



WELCOME TO BEAD

Post-Award Orientation for Subgrantees

March 24, 2026

Agenda

- 1. Welcome and Introductions**
- 2. BEAD Project Timeline**
- 3. Next Steps**
- 4. Understanding BEAD requirements**
- 5. Milestone Disbursement Process**
- 6. Monitoring and Oversight Framework**
- 7. Upcoming Technical Assistance**
- 8. Q&A**



Introductions

Rebecca Fairchild-Lewis

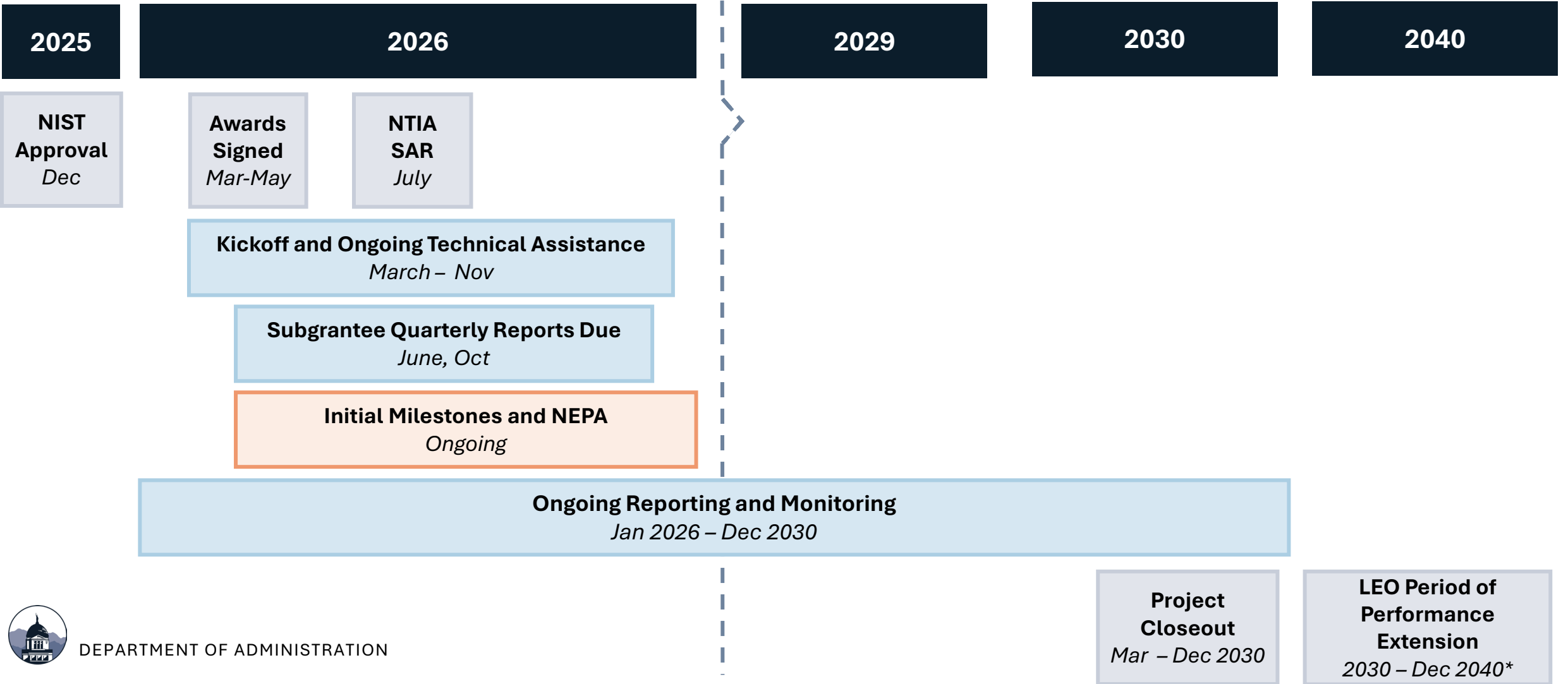
- Project Manager, Summit
- rebecca.fairchild-lewis@summitllc.us

Mitch Hergett

- Deputy Chief Operating Officer/Principal Engineer, CTC Technology & Energy
- mhergett@ctcnet.us



Post Award Timeline Overview



Deeper Dive Into 2026 Timeline

	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	
Submit EHP Questionnaire		[Orange bar from Mar to Aug]											
Execute Grant Agreement and return required documentation			[Orange bar from Apr to May]										
Submit Quarterly Reports						[Orange bar in Jul]			[Orange bar in Oct]			[Orange bar in Jan]	
Attend Subgrantee Technical Assistance		[Orange bar from Mar to Dec]											
Request Project Plan Milestone Disbursement			[Orange bar from Apr to Aug]										
Submit Annual Report												[Orange bar in Jan]	



Upcoming Steps for Awardees

Review Grant Agreements and schedule one-on-one **office hours** with ConnectMT to answer any questions.

Register for upcoming **TA Webinars** at <https://connectmt.mt.gov/Events/Upcoming>

- BEAD Milestone Disbursement Process – March 26th
- BEAD NEPA – March 31st
- BEAD Euna Solutions Reporting Webinar – April 2nd

Awardees will be invited to the Grants Management page in **Euna Grants** for their **BEAD Award**.

- Formerly known as AmpliFund, **Euna Grants** is the cloud-based platform where all **documentation will be submitted** and stored for BEAD Grants Management.
- Invitation will be sent once the Grant Agreement has been signed and reviewed by ConnectMT.





Understanding BEAD Requirements

BEAD Program Requirements

1

BEAD projects must provide broadband service to **all unserved and underserved locations** in their approved Project area.

2

Subgrantees are required to deploy and **complete construction 4 years** from the date the **Grant Agreement** is fully executed.

3

All Projects, regardless of technology type, must meet the proposed service obligation:

- Broadband service provided at speeds of at least **100 Mbps download & 20 Mbps upload**.
- Latency is less than/equal to **100 milliseconds**.

4

Subgrantees are required to expend the approved match percentage **proportionally and provide documentation of match expenditure**.



BEAD vs. ARPA

The Broadband Equity Access and Deployment (BEAD) Program has two core requirements distinct from the American Rescue Plan Act (ARPA):

Fixed Amount Subaward

The BEAD Program functions as a **fixed amount subaward**. Each subrecipient will have a pre-determined amount of funding to complete their project.

- Rather than being reimbursed for costs, like ARPA, subgrantees will be **reimbursed** when agreed upon **milestones are complete**.

NEPA

Subgrantees in the **BEAD program** are also required to comply and receive **approval** regarding the **National Environmental Policy Act (NEPA)** .

- Additional NEPA guidance will be discussed in greater detail during the NEPA Webinar, taking place on March 31st, 1PM MT.
- All projects must complete NEPA review and receive NEPA approval **before any construction or ground disturbance activities begin**.



Understanding Fixed Amount Subawards

BEAD Awards will function on a **fixed amount subaward** basis. Costs incurred by subgrantees will be **reimbursed** in accordance with the **milestone disbursement** process.

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, they will submit documentation in Euna Grants demonstrating completion of each milestone



Understanding Fixed Amount Subawards

Documentation Requirements

Subgrantees must maintain **complete records of all costs** incurred and be able to produce them for monitoring or audit purposes.

- Although subgrantees are not required to submit this documentation with disbursement requests, they must maintain it in accordance with **requirements set by NTIA and ConnectMT.**

Required documentation includes the creation and maintenance of records for all receipts, disbursements, and other transactions. Subgrantees must retain these records for seven years from the date ConnectMT notifies them that the final required BEAD report has been submitted.

Please note that ConnectMT may request additional supporting documentation on an ad hoc basis at any time.



National Environmental Policy Act and National Historic Preservation Act (NEPA/NHPA)

1

The state will ensure that subgrantees follow NEPA and NHPA rules and align with MEPA requirements

2

A completed Environmental and Historical Preservation (EHP) questionnaire helps determine whether any activities qualify for **Categorical Exclusions**

3

Subgrantees must conduct required consultations with state and federal agencies

More details on EHP will be provided in an upcoming webinar



BABA Compliance

Build America, Buy America Act (BABA) is a federal law that applies to **all** BEAD-funded infrastructure activities

- Requires domestic sourcing of iron, steel, manufactured products, and construction materials used in broadband infrastructure.
- No minimum domestic requirements for constituent components or raw materials.

Subgrantees must ensure BABA compliance throughout procurement and construction and must obtain contractor/supplier certifications confirming compliance.

ConnectMT will monitor BABA compliance through subgrantees' quarterly report submissions, document reviews, site visits, and audits.

The latest NTIA BABA information can be found at: [BABA Compliance and Self Certification | BroadbandUSA](#)





Milestone Disbursement

Milestone Disbursement Process



Subgrant contracts are for a **Fixed Amount Subaward**, which follow federal rules in 2 CFR § 200 and NTIA requirements



Subgrantees are reimbursed based on **completed milestones**, not actual costs, at predetermined values



Milestones are used to enable subgrantees to **receive payments earlier** instead of waiting for full project completion



There are **five milestone categories** with values based on a percentage of the grant amount; each milestone has its own documentation requirements



Once Montana has received sufficient information and validated all disbursement requirements; ConnectMT has 30 business days to disburse funds.

More details on milestone disbursement will be provided in an upcoming webinar



Milestone Categories

Disbursement for terrestrial projects:






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



Milestone Disbursement Documentation

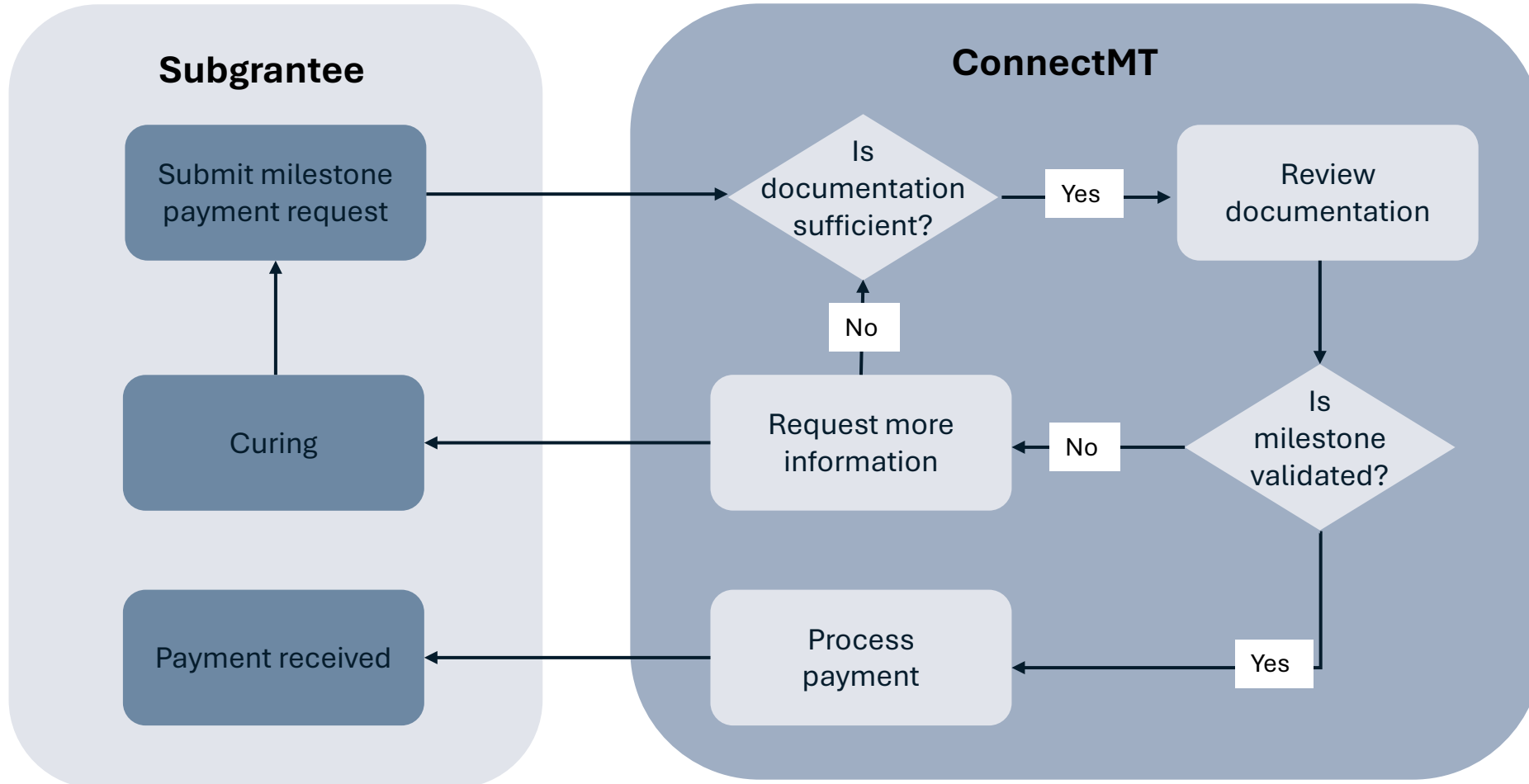
Milestone Documentation Matrix

- 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/IJA/Internet-Service-Provider-Information>

Required Documentation	Milestone				
	Project Plan 	Engineering and Permitting 	Pre-Deployment 	Deployment 	Network Activation and 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	
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
Fixed Wireless Design (<i>wireless projects only</i>) to be developed	X	X		X	X
Acceptance Testing (<i>wireless projects only</i>) to be developed				X	






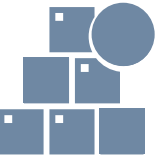
Milestone Disbursement Workflow





Monitoring and Oversight

Monitoring and Oversight Framework

ACTIVITY	SUBGRANTEE
Regular Reporting 	<ul style="list-style-type: none">• Submit quarterly and annual reports to ConnectMT• Prepare for and participate in quarterly calls• Submit closeout report
Milestone Disbursement 	<ul style="list-style-type: none">• Submit detailed budget and disbursement schedule• Submit documentation required per milestone
Risk Assessment 	<ul style="list-style-type: none">• Submit annual risk questionnaire
Additional Monitoring Activities 	<ul style="list-style-type: none">• Provide timely access to project sites, relevant documentation, and appropriate points of contact as needed to support additional project performance and documentation reviews, including field inspections and site visits.



Regular Reporting – Quarterly Report

Subgrantees will submit **quarterly project reports** to ConnectMT in Euna Grants on January 7, April 7, July 7, and October 7.

- Report must include project activities, expenditures, milestone disbursements, financial information, performance metrics, and other information required for ConnectMT's Semi Annual Report (SAR).

Subgrantees will also participate in **regular quarterly update calls** with ConnectMT.

LEO subgrantees must submit **LEO quarterly project reports** to ConnectMT beginning upon execution of their grant agreements and continuing for ten years from the date they certify that broadband is available at every project location.

- Reports must include the number of subscribers at the end of the reporting period and the number of consumer premises equipment (CPE) units shipped.



Regular Reporting – Annual Report

Subgrantees must submit **annual performance and compliance reports** to ConnectMT in Euna Grants.

- These annual reports serve as the State’s source of performance metrics, program compliance data, and audit information.

ConnectMT reviews and validates subgrantee annual performance data and submits BEAD Semi-Annual reports (SAR) to NTIA twice per year, maintaining the reporting cadence established during the BEAD planning phase.

ConnectMT aggregates annual risk and compliance data to support ongoing risk monitoring activities.



Regular Reporting - Closeout Report

Subgrantees must submit a final closeout report to ConnectMT in Euna Grants no later than **15 days after project completion**.

The report and required documentation must include:

- Final buildout map and subscriber location list, final disbursement request, performance testing data, and final project as-built project documentation.

ConnectMT will confirm closeout criteria prior to submission to ensure alignment with current NTIA guidance and audit requirements.

- Additional activities, such as field inspections, will be required to validate final project deliverables.



Additional Monitoring Activities

Subgrantees may be asked to validate project performance through **field inspections** and **project site visits**, depending on project risk level, missed milestones, compliance findings, key project changes, audit results, or unresolved issues.

ConnectMT and its contracting team may conduct:

- Field validations at network sites to confirm network documentation and performance.
- Site visits to confirm that project work is proceeding according to reported milestones schedule.

ConnectMT will conduct **desk reviews** of subgrantee progress and performance and develop corrective action plans if needed.

Desk reviews may include administrative reviews, budget monitoring, technical documentation reviews. Subgrantees will be notified via email regarding how to prepare for the desk review.

ConnectMT will **conduct** the annual **risk assessments** for subgrantees.





What Comes Next?

Grant Agreements Execution

Grant Agreements must be **signed** and submitted to ConnectMT via **DocuSign** by **May 31, 2026**.

Awardees must also provide an **Irrevocable Letter of Credit (ILOC)** from a financial institution prior to execution of the grant agreement, or a performance bond within 60 days of grant agreement execution.

Resolution of Tribal Consent (PDF) must be provided by awardees with their Grant Agreements.

Required documentation must include:

- Appropriate signatories
- Relevant context regarding the planned broadband deployment, including the agreement timeframe

What Happens After Submission:

- ☑ ConnectMT reviews all submitted materials
- ☑ Awardees receive access to the BEAD Award in Euna Grants
- ☑ The NEPA process begins
- ☑ Milestone disbursement requests are submitted and processed



Project Plan Milestone

The first milestone is the Project Plan Milestone, which is **equal to 5%** of the award amount.

The Project Plan milestone disbursement must be approved and processed before any subsequent milestones are submitted or reviewed.

Subrecipients must submit the following documentation as part of the first milestone disbursement request:

- Location List
- EHP Questionnaire
- Project Timeline
- Project Route File
- Permit Status Summary



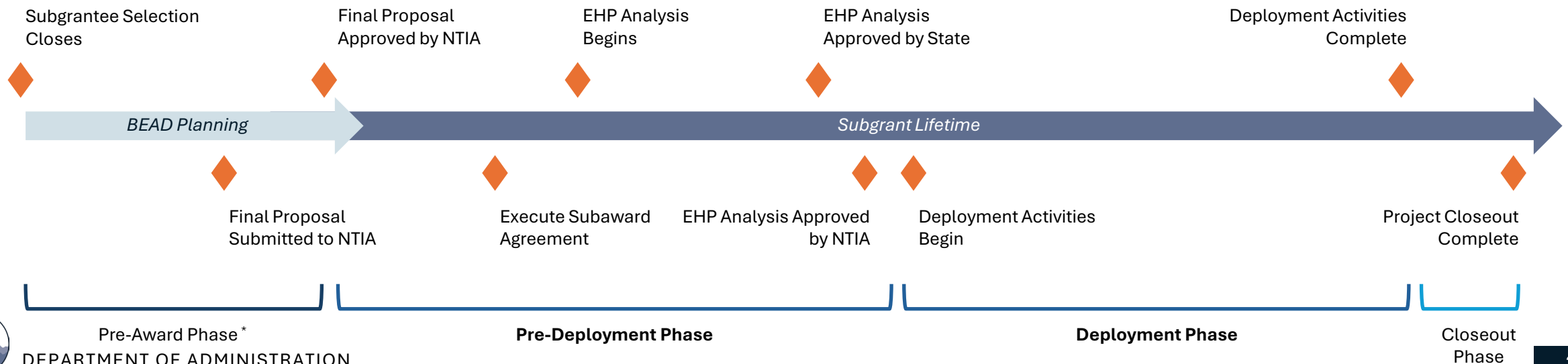
NEPA Roadmap

NEPA applies to all BEAD-funded projects and must be **completed and approved before** subgrantees begin the **construction** phase of the project.

- Subgrantees must submit a project description and EHP questionnaire to ConnectMT.

Timely and accurate submissions are critical. Incomplete information may delay the following:

- NEPA Review
- Construction phase
- Milestone payments



Upcoming Technical Assistance

Technical Assistance Session Calendar

Topic	Date	Time
Milestone Disbursement Process	March 26, 2026	2 PM MT
NEPA	March 31, 2026	1 PM MT
Introduction to Euna Grants	April 2, 2026	1 PM MT
Submitting Quarterly Reports	April 28 and May 14, 2026	1 PM MT & 11 AM MT
Permitting Overview	June 3, 2026	1PM MT
Submitting Quarterly Reports Q&A	June 4 and June 11, 2026	1PM MT & 11 AM MT
Submitting Annual Reports	November 3 and November 5, 2026	1 PM MT & 11 AM MT

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



Post Award Resources

IIJA/BEAD / IIJA/BEAD

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 – Grants and Contracts Coordinator

maria.jackson2@mt.gov

406-444-1391





Questions