

ConnectMT BEAD Program

BEAD Program Monitoring Plan

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Montana Broadband Office
BEAD Program Monitoring Plan

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1 Introduction

The State's goal for broadband deployment is to use federal funding efficiently and effectively to develop and implement lasting broadband infrastructure for a future-connected Montana. In 2021, the ConnectMT Act (Montana [Senate Bill 297](#)) established Montana's first broadband program to award grants to internet service providers to improve broadband access across the state. The Montana Legislature dedicated \$270 million from the American Rescue Plan Act (ARPA) to the first round of broadband grants.

Continuing these efforts, Montana applied for funds from the Infrastructure Investment and Jobs Act (IIJA) and has been allocated \$629 million through the Broadband Equity, Access, and Deployment (BEAD) Program, which is administered by the National Telecommunications and Information Administration (NTIA). BEAD process enlists the states and their partners in awarding funds to the service providers who submit plans meeting numerous compliance requirements, including subgrantee monitoring as provided in 2 CFR § 200.332.

The Connect Montana (ConnectMT) Broadband Office (MBO) is responsible for overseeing these broadband programs. With its history of ensuring Montanans get the benefit of its publicly funded facilities, MBO seeks to ensure its broadband grants meet their federal and State goals.

The purpose of this BEAD Monitoring Plan is to provide a shared framework for the subgrantee monitoring process. MBO plans to monitor these broadband investments in Montana's future using a risk-based approach that focuses on the successful completion of the awards. MBO will focus on interventions, such as technical assistance, that support this goal.

The Monitoring Plan provides criteria used to assess the initial monitoring level for each project, as well as outlining the approach for future adjustments to the monitoring levels. MBO anticipates that monitoring needs of subgrantees will change over time and focus on those adjustments accordingly.

For the BEAD Program, NTIA has delegated substantial monitoring and reporting responsibilities to Montana. To that end, MBO will serve as the first line of monitoring for BEAD projects, although NTIA, the U.S. Department of Commerce Office of Inspector General, or the U.S. General Accountability Office (GAO) may also play roles in oversight of the BEAD Program.

MBO's primary goals for effective subgrant monitoring include:

- Projects are implemented on time, on schedule, and as intended
- Projects comply with the terms and conditions of their subgrant and make broadband available to Montana residents



2 Overview of Montana's BEAD monitoring process

As subgrantees spend BEAD money on construction, equipment, services, and personnel, it is MBO's responsibility to monitor subgrantees to ensure that its constituents receive the broadband benefits provided in the award. In addition, this oversight is critical to MBO's role as the primary subgrantee (grantee) of BEAD funds and reflects on its ability to timely and accurately complete reports to NTIA.

BEAD monitoring includes various monitoring activities—such as desk reviews and site or field visits—which produce data about subgrantee performance and progress that will be used to inform and direct the provision of technical assistance and appropriate corrective action, and enforcement measures as warranted. The technical assistance function, supported by both state and contractor personnel, will be targeted at general issues facing all or a subset of subgrantees as well as issues specific to a given subgrantee who is facing performance challenges or setbacks. The same data will be useful in constructing a robust view of the BEAD portfolio, inclusive of accomplishments, key outcomes, and other information to be used by senior management to assess the overall progress and status of the grants.

2.1 Approach to subgrant monitoring

Given the size and diversity of BEAD subgrants, MBO plans to adopt an efficient but comprehensive strategy for subgrant reviews. While MBO plans to manage at the BEAD portfolio level, it may consider performance or financial issues that arise under its entire broadband grant portfolio when assessing individual subgrant risk.

Table 1: Types of subgrant monitoring

Type of monitoring	Description
Individual subgrants	Regular meetings with subgrantees, review of progress and financial reports, analysis and recording of information gained from desk reviews and site visits
Portfolio management	Review of program-wide data designed to identify program-wide issues from scheduling issues to more complex problems
Program support	Eligible entities support subgrantees as they address policy, legal, organizational, financial, and technical hurdles. Assistance varies from the publication of fact sheets and papers to onsite subgrant support as well as support in communicating and interacting with other government agencies

Subgrant monitoring includes activities related to specific subgrants, such as desk reviews and site visits. These monitoring activities, as well as subgrantees' regular reports, provide program-wide data that can be used to inform and direct the provision of technical assistance as well as corrective action and even enforcement measures.

Technical assistance can be targeted at individual subgrantees, but, when issues arise, program-wide data can be used to assess whether an issue in one project is a program-wide issue or a potential program-wide issue. In some cases, such issues can be solved by means of early communications to all subgrantees, but in other cases, more detailed monitoring activities and data collection may be required.

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Subgrant monitoring relies on the submission of timely and accurate performance and financial data through semi-annual progress and financial reports. These data are supplemented with additional information to enrich the view of subgrantee performance and progress throughout the subgrant performance period, such as site visits to support more robust subgrant oversight. Through these comprehensive activities, immediate project risks and challenges are identified and addressed to facilitate successful project completion. Such activities will also inform longer term courses of action for subgrantees to implement—in the case of performance issues, based on the severity and nature of such issues.

2.2 *Timing of subgrantees' semi-annual reports*

Subgrantees will be required to file semi-annual financial and performance reports by the first week of January and July, respectively. MBO will work to ensure that reporting dates do not fall on weekends or public holidays. MBO must receive reports in time to review, request revisions, and approve them before filing its own regular reports to NTIA. Subgrantees may make reimbursement requests on a monthly basis. MBO may require additional reporting on a one-time basis or as NTIA requires.

Table 2: Sample timing of subgrantees' reports

Subgrantee report	Sample timing
Semi-annual report covering Jan.1 to June 30 / July 1 to Dec. 31	July 10 Jan. 9
Reimbursement requests	No more than once every 30 days, per Montana's IPv2, section 2.16.2 (d).
Semi-annual performance (technical) progress report (PPR) covering Jan.1 to June 30 / July 1 to Dec. 31	July 3 Jan. 9

2.3 *Desk reviews*

MBO will use desk reviews as a monitoring tool to develop an understanding of subgrantee progress and performance. MBO personnel will undertake a review of information provided by the subgrantee to substantiate its progress; demonstrate compliance with key requirements, terms and conditions, or milestones; and show achievement of reported outcomes or other measures. Staff from MBO and its contractors may also interact with the subgrantee via phone and/or email to obtain answers to specific questions identified through the desk reviews.

Every subgrantee will be monitored through periodic desk reviews, such as semi-annual desk reviews. Where issues are found, MBO may initiate an issue-specific desk review. In an issue-specific desk review, a subgrantee will provide additional information and documentation as required (e.g., Build America, Buy America Act (BABA) compliance). MBO will document the review process and its resolution. Corrective actions may include additional guidance, webinars, or technical assistance from MBO to all subgrantees; specific technical assistance recommendations; or other corrective actions.

An issue-specific desk review focuses on a particular issue or topic. It may be conducted as a supplement to semi-annual desk reviews to specifically address and collect additional information about identified issues or deficiencies. It may also be used to examine a particular issue of concern.

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2.4 Field engineering reviews and inspections

Working with a third-party engineering firm, MBO will complete field inspections using a mix of risk-based and other approaches to ensure that subgrantees are meeting reported milestones, applying safety standards, restoring sites, etc. The field engineering team will review project segments against as-built reporting and application requirements. They may also review and verify initial performance testing. While field inspections may be similar to site visits, they will likely occur at network sites and be used to confirm network documentation and performance.

The field engineering team will also perform closeout inspections and final network acceptance testing prior to MBO's acceptance of closeout materials.

2.5 Site visits

MBO may also use site visits as a monitoring tool. Site visits generally use a standardized agenda and published checklist of review items, which are tailored to fit the issues and circumstances of each site visit. Subgrantees will be informed of agendas and performance data to be validated, confirmed, discussed, or observed during the visit.

Site visits may be prioritized based on factors such as:

- Monitoring level assigned at start of project
- Unresolved issues and questions
- Missed milestones
- Key personnel changes

After a site visit, MBO will complete a standard report that documents findings and conclusions, attaching supporting data. Where site visits identify or confirm significant issues, MBO may specify corrective actions to be taken by the subgrantee based on observations and conclusions drawn from the site visit. MBO may adjust monitoring levels based on a site visit.

2.6 Subgrantee accountability

The subgrant agreement establishes the obligations that subgrants must meet in deploying its broadband project. Each subgrant will have a subgrant agreement that contains MBO's terms and conditions.¹ MBO may, as warranted, add specific special award conditions depending upon individual circumstances (e.g., environmental issues, risk assessments). BEAD subgrant agreements must include terms and conditions that support MBO's monitoring plan, including requiring distribution of funding on a reimbursable basis and clawback provisions for non-compliance.

3 Monitoring activities

MBO's goal for BEAD is to ensure high-speed internet connectivity for all constituents. With that goal in mind, MBO will be conducting monitoring activities consistently across projects. Monitoring

¹ See, DRAFT MT BEAD Grant Agreement, https://connectmt.mt.gov/_files/DRAFT-MT-BEAD-Grant-Agreement-w-Exhibit-BB-Posted-8.18.2025.pdf. Note that this document is in draft form and subject to change at any time.

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outputs will inform risk-analysis and decision-making. Monitoring activities may be adjusted, as needed, to align with MBO's available staff and contract resources.

3.1 Establishing initial monitoring levels

MBO will establish initial monitoring levels using a combination of fixed subgrantee or award attributes (e.g., grant funding, project size, number of BSls, topography), objective characteristics (e.g., financial, managerial and organizational capacity), and previous experience.

3.2 Conducting an annual portfolio risk assessment

MBO will plan an annual portfolio risk assessment. To prepare, MBO will create tools to assist with risk assessment and measuring award attributes consistently across the entire portfolio. Tools will utilize a mix of objective and subjective factors, including subgrantee performance, to adjust monitoring levels as appropriate.

3.3 Levels of monitoring

The following sections provide standard descriptions of monitoring levels. MBO may change monitoring levels and activities as circumstances require.

3.3.1 Standard monitoring

Standard monitoring comprises the following activities for each subgrantee:

- Conference call with subgrantee, at least semi-annually
- Semi-annual desk review, with issue-specific review if needed
- Field inspection to confirm milestones completed
- Site visit, if needed

3.3.2 Intermediate monitoring

Subgrantees subject to intermediate monitoring will have a site visit at least once over the course of the award, subject to staff resources. Field inspections, advanced desk reviews, and advanced site visits/field inspections are more likely and may depend upon the risk involved.

3.3.3 Advanced monitoring

Advanced monitoring comprises the following activities for each subgrantee:

- Monthly conference call with subgrantee, depending on the cause of the advanced monitoring status—subgrantees requiring technical assistance are more likely to receive weekly calls
- Additional scrutiny of milestone and semi-annual reporting, especially during semi-annual desk review, with issue-specific review if needed
- Field inspections to confirm reported milestones
- Site visit at least once over the course of the award

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3.3.4 *Changing the monitoring level*

The outcome of any monitoring activity described in this section could result in a change in the monitoring level assigned to any subgrant. The following is a list of possible events that could trigger a recommendation for an upward adjustment of a project's monitoring status:

- Reports of fraud, waste, or abuse
- Significant modifications in project activity
- Consistent delinquency on submission of and completeness of reports
- Potential violation of subgrant agreement terms and conditions
- Audit findings
- Management or key personnel changes that could impact performance

MBO may consider some of the following events in raising subgrantees to increased monitoring:

1. Project(s) significantly behind schedule – may suggest improper management of federal funds or misunderstanding of requirements
2. Large budget changes – changes of 10 percent or more in budget line items may suggest deficient budget capability or irregular expenditures
3. Audit findings – material audit findings may suggest flaws in financial management or in processes and controls that are needed to prevent waste, fraud, and abuse
4. Key personnel changes – changes in two or more key personnel may suggest a changing management environment, which may enable waste, fraud, and abuse

3.4 *Closeout*

Effective subgrant administration is essential for a cost-effective and timely program and provides an opportunity to confirm that subgrant requirements were fulfilled. The final and paramount subgrant administration function is the closeout of the subgrant, which includes verification of subgrant completion, final acceptance testing, confirmation of UCC-1 filing, review of final reports and reimbursement requests, disposition of award funding, and any remaining requirements. Timely subgrant closeout is critical to effective monitoring and oversight of subgrants.

MBO will create a standard closeout checklist to help subgrantees and MBO confirm project completion before releasing a final payment. The closeout checklist will include documentation regarding final network acceptance testing, UCC-1 filing documentation, and documents supporting the subgrantee's final reimbursement request.

The final disposition of all files related to the completed project will be managed according to established document retention procedures that follow applicable laws and program requirements. MBO will retain BEAD records for at least three years following subgrant closeout.



4 Recordkeeping

MBO will maintain a file in its BEAD grants management system for each awarded subgrant that includes, as noted in Montana's Initial Proposal Volume 2, the following:

1. Approved Applications
 - a. Subgrantee application and proposed budget
 - b. Feedback to the subgrantee on initial application and updated application if applicable
 - c. Executed subaward agreement
 - d. Approved budget at the time of executed agreement
 - e. A copy of the original application form/questions
 - f. Any subsequent modifications to relevant documents
2. Subgrantee Reimbursement Requests, Approvals, Payments, and/or Denials
 - a. Subgrantee requests for grant disbursement
 - b. A Status of Funds spreadsheet including details of funds expended
 - c. Documentation of approved costs incurred (receipts, invoices, etc.)
 - d. Approval or denial of request, including names and positions of reviewers and approvers
 - e. Documentation of payments made, including approvals, date, and time between request and approval
3. Subgrantee Project Change Requests
 - a. For each request:
 1. A separate Project Change Request
 2. A Status of Funds spreadsheet supporting the requested change
 3. Documentation of new pricing/costs (invoices, quotes, reason for additional labor/services, etc.)
 4. Adjudication of approval, denial, or provisional approval and resubmission of any Project Change Requests and/or associated Status of Funds, including roles and responsibilities of approvers
4. Subgrantee Semiannual Reporting
 - a. Financial Reporting
 1. Semiannual financial report, including an updated Status of Funds reflecting the most recent half year's expended funds

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2. Reimbursement requests (as applicable, ordered by date and grouped behind the corresponding semiannual financial report)
3. Documentation about timeliness, including any missing reports – documentation of notification to the subgrantee that report is overdue
4. Reports not approved due to a compliance issue – documentation to the subgrantee of the compliance issue, clarification of what is required to correct the issue, and potential impact on award
5. Internal financial reports used for monitoring
6. Proactive notification to the subgrantee of any financial concerns

- b. Progress Reporting
 1. Semiannual progress report, tied to approved program metrics
 2. Documentation if approved, request for additional information, etc.
 3. Documentation about timeliness, including any missing reports – documentation of notification to the subgrantee that report is overdue
 4. Reports not approved due to a compliance issue – documentation to the subgrantee of the compliance issue, clarification of what is required to correct the issue, and potential impact on award
 5. Proactive notification of any progress concerns, including changes in key staff
- c. Semiannual Location Template Reporting
 1. A completed template with the required information
 2. Documentation about timeliness, including any missing reports documentation of notification to the subgrantee that the report is overdue
 3. Reports not approved due to a compliance issue – documentation to the subgrantee of the compliance issue, clarification of what is required to correct the issue, and potential impact on award
 4. Proactive notification to the subgrantee of any broadband concerns

5. Miscellaneous
 - a. Relevant internal and external correspondence, including notes and emails
 - b. Proactive notification of any key concerns, including staffing
 - c. Records on staff training, including compliance training, and key roles and responsibilities
 - d. Documentation of any risks, concerns, and mitigation plans



5 Monitoring actions

In general, a corrective course of action will include the following steps:

1. Identify
2. Document and plan
3. Notify subgrantee
4. Confirm resolution and documentation
5. Closeout

MBO will seek to resolve most issues through technical assistance but may select further corrective action, as outlined below. MBO will document its actions, which will form a part of the subgrantee's file. MBO will create standard templates for consistency and uniformity across the portfolio.

5.1 *Technical Assistance (TA)*

Project leadership may recommend specific TA activities for a subgrantee if the subgrantee has performance issues and requires project-specific support or subject matter expertise.

5.2 *Corrective Action Plan (CAP)*

A CAP can be used to formally document a required subgrantee action of programmatic concern (e.g., schedule or timely reporting), or address and officially document significant non-compliance or chronic, unresolved performance issues. Any non-resolution of significant issues identified may lead to an enforcement action.



6 Monitoring resources

BEAD NOFO Waivers – <https://broadbandusa.ntia.gov/waivers-policies>

- **Letter of Credit Waiver** (includes performance bond) – <https://broadbandusa.ntia.doc.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver>
- **Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification** – https://broadbandusa.ntia.doc.gov/funding-programs/policies-waivers/BEAD_
[Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification](#)
- **Programmatic Waiver of Tribal Lands** – https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD_Program_
[Waiver of Subpoint E of the Definition of Tribal Lands](#)
- **Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of the BEAD Program (Build America, Buy America Waiver)** – <https://www.commerce.gov/sites/default/files/2024-02/BABA%20Waiver%20Signed.pdf>
- **Tailoring the Application of the Uniform Guidance to the BEAD Program** (December 2023) – https://broadbandusa.ntia.doc.gov/sites/default/files/2023-12/BEAD_Policy_Note_of_Part_200_Exceptions_Related_Issues.pdf

General Terms and Conditions for the NTIA Broadband Equity, Access, and Deployment Program (BEAD) Program Funds – https://broadbandusa.ntia.doc.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf

2 CFR Part 200 – <https://www.ecfr.gov/current/title-2 subtitle-A/chapter-II/part-200?toc=1>

- **Uniform Guidance for 2 CFR Part 200:**
 - o Tailoring the Application of the Uniform Guidance to the BEAD Program (December 2023) – https://broadbandusa.ntia.doc.gov/sites/default/files/2023-12/BEAD_Policy_Note_of_Part_200_Exceptions_Related_Issues.pdf
 - o Uniform Guidance Policy Notice for the BEAD Program (March 2024) – https://broadbandusa.ntia.gov/sites/default/files/2024-06/BEAD_Uniform_Guidance_Briefing.pdf

Department of Commerce Financial Assistance Award Terms & Conditions (October 2024) – [DOC](#) Financial Assistance General Terms and Conditions as of 01 October 2024.pdf

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OMB Circular A-133: Audits of States, Local Governments, and Non-Profit Organizations:

- Circulars (note that OMB Circular A-133 was updated under 2 CFR) – <https://www.whitehouse.gov/omb/information-for-agencies/circulars/>
- 2024 Compliance Supplement – <https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/05/2024-Compliance-Supplement-V1.pdf>
- 2 CFR Subpart F – Audit Requirements – <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F>

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7 Additional BEAD-related resources

Resource	Website Address	Description
Advisory Council on Historic Preservation	http://www.achp.gov/	This website provides information regarding compliance with Section 106 of NHPA.
BEAD Program Website	https://www.internetforall.gov/program/broadband-equity-access-and-deployment-bead-program	This website is the homepage of BEAD and contains all publicly available guidance on compliance and program requirements, as well as descriptions of each award, including quarterly and annual performance reports.
Council on Environmental Quality (CEQ)	https://www.whitehouse.gov/ceq/	This website is for guidance and information concerning NEPA requirements.
Financial Management Handbooks	https://www.commerce.gov/om/publications/handbooks-and-manuals/financial-management	Links to templates, guidance, and handbooks at varying levels of detail.
NIST Financial Assistance Reference Guide	https://www.nist.gov/system/files/documents/2022/02/17/GMD%20Financial%20Assistance%20Reference%20Guide%20v3.0.pdf	Provides information on the essential elements and most commonly asked questions of NIST financial assistance subgrantees. The guide contains a multitude of carefully selected topics designed to assist the grant and cooperative agreement community from acceptance of the award to reporting requirements to amendments and prior approvals during the award to close-out procedures after award completion.
U.S. Government Accountability Office (GAO) Red Book	https://www.gao.gov/legal/appropriations-law/red-book	<i>Principles of Federal Appropriations Law</i> , also known as the Red Book, is GAO's multi-volume treatise concerning federal fiscal law. The Red Book provides text discussion with reference to specific legal authorities to illustrate legal principles, their application, and exceptions.