



**FLORIDA  
BROADBAND  
SUMMIT 2023**

**WELCOME**  
**Day 1: September 21**



**Welcome**  
**FloridaCommerce**  
**Deputy Secretary**  
**Meredith Ivey**







# STATE OF FLORIDA BROADBAND

**Meredith Ivey**

Deputy Secretary, Division of Community Development





# WHAT IS BROADBAND?





# BROADBAND – HOW IT'S DEFINED

The term “Broadband” refers to high-speed Internet access that is always on and faster than traditional dial-up access. Broadband includes several high-speed transmission technologies, such as fiber, wireless, satellite, digital subscriber line, and cable.

Typically, consumers consider performance of broadband transmission media measured primarily by speed (upload and download) and latency (duration of the end-to-end “round trip” communication).

Florida Statutes define “Broadband Internet Service” as one “that offers a connection to the internet with a capacity for transmission at a consistent speed of at least 25 megabits per second (Mbps) downstream and 3 Mbps] upstream” (25/3 Mbps). (§ 288.9961(2)(a), Fla. Stat.).

Download and upload speeds are measured separately.

Federal Communications Commission (FCC) threshold for “broadband service” is 25 Mbps download and 3 Mbps upload.

Infrastructure Investment and Jobs Act (IIJA) threshold for “broadband service” is 100 Mbps download and 20 Mbps upload.





# BROADBAND – NUMBERS & UNITS

**3G:** 3rd generation wireless telecommunications standards usually with network speeds of less than 1 Mbps.

**4G:** 4th generation wireless telecommunications standards usually with network speeds greater than 1 Mbps.

**5G:** 5th generation wireless telecommunications standards usually associated with network speeds of up to 1 Gbps or more.

**Bit** = Smallest unit of digital information

**Byte** = Equal to 8 bits

**Bps** = Bits per second

**Kbps** = Kilobits per second (1000 bits per second)

**Mbps** = Megabits per second (1 million bits per second)

**Gbps** = Gigabits per second (1 billion bits per second)

**Tbps** = Terabits per second (1 trillion bits per second)

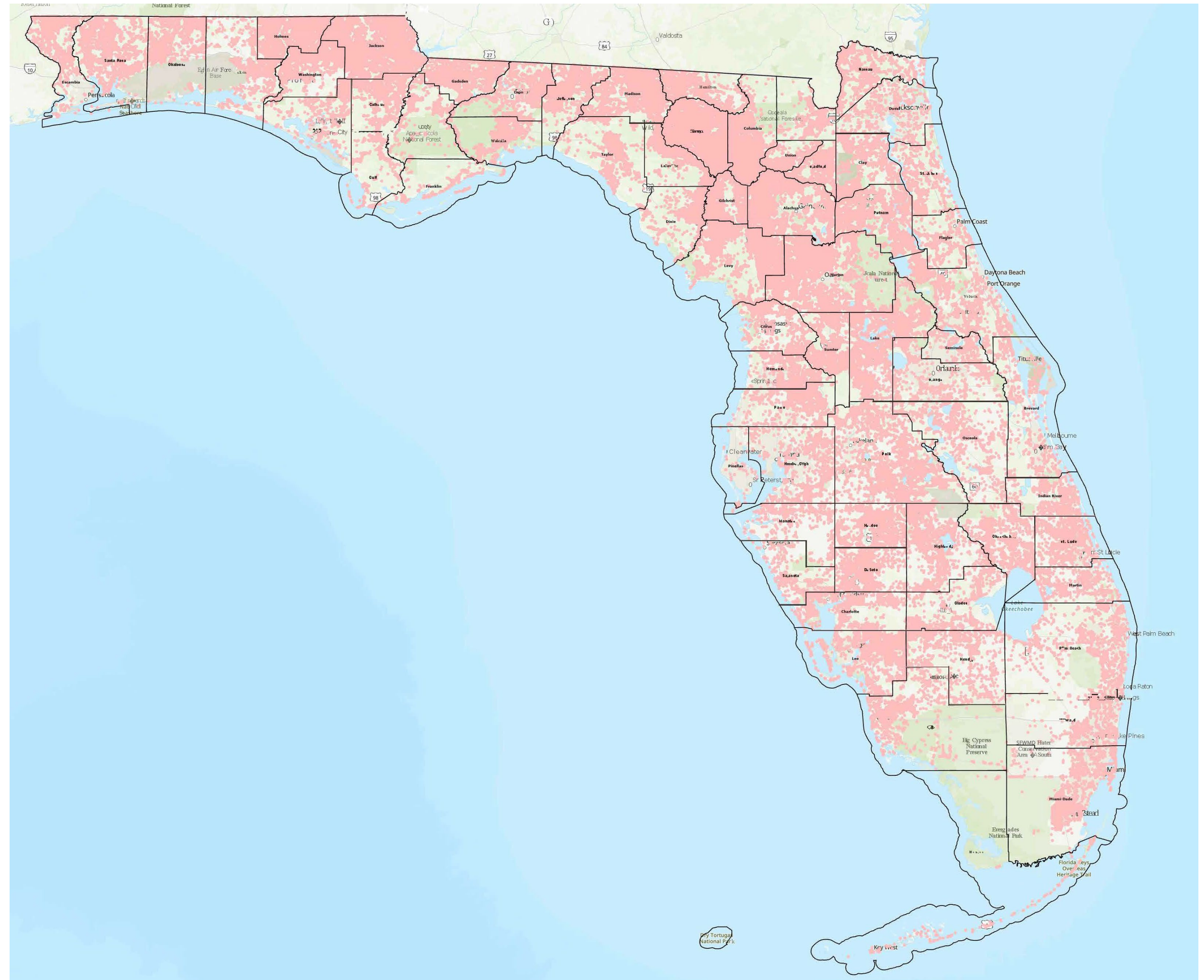




# Florida – Unserved & Underserved Locations

Unserved:  
speeds below 25/3 Mbps

Underserved:  
below 100/20 Mbps





# BROADBAND – SOME KEY TERMS

## **Broadband Adoption:**

The use of broadband in places where it is available, measured as the percentage of households that use broadband in such areas.

## **Fiber:**

A flexible hair-thin glass or plastic strand that is capable of transmitting large amounts of data at high transfer rates as pulses or waves of light.

## **Fixed Wireless Broadband Access:**

The use of wireless devices/systems in connecting two fixed locations, such as offices or homes. The connections occur through the air, rather than through fiber.

## **Internet Service Provider (ISP):**

A company that provides users (individuals or businesses) with access (a connection) to the Internet and related services.





# BROADBAND – SOME KEY TERMS

**Middle Mile:** The connection between a local network, also called a “last mile” connection, and the backbone Internet network.

**Last Mile:** The technology and process of connecting the end customer’s home or business to the local network provider.

**Community Anchor Institutions:** Community support organizations (e.g. schools, libraries, etc.) that provide outreach, access, equipment and support services to facilitate greater use of broadband service by the entire population.

**Digital Literacy:** The ability to leverage current technologies, such as smartphones and laptops, and Internet access to perform research, create content and interact with the world.

**Digital Skills:** Any skills related to operating digital devices or taking advantage of digital resources.







# WHAT IS THE STATE OF BROADBAND IN FLORIDA?







*Under Governor DeSantis' leadership, Florida is expanding broadband Internet to small and rural areas of the state that will now have access to critical resources. **Broadband Internet infrastructure will change the landscape and quality of life for Florida families and businesses, connecting them to workforce training, jobs, educational resources and telehealth services.***

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**J. Alex Kelly, Secretary of FloridaCommerce**

*On Governor Ron DeSantis Awarding More Than \$247 Million Through the Broadband Infrastructure Program*





# OUR MISSION

The mission of FloridaCommerce is to advance Florida's economy by championing the state's economic development vision and administering state and federal programs and initiatives to help visitors, citizens, businesses, and communities.

Established in July 2020 through HB 969 "Broadband Internet Service," **the Office of Broadband within FloridaCommerce** works with local, state, and federal government agencies, community organizations, and private businesses to increase the availability and accessibility of Broadband Internet throughout the state. Through these partnerships, the Office of Broadband encourages investment in grant funding opportunities and promotes broadband Internet services in the state. that focus on the expansion of broadband.





# OUR VISION – A CONNECTED ECONOMY

## Florida's Strategic Plan for Broadband:

Provide guidance and implement programs for the provision of high speed, reliable broadband Internet service access to all Florida communities in support of telemedicine, education opportunities, workforce development, business development, and community development.

## Three Steps to a Connected Economy:

Fully realize broadband Internet connectivity and reach the goal of a Connected Economy bolstering the central tenets of supporting a robust workforce, educational opportunities, and health care access through:

- 1) Availability;
- 2) Adoption; and
- 3) Use of digital content.





# OUTREACH & COMMUNITY ENGAGEMENT

## **Collaboration is Key to Our Success!**

The Office of Broadband is proud to have established the Local Technology Planning Teams (LTPTs) initiative with all 67 counties to empower local communities to understand their current broadband availability, locate unserved and underserved businesses and residents, identify assets relevant to broadband deployment, build partnerships with broadband service providers, and identify opportunities to leverage assets and reduce barriers to the deployment of broadband Internet services in the community.

Since 2020, the Office of Broadband has facilitated well over 100 various workshops, meetings, and webinars to enhance collaboration and engagement with local governments, state agencies, ISPs, stakeholders, and citizens to facilitate collaboration, education, and continuous feedback.





# OUTREACH & COMMUNITY ENGAGEMENT



Alex Kelly, Secretary of the Florida Department of Commerce, addresses those gathered at a broadband workshop July 7. [ Wendy Weitzel | The Star ]



STATE SENATOR COREY SIMON PARTICIPATES IN A BROADBAND WORKSHOP IN GULF COUNTY. [ WENDY WEITZEL | THE STAR ]

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## State seeks local input for broadband planning, solutions

By Wendy Weitzel • July 11, 2023





# ACTIVE GRANT PROGRAMS

## **Broadband Opportunity Program (\$400 Million – State of Florida)**

Provides funding for the installation and deployment of broadband Internet infrastructure in unserved Florida communities, providing valuable telehealth, economic, educational, and workforce development opportunities to offer a brighter future for all Floridians.

## **Capital Projects Fund (\$366 Million – U.S. Treasury)**

**Infrastructure Program:** Deploys broadband Internet infrastructure in unserved and underserved areas throughout the state, prioritizing rural areas. In November 2022, the Office of Broadband received \$247.8 million from the U.S. Treasury for the Capital Projects Fund Broadband Infrastructure Program.

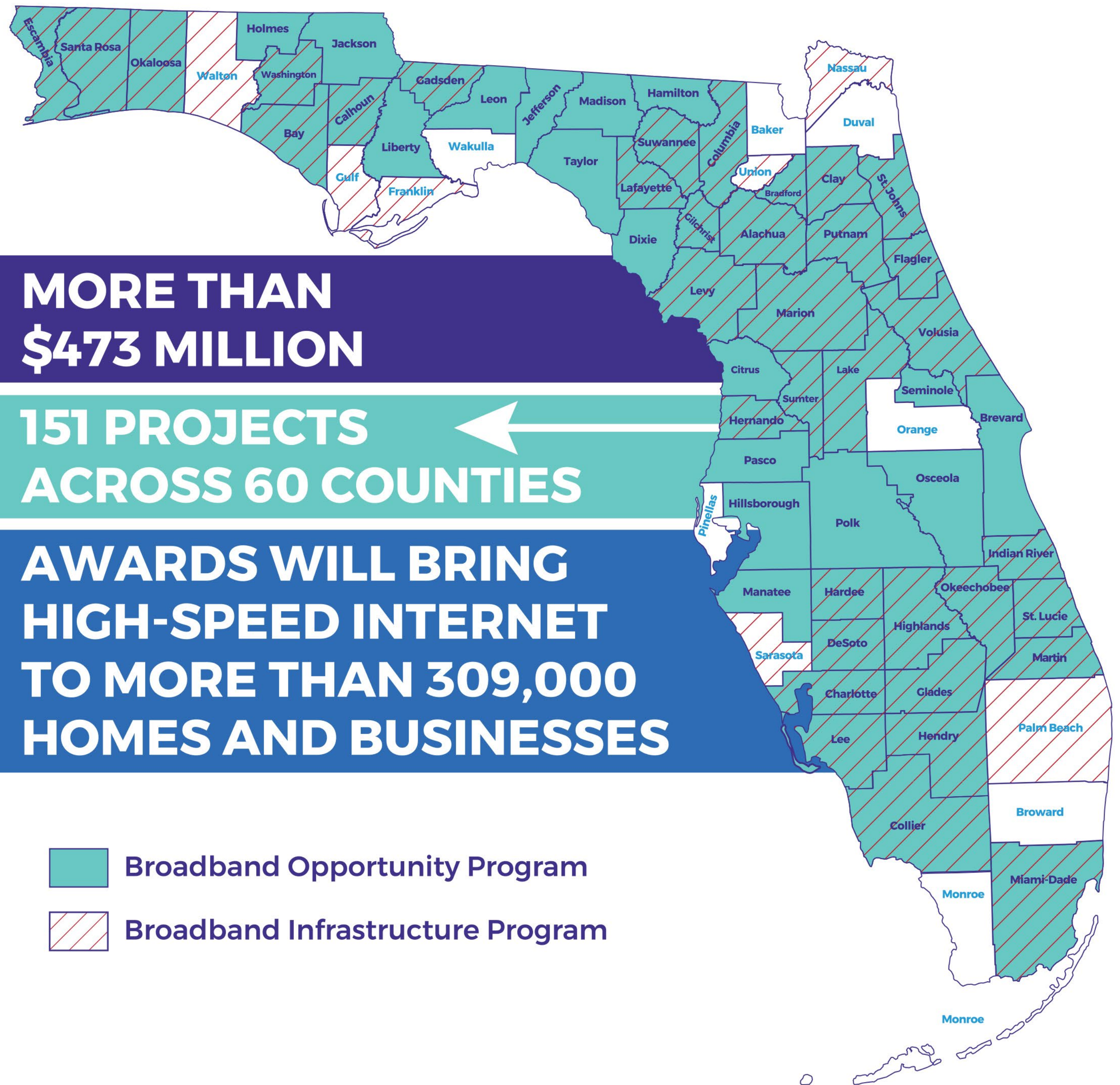
**Multi-Purpose Community Facilities Program:** Renovates or builds Multi-Purpose community buildings to help provide access and improve resources to the rural communities for health monitoring, work, and education. The Office of Broadband received \$86.9 million from the U.S. Treasury for the Capital Projects Fund Multi-Purpose Community Facilities.

**Digital Connectivity Technology Program:** The purchase and/or installation of devices and equipment to facilitate broadband internet access are eligible for funding under the capital projects fund program where affordability has been identified by the recipient as a barrier to broadband adoption and use. In September 2023, the Office of Broadband received \$13 million from the U.S. Treasury for the Capital Projects Fund Digital Connectivity Technology Program.





# Expanding Broadband in Small and Rural Communities





# MAPS – FLORIDAJOBS.ORG/BROADBAND

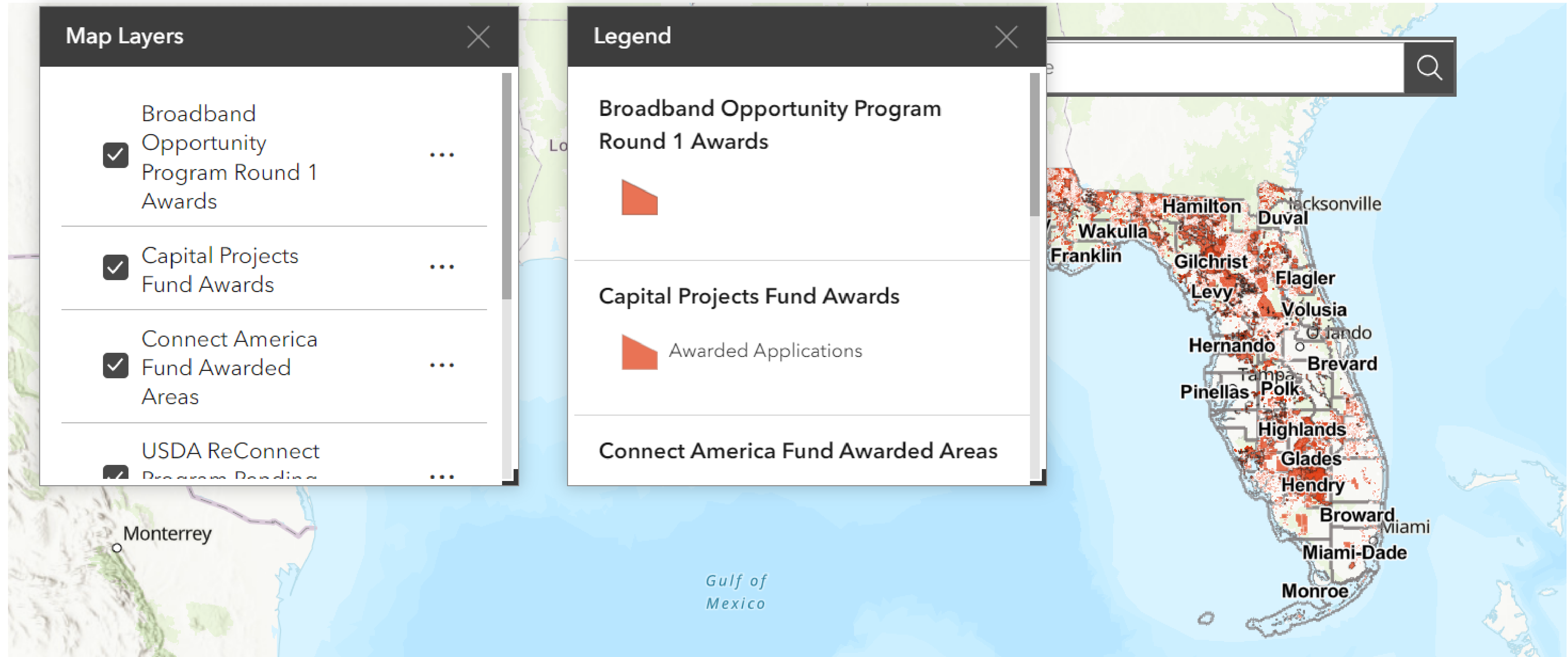
**Florida's Broadband Availability Map & Internet Speed Test:** Identifies broadband internet service availability throughout the state by highlighting a location's speed, connectivity, and access to broadband services. These insights allow the state of Florida to better identify and reach unserved and underserved areas of the state.

**Faster Florida Broadband Map:** Identifies census blocks as unserved, underserved, served, and no fixed internet service as defined in 288.9961 F.S. The map also identifies Florida geographic boundaries, community anchor institutions, grant funding opportunities, and information on the speed tests taken through the Florida Broadband Availability Map.

**ConnectedFlorida Map:** Identifies project areas submitted in applications and project areas that were awarded grant funding. This map is updated as applications are submitted for grant funding and as successful projects are awarded.







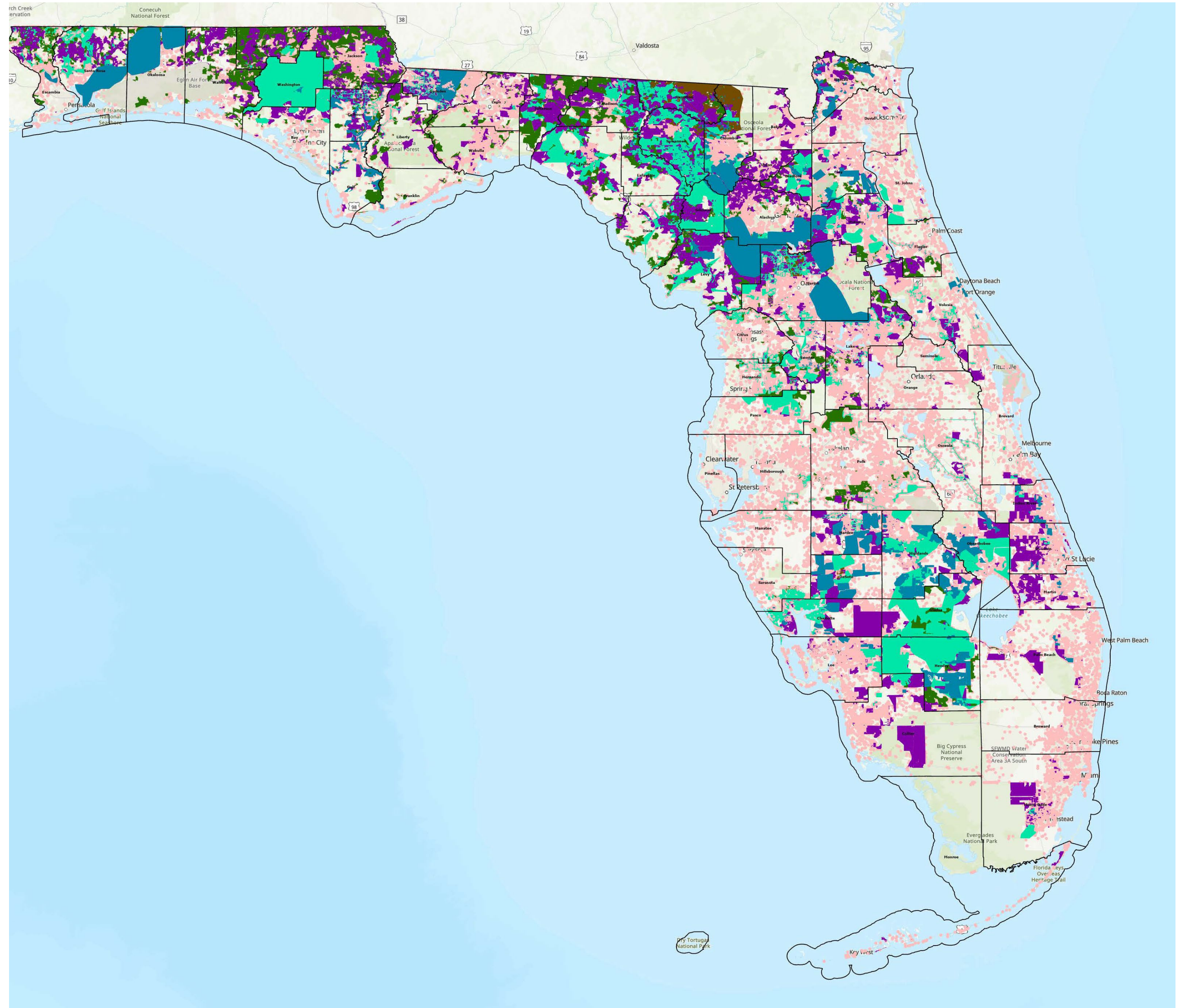


# Programs Underway

-  Rural Digital Opportunity Fund
-  Connect America Fund
-  ReConnect America Program

# Office of Broadband Programs

-  Broadband Opportunity Program
-  Capital Projects Fund – Broadband Infrastructure Program





# UPCOMING – BEAD PROGRAM

## **BEAD Program - (\$1.1 Billion - National Telecommunications and Information Administration)**

The BEAD Program provides federal funding for grants to states for broadband planning, deployment, mapping, and adoption and use activities. The BEAD Program, part of the Infrastructure Investment and Jobs Act (IIJA), allocates a minimum of \$100 million for states to expand broadband infrastructure and connectivity programs.

On August 15, 2022, the Office submitted the program proposal, “Prosperity Through a Connected Florida” and in June 2023, the State of Florida learned its allocation is over \$1.1 Billion.

In July 2023, FloridaCommerce held a series of nine public meetings and webinars to hear directly from Floridians about barriers to accessing broadband Internet service. The meetings and webinars focused on discussing our goal to ensure all Florida communities can easily access Internet service, online devices, and digital skills training. FloridaCommerce also held meetings with the Seminole Tribe and Miccosukee Tribe to discuss future collaboration.

The state of Florida’s five-year action plan is due to NTIA by the end of October 2023 and awards are anticipated to begin in calendar year 2024.

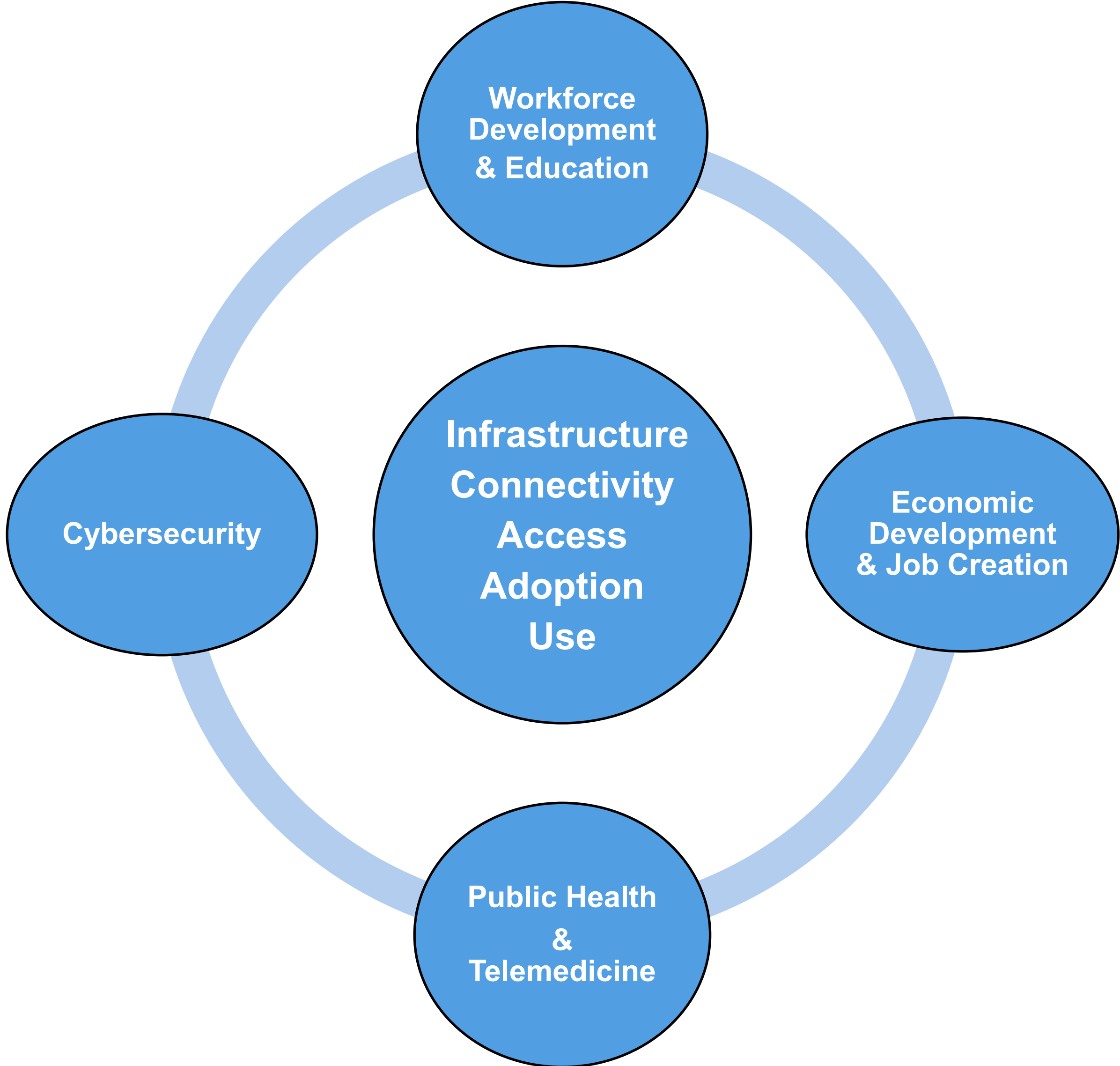




# WHERE IS FLORIDA BROADBAND HEADED IN THE NEXT 5 YEARS?



# ELEVATING THE BROADBAND CONVERSATION





# FLORIDA BROADBAND SUMMIT HIGHLIGHTS

Luncheon Keynote Address Delivered by  
**Lt. Governor Jeanette M. Nuñez**

Executive Reception Keynote Remarks Delivered by  
**FloridaCommerce Secretary J. Alex Kelly**

**Informative panels on:**

Mapping, Cybersecurity, Workforce Development, Local Workforce Development Boards, BEAD, Community Partnerships, and Digital Adoption & Use

**Office hours and workshops** with subject matter experts

Enjoy interacting with **exhibitors** during refreshment breaks ... and more!







**THANK  
YOU**



# **Mapping the State:** An In-depth Look at Broadband Expansion in the State of Florida

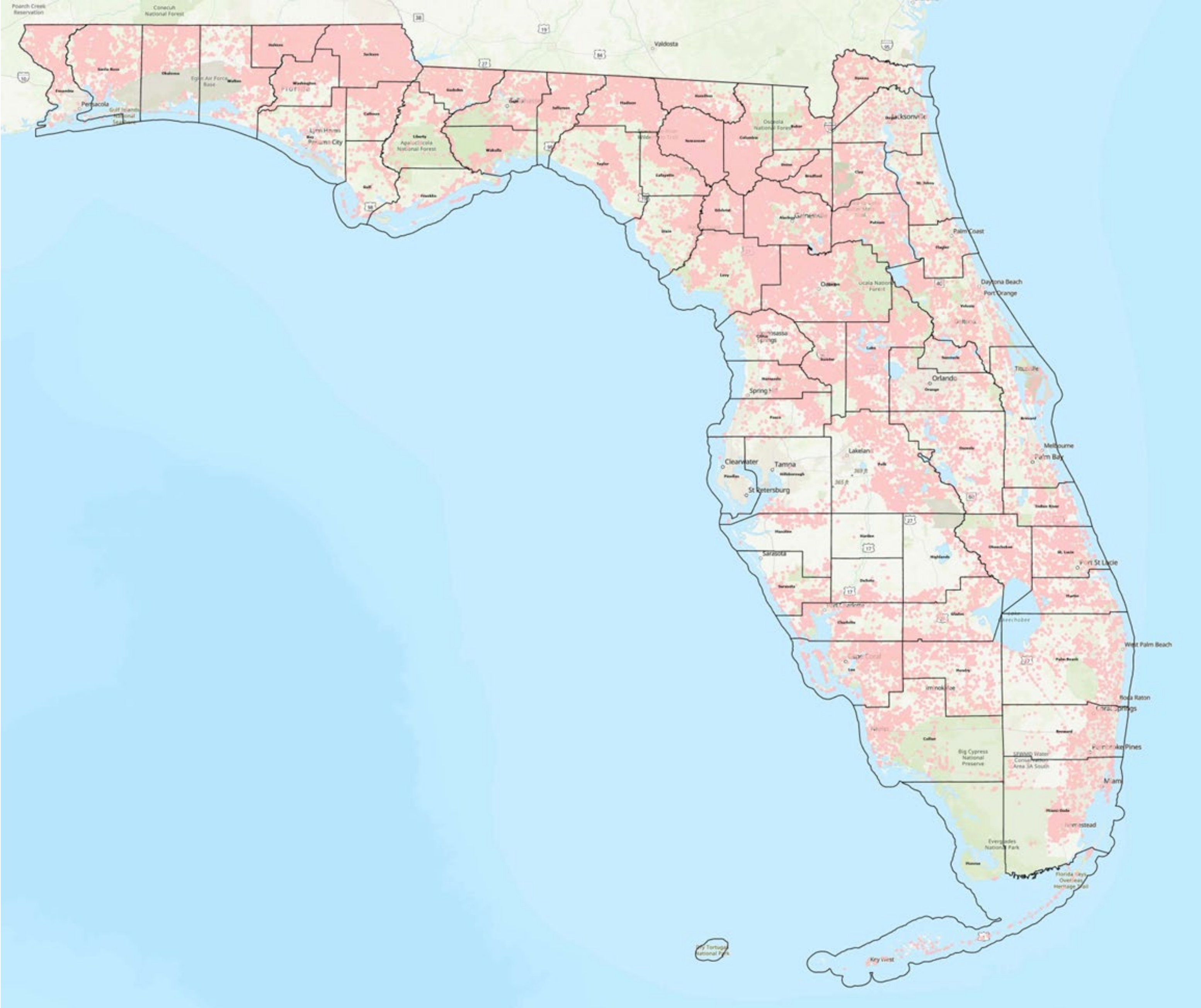
- **Led by FloridaCommerce Deputy Secretary Meredith Ivey**
- **Kyle Baltuch, Florida Chamber of Commerce Foundation**
- **Anthony Puzzo, ESRI/ArcGIS**
- **Katie Smith, Director, Office of Broadband**





# Florida – Unserved Locations

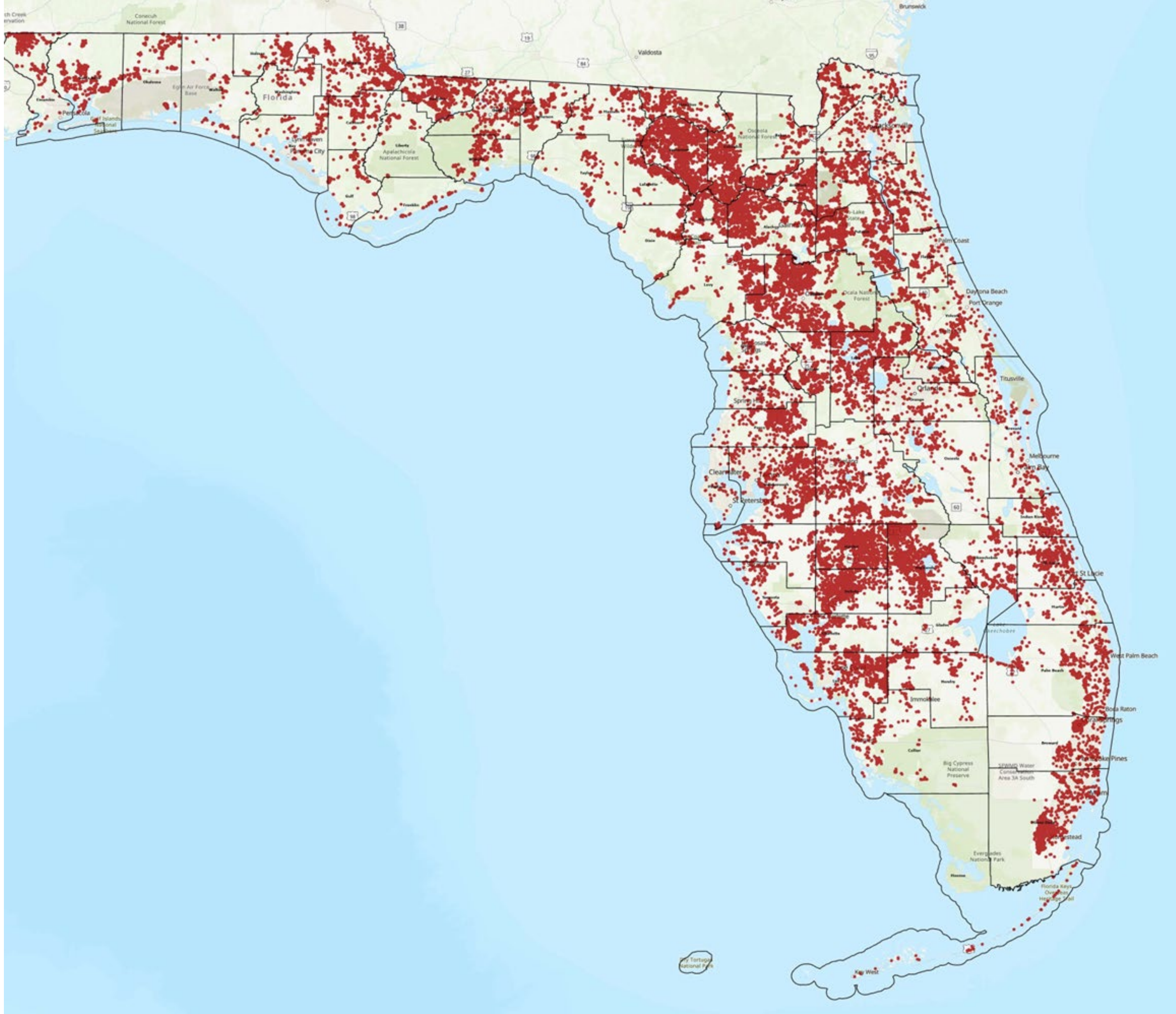
Unserved: speeds below 25/3 Mbps







# Florida – Underserved Locations

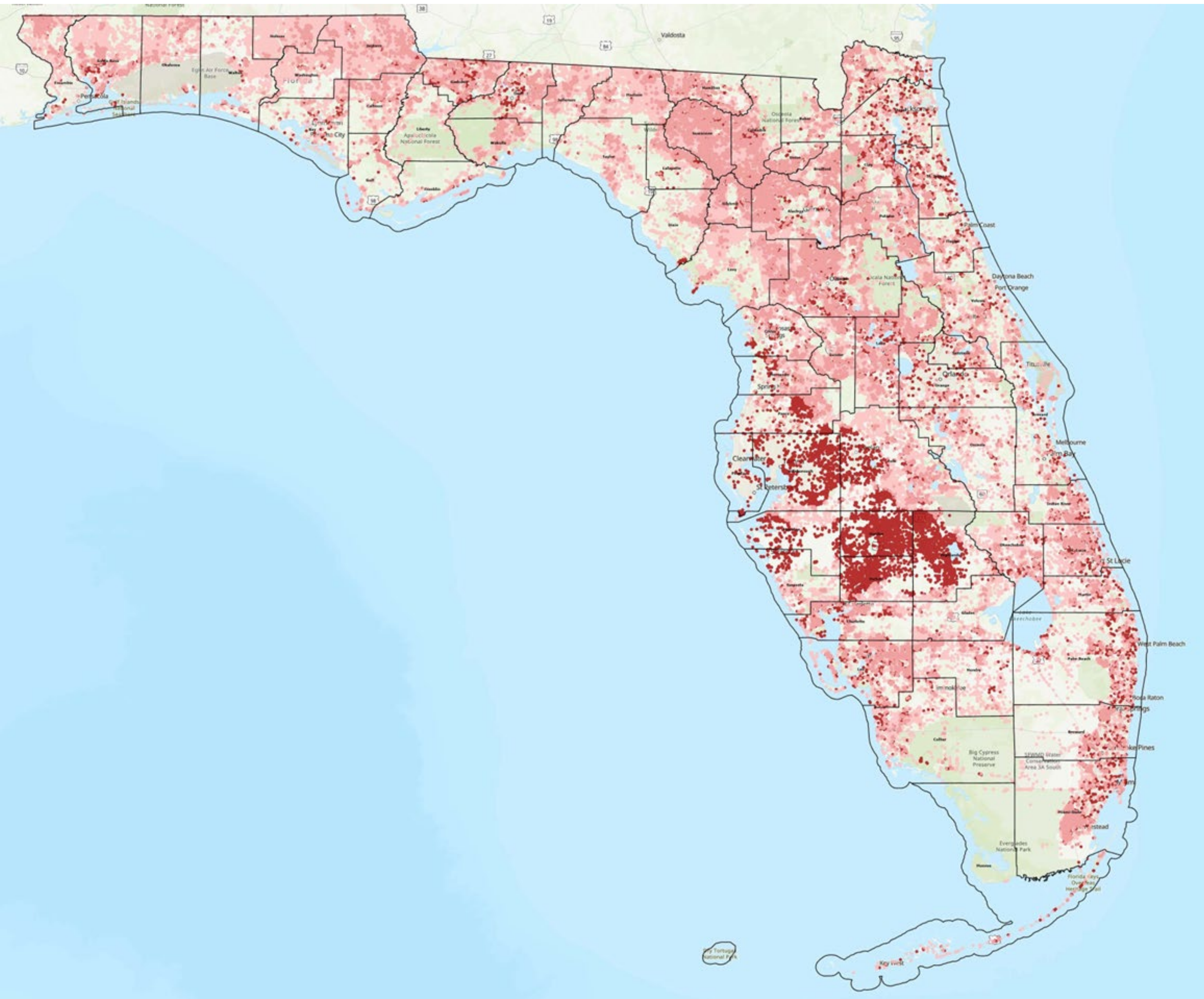
Underserved: below 100/20 Mbps





# Florida – Unserved & Underserved Locations

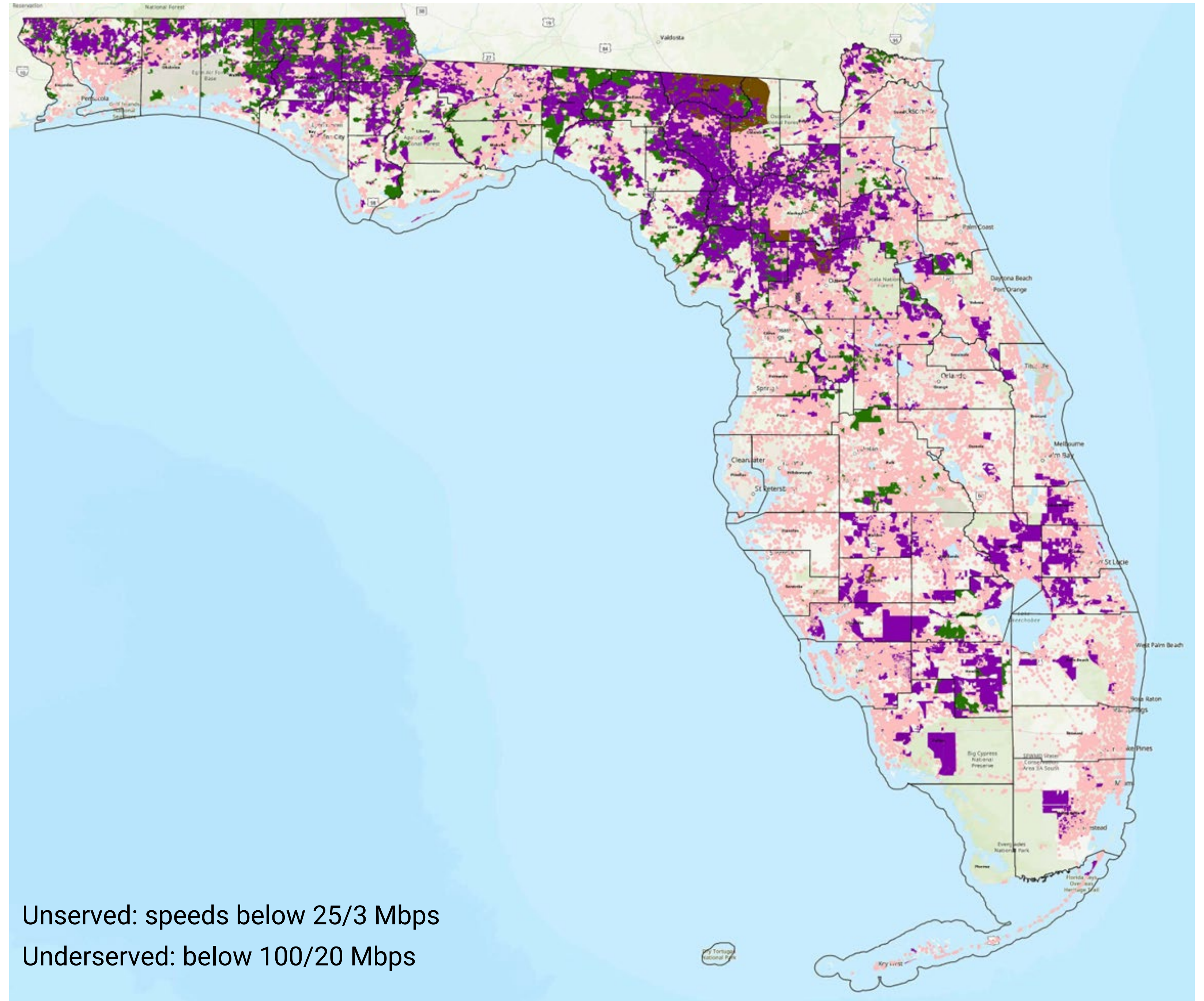
-  **Unserved: speeds below 25/3 Mbps**
-  **Underserved: below 100/20 Mbps**





# Programs Underway

-  Rural Digital Opportunity Fund
-  Connect America Fund
-  ReConnect America Program



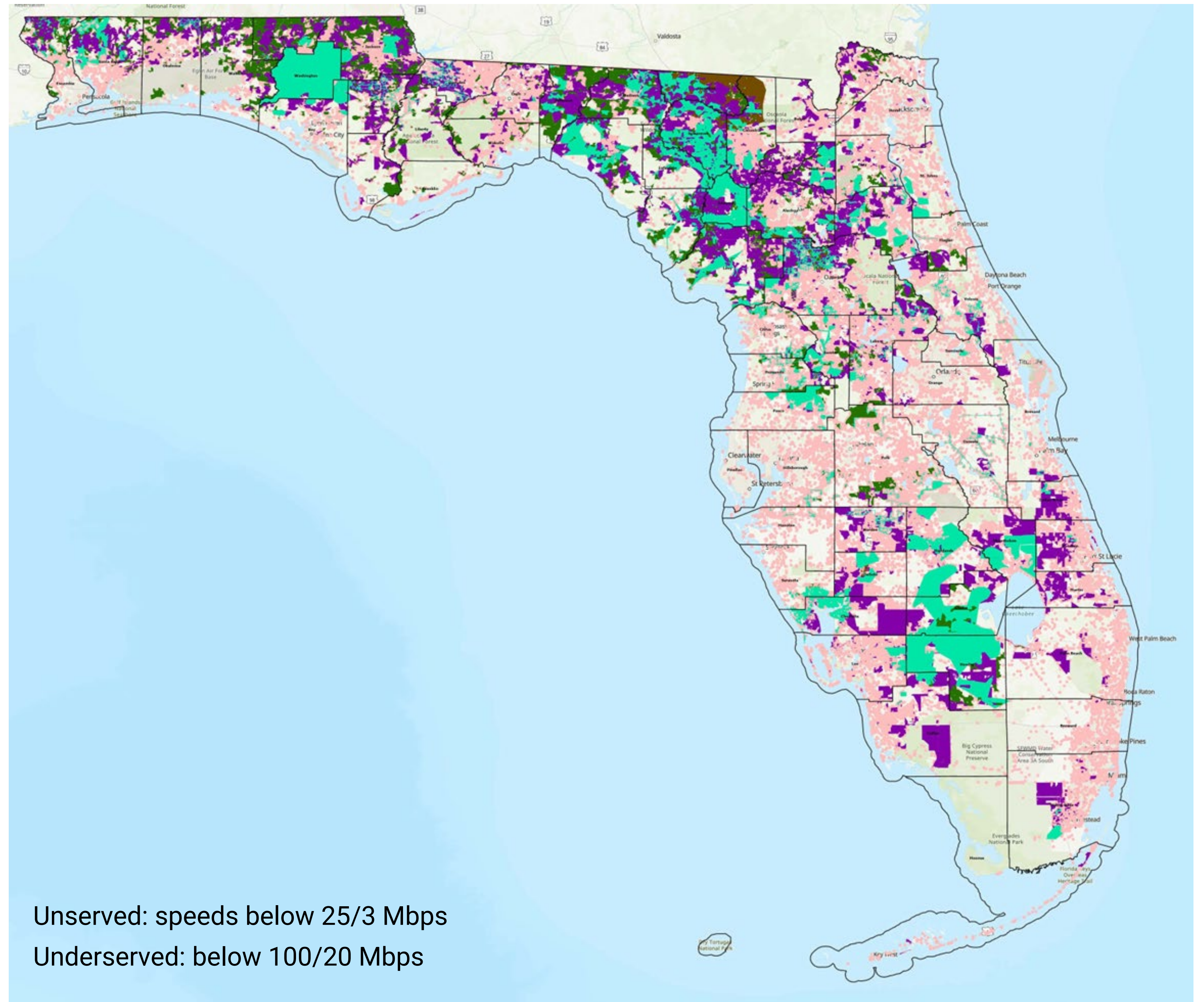


# Programs Underway

-  Rural Digital Opportunity Fund
-  Connect America Fund
-  ReConnect America Program

# Office of Broadband Programs

-  Broadband Opportunity Program



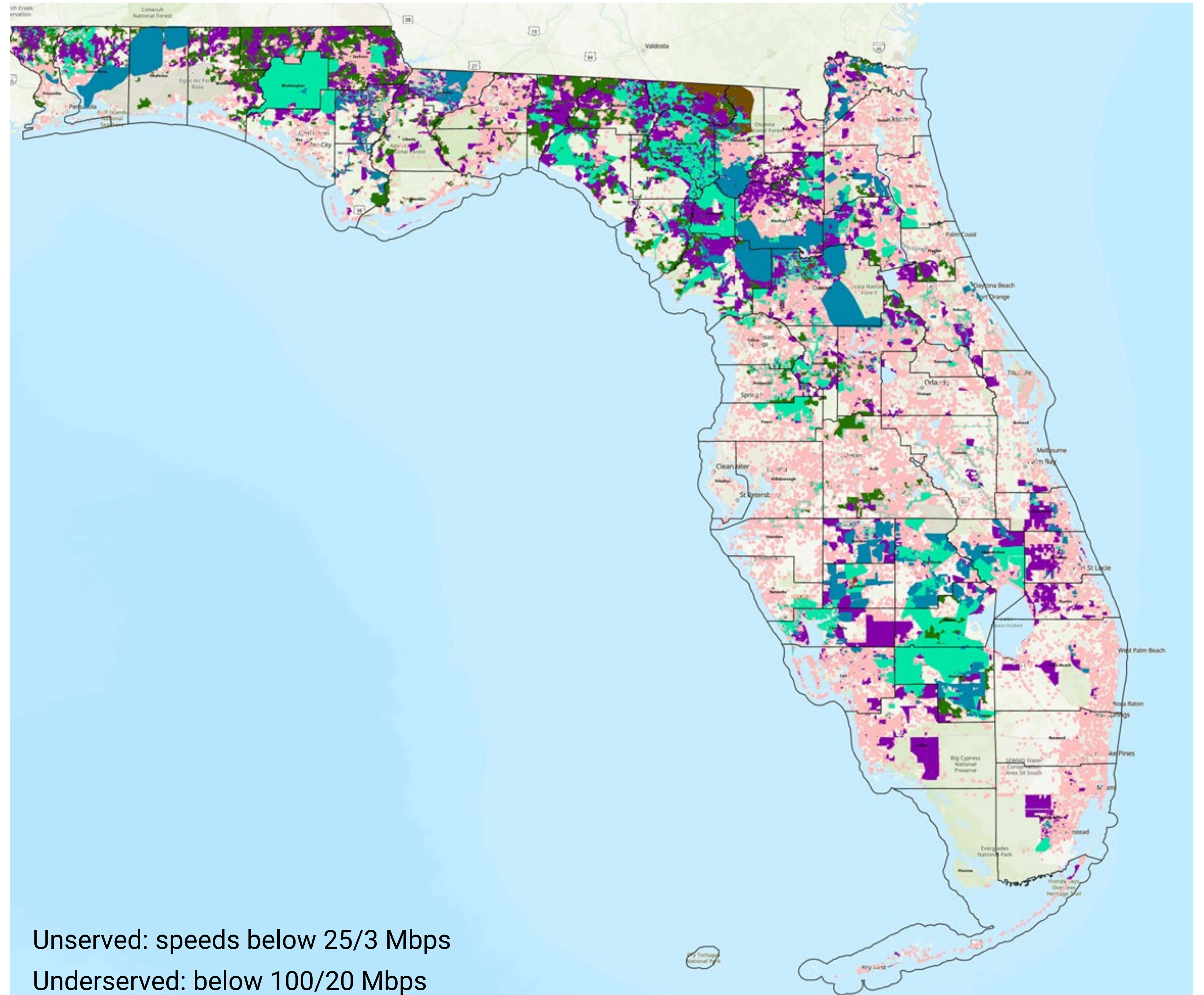


# Programs Underway

-  Rural Digital Opportunity Fund
-  Connect America Fund
-  ReConnect America Program

# Office of Broadband Programs

-  Broadband Opportunity Program
-  Capital Projects Fund – Broadband Infrastructure Program

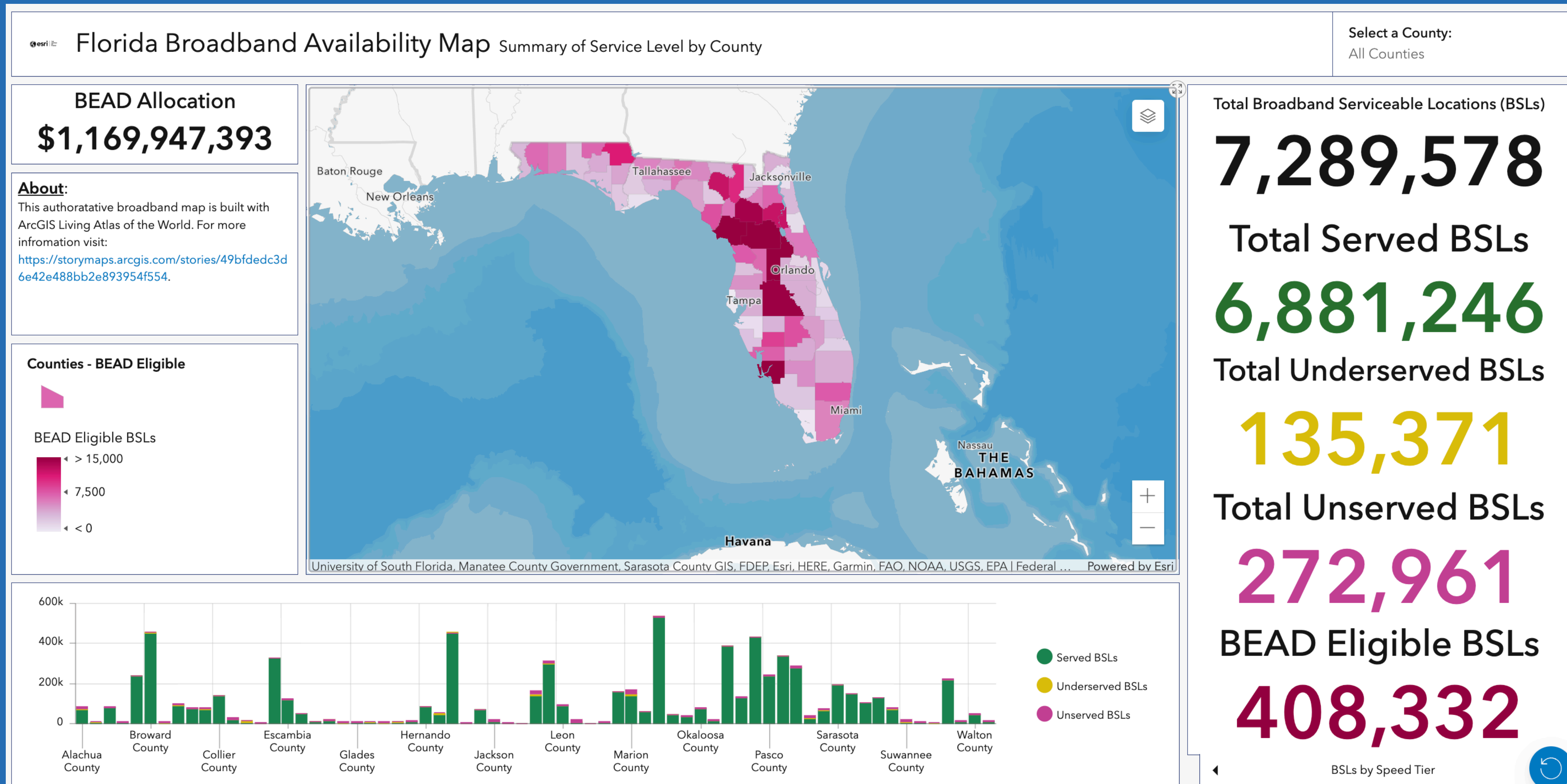


Unserved: speeds below 25/3 Mbps  
Underserved: below 100/20 Mbps





# BEAD FUNDING





# BEAD FUNDING

## Florida Broadband Availability Map Summary of Service Level by County

Select a County:  
Martin County

### BEAD Allocation

# \$5,263,372

**About:**  
This authoritative broadband map is built with ArcGIS Living Atlas of the World. For more information visit:  
<https://storymaps.arcgis.com/stories/49bfdedc3d6e42e488bb2e893954f554>.

### Total Broadband Serviceable Locations (BSLs)

# 62,985

### Total Served BSLs

# 61,164

### Total Underserved BSLs

# 593

### Total Unserved BSLs

# 1,228

### BEAD Eligible BSLs

# 1,821

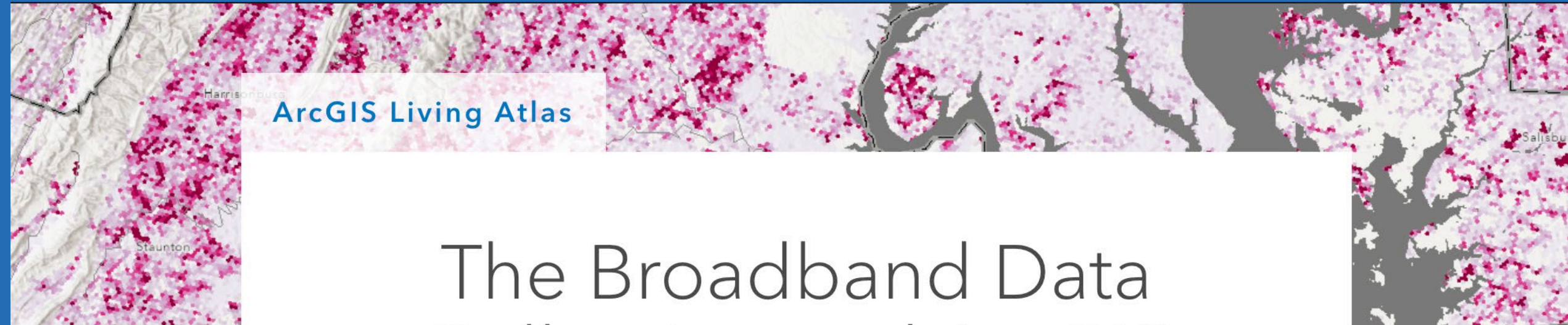
BSLs by Speed Tier

### Counties - BEAD Eligible

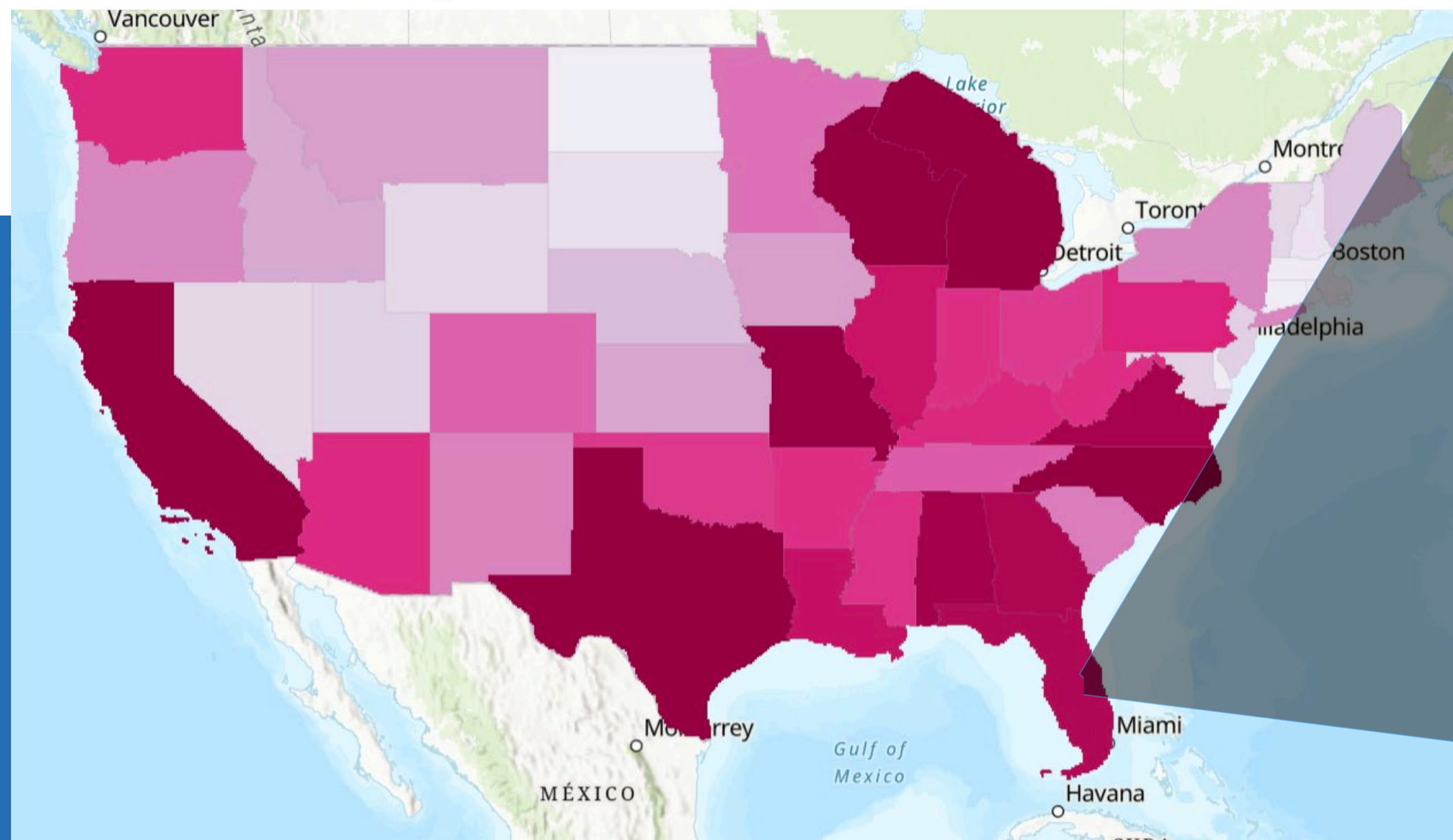
| County          | Served BSLs | Underserved BSLs | Unserved BSLs |
|-----------------|-------------|------------------|---------------|
| Alachua County  | ~50k        | ~50k             | ~50k          |
| Broward County  | ~450k       | ~50k             | ~50k          |
| Collier County  | ~100k       | ~50k             | ~50k          |
| Escambia County | ~300k       | ~50k             | ~50k          |
| Glades County   | ~50k        | ~50k             | ~50k          |
| Hernando County | ~100k       | ~50k             | ~50k          |
| Jackson County  | ~50k        | ~50k             | ~50k          |
| Leon County     | ~300k       | ~50k             | ~50k          |
| Marion County   | ~150k       | ~50k             | ~50k          |
| Okaloosa County | ~100k       | ~50k             | ~50k          |
| Pasco County    | ~400k       | ~50k             | ~50k          |
| Sarasota County | ~200k       | ~50k             | ~50k          |
| Suwannee County | ~100k       | ~50k             | ~50k          |
| Walton County   | ~200k       | ~50k             | ~50k          |



# Data Access



## The Broadband Data Collection and ArcGIS Living Atlas of the World



### Florida

There are **7,289,578 Broadband Serviceable Locations (BSLs)** in this State, and an **estimated population of 21,781,128**.

- **94% are Served (>100/20 Mbps): 6,881,246 BSLs**
  - Served\* by Fiber: 3,022,701
  - Served\* by Cable: 6,671,865
  - Served\* by Copper: 375,129
  - Served\* by Licensed Fixed Wireless: 1,119,391
- **2% are Underserved (<100/20 Mbps): 135,371 BSLs**
- **4% are Unserved (<25/3 Mbps): 272,961 BSLs**

#### List of Service Provider offerings:

\* Note - a BSL can be served by multiple providers and transmission technologies.

| Technology              | Provider                    | Total BSLs | Served BSLs |
|-------------------------|-----------------------------|------------|-------------|
| Cable                   | Xfinity                     | 3,549,198  | 3,549,198   |
| Cable                   | Charter Communications Inc  | 2,835,442  | 2,835,442   |
| Fiber                   | AT&T Inc                    | 1,436,281  | 1,436,263   |
| Fiber                   | FRONTIER                    | 1,093,573  | 1,092,865   |
| Licensed Fixed Wireless | T-Mobile US                 | 5,225,894  | 1,081,363   |
| Copper Wire             | AT&T Inc                    | 2,196,193  | 334,684     |
| Cable                   | WOW Internet, Cable & Phone | 323,832    | 323,832     |
| Cable                   | Cox Communications          | 288,822    | 288,822     |
| Fiber                   | Quantum Fiber               | 245,272    | 245,272     |

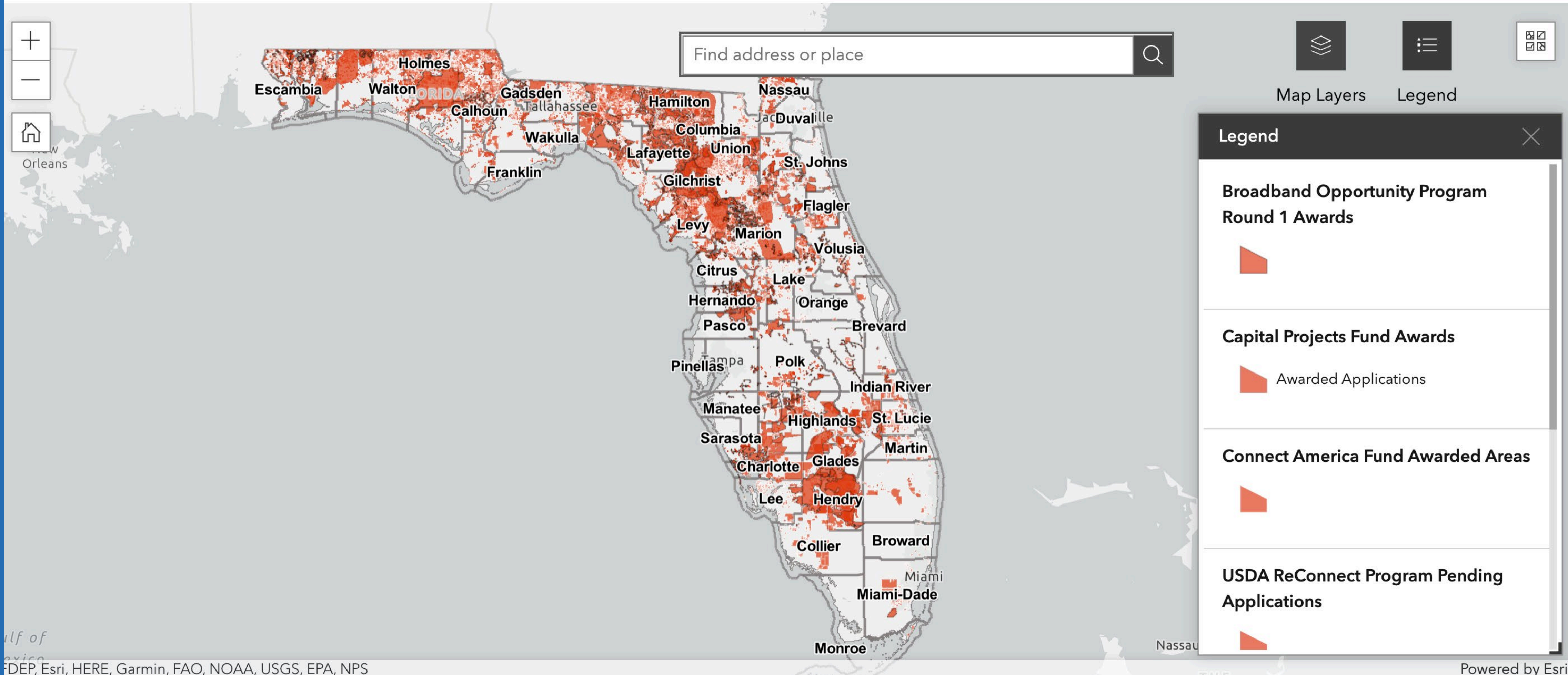


# CONNECTED FLORIDA MAP

FLORIDACOMMERCE

## ConnectedFlorida

Updated: 6/30/2023





# OVER 50% OF FLORIDA'S KIDS LIVING IN POVERTY LIVE IN ONLY 15% OF FLORIDA'S 983 ZIP CODES

## FLORIDA

 CHILDREN IN POVERTY

**18.2%**  
(Decreasing)

**<10%**  
2030 Goal

**763,527**  
(Decreasing)

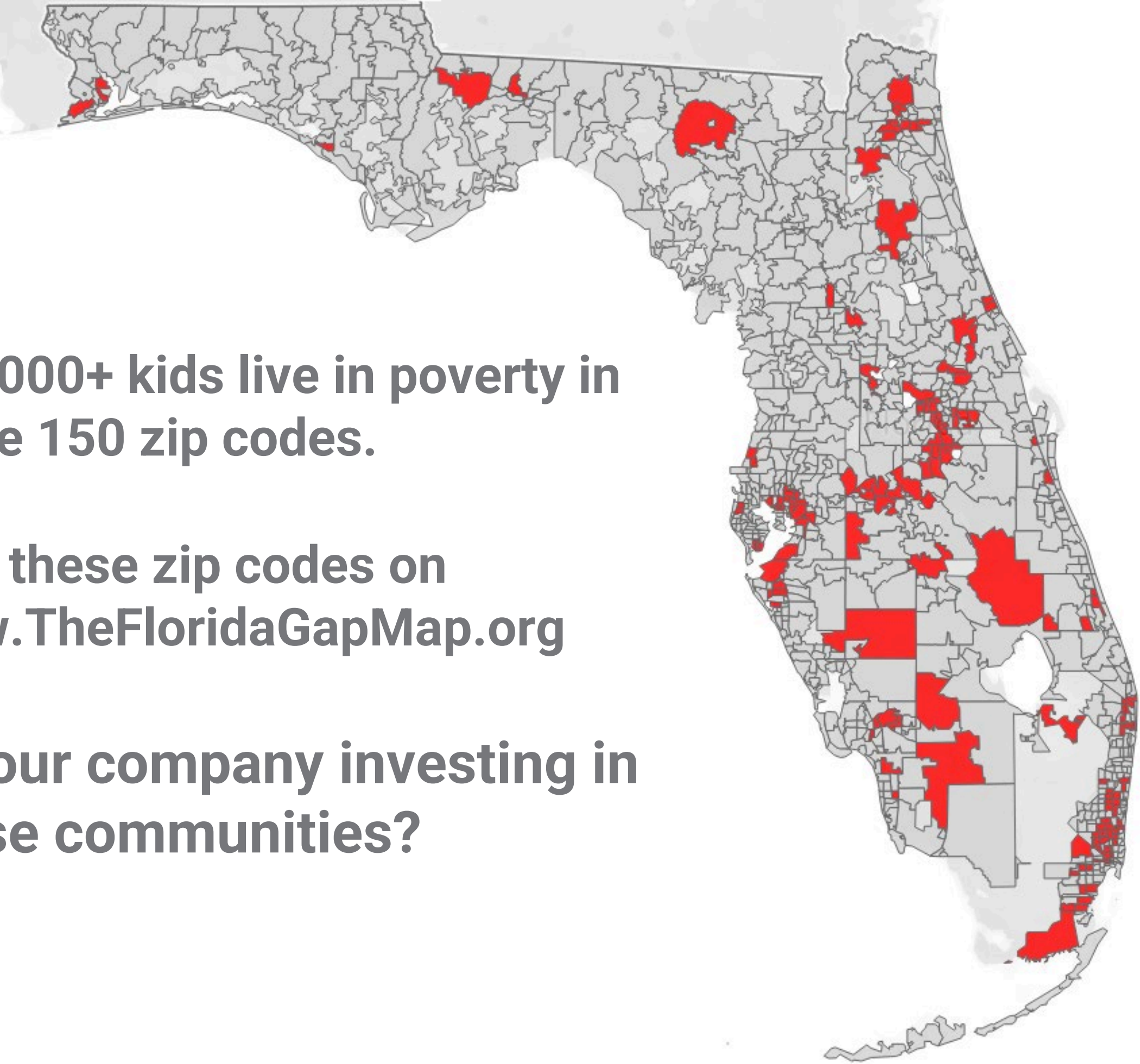
## ORANGE COUNTY

 CHILDREN IN POVERTY

**19.0%**  
(Decreasing)

**<10%**  
2030 Goal

**58,326**  
(Decreasing)



387,000+ kids live in poverty in these 150 zip codes.

Find these zip codes on [www.TheFloridaGapMap.org](http://www.TheFloridaGapMap.org)

Is your company investing in these communities?



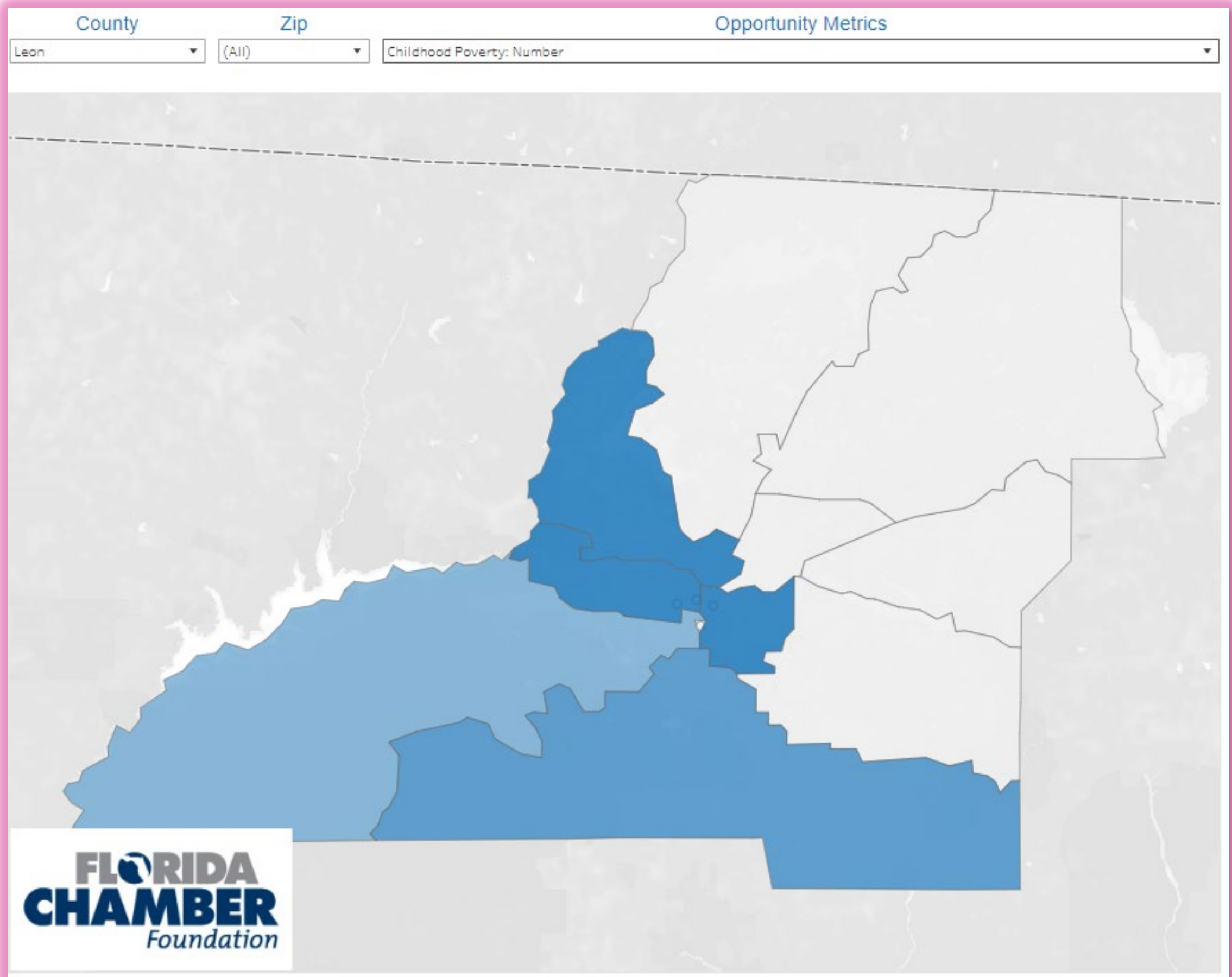
Unemployment Rate Average in 150 Zip Codes

**6.7%**

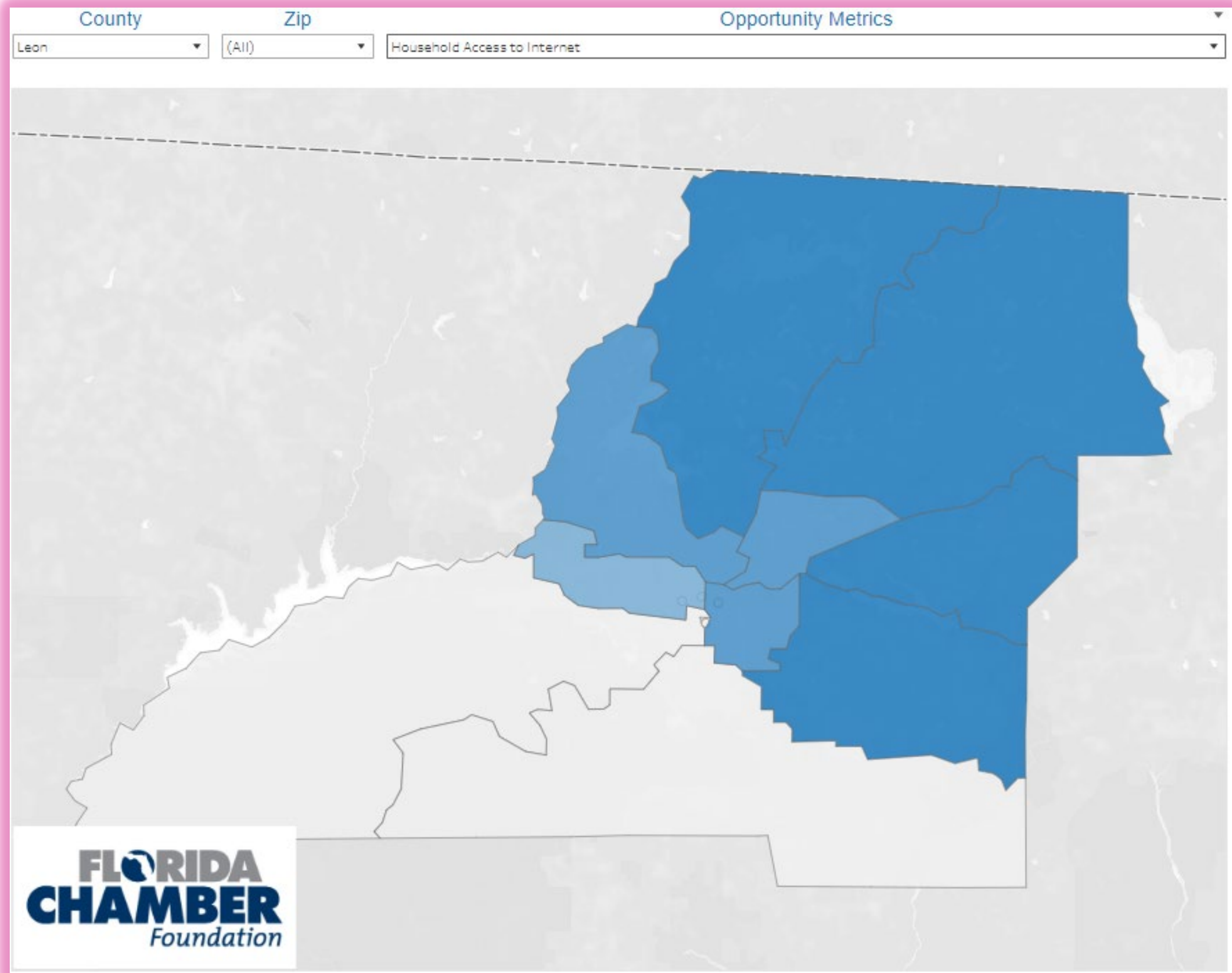




# POVERTY & INTERNET WITHIN THE HOME



Childhood Poverty

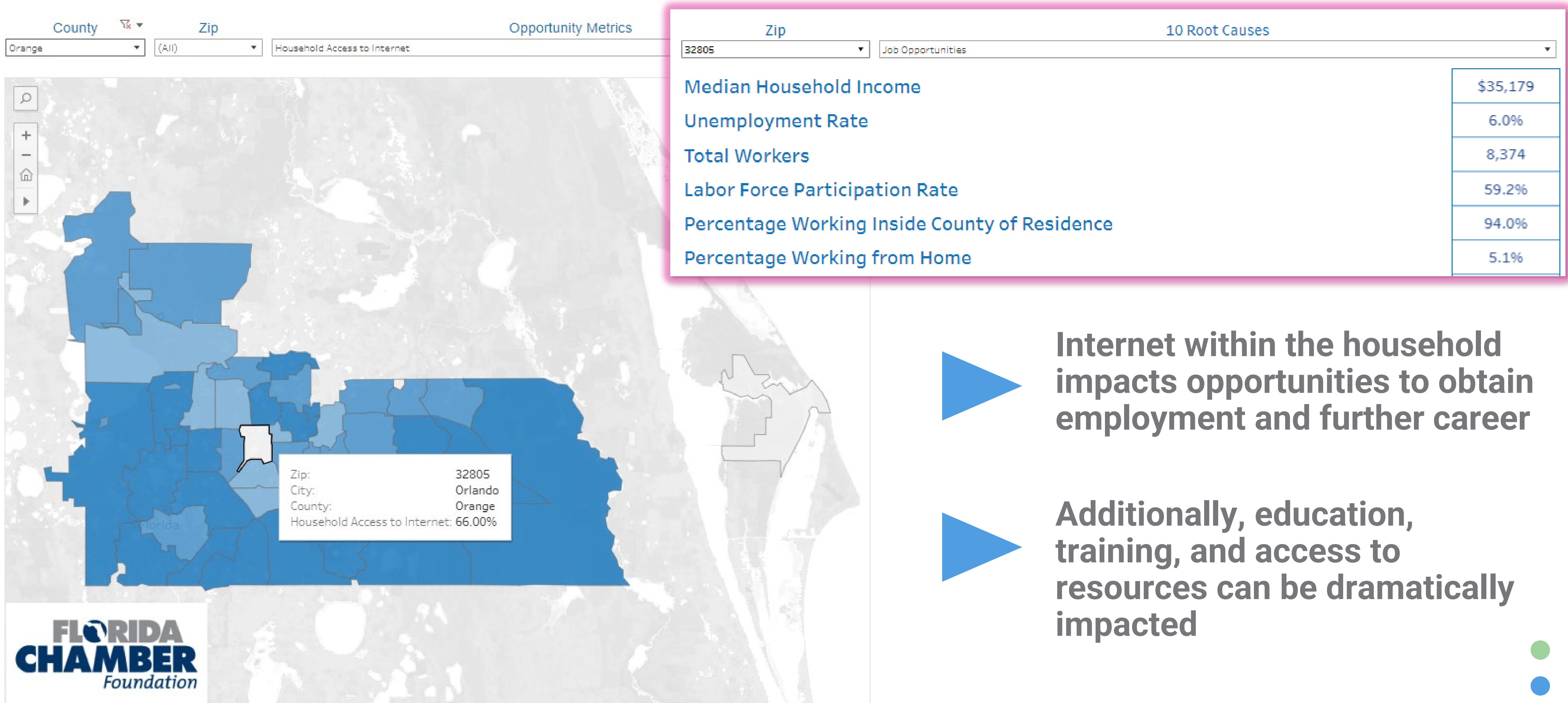


Household Access to Internet





# BROADBAND CHALLENGES IN EVERY COMMUNITY





# THANK YOU.

If you have questions or comments about this presentation, please contact us.



Office Of Broadband

Email: [broadband@commerce.fl.gov](mailto:broadband@commerce.fl.gov)





# Break

Next session begins at  
11:00 AM in Gatlin D



# **Securing the Future: A Look at Cybersecurity Programs for Communities**

- **Led by DMS Secretary Pedro Allende**
- **Freddie Figgers, Figgers Communications**
- **Jay Harmon, BorderHawk Cybersecurity**
- **Jeremy Rodgers, State CISO, Florida Digital Service**







# Break

Lunch will begin at  
12:00 PM in Gatlin C



# **Broadband Workforce Panel: Working Toward the Future**

- **Led by Adrienne Johnston, President & CEO, CareerSource Florida**
- **Representative Josie Tomkow**
- **Florida Department of Education: Senior Chancellor Kim Richey & Chancellor Kevin O'Farrell**
- **Marva Johnson, former State Board of Education appointee**
- **FloridaCommerce Deputy Secretary Lindsay Volpe**





# Local Workforce Development Board Panel

- **Led by Rick Beasley, Executive Director, CareerSource South Florida**
- **Joshua Matlock, CareerSource Suncoast**
- **Marcus McBride, CareerSource Escarosa**
- **Richard Williams, CareerSource Chipola**





## Break

### Up Next: BEAD Breakout Sessions: All About BEAD

- **3:00 PM, Gatlin D (current room):** The BEAD Challenge Process and the Importance of Fabric IDs
- **3:00 PM, Gatlin C:** Broadband Infrastructure Implementation Considerations – Procurement and Key Provisions of the BEAD Program





# The BEAD Challenge Process and the Importance of Fabric IDs

- Led by Sean Lewis, Office of Broadband
- Raj Shelat, KPMG
- Jessie Shuler, Inspired Technologies







# Break

Next session begins at  
4:00 PM in Gatlin D



## **Federal Regulations & Compliance – Beyond Procurement**

- **Led by Paul Wotherspoon, Office of Broadband**
- **Jill Reyes, RSM**





# THE POWER OF BEING UNDERSTOOD



# FEDERAL REGULATIONS – COMPLIANCE BEYOND PROCUREMENT

September 21, 2023



# Presentation Agenda

Overview of Programs and Funding Sources

Overview of 2 CFR 200 Uniform Guidance

- A few words on Procurement
- Everything Else

Internal Controls over Grants





**Jill Reyes**

Partner

Jill has provided audit and consultation services to a variety of public sector entities since 2001. She focuses primarily on process improvements, grant management, and reporting responsibilities for state governments, cities, counties, and school districts. In her current role, Joel advises and consults regularly with budget directors, policy staff, and elected officials. Jill is also a national speaker and trainer on topics such as regulatory compliance, fraud and internal controls. She is a CPA, Certified Internal Auditor and Certified Fraud Examiner. She leads the RSM broadband grant compliance and monitoring team for services provided to FloridaCommerce, as well as serves as a broadband quality reviewer to clients in Iowa, Georgia, Virginia.



**Vince Masson**

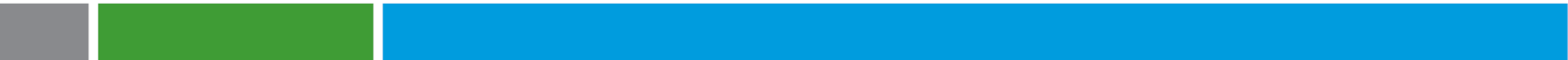
Senior Director

Vince has provided management consulting services for over 30 years managing and promoting cross-functional and cross-cultural team diversity across the globe. Most recently, Vince led the C-Band transition relocation coordinator team for this \$100 billion program in the continental United States (CONUS). Coordinating with satellite operators from Belgium, Brazil, Canada, France, and the United States, clearing C-band spectrum for 5G broadband services expansion in CONUS by Federal Communications Commission (FCC) clearing deadlines. He is also a technical SME and delivery assurance professional for the RSM Broadband growth and delivery team, including serving clients in Florida, Georgia, Iowa and Virginia.



# OVERVIEW OF PROGRAMS, FUNDING SOURCES AND ALLOWABLE USES

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# Broadband Funding Sources

While USDA ReConnect, ARPA Capital Projects and IJA NTIA BEAD may be the most recognized primary funding sources, there are over 90 funding sources across Federal programs.

Interactive Guide in a question/answer format at: <https://broadbandusa.ntia.doc.gov/resources/federal/federal-funding>

PDF at: [https://broadbandusa.ntia.doc.gov/sites/default/files/2022-10/FY22\\_Federal\\_Funding\\_Guide\\_10-18-22.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2022-10/FY22_Federal_Funding_Guide_10-18-22.pdf)

Excel Spreadsheet (as of October 19 2022) at: <https://broadbandusa.ntia.doc.gov/resources/federal/federal-funding>



**BroadbandUSA**  
National Telecommunications and Information Administration

Home | Federal

**Agency/Department**

- Any -
- Appalachian Regional Commission
- Delta Regional Authority
- Denali Commission
- Department of Agriculture
- Department of Commerce
- Department of Education
- Department of Housing

## Federal Funding

BroadbandUSA's Federal Funding site connects you to funding opportunities that support broadband planning, digital inclusion, and deployment projects. The site allows you to filter programs by Agency/Department, Eligible Recipients, and/or Program Purpose by using the filter options on the left.

In November 2021, President Biden signed the Infrastructure Investment and Jobs Act into law and provided \$65 billion for broadband. **While these new funding opportunities are included in the federal funding website, additional information about the investment in high-speed internet can be found in the White House's Guidebook to the Bipartisan Infrastructure Law and on InternetForAll.gov.** For information on state broadband programs and contact information for state-level broadband leaders please visit NTIA's state resources page.

This site is updated with information provided by federal agencies and the Federal Communications Commission as new funding becomes available. Information included in the Federal Funding site can be downloaded in **PDF** and **spreadsheet** formats as well as an **Interactive Guide**. Feedback on the site and its resources is always welcome. Please contact [BroadbandUSA@ntia.doc.gov](mailto:BroadbandUSA@ntia.doc.gov) to



# Recent Broadband Legislation Timeline

## 2019 and prior

- USDA ReConnect/FCC RDOF -
  - Focus primarily on rural America for the unserved

## 2020 Coronavirus Aid Relief and Economic Security Act (CARES Act)

- Coronavirus Relief Fund - \$150 Billion in a year
  - Necessary to the pandemic – Some state used for broadband
- Governor's Emergency Education Relief Fund - \$3 Billion in a year
  - Providing off-campus access to reliable, high-speed internet for students and teachers through the purchase of internet-connected devices/equipment, mobile hotspots, wireless service plans, or installation of Community Wi-Fi Hotspots, especially in underserved communities

## 2021 American Rescue Plan Act (ARPA)

- Coronavirus State and Local Fiscal Recovery Funds - \$350 Billion over 2 years
  - Can be spent on a variety of things with no approval from UST
- Capital Projects Fund - \$10 Billion in a year
  - Can be spent on a on broadband and digital equity, or other projects directly enable work, education, and health monitoring
  - Application needs approval from UST

## 2021 Infrastructure Investment and Jobs Act (IIJA)

- NTIA received \$42.5 Billion for Broadband Equity and Access Deployment (BEAD)
  - Solely for broadband middle mile, last mile and digital equity





## CSLFRF - Use of Funds

The Coronavirus State and Local Fiscal Recovery Funds provide eligible state, local, territorial, and Tribal governments with a substantial infusion of resources to meet pandemic response needs and rebuild a stronger, and more equitable economy as the country recovers. Recipients may use these funds to:

**Replace lost public sector revenue**, using this funding to provide government services up to the amount of revenue lost due to the pandemic

**Respond to the far-reaching public health and negative economic impacts of the pandemic**, by supporting the health of communities, and helping households, small businesses, impacted industries, nonprofits, and the public sector recover from economic impacts

**Invest in water, sewer, and broadband infrastructure**, making necessary investments to improve access to clean drinking water, to support vital wastewater and stormwater infrastructure, and to expand affordable access to broadband internet

**Provide premium pay for essential workers**, offering additional support to those who have and will bear the greatest health risks because of their service in critical sectors

Within these overall categories, recipients have broad flexibility to decide how best to use this funding to meet the needs of their communities.



- CARES Act was intended to provide to COVID-19 response, and specifically would not allow for already budgeted expenses to be eligible; and did not provide for revenue replacement.
- ARPA provides for response, but also allows for economic recovery, by allowing for revenue replacement and providing additional flexibility on the timing and use of funds.

Broadband and infrastructure projects are eligible under both Acts.



## IIJA – Fast Facts

- Primarily runs through the US Department of Transportation rather than US Treasury, but includes programs under DEP, USDA, FAA and others, including NTIA for broadband
- Similar eligible uses to SLFRF, but expands into energy, cybersecurity, and is intended to strengthen supply chain channels (road, port, rail, air)
- Additional focus on climate and environmental sustainability



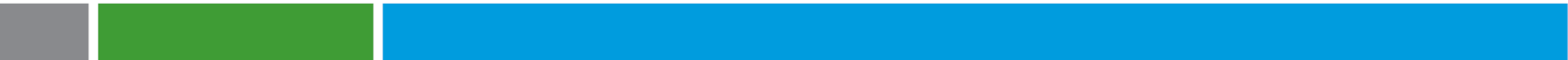
Hold on!



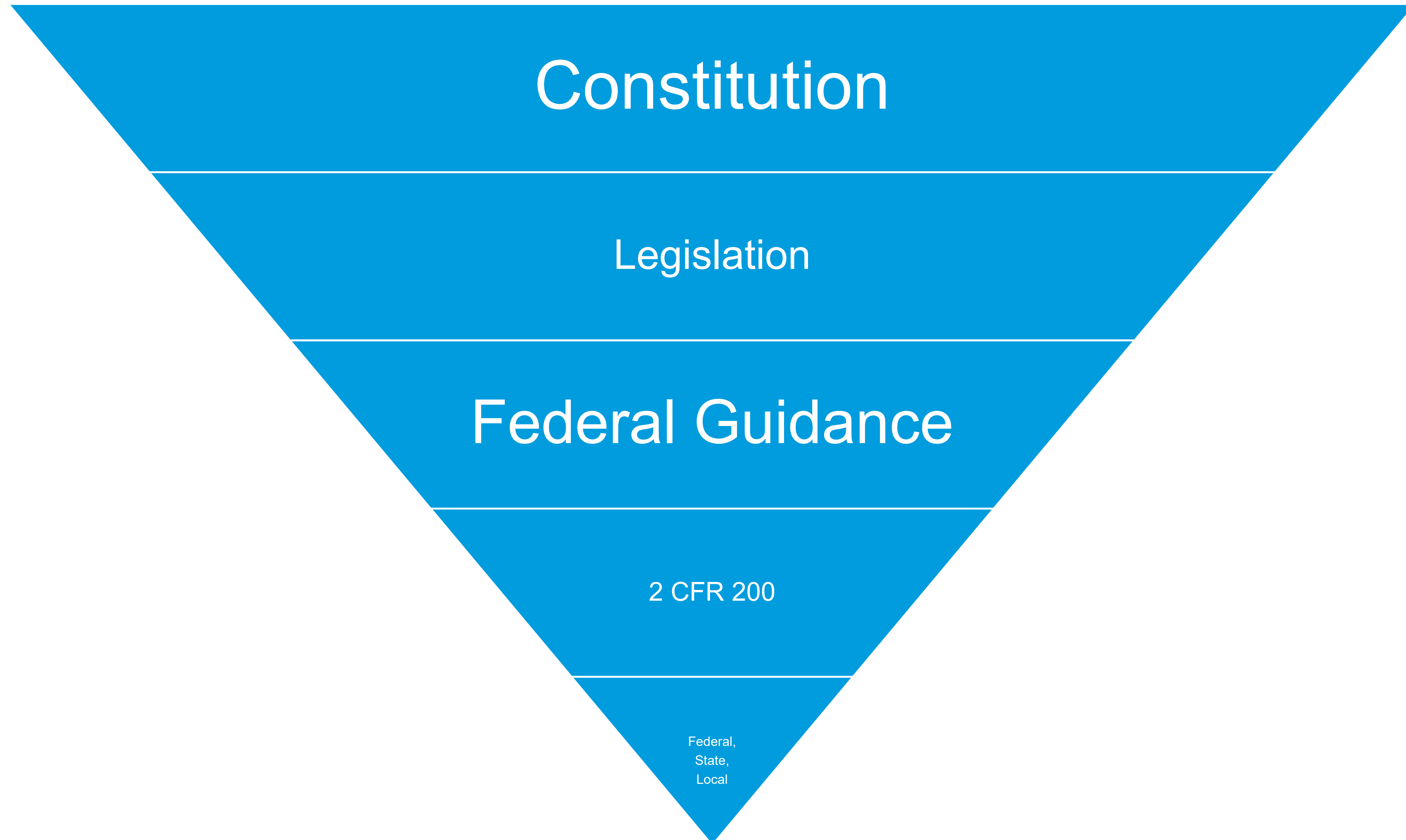


# OVERVIEW OF UNIFORM GUIDANCE

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## Policy Requirements

Per SAM.gov, the following 2CFR policy requirements apply to Assistance Listing Numbers "ALN" (formerly CFDA number) 21.027 (SLFRF), 21.029 (CPF) and 11.035 (BEAD):

[Subpart B, General provisions](#)

[Subpart C, Pre-Federal Award Requirements and Contents of Federal Awards](#)

[Subpart D, Post Federal; Award Requirements](#)

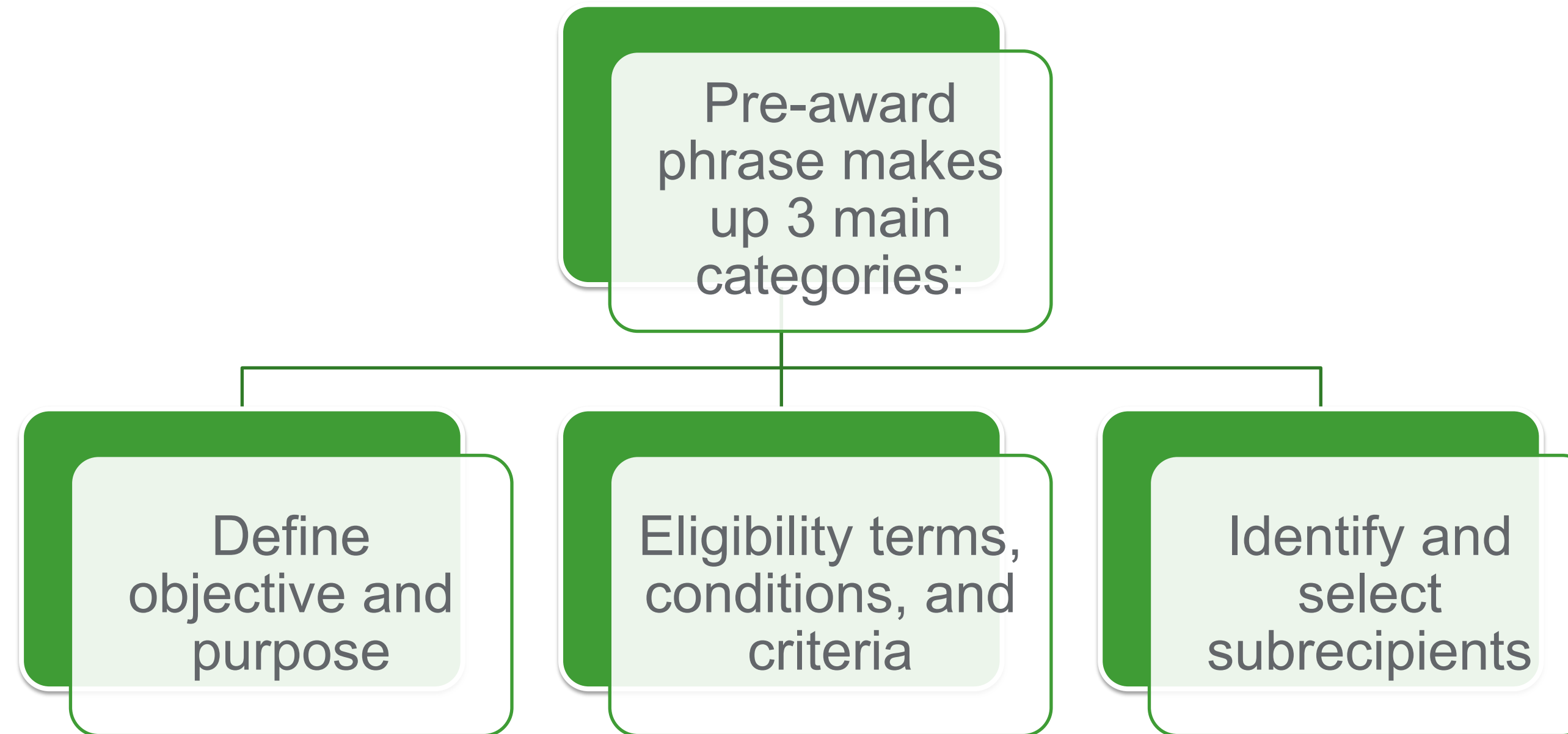
[Subpart E, Cost Principles](#)

[Subpart F, Audit Requirements](#)

NOTE: Certain 2CFR policy requirements are waived or adjusted for SLFRF and CPF-funded projects categorized as broadband infrastructure. Recipients should consult Treasury's supplementary broadband guidance when implementing such a project. Note that NTIA is currently reviewing applicable guidance and accepting comments through 9/21/2023.



# Design the grant to save the world



- **Subpart A is the definitions – lexicon of the guidance – READ IT!**
- **Subpart B and C tell Recipients what they need to do at the start of the grant**
- **Subpart D, E, and F tell Subrecipients what they need to do comply with the grant**
- **All of it needs to be in the grant program design**



# Changing Regulatory Complexity Creates Uncertainty

| Requirement                             | ARPA SLFRF        | ARPA CPF          | BEAD (RFC open)            |
|---|-------------------|-------------------|----------------------------|
| 2 CFR 200 All                           | Yes               | Yes               | Yes                        |
| 2 CFR 200 Procurement                   | No if Fixed Award | No if Fixed Award | Yes, with BEAD Guidance+   |
| NHPA Section 106                        | No                | No                | Yes                        |
| Build America, Buy America (BABA)       | No                | No                | Yes, with Limited Waiver++ |
| Davis Bacon                             | > \$10 Million*   | > \$5 Million**   | Yes                        |
| NEPA                                    | No                | No                | Yes                        |
| Climate Resilience                      | No                | No                | Yes                        |
| Financial Risk (86 FR 27967)            | No                | No                | Yes                        |
| Flood Risk (80 FR 6425)                 | No                | No                | Yes                        |
| ISP CyberSecurity Plan+++               | No                | No                | Yes                        |
| Supply Chain Risk Management#           | No                | No                | Yes                        |
| Letter of Credit for each Grant/Project | No                | No                | Yes                        |



+ Dept of Commerce – NTIA – Docket 230622-0154 Tailoring the Application of the Uniform Guidance to the BEAD Program; Request for Comments closed as of August 4, 2023; Guidance pending - <https://www.govinfo.gov/content/pkg/FR-2023-07-05/pdf/2023-14114.pdf>

++ Dept of Commerce - Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Broadband Equity, Access, and Deployment Program; Comments due by 9/21/2023 <https://www.commerce.gov/sites/default/files/2023-08/BEAD%20Waiver.pdf>

\* Total project amount

\*\* Total grant amount

+++ NIST Framework for Improving Critical Infrastructure Cybersecurity v1.1 or current; Executive Order 14028;

# NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented



## Subpart A – Now we are speaking the same language

Subpart A is the lexicon of 2 CFR 200

- The definitions used in Subpart A is how you must read the rest of the Subparts and the Appendices.
- They should also be the definitions you use in your grant agreements

***Pass-through entity (PTE)*** means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program. ***For Florida broadband programs, this is the state or in some cases a local government.***

***Non-Federal entity (NFE)*** means a State, local government, Indian tribe, Institution of Higher Education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient. ***For Florida broadband programs, this is the local governments that receive funds from the State, ISPs, etc.***



## Subpart A – Now we are speaking the same language

***Recipient*** means an entity, usually but not limited to non-Federal entities that receive a Federal award **directly from a Federal awarding agency**. The term recipient does not include subrecipients or individuals that are beneficiaries of the award.

***Subrecipient*** means an entity, usually but not limited to non-Federal entities, that receives a subaward **from a pass-through entity** to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.



# Subpart A – Now we are speaking the same language

## Take away:

- Ambiguity is dangerous, especially later on in the grant life cycle. You might be reading a definition one way and others are reading it another way. Reference Subpart A as often as possible for a standard definition.



- Subpart D contains Federal requirements post award. Popular highlights include:
  - Property Standards § **200.310 - 200.316**
  - Procurement Standards § **200.317 - 200.327** – Everyone's favorite subsection (until it isn't)
  - Subrecipient Monitoring and Management § **200.331 - 200.333**



# Subpart D – Is this property mine forever?

**It depends!**

## Types of Property:

- Real property
- Federally owned and exempt property
- Equipment
- Supplies
- Intangible property



# Subpart D – Is this property mine forever?

| Section                                       | Title  | Use   | Disposition  |
|---|--|---|--|
| 200.311 - Real Property                       | Title vests upon acquisition in the non-Federal entity                     | Must be used for the originally authorized purpose as long as needed for that purpose, during which time the non-Federal entity must not dispose of or encumber its title or other interests.         | When real property is no longer needed for the originally authorized purpose, the non-Federal entity must obtain disposition instructions from the Federal awarding agency or pass-through entity. |
| 200.312 - Federally-owned and exempt property | Title to federally-owned property remains vested in the Federal Government | Upon completion of the Federal award or when the property is no longer needed, the non-Federal entity must report the property to the Federal awarding agency for further Federal agency utilization. |  |



# Subpart D – Is this property mine forever?

| Section             | Title  | Use  | Disposition   |
|---------------------|--|--|---|
| 200.313 - Equipment | Title to equipment acquired under a Federal award will vest upon acquisition in the non-Federal entity*. <b>Unless otherwise authorized by the Federal Awarding Agency</b> , this is a <b>conditional</b> title. | Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award, and the non-Federal entity must not encumber the property without prior approval of the Federal awarding agency. | When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency... the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. |



# Subpart D – Is this property mine forever?

| Section                       | Title   | Use   | Disposition   |
|-------------------------------|---|---|---|
| 200.314 - Supplies            | Title to supplies will vest in the non-Federal entity upon acquisition. | Shall be used for the project or program, and may use excess supplies for other Federal award programs.   | The non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal Government for its share |
| 200.315 - Intangible Property | Title vests upon acquisition in the non-Federal entity                  | Must use that property for the originally-authorized purpose, and must not encumber the property without approval of the Federal awarding agency. | Has the same disposition requirements as 200.313 - Equipment.   |



## And now, a few words about Procurement Standards:

Approximately 1/3 of Single Audit findings relate to improper procurement. Training and technical assistance, as well as pre-reviews (staff and time permitting) can help.

Even when procurement standards do not apply (*such as with SLFRF – Broadband Opportunity Program, Fixed Awards and some CPF awards*), the controls in place will be evaluated during the risk assessment, and higher risk applicants may be subject to more in-depth or more frequent monitoring.

Reminder: Procurement Standards § 200.317 - 200.327



# Subpart D – Procurement Cheat Sheet

| CFR Source      | Type                      | Threshold   | Consolidated Requirement   |
|-----------------|---------------------------|---|--|
| § 200.320(a)(1) | Micro Purchases           | ≤ \$10,000 / \$50,000. Note - \$10,000 threshold applies if subrecipient does not produce an annual written justification of increase to the threshold up to \$50,000 | No procurement documentation required<br><br>Note that if grantee increases micro purchase threshold above \$10,000 that the annual board certified resolution must be provided.             |
| § 200.320(a)(2) | Small Purchases           | \$10,000 / \$50,000 - \$250,000   | 1. Three (3) quotes must be obtained<br>2. Contract formed with selected vendor including Appendix II  |
| § 200.320(b)(1) | Sealed Bids               | ≥ \$250,000   | 1. Evidence of public advertisement<br>2. RFP package<br>3. All bids received<br>4. Bid leveling/analysis of bids performed<br>5. Contract formed with selected vendor including Appendix II |
| § 200.320(b)(2) | Competitive Proposals     | ≥ \$250,000   | 1. Evidence of public advertisement<br>2. RFP package<br>3. All bids received<br>4. Bid leveling/analysis of bids performed<br>5. Contract formed with selected vendor including Appendix II |
| § 200.320(c)    | Non-Competitive Proposals | The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold  | 1. Sole source justification form required providing narrative to the reasons why sole source was the only viable option.<br>2. Contract formed with selected vendor including Appendix II   |

## Subpart D - Remedies

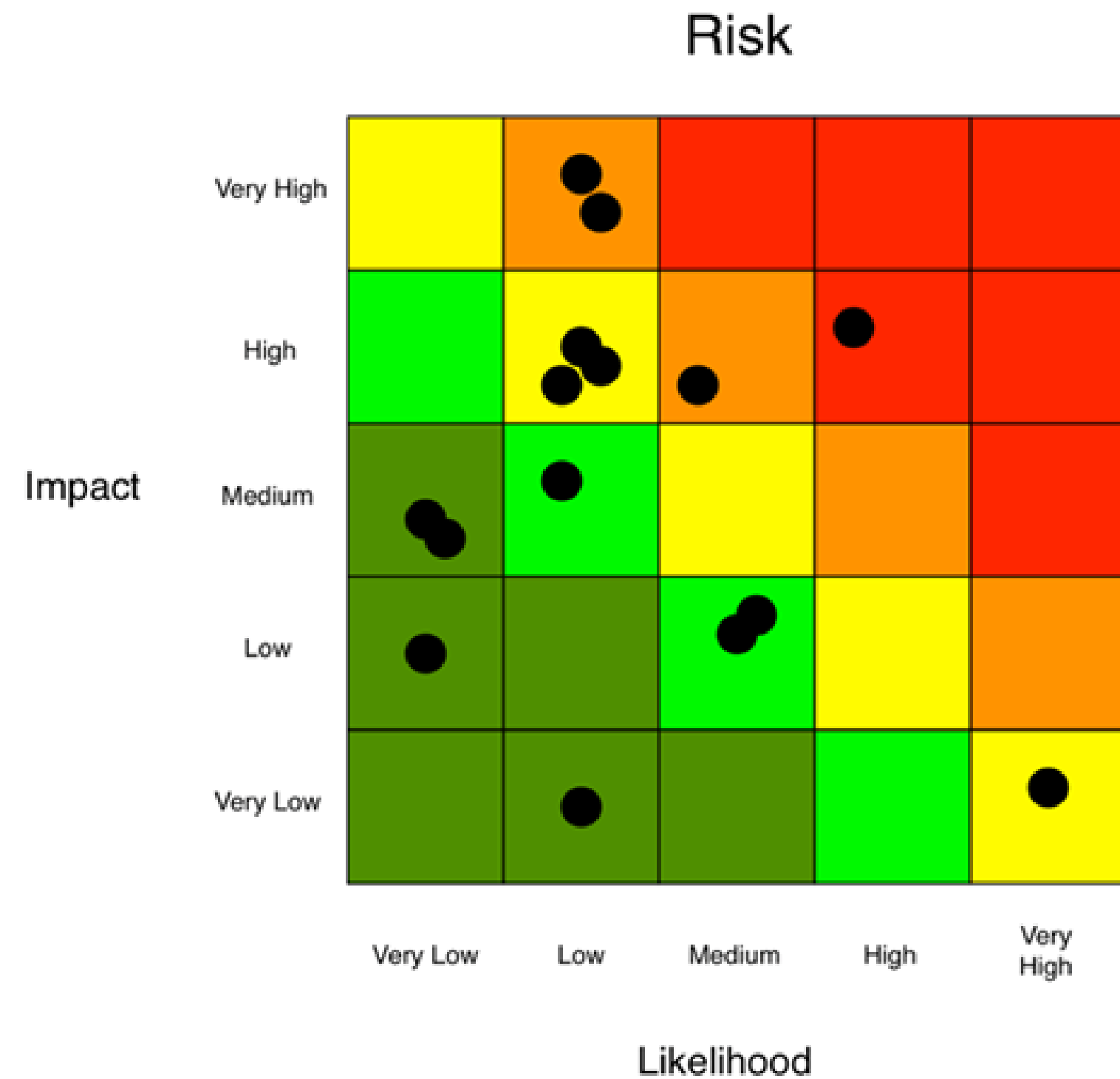
- (a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the Federal award.
- (d) Initiate suspension or debarment proceedings as authorized under [2 CFR part 180](#) and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- (e) Withhold further Federal awards for the project or program.
- (f) Take other remedies that may be legally available.



## Subpart D – I've been grants funds from the State, now what?

- § 200.332 contains the requirements (i.e., **MUST**) for pass-through entities, including:
  - Clearly identifying subawards with the information listed under § 200.332(a).
  - Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward (i.e., **perform a risk assessment**)
  - Consider imposing specific subaward conditions upon a subrecipient, if appropriate
  - Monitor the activities of the subrecipient to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward (i.e., **perform subrecipient monitoring**).
  - Verify that subrecipients are audited as required by [Subpart F](#)

# Subpart D – What does the risk assessment accomplish?



§ 200.332(b) requires the pass-through entity to complete a risk assessment.

- A risk assessment evaluates a subrecipient's potential non-compliance with the requirements of the award and the federal or state regulations.
- The results of the risk assessment influence the procedures performed during subrecipient monitoring



## Subpart D – What is required of subrecipient monitoring?

- There are a few MUSTs when it comes to subrecipient monitoring (in addition to the risk assessment):
  1. The pass-through entity MUST review any financial and performance reports that are required either by the federal program or the subaward agreement.
  2. Any deficiency items of note should be addressed timely and MUST be monitored for status.
  3. If a Single Audit is required, the pass-through entity MUST verify one occurred.
  4. If there is an unallowable cost identified and cannot be replaced, the pass-through entity MUST adjust their own records and communicate the amount to the federal awarding agency and possibly pay the funds back. **Hopefully, the item is identified in time to replace that cost with another ELIGIBLE cost, negating the need for this step. *This is why continuous monitoring is a KEY practice to consider.***

# Subpart D – What is RECOMMENDED for Subrecipient Monitoring?

- Training and technical assistance
- Site visits
- Desk audits (continuous and close out)

## And now, a few words about Procurement Standards:

Approximately 1/3 of Single Audit findings relate to improper procurement. Training and technical assistance, as well as pre-reviews (staff and time permitting) can help.

Even when procurement standards do not apply (*such as with SLFRF – Broadband Opportunity Program, Fixed Awards*), the controls in place will be evaluated during the risk assessment, and higher risk applicants may be subject to more in-depth or more frequent monitoring.



# Subpart E – It won't Cost you much

## § 200.401 Application.

(a) **General.** These principles must be used in determining the allowable costs of work performed by the non-Federal entity under Federal awards. These principles also must be used by the non-Federal entity as a guide in the pricing of fixed-price contracts and subcontracts where costs are used in determining the appropriate price. The principles do not apply to:

(1) Arrangements under which Federal financing is in the form of loans, scholarships, fellowships, traineeships, or other fixed amounts based on such items as education allowance or published tuition rates and fees.

(2) For IHEs, capitation awards, which are awards based on case counts or number of beneficiaries according to the terms and conditions of the Federal award.

(3) Fixed amount awards. See also [§ 200.1](#) Definitions and 200.201.

(4) Federal awards to hospitals (see appendix IX to this part).

(5) Other awards under which the non-Federal entity is not required to account to the Federal Government for actual costs incurred.

# Subpart E – It won't Cost you much

## § 200.403 Factors affecting allowability of costs.

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- (e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also § 200.306(b).
- (g) Be adequately documented. See also §§ 200.300 through 200.309 of this part.
- (h) Cost must be incurred during the approved budget period. The Federal awarding agency is authorized, at its discretion, to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to § 200.308(e)(3).



# Subpart E – It won't Cost you much

## § 200.404 Reasonable costs.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded. In determining reasonableness of a given cost, consideration must be given to:

- (a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.
- (b) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.
- (c) Market prices for comparable goods or services for the geographic area.
- (d) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government.
- (e) Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.

# Subpart E – It won't Cost you much

## § 200.405 Allocable costs.

(a) A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:

(1) Is incurred specifically for the Federal award;

(2) Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and

(3) Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award in accordance with the principles in this subpart.

(b) All activities which benefit from the non-Federal entity's indirect (F&A) cost, including unallowable activities and donated services by the non-Federal entity or third parties, will receive an appropriate allocation of indirect costs.

(c) Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons. However, this prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.

(d) Direct cost allocation principles: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding paragraph (c) of this section, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. Where the purchase of equipment or other capital asset is specifically authorized under a Federal award, the costs are assignable to the Federal award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required. See also §§ 200.310 through 200.316 and 200.439.

(e) If the contract is subject to CAS, costs must be allocated to the contract pursuant to the Cost Accounting Standards. To the extent that CAS is applicable, the allocation of costs in



# Subpart F – The F doesn't stand for Fail



Subpart F sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal Awards.



Who is required to have an audit? A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of § 200.501.

## Subpart F – The F doesn't stand for Fail

- ***For-profit subrecipient.*** Since this part does not apply to for-profit subrecipients, the pass-through entity is responsible for establishing requirements, as necessary, to ensure compliance by for-profit subrecipients. The agreement with the for-profit subrecipient must describe applicable compliance requirements and the for-profit subrecipient's compliance responsibility. Methods to ensure compliance for Federal awards made to for-profit subrecipients may include pre-award audits, monitoring during the agreement, and post-award audits. See also [§ 200.332](#).



# Subpart ? – They just threw it all in the Appendices

**Appendix I to Part 200**

[Full Text of Notice of Funding Opportunity](#)

**Appendix II to Part 200**

[Contract Provisions for Non-Federal Entity  
Contracts Under Federal Awards](#)

**Appendix III to Part 200**

[Indirect \(F&A\) Costs Identification and Assignment,  
and Rate Determination for Institutions of Higher  
Education \(IHEs\)](#)

**Appendix IV to Part 200**

[Indirect \(F&A\) Costs Identification and Assignment,  
and Rate Determination for Nonprofit Organizations](#)

**Appendix V to Part 200**

[State/Local Governmentwide Central Service Cost  
Allocation Plans](#)

**Appendix VI to Part 200**

[Public Assistance Cost Allocation Plans](#)

**Appendix VII to Part 200**

[States and Local Government and Indian Tribe  
Indirect Cost Proposals](#)

**Appendix VIII to Part 200**

[Nonprofit Organizations Exempted From Subpart E  
of Part 200](#)

**Appendix IX to Part 200**

[Hospital Cost Principles](#)

**Appendix X to Part 200**

[Data Collection Form \(Form SF–SAC\)](#)

**Appendix XI to Part 200**

[Compliance Supplement](#)

**Appendix XII to Part 200**

[Award Term and Condition for Recipient Integrity  
and Performance Matters](#)

## Appendix II – Back to Procurement and Contracting

### *Appendix II to Part 200—Contract Provisions for Non-Federal Entity Contracts Under Federal Awards – Required by [§ 200.327](#)*

Appendix II contains 12 provisions that **MUST** be included in federally-funded contracts.



**But wait....**What if the Procurement Standards (which includes 200.327) don't apply to my award?

This means you don't have to include the Contract Provisions in your subcontracts. This does NOT mean you are not still required to comply with some of the stated requirements.



## Appendix II – Back to Procurement and Contracting

- Davis Bacon Act (required for CPF and BEAD, where applicable)
- Debarment and Suspension (Sam.gov UAE required!)
- Prohibition on certain telecommunications and video surveillance services or equipment (required!)
- Domestic preference (preferred, not required)
  - Note: this is different from BABA

# INTERNAL CONTROLS

How can I better plan for compliance?



# Plan for the worst and expect the best!

What does fraud look like in your grant?

What does waste and abuse look like?

What would a failed project look like?

What if I have unexpected challenges along the way?

**Remember to plan the work and work the plan but be willing to be flexible when needed.**

## No Single Audit? Remember - Subpart F

- ***For-profit subrecipient.*** Since this part does not apply to for-profit subrecipients, ***the pass-through entity is responsible for establishing requirements, as necessary, to ensure compliance by for-profit subrecipients.*** The agreement with the for-profit subrecipient must describe applicable compliance requirements and the for-profit subrecipient's compliance responsibility. Methods to ensure compliance for Federal awards made to for-profit subrecipients may include pre-award audits, monitoring during the agreement, and post-award audits. See also [§ 200.332](#).



# Internal Controls over Compliance

Controls to consider that will facilitate compliance:

1. Create a separate expenditure account in the financial records for project related expenses; create one for each project so as to keep the costs separate if there is more than one project award.
2. For supplies taken out of inventory, establish a methodology for determining how costs were allocated, especially for items purchased before March 2021 (where applicable).
3. Have written procurement policy (required if procurement standards apply, recommended even if they don't) – or a memo on how subcontractors for these projects specifically were selected.
4. Have a written grant management policy – this should include how you ensure that funds are not commingled, and address possible duplication of benefits. It should also include how subcontractors are monitored for compliance and performance.

# Internal Controls over Compliance

Controls to consider that will facilitate compliance:

5. Labor records – there should be a methodology for how internal labor is tracked and documented, or allocated if it is a percentage.
6. Consider segregating the duties of processing and reporting.
7. Provide periodic training to employees on grant management and compliance.
8. Have a process for monitoring changes to the requirements.
9. **ASK QUESTIONS!!!**



# Subrecipient Monitoring - How to Prepare:

- Complete the reporting timely, and with the greatest level of detail available to you;
- Clearly identify underlying unit prices and quantities where available; do not enter lump sum amounts without a corresponding justification/narrative; and
- Provide detailed descriptions and supporting schedules regarding how cost estimates were developed for Construction, Equipment, and Contracts/Consultants/Subawards.
- Enact strong document management and retention controls for all project related documentation, especially those related to commitments and expenditures;
- Ensure subcontractors are aware of compliance monitoring and are responsive to requests for information; and
- Be prepared to cooperate! Our team is committed to working with your designated project representative(s) to develop reasonable response times to our information requests and we will work hard to develop a seamless and efficient process for conducting validation procedures

## Compliance Areas<sup>N1</sup>

- State Reporting
- 2 CFR Compliance
- Disbursements
- Subcontracting
- Change Orders/Contingency
- Equity and Inclusion
- Mbps and locations served

N1-Example, not a comprehensive listing

# Contact Info



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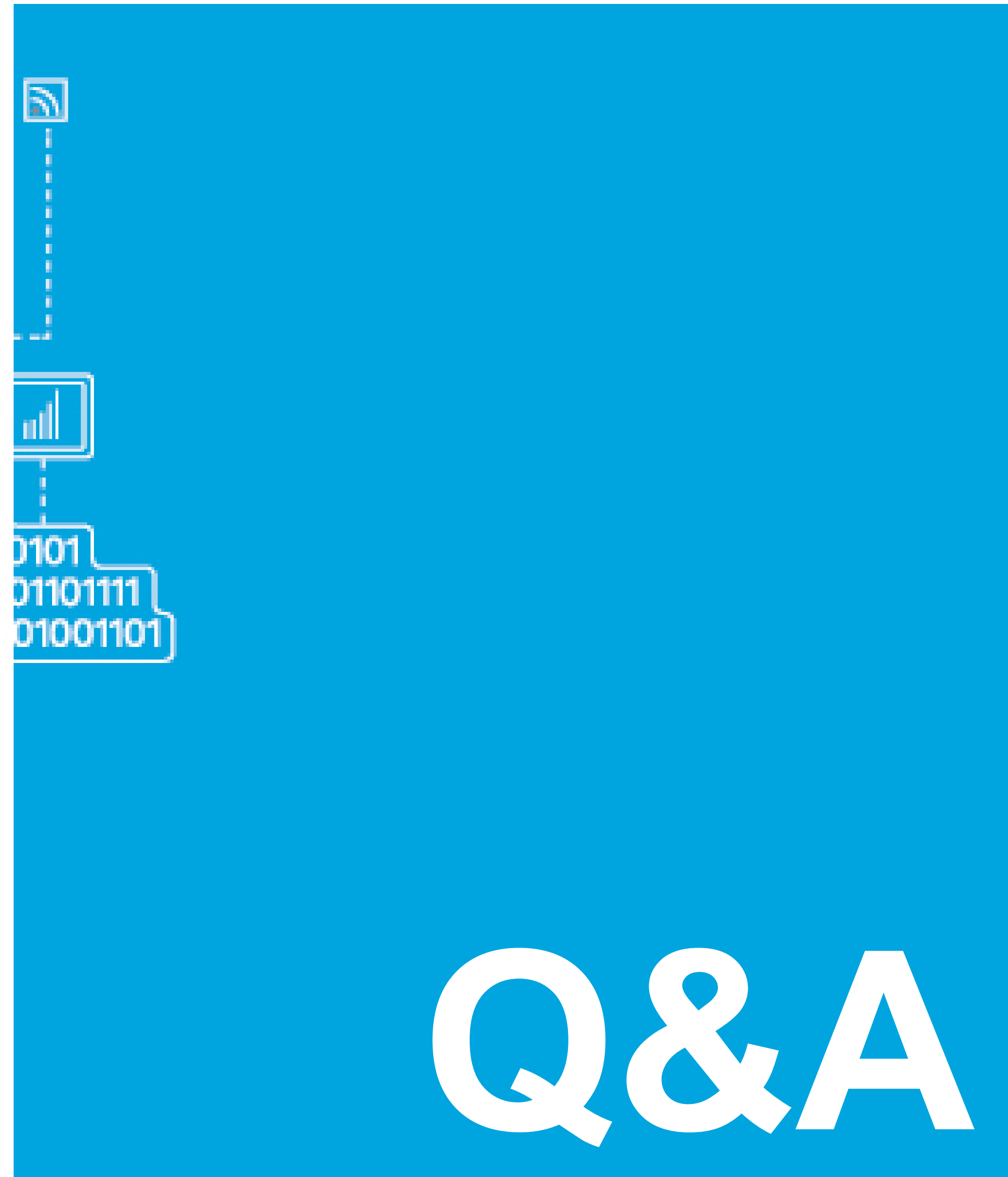
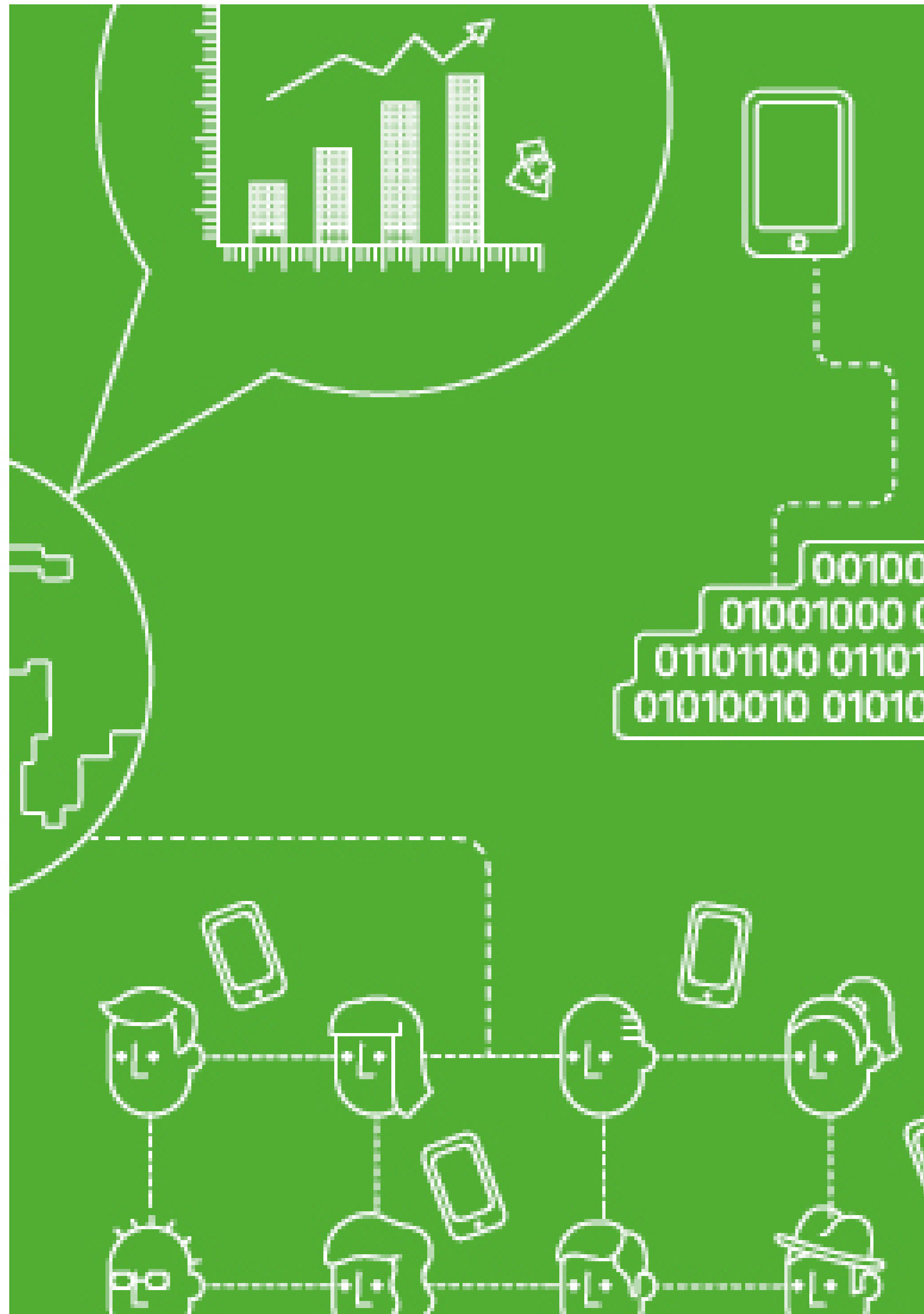
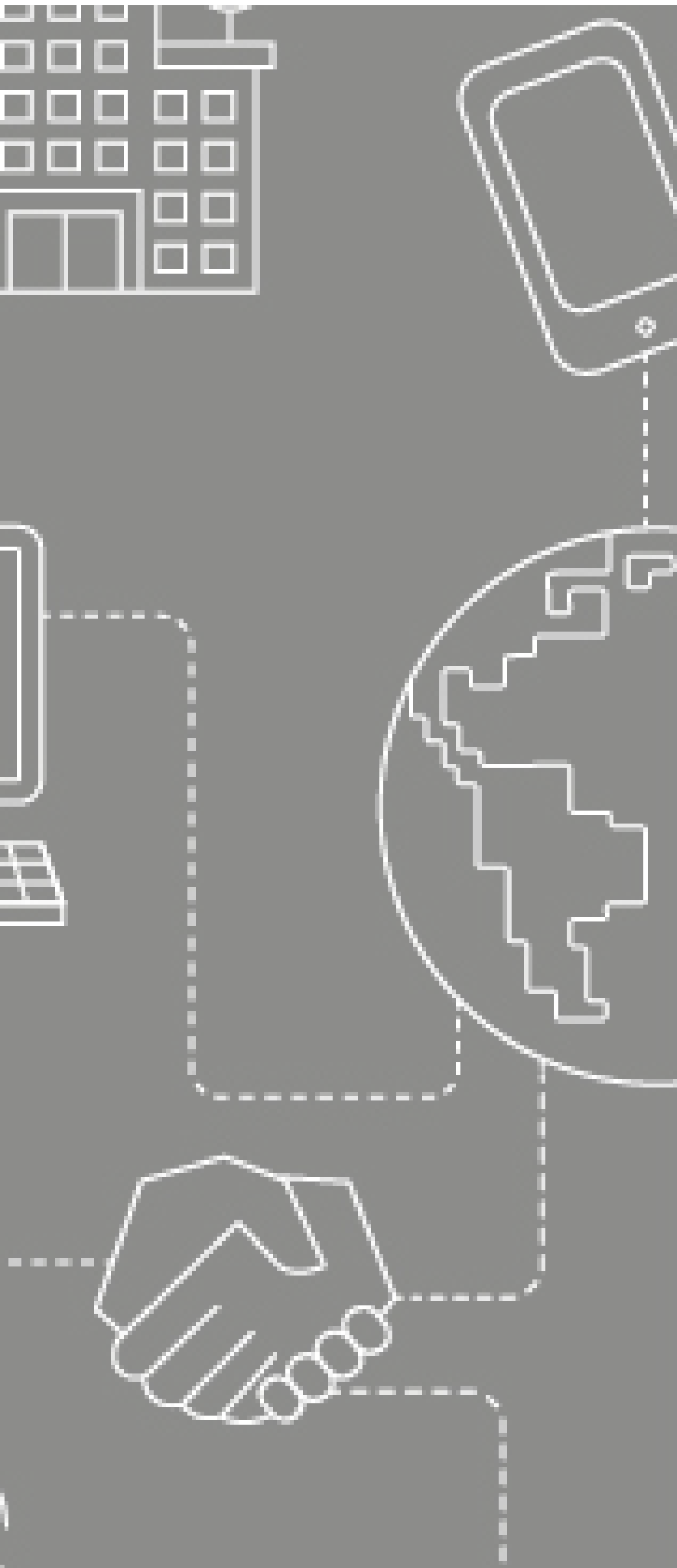


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THANK YOU FOR  
YOUR TIME AND  
ATTENTION



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**5:00 – 6:00 PM: Office Hours in Exhibit Hall**  
**Executive Reception begins at 6:00 PM in Gatlin C**

