

INTERNET FOR ALL

BEAD Subgrantee Qualifications

Evaluation Guide



U.S. Department of Commerce National Telecommunications and Information Administration

Disclaimer

The Broadband, Equity, Access & Deployment Program (BEAD)¹ provides federal funding to make grants to Eligible Entities for broadband planning, deployment, mapping, equity, and adoption projects and activities. The following guide is intended to clarify and provide guidance on information set forth in the Notice of Funding Opportunity (NOFO) on May 13, 2022.

The below guide is for informational purposes only and is intended solely to assist potential applicants in better understanding the NTIA BEAD Program and the application requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This guide does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in the below guide.

¹ Authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021), also known as the Bipartisan Infrastructure Law.







Table of Content

Disclaimer1		
Introduction		.3
Purpo	se of This Guide	.3
Subgrantee Qualifications as Gating Criteria		.3
Importance of Reviewing Subgrantee Qualifications		.3
1. Ger	neral Requirement	.4
2. Spe	ecific Qualifications for Subgrantees Deploying Network Facilities	.4
2.1.	Financial Capability (BEAD NOFO Section IV.D.2.a)	.5
2.2.	Managerial Capability (BEAD NOFO Section IV.D.2.b)	.7
2.3.	Technical Capability (BEAD NOFO Section IV.D.2.c)	.8
2.4.	Compliance With Laws (BEAD NOFO Section IV.D.2.d)	.9
2.5.	Operational Capability (BEAD NOFO Section IV.D.2.e)	10
2.6.	Ownership (BEAD NOFO Section IV.D.2.f)	12
2.7.	Other Public Funding (BEAD NOFO Section IV.D.2.g)	12
Appendix: Subgrantee Qualification Checklist14		



Internet for All



 $internet for all.gov \mid internet for all @ntia.gov$

Introduction

Purpose of This Guide

The BEAD NOFO (Section IV.D) requires Eligible Entities to ensure that all prospective subgrantees can carry out activities funded by the subgrant in a competent manner and in compliance with all applicable laws. This Subgrantee Qualifications Evaluation Guide provides an overview of the BEAD NOFO requirements and how to evaluate the qualifications of prospective BEAD subgrantees.

Subgrantee Qualifications as Gating Criteria

Subgrantee qualifications act as gating criteria, meaning that prospective subgrantees must meet the standards to be eligible for funding. Please note that gating criteria are **not** scoring criteria. Gating criteria (also referred to as eligibility criteria) help determine which subgrant applicants are qualified to compete for subgrants, whereas scoring criteria help with selection between competing eligible prospective subgrantees.

Importance of Reviewing Subgrantee Qualifications

It is essential for Eligible Entities to conduct a comprehensive evaluation of subgrantee qualifications. This review process benefits the program by:

- Ensuring that prospective subgrantees are financially stable and have the necessary expertise and experience to successfully implement the proposed projects;
- Increasing the probability of identifying potential risks and avoiding common obstacles;
- Confirming that the proposed projects will be implemented in compliance with applicable regulations and laws; and
- Providing a clear understanding of the prospective subgrantees' organizational structures, stakeholders, and funding sources.

Capacity to Review the Subgrantee Qualifications

Eligible Entities are strongly encouraged to assemble a group of subject matter experts (SMEs) to review and assess the qualifications of their prospective subgrantees. The Eligible Entities can either use in-house capacity or enlist the services of outside experts. Examples of positions that may be helpful when reviewing subgrantee qualifications include the following:

Example 1: Financial Analyst (e.g. Certified Public Accountant)

Financial analysts can assess the stability and health of prospective subgrantees' finances and evaluate financial statements, pro forma analysis, and business plans.

Example 2: Technical Reviewer (e.g. Network Engineer)

Technical reviewers can analyze network designs, infrastructure diagrams, and confirm the feasibility of the technical proposals.

Example 3: Compliance/Legal Officer (e.g. Attorney, Grants Specialist)

Compliance/legal officers can evaluate prospective subgrantees' legal and compliance documents and history to ensure adherence to applicable laws and regulations.





1. General Requirement

Prior to entering any subgrantee agreement, including non-deployment projects, each Eligible Entity shall ensure that the prospective subgrantee:

- Is capable of carrying out activities funded by the subgrant in a competent manner in compliance with all applicable federal, Eligible Entity, and local laws;
- Has the financial and managerial capacity to meet the commitments of the subgrantee under the subgrant, the requirements of the Program, and such other requirements as have been prescribed by the Assistant Secretary or the Eligible Entity; and
- Has the technical and operational capability to provide the services promised in the subgrant in the manner contemplated by the subgrant award.²

In making this determination, Eligible Entities should keep in mind that evaluation of these capabilities is relative to the size and type of project. The evaluation process is not intended to exclude smaller entities from applying for appropriately sized projects that fit their capabilities.

Additionally, Eligible Entities should be aware that prospective subgrantees can demonstrate their capabilities in a variety of ways. For example:

- A new consortium may highlight its individual members' strengths to demonstrate that the consortium meets the subgrantee qualifications;
- A prospective subgrantee with broadband deployment experience but no operational background may partner with an experienced entity to demonstrate financial and managerial qualifications; or
- Different types of entities, e.g., municipalities and traditional ISPs, may provide evidence of capabilities in different ways.

2. Specific Qualifications for Subgrantees Deploying Network **Facilities**

In addition to the general qualifications, subgrantees deploying network facilities must also meet specific requirements related to:

- Financial Capability:
- Managerial Capability;
- Technical Capability;
- Compliance with Laws:
- Operational Capability;
- Ownership; and

² BEAD NOFO Section IV.D.1

• Other Public Funding.



Internet for All





Page | 4

2.1. Financial Capability (BEAD NOFO Section IV.D.2.a)

2.1.1. Requirements

To demonstrate financial capability, prospective subgrantees must provide the following evidence³:

Certifications

- Prospective subgrantees must certify that they:
 - Are financially qualified to meet the obligations associated with the project;
 - Will have available funds for all project costs that exceed the amount of the grant; and
 - Will comply with all Program requirements, including service milestones.
- If funding is disbursed upon task completion, subgrantees must certify sufficient financial resources to cover project costs until further disbursements are authorized.

Letter of Credit (LOC) Requirements

The BEAD NOFO and the conditional programmatic waiver⁴ of the NOFO's letter of credit requirements together require the following:

- Prospective subgrantees must submit a letter from:
 - An eligible bank or credit union committing to issue an irrevocable standby letter of credit in the form established by the Eligible Entity; or
 - A certified surety on federal bonds committing to issue the prospective subgrantee a performance bond.
- Before finalizing any subgrantee agreement, the prospective subgrantee must obtain:
 - A standby letter of credit in the form established by the Eligible Entity valued at no less than 25% of the subaward amount; or
 - A performance bond acceptable in all respects to the Eligible Entity in a value of no less than 100% of the subaward amount; or
 - The Eligible Entity may elect to issue funding on a reimbursable basis for periods of no more than six months and permit subgrantees to maintain a letter of credit or performance bond valued at 10% of the subaward amount.
- If requiring the 25% letter of credit or 100% performance bond, the Eligible Entity may elect to permit subgrantees to reduce the amount of the letter of credit or performance bond upon achievement of specific deployment milestones.
- Letters of credit, but not performance bonds, must be accompanied by an opinion letter from legal counsel asserting that in bankruptcy proceedings the letter of credit or its proceeds will not be treated as the subgrantee's bankruptcy estate property, subject only to customary assumptions, limitations, and qualifications.

https://broadbandusa.ntia.gov/sites/default/files/2023-10/BEAD_LOC_Waiver_Notice_10.23.23.pdf







³ With the Assistant Secretary of Commerce for Communications and Information's approval, entities with the ability to issue public bonds, such as municipalities, can provide comparable evidence of financial capabilities.

⁴ BEAD Letter of Credit Waiver Notice (October 23, 2023),

Audited Financial Statements

Prospective subgrantees must submit financial statements from the prior fiscal year that are audited by an independent certified public accountant. If not previously audited during the ordinary course of business, prospective subgrantees can provide unaudited statements but must commit to supplying audited statements by a deadline specified by the Eligible Entity.

Sustainability / Pro Forma Analyses

Prospective subgrantees must submit business plans and related analyses that substantiate the sustainability of the proposed project to the Eligible Entity. This can be provided in the form of pro forma statements or analyses, inclusive of cash flow and balance sheet projections, and should include at least three years of operating cost and cash flow projections post-project completion.

2.1.2. Potential Approaches to Review Financial Qualifications

Certifications

What the Eligible Entity Should Look for:

- ✓ Validity and dates of the certifications; and
- ✓ Proper authorization and endorsement of the certifications.

Example:

If a prospective subgrantee certifies that they have the necessary funds for project costs exceeding the grant, then the Eligible Entity can cross-check this claim with financial statements or bank guarantees.

Letter of Credit

What the Eligible Entity Should Look for (absent use of programmatic waiver):

- ✓ A letter amount corresponding to or exceeding 25% of the subaward value; and
- ✓ A legal opinion letter accompanying the letter of credit addressing bankruptcy considerations.

Example:

If the prospective subgrantee provides a \$250,000 letter of credit from a well-known bank for a \$1,000,000 project, the Eligible Entity should verify that the amount matches or exceeds 25% of the subaward amount and that the period of the letter is valid.

Audited Financial Statements

What the Eligible Entity Should Look for:

- ✓ Detailed financial statements audited by a credible firm;
- ✓ Indicators of cash flow for financial stability;
- ✓ Positive financial indicators and absence of alarming discrepancies; and
- ✓ Recommendations from auditors regarding material weaknesses/deficiencies.

Example:

Financial statements audited by a CPA firm showing consistent profitability and positive cash flow indicate good financial health and capability. However, the Eligible Entity should also:

- Check the credentials of the auditing firm;
- Examine profit and loss, balance sheets, and cash flow for financial stability; and
- Identify any substantive discrepancies or red flags in the statements.





Sustainability / Pro Forma Analyses

What the Eligible Entity Should Look for:

- ✓ Comprehensive and realistic business plans;
- ✓ Projections indicating the project's sustainability; and
- ✓ Contingencies and risk management strategies in the business plan.

Example:

If a prospective subgrantee's pro forma analysis predicts steady growth in user subscriptions over three years after completion, makes assumptions on subscriber take rates and Average Revenue Per User (ARPU) that reflect local conditions such as existing non-fiber competitors, and has contingencies for market downturns, it indicates a well-thought-out plan. However, Eligible Entities should:

- Analyze the company's business plan's clarity and alignment with the proposed project;
- Examine the pro forma statements for realistic projections; and
- Check for any risk mitigation strategies in the plan.

2.2. Managerial Capability (BEAD NOFO Section IV.D.2.b)

2.2.1. Requirements

To demonstrate managerial capability, prospective subgrantees must provide the following evidence:

Documentation

- Resumes of all key management staff; and
- Organizational chart(s) detailing all parent companies, subsidiaries, and affiliates.

Narrative on Managerial Readiness

Narrative describing the prospective subgrantee's readiness to manage a broadband network which includes:

- Experience and qualifications of key management;
- Experience undertaking projects of similar size and scope;
- Recent and upcoming organizational changes including mergers and acquisitions; and
- Relevant organizational policies.

2.2.2. Potential Approaches to Review Managerial Qualifications

Resumes & Organizational Charts

A. What the Eligible Entity Should Look For:

- Resumes with relevant qualifications, experience, and a track record of successfully managing and supporting similar projects; and
- ✓ Organizational charts that explain the structure and relationships within the organization.
- B. Examples:
 - If a project manager's resume shows a history of successful completion of similar-sized broadband network projects, it may indicate their suitability for managing the proposed project.
 - If a network engineer's resume indicates extensive experience in designing, implementing, and managing the type of broadband network in the project proposal, it





may signify the individual's technical proficiency and capability to efficiently execute and oversee the network aspects of the proposed project.

Managerial Readiness Narrative

A. What the Eligible Entity Should Look For:

✓ Detailed narrative covering key management qualifications, experience, past similar projects, organizational changes, and relevant policies.

B. Example:

If the prospective subgrantee provides a narrative explaining the involvement of its company in successful broadband projects implementation, it might indicate that the company is wellsuited for deploying and managing broadband networks. The Eligible Entity should capture the details provided about the past projects (e.g., the project size & scope), and make sure that they're similar in scope to the proposed project.

2.3. Technical Capability (BEAD NOFO Section IV.D.2.c)

2.3.1. Requirements

To demonstrate technical capability, prospective subgrantees must provide the following evidence:

Certification

A prospective subgrantee applying for funding to develop or enhance a broadband network must certify that it is:

- Technically qualified to complete and operate the project, and
- Capable of carrying out the funded activities in a competent manner, including that it will use an appropriately skilled and credentialed workforce.

Documentation

Prospective subgrantees must provide the following certified by a Professional Engineer (PE) stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the project:

- A network design and diagram;
- Detailed project costs;
- Build-out timeline and milestones for project implementation; and
- A capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant.

2.3.2. Potential Approaches to Review Technical Qualifications

Certification

A. What the Eligible Entity Should Look For:

- ✓ Validity, accuracy, and comprehensiveness of the certifications;
- ✓ Authentic endorsements by the appropriate authorities;
- ✓ A strategic plan showcasing the prospective subgrantee's intention to employ a credentialed and skilled workforce for the project; and
- ✓ Assurance that the prospective subgrantee acknowledges the program's requirements and has the means to meet the technical obligations.
- B. Examples:







- **Technical Qualification**: Prospective subgrantees might provide certifications from reputable institutions, or endorsements from prior partners. Eligible Entities should review the validity of the certifications and contact the listed partners to confirm the endorsements.
- Commitment to Skilled Workforce: Prospective subgrantees might provide a recruitment plan, workforce strategy, or training modules that highlight their commitment to hiring or deploying credentialed professionals. The Eligible Entity should ensure that these plans are not only comprehensive but also align with the BEAD NOFO's stipulations (*Fair Labor Practices and Highly Skilled Workforce*⁵).

Documentation

A. What the Eligible Entity Should Look For:

- ✓ Comprehensive network designs and diagrams that align with the project's scope;
- ✓ Detailed project cost estimates that are realistic and aligned with industry standards;
- ✓ A capital investment plan that ensures full project execution and initiation of services;
- ✓ Clear project timelines with defined milestones; and
- ✓ Endorsement of all documents by a PE, attesting the network's capability to deliver the standard broadband service to every location the project covers.

B. Examples:

- **Network Design & Diagram**: Prospective subgrantees might provide a technical drawing showing the layout of the network infrastructure. Eligible Entities should review this to ensure it aligns with the project's scope and objectives.
- **Project Costs**: A prospective subgrantee might provide a detailed budget breakdown showcasing all the costs. Eligible Entities should ensure these costs are realistic, justifiable and aligned with the project's scope.
- **Timeline & Milestones**: A prospective subgrantee might provide a Gantt chart or a similar project management tool to show the project timeline. Eligible Entities should review this to check for feasibility and ensure that all critical milestones are covered.

2.4. Compliance With Laws (BEAD NOFO Section IV.D.2.d)

2.4.1. Requirements

To demonstrate compliance with laws, prospective subgrantees must provide the following evidence:

Legal Adherence

Each prospective subgrantee must demonstrate that it can carry out funded activities in a competent manner in compliance with all applicable Federal, State, Territorial, and local laws.

⁵ Section IV.C.1.e of the BEAD NOFO.



Internet for All



= | 9 #

Occupational Safety and Health

Prospective subgrantees must adhere to safety and health requirements and must permit worker-led health and safety committees. Management must be prepared to meet with these committees upon a reasonable request.

2.4.2. Potential Approaches to Review Compliance with Laws

A. What the Eligible Entity Should Look For:

- Clear documentation from the prospective subgrantee attesting to their understanding and commitment to all relevant laws and safety requirements;
- ✓ Evidence of past compliance or adherence to similar regulations in previous projects or endeavors;
- ✓ Established processes, procedures, or protocols that the prospective subgrantee has in place to ensure continued compliance during the project; and
- ✓ Training programs or initiatives aimed at informing and ensuring that the prospective subgrantee's team understands and adheres to safety and legal standards.

B. Examples:

- **Past Records:** The prospective subgrantee may present previous records or compliance checks from past projects. The Eligible Entity should review these for any red flags or past non-compliance issues.
- **Training Programs:** If the prospective subgrantee describes training programs, they could provide training schedules, modules, or materials as evidence. The Eligible Entity should ensure these programs are relevant and align with the required safety and legal standards.

2.5. Operational Capability (BEAD NOFO Section IV.D.2.e)

2.5.1. Requirements

To demonstrate operational capability, prospective subgrantees must provide the following evidence:

Certifications

A prospective subgrantee that has provided a voice, broadband, and/or electric transmission or distribution service for at least the two (2) consecutive years prior to the date of its application submission or that it is a wholly owned subsidiary of such an entity, must certify to these facts and specify the number of years the prospective subgrantee or its parent company has been operating.

If the prospective subgrantee has provided a voice and/or broadband service it must certify that it has timely filed its Federal Communications Commission ("FCC" or "Commission") Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations. Any deviations or failure to comply with Commission rules should be explained, including any related (pending or completed) enforcement actions, civil litigation, or other matters.







Service Reports

Prospective subgrantees that have operated only electric transmission/distribution services must provide qualified operating or financial reports⁶ filed with relevant financial institutions for the relevant time period, and must also certify to the accuracy of the provided reports.

New Entrants

New entrants to the broadband domain must present evidence to demonstrate readiness, highlighting their sufficient operational capabilities. This can be:

- Resumes of significant personnel;
- Detailed project descriptions and narratives from contractors; subcontractors, or partners with relevant operational experience; and/or
- Any other comparable evidence underlining operational proficiency.

2.5.2. Potential Approaches to Review Operational Capabilities

A. What the Eligible Entity Should Look For:

- ✓ Detailed documentation of prior projects, feedback, or recognition from past work;
- Regular and timely submission of required forms (e.g. Commission Form 477s and the Broadband DATA Act);
- Comprehensive operating or financial reports (for electric transmission and/or distribution companies) highlighting a clear and consistent track record of the prospective subgrantee's operational activities, or financial health and stability;
- ✓ Indicators of industry-standard performance or better;
- ✓ Credible plans that lay out a roadmap for project execution;
- ✓ Strong partnerships or hires that can fill experience gaps; and
- ✓ Detailed evidence, such as resumes, project plans, and narratives, which indicate the prospective subgrantee's preparation and strategy.
- B. Examples:
 - **Record Validity:** The prospective subgrantee might provide a track record of submitted Commission Form 477s. The Eligible Entity should make sure that it correlates with official databases, and if possible, engage with the Commission to check for any hidden issues.
 - New Entrants to Broadband Market: The prospective subgrantee might provide evidence of strategic partnerships and credentials of key hires. The Eligible Entity should check the credibility of partners or hired experts and evaluate the feasibility of project plans.

⁶ Acceptable submissions for this purpose are the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. *See Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 719, n. 202.





2.6. Ownership (BEAD NOFO Section IV.D.2.f)

2.6.1. Requirements

Eligible Entities are required to have every prospective subgrantee provide a comprehensive disclosure of their ownership information, adhering to the specifics laid out in 47 C.F.R. § 1.2112(a)(1)-(7). This regulation mandates the full disclosure of direct and indirect ownership interests, including details of any parties with a 10% or more stake, the nature of the interest, and the inter-relationships with any FCC-regulated entities.

2.6.2. Potential Approaches to Review Ownership

A. What the Eligible Entity Should Look For:

- ✓ Complete disclosure of direct and indirect ownership, ensuring no hidden interests;
- ✓ Specific details of all parties with a stake of 10% or more; and
- ✓ Verification of the relationship between the applicant and any related FCC-regulated entities.

B. Examples:

The prospective subgrantee might provide a detailed ownership chart showcasing direct and indirect stakeholders, a list of associated FCC-regulated entities, and clear explanations of relationships between entities. The Eligible Entity should:

- Cross-reference the provided list with external databases to verify accuracy;
- Seek clarifications on any ambiguities; and
- Consult with legal teams to ensure that the disclosure aligns with the requirements of 47 C.F.R. § 1.2112(a)(1)-(7).

2.7. Other Public Funding (BEAD NOFO Section IV.D.2.g)

2.7.1. Requirements

Eligible Entities shall require that prospective subgrantees, along with their affiliates, fully disclose all applications it has submitted or plans to submit and every broadband deployment project funded by public sources. This includes detailing aspects like sources of public funding, service speed, coverage area, commitment to serve unserved/underserved areas, the amount of public funding used, consumer service costs, and any matching commitments.

Note: The term "affiliate," per the BEAD NOFO, refers to a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this definition, the term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

2.7.2. Potential Approaches to Review Other Public Funding

A. What the Eligible Entity Should Look For:

At a minimum, the Eligible Entity shall require the disclosure, for each broadband deployment project, of:

- ✓ The speed and latency of the broadband service to be provided;
- ✓ The geographic area to be covered;
- ✓ The number of unserved and underserved locations committed to serve;
- ✓ The amount of public funding to be used;
- ✓ The cost of service to the consumer; and



Internet for All





internetforall.gov | internetforall@ntia.gov

✓ The matching commitment, if any, provided by the subgrantee or its affiliates.

B. Examples:

Example 1:

- A prospective subgrantee might provide details of a project funded under the CARES Act, covering a defined geographic area, aiming to serve 80% of unserved locations, with a service speed of 25/3 Mbps and latency of 60ms. They might also disclose a \$2M funding from the CARES Act and a service cost of \$50/month to consumers.
- The Eligible Entity should cross-check the details, especially the funding amount and commitments, to ensure there are no overlaps or conflicts with other projects and verify if the service costs align with market rates.

Example 2:

- The prospective subgrantee might provide a list of affiliates as per the 10% equity interest definition, detailing their involvement in public-funded projects, including their specific commitments, and received funds.
- The Eligible Entity should assess the affiliates' commitments and ensure that they complement, rather than conflict with, the prospective subgrantee's project goals. This includes checking service areas, funding sources, and other key details.







Appendix: Subgrantee Qualification Checklist

The checklist below summarizes the requirements that the Eligible Entity should use to ensure each prospective subgrantee is eligible for BEAD funding. More details are provided in the body of the document above.

General Requirements:

□ Can the prospective subgrantee competently execute funded activities while adhering to all relevant federal, Eligible Entity, and local laws?

□ Does the prospective subgrantee possess the financial and managerial strength to fulfill the subgrant's commitments, meet program requirements, and adhere to standards set by the Assistant Secretary and the Eligible Entity?

□ Does the prospective subgrantee have the necessary technical and operational skills to deliver the services pledged in the subgrant as intended by the award?

□ Financial Capability:

□ Does the prospective subgrantee provide valid and proper authorization and endorsement of the certifications?

□ Does the prospective subgrantee provide a Letter of Credit, Performance Bond, or a lower requirement when receiving funding on a reimbursable basis that meets or exceeds 25% of the subaward value?

□ Does the prospective subgrantee provide a legal opinion letter accompanying the letter of credit which addresses bankruptcy considerations (assuming the subrecipient does not use the Performance bond option)?

□ Does the prospective subgrantee provide audited financial statements with indicators of cash flow that indicate financial stability and an absence of alarming discrepancies?

□ Does the prospective subgrantee provide sustainability and pro-forma analyses which describe a comprehensive and realistic business plan and projections indicating the project's sustainability?

□ Managerial Capability

□ Does the prospective subgrantee provide resumes and organizational charts?

□ Does the prospective subgrantee provide narratives on managerial readiness?

□ Technical Capability

 \Box Does the prospective subgrantee provide certifications to prove the technical qualification?





□ Does the prospective subgrantee provide required documentation (Network Diagrams, Project Cost Estimates, Timeline & Milestones, PE endorsement...etc.)?

\Box Compliance with the Law

 \Box Does the prospective subgrantee provide evidence of legal adherence in the past and plans for future compliance?

 \Box Does the prospective subgrantee provide plans to be in compliance with occupational safety and health requirements?

□ Operational Capability

 $\hfill\square$ Does the prospective subgrantee provide past experiences?

 \Box Does the prospective subgrantee provide valid records?

□ Does the prospective subgrantee provide financial and operational reports?

□ Does the prospective subgrantee provide evidence underlining operational proficiency? (Question for new entrants to broadband market)

□ Ownership

 \Box Does the prospective subgrantee provide complete disclosure of direct and indirect ownership?

 $\hfill\square$ Does the prospective subgrantee provide details of all parties with a stake of 10% or more?

 $\hfill\square$ Verification of the relationship between the applicant and any federal FCC regulated entities

□ Other Public Funding

 \Box Does the prospective subgrantee provide a comprehensive disclosure of all publiclyfunded broadband projects the subgrantee or its affiliates are participating in?

 \Box Does the prospective subgrantee provide a clear statement of commitment levels to unserved and underserved areas?

□ Does the prospective subgrantee provide details of the funding received from specified public funds?

 \Box Does the prospective subgrantee provide information about consumer service costs and any additional commitments made by the prospective subgrantee or its affiliates?



