records, supporting documents, statistical records, and all other records pertinent to Award Funds, the Project, and reporting for not less

than five (5) years after the Closeout Date. These records must be available to the ACA, NTIA, NIST, Inspectors General, the Comptroller General, or their authorized representatives upon request.

As-Requested/Ad-Hoc Reporting: Subgrantee shall provide Project-related information as requested in writing by the ACA on reasonable timelines the ACA may specify to support ACA's federal, state, or local reporting obligations.

7 Appendix A: Statutory Requirements and Guiding Documents

In accordance with Title 2, Code of Federal Regulations, Part 200 (2 C.F.R. § 200), the terms and conditions of a federal award flow down from the primary recipient (the Arizona Commerce Authority [ACA]) to all subgrantees. Consequently, subgrantees under the Broadband Equity Access and Deployment (BEAD) program are responsible for complying with a multi-layered framework of legal and programmatic requirements. This includes mandates from the federal awarding agency, National Telecommunications and Information Administration (NTIA), as well as all obligations detailed within the executed Subgrant Agreement with the ACA.

The following sections provide a reference to the hierarchy of guiding documents that establish these requirements.

7.1 Relevant Guidance for the ACA's BEAD Program

Throughout the lifecycle of the BEAD program, all reporting efforts are administered based on applicable federal and state regulations, BEAD program requirements, and the binding terms of executed subgrant agreements between ACA and its subgrantees. The following resources represent the relevant requirements and guidance that apply to all projects within the ACA's BEAD program.

- **Arizona Broadband Equity, Access and Deployment (BEAD) Subgrant Agreement** – subgrant agreement executed between the ACA and a BEAD subrecipient. The subgrantee should regularly reference the executed subgrant agreement between the ACA and BEAD subrecipient.
- [BEAD Five-year Action Plan](#) - Arizona Commerce Authority BEAD Five-Year Action Plan. Arizona's vision is to provide dependable and affordable high-speed internet services to every community and access to the necessary digital skills, so every resident can fully participate in a digital world.
- [BEAD Proposal Volume I & II](#) - Arizona Commerce Authority Initial Proposal for the Broadband Equity, Access and Deployment (BEAD) Volumes I & II. Volume I outlines existing broadband funding within Arizona, the list of the locations designated as unserved and underserved in the FCC National Broadband Map, Arizona's Community Anchor Institutions (CAIs) as defined by the National Telecommunications and Information Administration (NTIA) and the proposed plan for the BEAD challenge process. Volume II outlines the long-term objectives for deploying broadband, closing the digital divide, addressing access, affordability, and adoption issues, and enhancing economic growth and job creation including information developed in the Five-Year Action Plan.
- [Arizona Commerce Authority Connect All AZ](#) – ACA's Connect All AZ website provides more information and additional resources available for BEAD and other broadband programs.
- [Arizona Commerce Authority](#) – ACA [Uniform Terms and Conditions](#).

7.2 Relevant Guidance for BEAD and Federal Programs

The following resources represent relevant federal requirements for ACA BEAD subrecipients:

- **Code of Federal Regulations** – Title 2 Code of Federal Regulations (C.F.R.) Part 200. 2 C.F.R. Part 200 is the set of regulations for federal grants that provide uniform administrative requirements, cost principles, and audit requirements for federal awards. Some specific provisions that are especially relevant to the BEAD program are described below.
- **Eligible Uses of BEAD Program Funds** – Grant recipients may only use federal award funds, and any non-federal cost share committed to an award to pay for allowable costs under the BEAD program, as detailed in the *Fixed Amount Subaward Primer* referenced in Appendix B of this document. BEAD funding generally is disbursed to ACA subrecipients utilizing a fixed cost subaward structure. See also 2 C.F.R. §§ 200.201, 200.333. A fixed amount subaward is a type of subgrant agreement where payments are based on meeting specific milestone requirements of the federal award.
- **BEAD Capital expenditures (CapEx) and operating expenditures (OpEx)** – The BEAD program does not restrict eligible uses of funds to capital expenses. However, the cost principals applied must be in accordance with 2 C.F.R. Part 200, Subpart E for States and non-profit organizations and in 48 C.F.R. Part 31 for commercial organizations.
- **Costs specifically identified as prohibited under the BEAD Program** – An Eligible Entity (e.g., ACA) or subrecipient/subgrantee (including contractors and subcontractors of subrecipients) may not use grant funds received under the BEAD program to purchase or support any covered communications equipment or service (as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608)).
- **Provision of Information to Federal Communications Commission and United States Department of Agriculture** – NTIA will provide the information collected under Section I.E.2 of BEAD NOFO, and such other Program information as is necessary, to the Commission, the Department of Agriculture, the Department of the Treasury, and any other federal agency that funds broadband deployment, to be used, as applicable, in determining whether to award funds for the deployment of broadband under any program administered by those agencies.
- **Recipient Integrity and Performance Matters** – In accordance with Section 872 of Public Law 110-417, as amended, see 41 U.S.C. § 2313, if the total value of a recipient's currently active grants, cooperative agreements, and procurement contracts from all federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of an award made under BEAD NOFO, then the recipient shall be subject to the requirements specified in Appendix XII to 2 C.F.R. Part 200.03.
- **Federal Funding Accountability and Transparency Act of 2006** – In accordance with 2 C.F.R. Part 170, all recipients of a federal award made on or after October 1, 2010, are required to comply with reporting requirements under the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. No. 109-282).
- **Uniform Administrative Requirements, Cost Principles and Audit Requirements** – Through 2 C.F.R. § 1327.101, the Department of Commerce adopted Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at 2 C.F.R. Part 200, which apply to awards in the BEAD program. Refer to <http://go.usa.gov/SBYh> and <http://go.usa.gov/SBg4>. The 2

C.F.R. Part 200, Subpart F, adopted by the Department of Commerce through 2 C.F.R. § 1327.101 requires any non-federal entity that expends federal awards of \$1,000,000 or more in the recipient's fiscal year to conduct a single or program-specific audit in accordance with the requirements set out in the Subpart. Refer to the Policy Notice on Uniform Guidance for BEAD for exceptions, adjustments, and clarifications to certain provisions of 2 C.F.R. Part 200.

- **Department of Commerce Financial Assistance Standard Terms and Conditions** – The Department of Commerce will apply to each award in this Program, the Financial Assistance Standard Terms and Conditions in effect on the date of award. The current version, dated September 22, 2025, is accessible at Department of Commerce Financial Assistance Standard Terms and Conditions. Refer to Section VIII of BEAD NOFO (Federal Awarding Agency Contact(s)) and the General Terms and Conditions for BEAD for more information.
- **General Terms and Conditions for the NTIA Broadband, Equity, Access, and Deployment (BEAD)** – Grantees shall comply, and must require each Subgrantee or contractor, including lower tier Subgrantees or subcontractors, to comply with all applicable Federal, State, and local laws and regulations, and all applicable terms and conditions of this award. Grantees and its Subgrantees are responsible for ensuring that all contracts, including those necessary for design and construction of facilities, are implemented in compliance with these specific terms and conditions of the award. Grantees must also comply with all requirements contained in 47 U.S.C. § 1702, the BEAD NOFO, the Department of Commerce General Terms and Conditions (dated September 22, 2025), the General Terms and Conditions for the BEAD Program, and the Specific Award Conditions applicable to each individual award. In any case where language among two or more authorities appears inconsistent, the relevant authorities should be read and interpreted in a manner which emphasizes consistency and harmonization across all relevant authorities. Where harmonization is impossible, NTIA has instructed Grantees to prioritize following the language contained in these authorities in the following order (from highest to lowest priority): 47 U.S.C. § 1702; the award's Specific Award Conditions; the General Terms and Conditions for the BEAD Program; the BEAD Restructuring Policy Notice (June 2025); the BEAD NOFO; the Department of Commerce General Terms and Conditions (dated September 22, 2025).
- **Pre Award Notification Requirements** – The Department of Commerce will apply the Pre-Award Notification Requirements for Grants and Cooperative Agreements dated December 30, 2014 (79 FR 78390), accessible at <http://go.usa.gov/hKkR>. Refer to Section VIII of BEAD NOFO (Federal Awarding Agency Contact(s)) for more information.
- **Environmental and National Historical Preservation Requirements** – Awarding agencies are required to analyze the potential environmental impacts, as required by the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) for Eligible Entity (e.g., ACA) proposals and awardee projects and other eligible activities seeking funding under the BEAD program.
- **Property Trust Relationship and Public Notice Filings for Grant-Acquired Property** – In accordance with 2 C.F.R. § 200.316, any real property, equipment, or intangible property acquired or improved with a federal award must be held in trust by the Eligible Entity (e.g., ACA) or subrecipient as trustee for the beneficiaries of the project, other eligible activity, or program under which the property was acquired or improved.
- **Domestic Preference for Procurements** – All funds made available through the BEAD program for broadband infrastructure must comply with the Build America, Buy America Act. Additionally,

the Infrastructure Act expressly prohibits subrecipients from using BEAD funding to purchase or support fiber optic cable and optical transmission equipment manufactured in the People's Republic of China unless a waiver of this requirement is received from NTIA.

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Appendix B: Definitions and Acronyms

Term	Definition	Acronym (if applicable)
National Telecommunications and Information Administration (NTIA)	<ul style="list-style-type: none"> The National Telecommunications and Information Administration (NTIA) is a federal agency administering the BEAD program. 	NTIA
Broadband Equity, Access and Deployment (BEAD) Program	<ul style="list-style-type: none"> The Broadband Equity, Access and Deployment Program administered by the National Telecommunications and Information Administration (NTIA) for deployment of broadband infrastructure projects in the state. 	BEAD
Arizona Commerce Authority	<ul style="list-style-type: none"> Coordinator and administrator of all broadband infrastructure funding programs in Arizona Key administration stakeholder and Subject Matter Expert (SME) on digital inclusion 	ACA
Eligible Entity	<ul style="list-style-type: none"> The term “Eligible Entity” means any State of the United States, the District of Columbia, Puerto Rico, American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands. In this case, Eligible Entity refers to ACA. 	N/A
Subgrantee	<ul style="list-style-type: none"> The term “subgrantee” means an entity that receives grant funds from an Eligible Entity to carry out eligible activities. 	N/A
Underserved Location	<ul style="list-style-type: none"> The term “underserved location” means a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to Reliable Broadband Service offered with—(i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds 	N/A

Term	Definition	Acronym (if applicable)
	<ul style="list-style-type: none"> An underserved service project is defined as a project in which not less than 80% of broadband-serviceable locations served by the project are unserved locations or underserved locations. An “Underserved Service Project” may be as small as a single underserved broadband serviceable location (NOFO Section I.C.cc). 	
Community Anchor Institution	<ul style="list-style-type: none"> The term “community anchor institution” means an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aged individuals. A Community Anchor Institution that lacks access to Gigabit-level broadband service is an eligible service location under the BEAD program 	CAI
Unserved Location	<ul style="list-style-type: none"> The term “unserved location” means a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to Reliable Broadband Service offered with—(i) a speed of not less than 25 Mbps for downloads; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds. 	N/A
Broadband; Broadband Service	<ul style="list-style-type: none"> The term “broadband” or “broadband service” has the meaning given the term “broadband internet access service” in Section 8.1(b) of title 47, Code of Federal Regulations, or any successor regulation, that it is a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up internet access service. This term also encompasses any service that the Commission finds to be providing a functional equivalent of the service 	N/A

Term	Definition	Acronym (if applicable)
	described in the previous sentence or that is used to evade the protections set forth in this part.	
Broadband Serviceable Location	<ul style="list-style-type: none"> A location in the FCC's Broadband Serviceable Location Fabric that is eligible for fixed broadband service and used for BEAD reporting and serviceability metrics 	BSL
Qualifying Broadband Service	<ul style="list-style-type: none"> For locations that are not CAIs: Reliable Broadband Service with at least 100 Mbps download, 20 Mbps upload, and latency ≤ 100 ms. For CAIs: Reliable Broadband Service with at least 1 Gbps symmetrical and latency ≤ 100 ms. 	N/A
Monthly Permit Status Report	<ul style="list-style-type: none"> The term 'Monthly Permit Status Report' refers to the report submitted by subgrantees monthly to provide the ACA with consistent updates on the status of all federal, state, tribal, and local permit applications required for the performance of the Project. 	N/A
Quarterly Progress Report	<ul style="list-style-type: none"> The term 'Quarterly Progress Report' refers to the report submitted by subgrantees quarterly to provide the ACA with regular, near real-time updates on project progress, risks, and key performance indicators (KPIs). 	N/A
Semiannual Progress Report	<ul style="list-style-type: none"> The term 'Semiannual Progress Report' refers to the report submitted by subgrantees twice a year to provide a comprehensive, formal update on the project's financial and operational status for federal oversight purposes. 	N/A
Final Performance (Technical) Report	<ul style="list-style-type: none"> The term 'Final Performance (Technical) Report' refers to the report subgrantees provide to the ACA with a final, post-project summary of financial and performance data to support the ACA's closeout reporting to NTIA. 	N/A

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Appendix C: BEAD Supporting Documents

Term	Definition
BEAD General Terms & Conditions	<ul style="list-style-type: none"> • BEAD grant funding General Terms & Conditions provided by the NTIA.
BEAD NOFO	<ul style="list-style-type: none"> • The Notice of Funding Opportunity for the Broadband, Equity, Access, and Deployment Program. It outlines the requirements required to submit the Final Proposal.
NTIA BEAD FAQs	<ul style="list-style-type: none"> • Frequently asked questions by an Eligible Entity regarding numerous topics such as the Challenge Process, Subrecipient Selection Process, Final Proposal questions and more.
BEAD Final Proposal Guidance	<ul style="list-style-type: none"> • This document provides guidance and requirements for BEAD Financial proposal
BEAD Subgrantee Selection Primer	<ul style="list-style-type: none"> • This document provides a high-level overview of how an Eligible Entity can conduct a Subrecipient Selection Process.
Build America, Buy America Compliance and Documentation Requirements and Procedures	<p>This document serves as a guide to the compliance and documentation requirements and procedures that NTIA’s Office of Internet Connectivity and Growth (OICG) will use to monitor compliance with BABA by recipients of NTIA grants subject to BABA requirements, which includes BEAD.</p>
BEAD Build America, Buy America, Notice of Final Nonavailability Waiver	<ul style="list-style-type: none"> • In accordance with the Build America, Buy America Act (BABA), this notice advises that the Department of Commerce (DOC) issued a limited, general applicability, nonavailability waiver of the Buy America Domestic Content Procurement Preference (Buy America Preference) to recipients of Federal financial assistance under NTIA’s BEAD program, which will flow down to subrecipients. The waiver is provided in the attached link.
BEAD BABA FAQ	<ul style="list-style-type: none"> • Department of Commerce BEAD BABA specific FAQ 2/2024
BEAD Restructuring Policy Notice	<ul style="list-style-type: none"> • This Policy Notice modifies and replaces certain requirements outlined in the BEAD NOFO. Each Subrecipient must comply with this Policy Notice to gain approval of its Final Proposal

Term	Definition
	<p>from the Assistant Secretary of Commerce for Communications and Information.</p>
<p>BEAD Subrecipient Qualifications</p>	<ul style="list-style-type: none"> • The BEAD NOFO (Section IV.D) requires an Eligible Entity to ensure that all prospective subrecipients can carry out activities funded by the subgrant in a competent manner and in compliance with all applicable laws. • This Subrecipient Qualifications Evaluation Guide provides an overview of the BEAD NOFO requirements and how to evaluate the qualifications of prospective BEAD subrecipients.
<p>Subrecipient vs. Subcontractor Guidance</p>	<ul style="list-style-type: none"> • This checklist provides a Broadband, Equity, Access, and Deployment (BEAD) Eligible Entity with considerations to determine if a partnering entity should be considered a subrecipient or a subcontractor. Note, for BEAD deployment projects, Eligible Entities must use competitively awarded subgrants.
<p>Fixed Amount Subaward Primer</p>	<ul style="list-style-type: none"> • This primer provides a Broadband Equity, Access, and Deployment (BEAD) program Eligible Entity with guidance on fixed amount subawards, which are only allowed for subgrants in which the major purpose of the project is broadband infrastructure deployment.
<p>Notification of Provisional Selections</p>	<ul style="list-style-type: none"> • This document provides an Eligible Entity guidance on the requirements they must satisfy before public notification of provisional BEAD subrecipient selections.
<p>Guidance on NTIA National Environmental Policy Act Compliance</p>	<ul style="list-style-type: none"> • Guidance on NEPA process requirements, roles and responsibilities, and Appendices applicable to NTIA programs effective April 2024. • NOTE: BEAD subgrantees should view the BEAD general terms and conditions and NEPA for BEAD resources for additional context on roles and responsibilities in the BEAD program.
<p>Selecting Technology Policy Notice One Pager</p>	<ul style="list-style-type: none"> • This resource provides comprehensive guidance on obtaining applications during subrecipient selection for deploying broadband service to all unserved and underserved locations, prioritizing the most robust, affordable, and scalable technologies.
<p>Broadband Equity, Access, and Deployment (BEAD)</p>	<ul style="list-style-type: none"> • NTIA) as the agency guidance for

Term	Definition
Program: Performance Measures for BEAD Last-Mile Networks	<ul style="list-style-type: none">• BEAD Eligible Entities (States, Territories, and the District of Columbia) and prospective subgrantees on the performance measurement standards related to speed, latency, and reliability of last-mile deployment projects required under the BEAD Program.