

Technical Assistance for ConnectMT ARPA Awards:

REIMBURSEMENTS, REPORTING, AND UPDATED TREASURY GUIDANCE

AGENDA

- Meet the Speakers
- The Reimbursement Process
- Reporting Overview
- Submittable Walkthrough
- Overview of Treasury Guidance Update
- Questions and Answers



MEET OUR SPEAKERS

- MARIA JACKSON | Grants Contract Administrator, ConnectMT, DOA
- HEATHER MILLS | CTC Technology & Energy
- RACHEL STOGNER | CTC Technology & Energy
- MONA RUPANI | Ernst & Young LLP

The ConnectMT Broadband Program is administered by the Montana Department of Administration.

More information is available at <u>connectmt.mt.gov</u>.



Prerequisites satisfied

Prepare Required Forms/Gather Backup

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Submit

Initial Review DOA Review

Approval

- Contract signed
- All required paperwork submitted
- W9
- 204 EFT
- DEQ clearance

 State of Montana -Vendor Invoice

- Status of Funds/Budget Tracking
- Additional Supporting Documentation

 The application author should receive an email with instructions

for access

- Demonstration later in presentation
- Excel Template
- Backup documentation
- Proof of payment

- CTC admin review of documentation
- Additional information may be requested
- Second line review of information and documentation
- Once approved, forwards for payment
- Email to awardee with updated Excel File



GENERAL POINTERS AND PRE-REQUISITES

- File all required documents with DOA prior to RR submission
- Ensure you file over Submittable
 No email submissions!
- Filing timing: Once every 30 days

Reimbursement Requests (RR's) may be submitted with monthly and quarterly Progress Reports

RR's may not be submitted more than every 30 days

Requests for additional documentation to support RR's must be submitted within 10 calendar days of request from DOA



STATUS OF FUNDS: FORM WALKTHROUGH

Project Budget

Verification/restatement of budget

Budget Tracking

- Current status of budget
- History of payments

Supporting information

Details on invoices





FILING RRs IN SUBMITTABLE

- 1. Log in to Submittable
- 2. Choose Report from list

During the project period, reimbursement requests are available when submitting either a monthly or quarterly report.

ARPA ConnectMT Reimbursement Request & Progress Report

General Project Information

What type of report is this? *

Final Report

Monthly Report

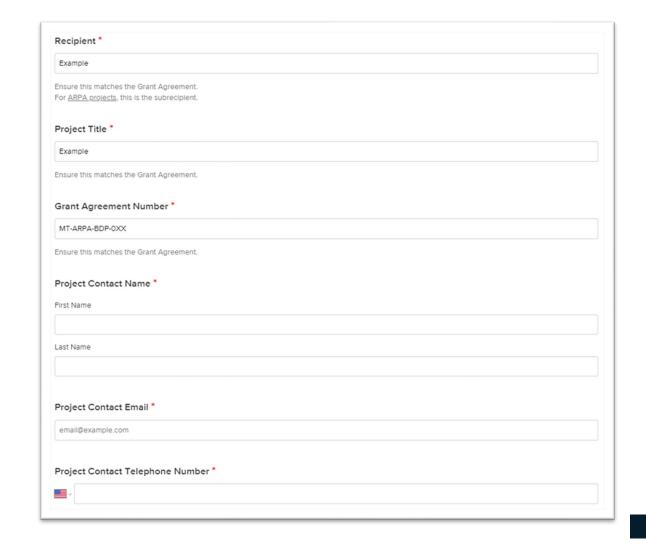
Quarterly Report

Annual Report

REIMBURSEMENT PROCESS OVERVIEW

Basic information about your project is required:

- Date
- Grant Recipient
- Project Title
- Grant Agreement Number (formatted MT-ARPA-BDP-0XX)
- Project Contact
 - Name
 - o Email
 - Phone Number



REIMBURSEMENT DOCUMENTATION

The Reimbursement Request requires the following uploads:

- State of Montana Vendor Invoice (signed by Authorized Agent)
- Status of Funds/Budget Tracking
 (include billing breakdown by tasks
 identified in the project scope of work
 and budget)
- Additional Supporting Documentation (contractor/material invoices, receipts, pictures, articles, media, or maps)

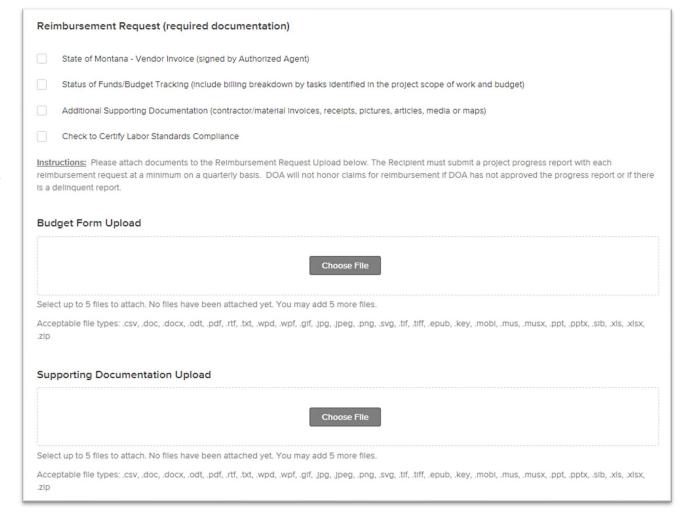
Reimbursement Request **Budget Information** Instructions: You are required to adhere to the budget and schedule outlined in the Final Statement of Work and Budget in Exhibit B of your Grant Agreement. Any revision to this budget or timeline requires an amendment request and written approval from the Department (a Change Order). Please provide an update on your project expenditures by uploading the Status of Funds form given to you by the Grants Manager and available on the ConnectMT website. If you need another copy of this form, contact the Grants Manager Grant funds may only be used for eligible expenses such as capital costs of project infrastructure, not including general operations, marketing, etc. (MT SB 297 §4(1)). Any cost overruns will be the responsibility of the Subrecipient. Please upload your W9 form and 204 EFT form through the State of Montana's File Transfer Service. When prompted for an email address, please send the documents to ConnectMT@mt.gov. Click here for instructions on how to use the File Transfer Service and Okta login. If you have any issues with the File Transfer upload, please call (406)-444-Reimbursement Request (required documentation) State of Montana - Vendor Invoice (signed by Authorized Agent) Status of Funds/Budget Tracking (include billing breakdown by tasks identified in the project scope of work and budget) Additional Supporting Documentation (contractor/material invoices, receipts, pictures, articles, media or maps) Check to Certify Labor Standards Compliance Instructions: Please attach documents to the Reimbursement Request Upload below. The Recipient must submit a project progress report with each reimbursement request at a minimum on a quarterly basis. DOA will not honor claims for reimbursement if DOA has not approved the progress report or if there is a delinquent report.



REIMBURSEMENT REQUIREMENTS

Awardees are required to:

- Select a checkbox that certifies labor standards compliance.
- Adhere to the budget and schedule outlined in the Final Statement of Work and Budget in Exhibit B of the Grant Agreement.
 - Any revision to this budget or timeline requires an amendment request and written approval from DOA (a Change Order).
- Upload W9 form and 204 EFT forms through the State of Montana's File Transfer Service.





MONITORING AND REPORTING

Reporting Requirements

You will be required to submit ongoing reports as specified below. All reports except for the Annual Map will be submitted through Submittable

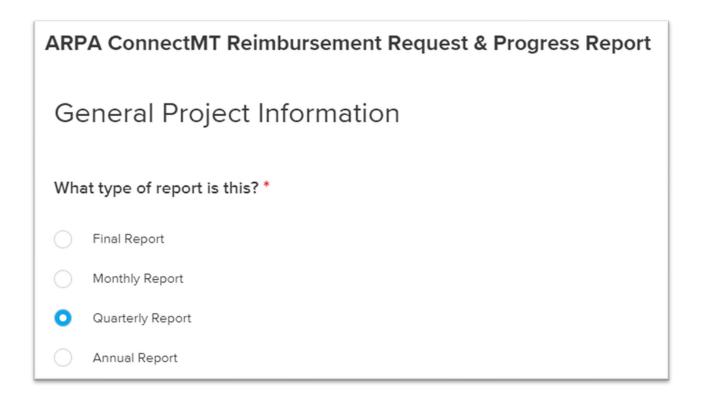
Type of Reporting	Description	
Monthly Project Status Reports	Brief Project status report within seven calendar days after the month. Monthly reports submitted when not end of calendar quarter	
Quarterly Reports	At Quarter end (excluding Q2), the Subrecipient will provide additional Project attributes as identified by Treasury within seven calendar days after quarter end	
Annual Report	For the 2 nd Quarter, the Subrecipient will submit an annual report within seven calendar days after quarter end.	
Other Performance and Financial Reporting (as requested)	The Subrecipient shall provide necessary information/reports within ten calendar days	
Annual Map Reporting	The Subrecipient shall provide necessary information within thirty calendar days after the end of the Calendar Year to the Department's Mapping vendor	
Close Out Reporting	The Subrecipient shall provide necessary information within fifteen days after the completion of Project or termination of the award, whichever occurs first- but no later than September 30, 2026	



QUARTERLY REPORT OVERVIEW

Overall Project Status Updates

- Construction Start Date (Actual/Projected)
- Construction Completion Date (Actual/Projected)
- Status of Completion and Work Completion %
- Total Project Costs Incurred During the Period and Overall
- Brief Description of the Costs Incurred During The Period



PROJECT CHANGES

Describe any changes that might significantly impact the project:

- Construction Delays
- Labor Disputes
- Supply Chain Problems

Does your project require changes in any of the following Statement of Work areas: *

Project Schedule

Project Budget

Project Contact

None of these options apply to my project

CERTIFICATION OF WAGES AND LABOR STANDARDS

U.S. Treasury encourages broadband projects to use strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions, not only to promote effective and efficient delivery of high-quality projects, but also to support the economic recovery through strong employment opportunities for workers.

As stated in Exhibit D of Grant Agreement, Grant awards above \$5 million will report:

- 1. Davis-Bacon Act Certification OR alternative wage data
- 2. Project Labor Agreement OR Project Workforce Continuity Plan
- 3. Prioritization of Local Hires
- 4. Community Benefit Agreement



PART 1: DAVIS-BACON CERTIFICATION

Do you certify that for the relevant Project, all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with Subchapter IV of Chapter 31 of Title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State in which the work is to be performed, or by the appropriate State entity pursuant to a corollary State prevailing-wage in construction law (commonly known as "baby Davis-Bacon Acts"), and understand you are expected to retain the required documentation, including certified payrolls, and make it available for periodic monitoring? *

Ye

No

PART 1: ALTERNATIVE WAGE DATA

Subrecipients that do not certify compliance with Davis-Bacon Requirements will need to report the following:

- Number of direct employees
- Number of contractor employees
- Number of 3rd part employees
- Wages and benefits of workers on the project by classification
- Whether or not those wages are less than the prevailing wages

The Montana Department of Labor & Industry publishes prevailing wage rates on their website (https://erd.dli.mt.gov). An example is included below:

CONSTRUCTION LABORERS GROUP 3

	Wage	Benefit
District 1	\$24.55	\$11.82
District 2	\$24.55	\$11.82
District 3	\$24.55	\$11.82
District 4	\$24.55	\$11.82

This group includes but is not limited to:

Concrete Vibrator; Dumpman (Grademan); Equipment Handler; Geotextile and Liners; High-Pressure Nozzleman; Jackhammer (Pavement Breaker) Non-Riding Rollers; Pipelayer; Posthole Digger (Power); Power Driven Wheelbarrow; Rigger; Sandblaster; Sod Cutter-Power and Tamper.



PART 1: ALTERNATIVE WAGE DATA

Please upload a file that details 1) the wages and benefits of workers on the project by classification; and 2) whether those wages are at rates less than those prevailing. *

Choose File

Upload a file. No files have been attached yet.

Acceptable file types: .csv, .doc, .docx, .odt, .pdf, .rtf, .txt, .wpd, .wpf, .gif, .jpg, .jpeg, .png, .svg, .tif, .tiff

Please provide the following in the text box below: 1) the wages and benefits of workers on the project by classification; and 2) whether those wages are at rates less than those prevailing. Data should be entered in the following format: 'Employee Classification; Wages; Benefits; Prevailing (Y/N)'

47-2061: Construction Laborers Group 3; \$26.00; \$12.00; Y



PART 2: PROJECT LABOR AGREEMENT

Project Labor Agreement

Do you certify that this project includes a project labor agreement, meaning a collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f))? *

Yes



Project Continuity Plan

If you are not able to provide a project labor certification, please provide a project continuity plan narrative that addresses the following:

- 1) Describe how you will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the project, including a description of any required professional certifications, and/or in-house training, registered apprenticeships or labor-management partnership training programs, and partnerships like unions, community colleges, or community-based groups.
- 2) Describe how you will minimize risks of labor disputes and disruptions that would jeopardize the timeliness and cost-effectiveness of the project.
- 3) Describe how you will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities, including descriptions of safety training, certification, and/or licensure requirements for all relevant workers (e.g., OSHA 10, OSHA 30).



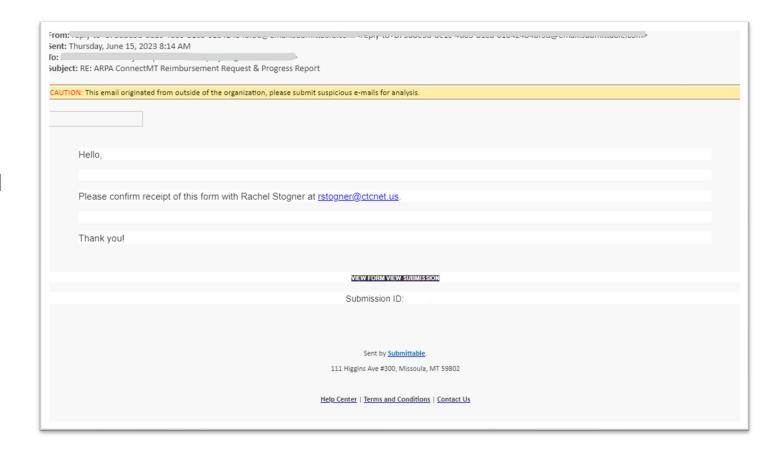
Part 3 AND 4: LOCAL HIRES AND COMMUNITY BENEFIT

Does your project prioritize local hires?		
Yes		
□ No		
Does the project have a Community Benefit Agreement? If yes, provide a description of the agreement. *		
○ Yes		
○ No		

SUBMITTABLE WALKTHROUGH

Accessing the Reporting Form:

- The Application Author and any Collaborators will receive an email from the st-of-montanamessagesupport@submittable.com email with a link to "View Form"
- If you do not receive this link, please contact Rachel Stogner at <u>rstogner@ctcnet.us</u> for support
 - Please also check your spam filter





TREASURY SUPPLEMENTARY BROADBAND GUIDANCE

Background: On May 17, 2023, Treasury provided additional guidance for Broadband Grants funded by The Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program and the Capital Project Fund (CPF). The supplementary guidance includes several important clarifications and updates to the requirements for both ISPs and the state of Montana.

Key changes impacting ConnectMT awardees:

- Procurement flexibility: "ISPs that receive fixed amount subawards are not required to comply with the cost principles and procurement practices of the Uniform Guidance."
- Extension of service obligations and subsidy participation: Service must be maintained and ISPs must participate in federal broadband service subsidy programs until December 31, 2034.
- Clarification on real property and equipment standards: Treasury clarified administrative requirements applicable to property and equipment acquired with ConnectMT funds, including insurance, recording title, transfer and disposal requirements



Next Steps: The ConnectMT team will work with ISPs to make the necessary amendments to existing

APPENDIX – ADDITIONAL RESOURCES



- ConnectMT ARPA
- Audit Requirements
- Additional Grant Agreement Terms & Conditions
- Record Retention

AUDIT REQUIREMENTS

In each year that you expend \$750,000 or more, you will provide the Department:

- A financial related audit for the Project in accordance with Generally Accepted Government Auditing Standards OR
- A Project specific audit in accordance with the requirements of <u>2 CFR §200.507</u>
- Subrecipient will provide the Department a copy of the Audit within 30 calendar days after receipt of the audit report or nine months after the end of the audit period.
- Additionally, Subrecipient must allow the Department and any authorized auditors
 access to the Subrecipient's records and financial statements as necessary for the
 Department to meet its requirements of <u>2 CFR Part 200</u>.

GRANT AGREEMENT TERMS & CONDITIONS

Service Obligation

You must manage and operate the Project in an efficient and economic manner, including maintain the Project in good repair at the level of broadband service provided in the Grant Agreement through December 31, 2034.

ACP Participation

You must participate in the Affordable Connectivity Program, or its successor through December 31, 2034.

Factors impacting selection

Some Projects were selected based on points awarded for commitments made in the Application. You must continue to comply with these commitments outlined in your Final Statement of Work.



RECORD RETENTION

- Financial records, supporting documents, statistical records, and all other Subrecipient records that are pertinent to a Federal award must be retained (2 C.F.R. 200.334)
- The Subrecipient will maintain appropriate and adequate records showing complete entries of all receipts, disbursements, and other transactions relating to the project for a period of eight years from the date of the Final required ARPA Report (April 30, 2027, for CSFRF and March 31, 2027, for CPF).





QUESTIONS?

PLEASE TYPE YOUR QUESTIONS IN THE CHAT BOX



Thank you!

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For Reporting Questions, please contact Maria Jackson at connectmt@mt.gov

For Technical Support, please contact Rachel Stogner at <u>ConnectMTInfoRequests@ctcnet.us</u>