Montana BEAD Program

FAQs

Updated March 2026

Contents

Frequently Asked Questions

Please note that this document has been updated following the provisional selection of BEAD awardees. New questions are denoted in red, and a summary of questions added to this FAQ are summarized in the table on page 17.

1. GENERAL INFORMATION

1.1. What is BEAD?

Response: The [Broadband Equity, Access, and Deployment (BEAD) program](#) provides $42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment, and adoption programs. Montana was allocated a $629 million grant under the BEAD program to improve broadband coverage across the state. BEAD program requirements focus this funding on unserved, locations unable to obtain broadband service of at least 25 Megabits per second (Mbps) downstream and three (3) Mbps (25/3 Mbps), and underserved locations, those locations with broadband service between 25/3 Mbps and 100/20 Mbps, and 1 Gbps symmetric for community anchor institutions (CAIs).

1.2. What are the requirements for the State to receive BEAD funding?

Response: To receive the $629 million in BEAD funding, the State must comply with the NTIA requirements. The Montana Broadband Office (ConnectMT) has completed all prior and updated requirements to date. As required by NTIA, ConnectMT conducted a subgrantee selection process and submitted a [final proposal](#) to NTIA on September 3, 2025, and was approved by NIST on December 9, 2025.

1.3. What unserved and underserved areas were prioritized during the BEAD application process?

Response: The State complied with the NTIA BEAD [Notice of Funding Opportunity (NOFO)](#) requirements when selecting projects. Under NTIA guidelines, the State must award projects to provide coverage of all unserved locations followed by all underserved locations and if funding allows eligible community anchor institutions. The [Initial Proposal Volume 2](#) and the [BEAD Restructuring Policy Notice](#) outline the process the state used to select subgrantees.

1.4. Who was eligible to receive BEAD funding from the ConnectMT Broadband Office?

Response: Consistent with SB 531, an eligible applicant means an entity that has authorization to do business in the state and has demonstrated that it has the technical, financial, and managerial resources and experience to provide broadband service or other communications services to customers in the state. This includes incorporated businesses or partnerships, Montana nonprofit organizations, limited liability companies, corporations, or cooperative entities organized for the purpose of expanding broadband access. A government entity or tribe is only eligible to apply in partnership with an eligible broadband service provider.

To be eligible to receive BEAD funding from the State of Montana, subgrantees must:

1. Meet mandated financial, operational, and managerial requirements

2. Propose a project that will provide a minimum 100/20 Mbps broadband service to all locations within the service area within a 4-year timeline

3. Be able to comply with all requirements mandated by the NTIA and the State of Montana

1.5. What is the matching requirement for the BEAD program? Do waivers exist for this matching requirement, and in what circumstances would those waivers be provided?

Response: As noted in the BEAD NOFO, except for specific circumstances where NTIA has waived the matching requirement, subrecipients were required to provide a match of 25% of subaward amount. NTIA removed the match requirement for the NTIA defined High Cost CBGs. Please note, this is only for the 23 CBGs designated as high cost by NTIA. (A list of high cost areas by census block group can be found on the ConnectMT IIJA/BEAD Resources page under NTIA BEAD Program.) With regards to match waivers, NTIA granted all relevant waivers for High Cost area projects in Montana.

1.6. Will ConnectMT record and/or post BEAD Technical Assistance Webinars?

Response: Yes. For more information regarding registering for Upcoming Webinars and previous webinar recordings, please visit Events on the ConnectMT website.

2. SUBGRANTEE SELECTION PROCESS

2.1. What was the Montana BEAD Challenge Process?

Response: During the initial Map Challenge Process, eligible challengers such as nonprofits, internet service providers (ISPs), and local and tribal governments were invited to submit challenges to the National Broadband Map to help ConnectMT finalize the list of BSLs and CAIs eligible for BEAD funding. Through a transparent, evidence-based, and fair review of submitted evidence, ConnectMT determined if challenges were sustained or rejected to finalize the list of unserved, underserved, and served locations for the BEAD Program. As required by the BEAD Restructuring Notice in June 2025, ConnectMT also held an Unlicensed Fixed Wireless (ULFW) Challenge Process.

2.2 How was the Prequalification Application Round conducted for the BEAD program?

Response: In accordance with the Initial Proposal Volume 2, ConnectMT launched this phase in March 2024. The prequalification phase of the subgrantee selection process was used to determine whether applicants met the BEAD minimum eligibility requirements, including financial capability, organizational capability, certifications, and compliance. ConnectMT received 26 prequalification applications; 22 were determined to be eligible, and 4 were found to be ineligible.

Following the issuance of NTIA's [BEAD Restructuring Policy Notice](#), ConnectMT reopened the prequalification process during the Benefit of the Bargain Round in June 2025. The following were invited to participate in the reopened prequalification process: new entrants seeking to participate in the BEAD program (regardless of technology), and existing applicants who had previously failed prequalification and chose to update their materials to seek prequalification again. Previously approved prequalified applicants were not required to reapply. ConnectMT reviewed newly submitted prequalification applications in accordance with the new guidance provided by NTIA in the BEAD Restructuring Policy Notice. ConnectMT received 6 new prequalification applications; 4 were determined to be eligible, and 2 were found to be ineligible.

2.3 How many application rounds did Montana conduct, and how were BEAD applications reviewed?

Response: Montana conducted two application rounds following the pre-qualification phase. In October 2024, ConnectMT launched the Main Round BEAD application round for both Priority and Non-Priority applications. ConnectMT received a total of 42 applications and initiated its application review and negotiation process as outlined in [Initial Proposal Volume 2](#). Pending new guidance from NTIA and the Trump Administration, ConnectMT paused all other program activities.

On June 6, 2025, the [NTIA BEAD Restructuring Policy Notice](#) was released, requiring ConnectMT to conduct a Benefit of the Bargain Round, in which ConnectMT would evaluate or reevaluate applications for every BEAD-eligible location, regardless of technology. Any applicants who had previously submitted a successful prequalification application were able to apply to the Benefit of the Bargain Round. Applicants who had previously submitted project applications in the Main Round could choose to either update and resubmit their existing application or submit a new application. The Benefit of the Bargain Round closed in July 2025.

2.4 Which project and awardee requirements were altered and/or removed due to the NTIA Restructuring Policy Notice (RPN)? Where can I find details about the affected requirements?

Response: The [RPN](#) released by NTIA on June 6th made the following changes to BEAD program requirements:

- Definition of Priority Projects: The term Priority Broadband Project is defined as a project that meets certain upload, download and latency requirements, regardless of technology type.

- Labor, Employment, and Workforce Development: Non-statutory requirements related to labor, employment, and workforce development in the BEAD NOFO are no longer required.

- Climate Change: Requirements related to climate change, specifically the Climate Resilience section of the BEAD NOFO, are no longer required.

- Open Access/Net Neutrality: Requirements related to open access and net neutrality stated in the NOFO are no longer required, specifically ensuring that data usage caps on any plans offered are not imposed on consumers.

- Local Coordination and Stakeholder Engagement: Awardees are no longer required to consult with representatives of various demographics and identity-based groups.

- Non-Traditional Broadband Providers: Traditional and non-traditional Broadband providers, such as municipalities or political subdivisions, are evaluated and considered equally.

- Middle Class Affordability Plan: Awardees are no longer required to develop a middle-class affordability plan.

- Low-Cost Service Option: Non-statutory requirements in the BEAD NOFO related to low-cost broadband service option are eliminated, specifically the Affordability and Low-Cost Plans. Note that awardees are still required to provide at least one Low-Cost Service Option and can set the price for this service.

For further details regarding eliminated requirements from the BEAD NOFO, see the full RPN Document here.

2.5 Were BEAD applications re-scored with the new criteria from the updated NTIA policy guidance?

Response: Yes, following the Restructuring Policy Notice, Montana updated its scoring criteria to focus on cost minimization, and applications received a new score. See the approved scoring rubric on the ConnectMT page Internet Service Provider Information for updated criteria.

2.6 Will the BEAD application summaries be posted after the application window closes?

Response: Montana included application summaries as part of the Final Proposal, which was submitted and posted in September 2025 and approved by NIST in December 2025. The proposal outlines the projects provisionally selected for funding.

2.7 When will subgrantee awards be determined?

Response: DOA is working diligently to continue the progress of the BEAD program. Montana's Final Proposal was submitted in September of 2025 to NTIA and approved by NIST in December 2025. DOA will finalize project details and award agreements with potential awardees following NTIA approval.

2.8 Did the same companies receive funding as ARPA?

Response: The Department performed a subgrantee selection process consistent with SB 531, the Initial Proposal, and subsequent NTIA guidance. Companies that received ARPA funding may choose to apply for additional projects through the BEAD application process.

2.9 If a competing application was selected over mine, am I able to know the details that went into that decision?

Response: If you have any questions regarding why a competing application was selected rather than yours for a given location, please contact the ConnectMT office at connectmt@mt.gov.

3. ELIGIBLE LOCATIONS AND MAPPING

3.1. What is the Montana Broadband Availability Map?

Response: The Broadband Availability Map is the outcome of Montana's BEAD Challenge process, identifying which locations within Census Block Groups (CBGs) are eligible for funding under the BEAD program. It can be found at https://connectmt.mt.gov/IIJA/IIJA-Map . Each CBG outlines the number of served, unserved, and underserved locations, the total number of locations, the benchmarking reference price, and the percentage of the CBG eligible for BEAD funding. With the issuance of the BEAD Restructuring Policy Notice, it was updated as of July 16, 2025.

3.2. How do I show only BEAD-eligible locations?

Response: To view BEAD-eligible location data only, remove all layers on the map. Go to the IIJA Map page. Select the State Broadband Availability Map drop-down. Select the State Broadband Availability Map. On the map home page, at the top right of your screen, you will see three icons. Select the middle icon (layer list). Please unselect the five FCC USAC locations: the FCC Rural Digital Opportunity Fund, the FCC Enhanced Alternative Connect America Cost Model, The USDA ReConnect Loan and Grant Program, and the US Treasury American Rescue Plan by clicking the blue check marks. Once all these layers are removed, the resulting map view will show BEAD-eligible locations.

3.3. How do I learn more about the Montana Broadband Availability Map functionality?

Response: Refer to the State of Montana BEAD Broadband Map How-to Guide for step-by-step instructions. This guide outlines the purpose of each map, outlines how to access the map, and provides detailed instructions on using features and functionalities.

3.4. Has the ConnectMT Broadband Office published a location eligibility list?

Response: Yes, the current Locations List spreadsheet includes the official list approved by NTIA on June 30, 2025. Applicants can find the template on the ConnectMT website under Internet Service Provider Information and Benefit of the Bargain Application Materials.

3.5. What version of the fabric data was used during the Benefit of the Bargain round?

Response: Fabric Version 3.2 was used as the foundational dataset and ConnectMT modified it to incorporate updates from Fabric Version 6, which allowed for the removal of locations no longer eligible for BEAD funding.

3.6. My house is listed as an eligible location to receive service. Who will be providing the service, and what kind of technology will it be?

Response: As outlined by NTIA, all eligible locations will receive service under the BEAD program. Once NTIA has approved Montana's Final Proposal and ConnectMT has fully executed its award agreements, interested parties may refer to the Montana Broadband Availability Map. The map will be updated to reflect the provider and technology type to serve each eligible location.

3.7. If my house is indicated as served by Satellite Internet service, what does this mean for me?

Response: Satellite internet service providers are still subject to the same upload, download, and latency speed requirements for all BEAD projects as set by NTIA. More guidance regarding low-earth orbit (LEO) Internet and how it will be accessed is forthcoming.

4. PROGRAMMATIC REQUIREMENTS

4.1. What process did awardees follow if their project locations intersect with Tribal Lands?

Response: Applicants that submitted applications for project areas that are partially or wholly located on Tribal Lands must secure written permission from the Tribe or Tribes that own the land. The applicant must submit a Resolution of Consent or other formal demonstration of consent from each Tribal Government, either from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed. Sub-awardees must provide a Resolution of Consent within six months of the approval of the BEAD Final Proposal.

4.2. Are there any resources available if I have questions regarding permitting or other agency-specific issues?

Response: Yes. For permitting or other agency-specific questions, please reach out to the agency directly. More details can be found at each of the links below:

- National Environmental Policy Act (NEPA)
- National Historic Preservation Act (NHPA)
- Montana State Historic Preservation Office (MT SHPO)
- Montana Sage Grouse Habitat Conservation Program
- Montana Department of Transportation (MDT)
- Montana Department of Environmental Quality (DEQ)
- Montana Department of Natural Resources & Conservation (DNRC)

4.3. Can you provide guidance on what the Parent Guarantee is that is being asked of in the BEAD Grant Agreement?

Response: Yes, the purpose of the parent guarantee is to ensure that the approved BEAD project is completed, including the connection of all BSLs. Therefore, the parent and the BEAD awardee must enter into a legal agreement that, at a minimum, guarantees that the Parent will complete the BEAD project, including the connection of all approved BSLs.

4.4. What is the deadline for providing Tribal Consent, if required?

Response: ConnectMT will require the Tribal Consent with the execution of your organization's grant agreement. NTIA requires Tribal Consent to be submitted in order for ConnectMT to release funds.

4.5. Are subgrantees able to submit audited financial statements at the parent-company level?

Response: Yes, audited financial statements of a parent company may be sufficient to meet the BEAD Program's audit requirements if the statements meet all relevant requirements in the BEAD NOFO, 2 CFR Part 200, and the BEAD General Terms and Conditions.

4.6. NTIA updated the BEAD Letter of Credit to clarify that providers will have within 60 days of signing their grant agreements to fulfill this obligation. Is that time extension applicable to both the letter of credit and performance bond, or just the latter?

Response: Per Question 8.5 of the most recent NTIA FAQ, the time extension is only applicable to the performance bond.

5. REPORTING REQUIREMENTS AND DISBURSEMENTS

5.1. What can awardees expect the Disbursement Process to be for the Monitoring and Compliance phase of the BEAD program?

Response: A milestone disbursement process will be implemented, disbursing funds to each subgrantee only after the successful and verified completion of each predefined project milestone. Disbursement requests must be submitted through the Euna Grants (formerly known as AmpliFund) portal. Each subgrantee will have a milestone-based budget and disbursement schedule specific to their project. For further details regarding the Disbursement Process' timeline, project phasing, and examples, see your project's respective grant agreement and the draft Disbursement Process Guide here.

5.2. What are the performance monitoring and reporting requirements for the BEAD program?

Response: In September 2025, NTIA released the BEAD Policy Notice: Performance Measures for the BEAD Last-Mile Networks. The policy notice outlines what subgrantees must test with regards to network speed, latency, and availability, how the tests are to be completed, and the frequency of testing required.

- Speed: NTIA requires that 80% of download and upload measurements be at or above 80% of the required speed tier. Upload and download tests are counted separately.

- Latency: 95% of the measurements must be at or below 100 milliseconds.

- Network Availability: the provider must show an average outage across its locations below 48 hours per calendar year.

Subgrantees must test a random sample size of active subscribers for each speed tier and technology type. The number of test locations is based on the FCC BDC map and determined by the number of active subscribers. Testing will begin during the BEAD program period of performance and be conducted annually at a minimum.

A provider is considered non-compliant if it fails to meet any of the four thresholds: download, upload, latency, or availability criteria. A provider is also considered non-compliant if it fails to use compliant testing methodology, fails to report measurement results on time, or fails to comply with transparency requirements in accordance with the NOFO and terms and conditions of an award.

5.3. What is the maximum pre-award costs allowed before grant execution?

Response: Pre-award costs cannot exceed 5% of the requested funding amount.

5.4. What specific costs qualify as pre-award costs for BEAD?

Response: ConnectMT allows certain pre-award costs as outlined in our Benefit of the Bargain User Guide. Pre-award costs are costs incurred after the publication of the BEAD NOFO but before the grant agreement is executed and include activities such as application development and design engineering (stage 1). Construction activities (ex., purchasing of inventory) completed before award approval are not eligible as pre-award costs.

5.5. What are the monitoring activities that my organization can expect from ConnectMT?

Response: Subgrantees should expect regular monitoring activities, including quarterly and annual reports, quarterly update calls, and milestone reviews. ConnectMT may also conduct desk reviews, field inspections, and project site visits if issues arise, such as project changes, compliance findings, unresolved issues, or audit results.

5.6. What is Euna Grants, and what will it be used for?

Response: Euna Grants (formerly known as AmpliFund) is the cloud-based platform where BEAD award documentation will be submitted for grants management. It will be used for quarterly and annual report submissions and disbursement requests. Awardees will be invited to the BEAD award in Euna Grants after their grant agreement has been signed and reviewed by ConnectMT.

5.7. When will subgrantees be required to submit the quarterly report?

Response: Subgrantees will submit quarterly project reports in Euna Grants on a recurring schedule. Quarterly reports are due January 7, April 7, July 7 and October 7 each year during the reporting period.

5.8. Do LEO subgrantees have different quarterly reporting requirements?

Response: Yes, LEO subgrantees will submit LEO quarterly project reports beginning when their grant agreements are signed and continuing for ten years from the date that they certify broadband is available at every project location.

5.9. What is the ConnectMT BEAD Risk Assessment process?

Response: ConnectMT will use an initial risk assessment and ongoing risk monitoring to tailor monitoring intensity. Risk levels (low, medium, high) help determine the frequency and depth of monitoring. Subgrantees will complete an initial risk assessment questionnaire and annual risk questionnaires.

5.10. How does milestone-based disbursement work for BEAD?

Response: ConnectMT will administer BEAD funds through a fixed-amount, milestone-based disbursement process. Subgrantees will have a project-specific milestone-based budget and disbursement schedule and will submit disbursement requests in Euna Grants after completing each milestone. Subgrantees are encouraged to refer to their respective Grant Agreement, the Disbursement Process Guide and the BEAD Monitoring Guide for more information.

5.11. What types of documentation are required for milestone completion?

Response: Required documentation varies by milestone and project type and is used to verify milestone completion. Documentation may include project schedules, location lists, environmental and permitting materials, design and route files, bills of materials, executed contracts, evidence of approvals, and, where applicable, performance testing and as-built documentation. Subgrantees should reference their grant agreement, milestone documentation matrix, and the Disbursement Process Guide for milestone-specific requirements.

5.12. How should organizations prepare for a ConnectMT desk review?

Response: ConnectMT will email organizations a checklist before a desk review. Organizations will compile requested documents and submit them via email/and or secure file transfer by the respective deadline. Desk reviews may include administrative, financial, procurement, and technical items.

5.13. What should organizations expect during a site visit or field inspection?

Response: ConnectMT may inspect project sites to validate milestone completion and confirm the accuracy/quality of deployed infrastructure compared to reported documentation.

5.14. Can milestones be completed in overlapping phases, or must all components of a given milestone be fully completed before beginning the next milestone phase?

Response: Yes. Often work may overlap operationally, but disbursements are only released when each milestone's requirements are fully completed and documented. However, please note that certain activities cannot be initiated until the project has obtained EHP approval.

5.15. Will Subgrantees be required to identify specific Broadband Service Locations (BSLs) or subprojects to support milestone groupings (e.g., 20%, 40%, 60%) and demonstrate milestone completion?

Response: Yes. The project plan milestone framework allows providers to create subprojects that group specific BSLs and related infrastructure for the purpose of documenting milestone completion. Providers may define these subprojects based on their operational needs. Milestone disbursements are then tied to one or more subprojects meeting or exceeding the required percentage of total project BSLs (20%, 40%, 60%, 80%, and 100%) completed for Engineering & Permitting, Pre-deployment, Deployment, and Network Activation milestones.

5.16. How should Subgrantees document material procurement versus installation for milestone purposes?

Response: Keep procurement records—such as POs, invoices, receiving documents, and inventory logs—separate from installation evidence, including as-builts tied to BSLs. Deployment milestones specifically require as-builts. The milestone evidence templates include dedicated fields that allow providers to record and document this information accurately.

5.17. Do the completed engineering drawings (milestones for initial 10% in 2% reimbursements) need to be certified by a Professional Engineer?

Response: No. The agreement requires "completed engineering drawings" for milestone credit but does not require PE certification.

5.18. How should subgrantees document and verify match?

Response: Match must appear in the approved Project Budget, be properly valued and documented, and be auditable. This information will be required during quarterly reporting and each milestone disbursement request.

5.19. Has NTIA provided guidance on what will be required for internal reporting (items such as payroll, wage licenses, etc.)?

Response: NTIA does not require subgrantees to routinely submit internal administrative records (such as payroll files, wage licenses, or personnel records) as part of regular reporting. Instead, subgrantees are required to submit quarterly and annual project reports to ConnectMT through Euna Grants for the duration of the subgrant.

While these internal records are not submitted on a regular basis, subgrantees must maintain complete and accurate documentation supporting all reported project activities, expenditures, and compliance requirements. This includes, as applicable, payroll records, prevailing wage documentation, licenses, contracts, and other financial or administrative records.

These records must be retained in accordance with federal recordkeeping requirements and made available upon request to support ConnectMT monitoring and reporting activities:

- Quarterly and annual reporting
- Milestone-based disbursement requests
- Desk reviews, site visits, or other monitoring activities
- Audit or compliance reviews, if applicable

Subgrantees are responsible for certifying that all information submitted is accurate and for ensuring that supporting documentation is readily available throughout the period of performance and the required record retention period.

6. ENVIRONMENTAL AND HISTORICAL PRESERVATION

6.1. What are the Environmental and Historical Preservation Requirements under the BEAD program? Were these requirements affected due to the Restructuring Policy Notice released by NTIA in June 2025?

Response: The BEAD program and its participants must comply with Environmental and Historical Preservation Requirements set by NTIA. Eligible Entities and awardees are still responsible for obtaining all necessary federal, state, and local governmental permits on the environment. The RPN did not alter any Environmental or Historical Preservation Requirements for awardees.

6.2. In addition to the National Environmental Policy Act (NEPA), Montana has the Montana Environmental Policy Act (MEPA). Which law takes precedence?

Response: Applicants must adhere to NEPA first, and MEPA second, as federal statutes supersede state law. To view the most updated guidance from NTIA regarding NEPA, visit NTIA's website [NEPA Resources page.](#)

6.3. Are LEO satellite providers subject to the same NEPA and NHPA BEAD requirements as terrestrial internet providers?

Response: Due to LEO satellite providers not funding a defined portion of the transmission work in the same way that land-based systems are funded, LEO satellite providers can possibly be exempt from NEPA requirements. These providers must provide documentation to NTIA, which will identify excluded satellite projects within the program. See the [BEAD Guidance on NEPA and NHPA for LEO Satellite Service - October 2025](#)

6.4. Are environmental studies and permit costs eligible pre-award costs?

Response: These "pre-award costs" would be allowable. The provider must follow NTIA's defined process for NEPA. Additional information related to allowable and ineligible pre-award costs can be found on page 5 of the [NEPA for BEAD resource](#) and starting on pg. 5 of the [Connect MT Benefit of the Bargain Program Guide](#). If a provider has specific activities in mind, they are

encouraged to email ConnectMT directly, and we can help validate if those activities would be considered allowable.

6.5. Can we start construction as soon as our grant agreement is executed, or do we need additional approvals first?

Response: NTIA requires that all projects complete NEPA review and NEPA approval before any construction or ground disturbance activities can begin.

6.6. Will most fiber builds qualify for Categorical Exclusion (CATEX)?

Response: Many fiber projects typically qualify, but CATEX is not guaranteed. NTIA/ConnectMT must issue the determination, which can only be done via the EHP process.

7. BEAD AWARD COMPLIANCE

7.1. If an applicant submits an application comprised solely of a high-cost Census Block Group (CBG) that is exempt from the match requirements, is a Letter of Credit still required?

Response: Yes, a Letter of Credit is a required component of all applications.

7.2. Are assets purchased under this program subject to federal interest?

Response: Yes. The Federal Interest Period as defined in the draft grant agreement will last until December 31st of the 10th year after the acceptance of the Closeout Report by the Department of Commerce (DOC) and NTIA. If awarded a grant, please review the final grant agreement as this requirement may change. The State will determine if there will be additional filing and reporting requirements with regards to the Federal Interest at a later date. See the draft Grant Agreement and its Exhibits posted on the ConnectMT website.

7.3. Can you confirm the number of years that post-completion reporting will be required?

Response: Subgrantee reporting will be required for four years after the date on which the subgrantee receives the subgrant and 120 days prior to the end of the period of performance for MT BEAD in accordance with 2 C.F.R. 200.344. After this date, any additional reporting is dependent upon the application's technology type.

7.4. Does BABA apply to all BEAD projects, including BEAD LEO projects?

Response: Yes, BABA applies to all BEAD projects. BABA applies to infrastructure projects, including deployment of broadband networks, and "infrastructure projects" are defined as any activity related to the construction, alteration, maintenance, or repair of infrastructure in the United States regardless of whether infrastructure is the primary purpose of the project (See 2 CFR § 184.3). To the extent that placing radios into a LEO system includes "any activity related to the construction, alteration, maintenance, or repair of infrastructure," the components used in that construction/alteration would be subject to BABA, even if the electronics were waived.

7.5. Do sub-awardees have to comply with Davis-Bacon? If not, what regulations must the sub-awardee adhere to?

Response: Sub-awardees are no longer required by the BEAD program to adhere to the Davis-Bacon federal statute. A sub-awardee can comply with Davis Bacon statute if they wish. If a sub-awardee does not wish to adhere to the Davis-Bacon statute, they must provide a project employment and local impact report detailing the number of contractors, employees on the project, wages and benefits of workers, and whether those wages are less than those prevailing. For more details, visit the ConnectMT website to view the BEAD Grant Agreement and Exhibits.

7.6. How long will subgrantees have to complete construction?

Response: Subgrantees will have 4 years from the date the agreement with the State is fully executed to complete construction.

7.7. When are Grant Agreements required to be signed and returned to ConnectMT?

Response: Grant Agreements must be signed and returned to ConnectMT via DocuSign by May 31st, 2026. Awardees must also provide the following documents: Official Tribal Consent (if applicable), Official ILOC from a financial institution (if applicable).

7.8. What is the order of operations for Subgrantees to receive their subgrant agreement from the ConnectMT and begin the subgrant period of performance, and to have funds made available?

Response: All subgrant agreements must be signed by May 31st, 2026. The period of performance for the subaward will begin once the subgrant agreement is signed by both parties (ConnectMT and the Subgrantee), in accordance with the terms and conditions of the subgrant agreement. ConnectMT may not release funding to Subgrantees until the "BEAD Program Default Certificate" certification (Exhibit E) is signed and submitted to ConnectMT, along with their signed subgrant agreement and supplemental required materials (if applicable), i.e., Tribal Consent and/or ILOC. Note that ConnectMT may still be required to hold back grant funding until certain activities have been completed (e.g., NEPA requirements).

7.9. What should we do immediately after receiving our grant agreement?

Response: ConnectMT recommends setting up your internal grant file, confirming your Authorized Organizational Representative (AOR), and beginning to assemble post-award documentation, such as any required tribal documentation. Organizations should also review program documents such as the Disbursement Process Guide, Monitoring Guide, EHP guide, and the BEAD NOFO and Terms and Conditions.

7.10. What records must the subgrantee retain and for how long?

Response: Subgrantees shall create and retain all records, including all receipts, disbursements, and other transactions, supporting the Grant Agreement, for a period of 7 years from the date the Department notifies the Subgrantee that the final required BEAD report has been submitted.

7.11. What BABA documentation should subgrantees keep on file?

Response: Subgrantees should maintain supplier/manufacturer certifications identifying the applicable BABA category and confirming domestic production (and domestic content thresholds for manufactured products), plus procurement language flowing requirements to contractors, and any waiver documentation/approvals.

7.12. What corrective actions may be required if non-compliance is identified?

Response: If ConnectMT identifies instances of non-compliance through reporting, monitoring, audits, or other oversight activities, the subgrantee may be required to implement corrective actions to address the issue. Corrective actions may include, but are not limited to, submitting additional documentation, implementing enhanced monitoring, or taking other remedial steps as outlined by ConnectMT. Continued or unresolved non-compliance may result in additional enforcement actions consistent with the BEAD Grant Agreement, including potential delays in disbursement or other remedies permitted under federal and state requirements.

8. NON-DEPLOYMENT FUNDS

8.1. Has ConnectMT or the CAC addressed the issue of issuing a portion of BEAD funds or other federal broadband funds to help utilities cover their increased locating costs associated with broadband deployment construction projects?

Response: Co-location costs are considered allowable expenses for BEAD; however, these costs must be recognized by the awardee. We recommend engaging in discussions with ISPs to gain a clearer understanding of awarded BEAD projects.

ConnectMT is still awaiting guidance from NTIA regarding the eligible uses of non-deployment funds.

8.2. How will ConnectMT communicate new guidance related to the use of non-deployment funds?

Response: ConnectMT will communicate any new guidance related to the use of non-deployment funds through official program communications, including updates to the ConnectMT website. When applicable, ConnectMT may also address new guidance during a technical assistance webinar or office hours. Subgrantees are encouraged to regularly review communications and program resources to stay informed of updates.

9. CLOSEOUT & POST-COMPLETION OBLIGATIONS

9.1. What can my organization expect from the Closeout Report?

Response: Subgrantees will submit a final closeout report in Euna Grants no later than 15 days after the completion of the project. The report and required documentation is expected to include final buildout map, subscriber location list, final disbursement request, performance

testing data, and final project as-built documentation. ConnectMT will confirm the closeout criteria before submission to align with current NTIA guidance and audit requirements.

9.2. What performance testing should subgrantees plan for at project closeout?

Response: At closeout, subgrantees will provide a list of active subscribers to ConnectMT through the Euna Grants system. This list will contain all locations within the project area that are currently connected and receiving service. ConnectMT will select at least 10 of those locations for testing. Subgrantees are strongly encouraged to refer to the BEAD Monitoring Guide for more detailed information regarding performance testing.

Revision History

Date	Summary of Updates
March 23, 2026	**Questions added:** • General Information (1.6) • Programmatic Requirements (4.3-4.6) • Reporting & Disbursements (5.3-5.19) • Environmental & Historical Preservation (6.4-6.6) • BEAD Award Compliance (7.7-7.12) • Non-Deployment Funds (8.1-8.2) • Closeout & Post-Completion Obligations (9.1-9.2)