



BEAD Milestone Disbursement Process

March 26, 2026

Agenda

1. **Milestones Disbursement Process**
2. **Project Plan Milestone**
3. **Q&A**



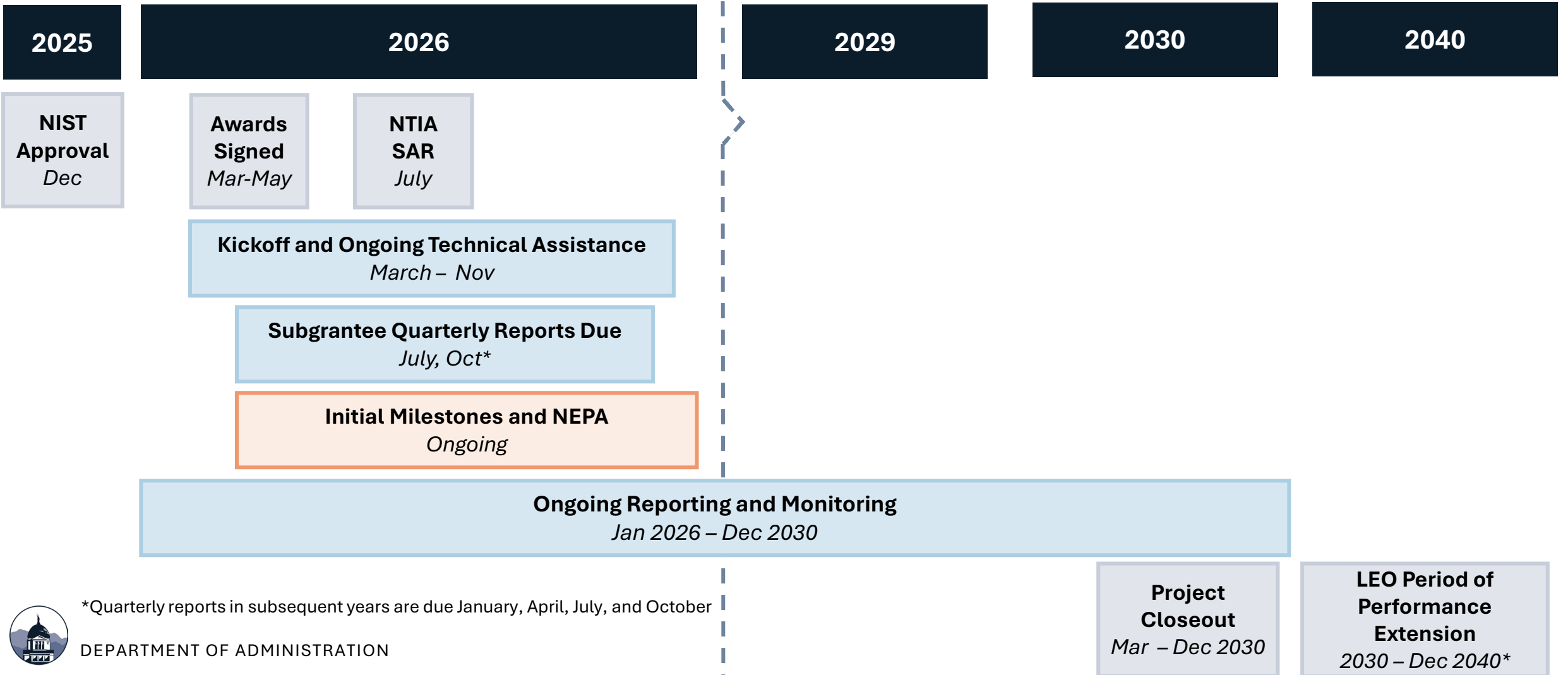
Introductions

Mitch Hergett

- Principal Broadband Engineer, CTC Technology & Energy
- mhergett@ctcnet.us



Post Award Timeline Overview



*Quarterly reports in subsequent years are due January, April, July, and October





Milestone Disbursement Process

Milestone Disbursement Process Summary

ConnectMT has chosen to award **fixed-amount subawards** with a **milestone disbursement** process for **BEAD**.

Subgrantees will submit **disbursement requests** with required documentation **upon the completion of a milestone** based on their project-specific milestone-based budget and disbursement schedule.

Subgrantees must **maintain full records for monitoring and audit purposes** as required by National Telecommunications and Information Administration (NTIA).

ConnectMT and its **contractor team** will review each disbursement request submission to **ensure milestones are met**, including the review of:

- Technical documentation
- Alignment with the subgrantees' grant agreement budget and timeline
- Eligible match amounts
- Other items determined as necessary to substantiate milestone completion



Understanding Fixed Amount Subawards

1

Fixed-amount subawards

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

2

Milestones & phasing

1. ConnectMT has created program milestones to better benefit subgrantees
2. Subgrantees can define their own project phases to optimize how program milestones are achieved

3

NTIA program requirements

1. ConnectMT must reimburse subgrantees in accordance with the objectives met
2. ConnectMT cannot disburse any funds upfront or before the pre-defined milestone is met

4

Required documentation

1. Subgrantees are not required to submit proof of individual expenditures
2. Instead, subgrantees will submit documentation in Euna Grants demonstrating completion of each milestone



Balancing Obligations

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



Disbursement Categories

Disbursement for Terrestrial Projects:

Milestone Categories	Reimbursement
Project Plan	5%
Engineering & Permitting	10%
Pre-Deployment	15%
Deployment	60%
Network Activation & Program Closeout	10%
Total	100%



Individual Milestone Thresholds

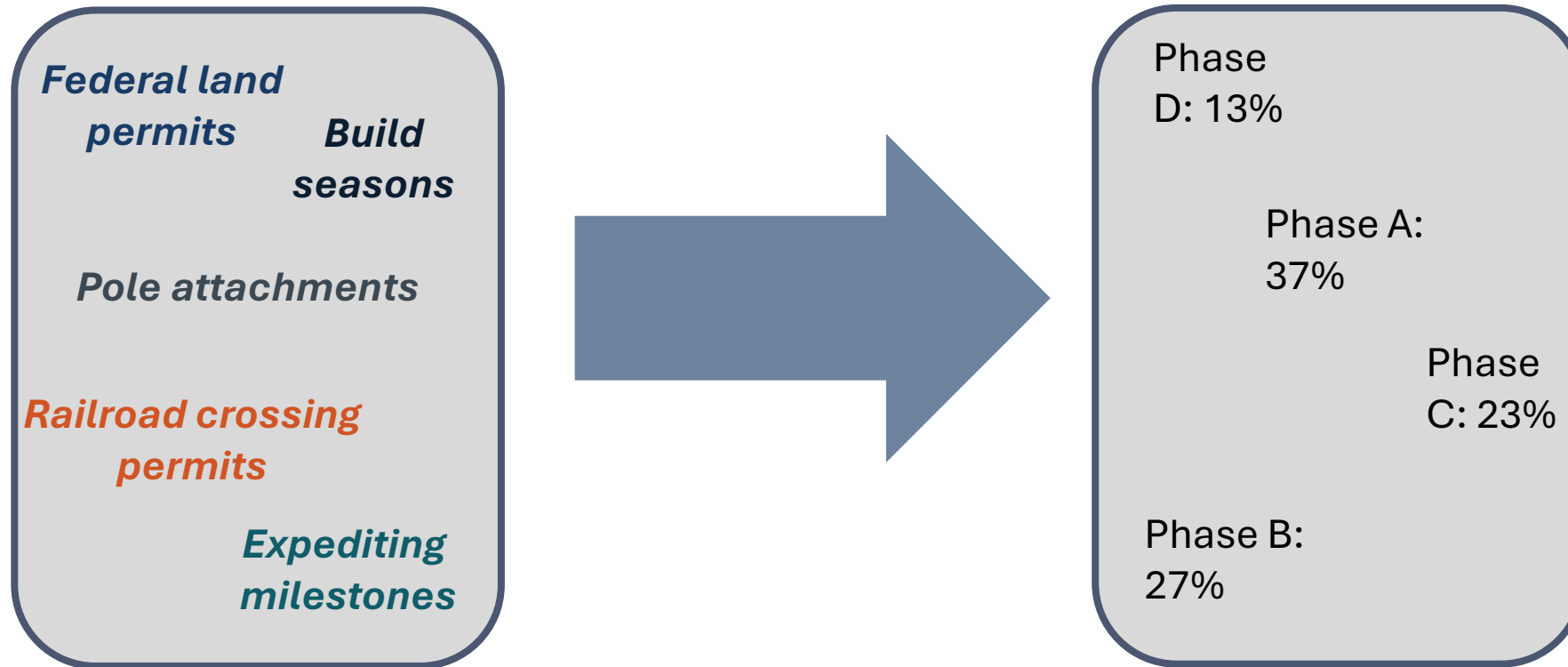
Disbursement example:

A deployment request that includes 37% of project BSLs is only eligible for 20% disbursement; a request that includes 62% of project BSLs is eligible for 60% disbursement.

Milestone	Disbursement (%) by Milestone	Percent Completion for BSLs	Disbursement (%) by Task
Project Plan	5	Completion for 100% of BSLs	5
Engineering & Permitting	10	Completion of 20% of BSLs	2
		Completion of 40% of BSLs	2
		Completion of 60% of BSLs	2
		Completion of 80% of BSLs	2
		Completion of 100% of BSLs	2
Pre-Deployment	15	Evidence for 20% of BSLs	3
		Evidence for 40% of BSLs	3
		Evidence for 60% of BSLs	3
		Evidence for 80% of BSLs	3
		Evidence for 100% of BSLs	3
Deployment	60	Completion of 20% of BSLs	12
		Completion of 40% of BSLs	12
		Completion of 60% of BSLs	12
		Completion of 80% of BSLs	12
		Completion of 100% of BSLs	12
Network Activation & Program Closeout	10	Completion of 20% of BSLs	2
		Completion of 40% of BSLs	2
		Completion of 60% of BSLs	2
		Completion of 80% of BSLs	2
		Completion of 100% of BSLs	2
Total	100		

Project Planning

Subgrantees can **split projects into phases** to meet the milestone threshold requirements.



Milestone Disbursement Documentation

Milestone Documentation Matrix

As part of each milestone request, subgrantees must submit the following documentation.

The milestone disbursement process guide can be found at: <https://connectmt.mt.gov/IIJA/Internet-Service-Provider-Information>

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





Project Plan Milestone

Project Plan Milestone

The **Project Plan Milestone** is the stage at which subgrantees **present their project plans** to ConnectMT for review and approval. This milestone **establishes the foundation for future milestone disbursements** by outlining project phasing, anticipated timelines, and the proposed network design.

The Project Plan disbursement is 5% of award funds.

Required milestone disbursement **documentation** includes:

- Location list
- EHP questionnaire
- Project timeline
- Project design shapefiles
- Permit status summary
- Evidence of expense tracking, match obligation, and record retention
- Evidence of match obligation
- FWA design template



EHP Questionnaire

Completion of this document demonstrates that the **subgrantee is aware of the EHP requirements** of the BEAD Program and how they will impact their project.

This has been **distributed to providers** prior to award and should be **returned to ConnectMT as soon as possible**. A copy is required to be uploaded as part of this milestone.

- Document link: <https://connectmt.mt.gov/IIJA/Internet-Service-Provider-Information>

Number	Question	Yes/No	Detailed Explanation of Findings	Links
1	What steps have you taken to ensure you have access to specialized expertise for National Environmental Protection Act (NEPA), National Historic Preservation Act (NHPA), and Endangered Species Act (ESA) Section 7 reviews?	NA		
2	Does your preliminary project evaluation include initiating NEPA documentation, including a detailed project description that details deployment procedures, potential impacts associated with those deployment procedures, and the photos and maps required to evaluate whether a Categorical Exclusion (CatEx), Environmental Assessment (EA), or Environmental Impact Statement (EIS) is necessary to determine potential impacts in compliance with NEPA, NHPA, and other relevant federal, state, and local regulations, per NTIA's "Streamlined Environmental Review & Permitting for Broadband: A Roadmap"; NTIA's "NEPA for BEAD: Milestone Schedule & NEPA Timeline"; and NTIA's "Frequently Asked Questions (FAQ) NEPA for BEAD Addendum"?			https://broadband.us.ntia.gov/sites/default/files/2025-07/NTIA_Permitting_and_Environmental_Streamlining_Tools_Roadmap.pdf https://broadband.us.ntia.gov/sites/default/files/2025-05/NEPA_for_BEAD_Milestone_Schedule_NEPA_Timeline.pdf https://broadband.us.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf
3	Does your preliminary project evaluation indicate that your proposed activities will occur near property listed or eligible for listing in the National Register of Historic Places or near property otherwise protected by Section 106 of the National Historic Preservation Act?			https://www.nps.gov/subjects/nationalregister/database-research.htm
4	Does your preliminary project evaluation indicate that your proposed activities will occur on tribal lands?			https://hbam.ntia.gov/content/27f42c6312e4b4b3d9a3c0542624939/about
5	Does your preliminary project evaluation indicate that your proposed activities will occur in proximity to threatened or endangered species or critical habitat as defined by the ESA and under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Service (NMFS), per "NTIA's Guide to Streamlined Endangered Species Act (ESA) Compliance for Broadband Deployments"? The Guide describes how to conduct an online review using USFWS's Information for Planning and Consultation (IPaC) tool.			https://broadband.us.ntia.gov/sites/default/files/2025-07/DOC_NTIA_Guide_to_Streamlined_Endangered_Species_Act_Compliance.pdf
6	Does your preliminary project evaluation indicate that your proposed activities will potentially affect threatened or endangered species or critical habitat as defined by the ESA and under the jurisdiction of USFWS and/or NMFS, per NTIA's Guide to Streamlined Endangered Species Act (ESA) Compliance for Broadband Deployments?			https://broadband.us.ntia.gov/sites/default/files/2025-07/DOC_NTIA_Guide_to_Streamlined_Endangered_Species_Act_Compliance.pdf
7	Does your preliminary project evaluation indicate that your proposed activities are located in a designated floodplain or have the potential to affect or be affected by a floodplain on a National Flood Insurance Program map as made available through the FEMA Flood Map Service Center, per Executive Order (E.O.) 11988 as amended by E.O. 13690			https://msc.fema.gov/portal/home



Project Timeline

This document submission demonstrates that the **subgrantee** has an **adequate project plan** to complete the network deployment work within the program timeline.

This document must include any **proposed project phasing** and updates to the **anticipated start dates and end dates** for the key project components for **each project phase**.

This document must also provide anticipated milestone submission dates.

- Document link: <https://connectmt.mt.gov/IIJA/Internet-Service-Provider-Information>

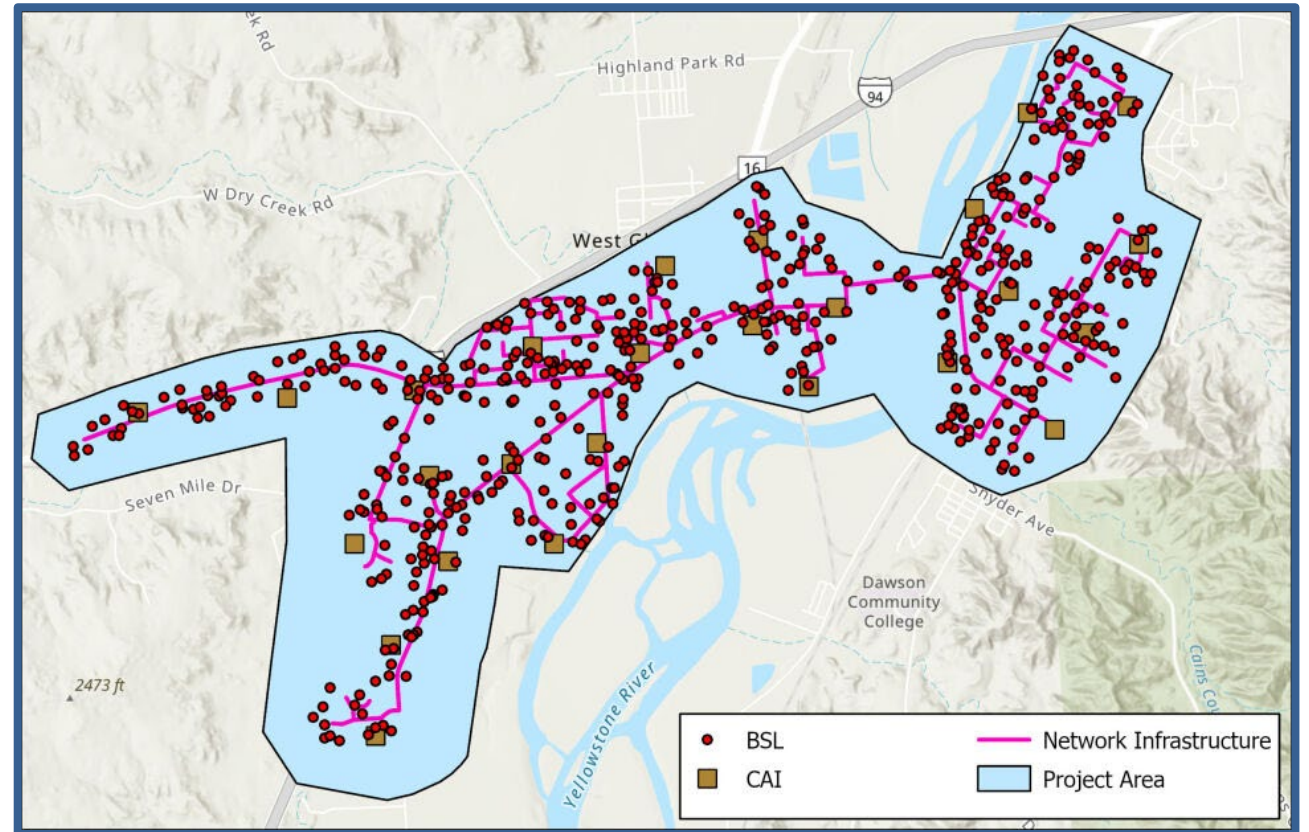
The image shows two project timeline tables. The top table is titled "Project Timeline - All Project Phases" and the bottom table is titled "Project Timeline - Phase 1". Both tables have columns for Project BSLs, Project Miles, Start (Month), and Duration (Months). The main part of each table is a grid representing months 1 through 48, grouped into Year 1 (months 1-12), Year 2 (months 13-24), Year 3 (months 25-36), and Year 4 (months 37-48). The "Project Timeline - All Project Phases" table lists phases: Project Planning, Design Engineering, Environmental and Historic Preservation (EHP), Engineering and Permitting Approvals, Materials Acquisition, Deployment, Network Activation & Testing, and Project Closeout. The "Project Timeline - Phase 1" table lists phases: Design Engineering, Engineering and Permitting Approvals, Materials Acquisition, Deployment, and Network Activation & Testing. A note at the bottom of the second table says "[Copy Rows Above for Each Proposed Project Phase]".



Project Design Shapefiles

The submission of the **shapefiles** should demonstrate that the that the proposed **infrastructure, service area, materials, and technology match those approved in the subaward agreement** and confirm that the infrastructure is capable of consistently delivering the **minimum proposed speeds to all proposed locations**.

As part of this submission, subgrantees should identify any required project phasing.




Permit Status Summary

This document demonstrates that the **subgrantee** has adequately **identified** and is **prepared to execute** all **required permits** needed for network deployment meeting their program obligations within the dates specified in their contract agreement.

As part of the project plan milestone, the **template** shall **identify** all **anticipated permits** required to complete the proposed project and must indicate the project phase and other key details.

- Document link:
<https://connectmt.mt.gov/IJA/Internet-Service-Provider-Information>



Project Phase	Permit Name	Permitting Authority	Type of Permit	Estimated Permit Submission Date	Actual Permit Submission Date	Estimated Permit Execution Date	Actual Permit Execution Date	Permit Expiration Date	Permit Status	Notes
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										
24										
25										


*Add additional lines if applicable



Evidence of Match Obligation

This document demonstrates that the subgrantee is meeting BEAD requirements by **accounting for their required matching funds** and **tracking the expenditure** of these funds proportionally with federal funds.

The template captures details at a high level. We are not looking for a submission of detailed records.

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



Other Compliance Documents and Rules

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

1. [2 CFR § 200 Uniform Guidance](#)
2. [General Terms & Conditions \(GTC\)](#)
3. [BEAD Restructuring Policy Notice \(RPN\)](#)
4. [BEAD Notice of Funding Opportunity \(NOFO\)](#)
5. [BEAD Performance Testing Requirements](#)
6. [NTIA FAQs](#)
7. [NTIA BEAD resources](#)



Upcoming Technical Assistance

Technical Assistance Session Calendar

Topic	Date	Time*
NEPA	March 31, 2026	1 PM
Introduction to Euna Grants	April 2, 2026	1 PM
Submitting Quarterly Reports	April 28 and May 14, 2026	1 PM & 11 AM
Permitting Overview	June 3, 2026	1PM
Submitting Quarterly Reports Q&A	June 4 and June 11, 2026	1PM & 11 AM
Submitting Annual Reports	November 3 and November 5, 2026	1 PM & 11 AM

Where to find webinar links:

- All webinar dates, times, and links to register can be found at:
<https://connectmt.mt.gov/Events/Upcoming>
- All webinars are recorded and will be posted on the ConnectMT website.

*All times are MST

**Additional questions should be submitted to the Technical Assistance email at connectmt@mt.gov



Post Award Resources

Broadband Equity, Access, and Deployment (BEAD) / Digital Equity (DE)

The Infrastructure Investment and Jobs Act (IIJA), signed into law in November 2021, provided \$550 billion in federal funding. The Broadband Equity, Access, and Deployment (BEAD) program and the Digital Equity Act (DE) program were funded through IIJA; both programs will be administered by the National Telecommunications and Information Administration (NTIA).

Montana has been awarded \$628,973,798.59 million through the Broadband Equity, Access, and Deployment (BEAD) program.

The ConnectMT Program was codified in Senate Bill 297 and House Bill 632 in Montana's 67th legislative session by Governor Gianforte to award grants to internet service providers (ISPs) to improve broadband access across the state. In 2021, the Montana Legislature dedicated \$270 million from the American Rescue Plan Act (ARPA) to the first round of grants.

Funding

FAQ

Internet Service Provider Information

Resources

IIJA Map

BEAD/DE Newsletter

Sign up to receive email updates including news, training opportunities, meetings and other topics related to BEAD/DE.

Where to find resources:

- All resources are found on:
<https://connectmt.mt.gov/IIJA/>
- The most commonly referenced resources are located under “FAQ” and “Internet Service Provider Information.”
 - Disbursement Guide
 - EHP Materials
 - Euna Grants Support



Post Award Resources

Technical Assistance

connectmt@mt.gov

Kim Martinell – Broadband Program Supervisor

kim.martinell@mt.gov

406-444-3307

Moriah Keller – Broadband Program Coordinator

moriah.keller@mt.gov

406-444-4099

Maria Jackson – Grant Contracts Coordinator

maria.jackson2@mt.gov

406-444-1391

Darlene Patzer– Grant Accountant

darlene.patzer@mt.gov

406-444-4016





Questions