



Arizona Broadband Development Grant Program

Monitoring and Compliance Guidelines

Arizona Commerce Authority

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1. Background

The U.S. Treasury's Capital Projects Fund (CPF) Program was established under Section 9901 of the American Rescue Plan Act of 2021 to allow State and Tribal governments to “carry out critical capital projects directly enabling work, education, and health monitoring. “The program includes providing funding to states, territories, and tribal governments to support the deployment of broadband infrastructure and related programs. The CPF program was established to promote the development of high-speed broadband infrastructure to ensure high-quality, reliable, and affordable internet connectivity to all citizens of the US, particularly those in underserved and rural areas.

The CPF program provides funding for a range of broadband infrastructure projects, including fiber-optic networks, hybrid fiber-coaxial networks, fixed wireless broadband, mobile broadband, and satellite broadband. Additionally, CPF program funding can be used to support a wide range of broadband-related initiatives, including digital literacy and adoption programs, workforce development programs, and public safety initiatives.

Treasury approved Arizona’s plan to invest \$100 million of CPF funding in broadband infrastructure projects that will provide high-quality internet to locations that lack access to adequate service. Arizona will implement two broadband infrastructure programs that aim to provide reliable internet access to areas of the state lacking adequate service. The Arizona Broadband Development Rural Infrastructure Grant Program (ABDG-Rural) is a competitive grant program designed to expand high-speed broadband in the state’s thirteen rural counties. The Arizona Broadband Development Urban Infrastructure Grant Program (ABDG-Urban) is a competitive grant program designed to improve and expand broadband infrastructure in the state’s two urban counties (collectively, the (“ABDG Program”). The ABDG Program will extend high-speed internet connectivity to unserved and underserved areas and sources funded from the CPF program under the American Rescue Plan Act (ARPA) of 2021. Applicants were awarded an allocation of the grant from across the state. Funds were allocated as follows:

1. **ABDG-Rural:** Consists of an award for reimbursement of costs associated with activities directly related to the construction, installation, or improvement of broadband infrastructure. An individual ABDG-Rural award cannot exceed \$10,000,000. It is anticipated that few applications will request the maximum award amount.
2. **ABDG-Urban:** Consists of an award for reimbursement of costs associated with activities directly related to the construction, installation, or improvement of broadband infrastructure. An individual ABDG-Urban award cannot exceed \$5,000,000. It is anticipated that few applications will request the maximum award amount.

In accordance with the regulations set forth by Title 2 Code of Federal Regulations (CFR) Part 200 (2 CFR 200), the terms and conditions of federal awards generally flow down to subcontracts and subawards. This means that those receiving federal funding must comply with requirements regardless of whether they are a recipient or subrecipient of a federal award. This includes guidance and requirements set forth by both the federal agency that houses the grant (the US Department of Treasury) and the main recipient distributing the funds (ACA State Broadband

Office). The State will follow the guidance set forth by the Treasury and the language contained within the Grant Agreement.

2. Roles and Responsibilities

The State Broadband Office has retained a contractor, to provide advisory services including oversight, monitoring, and compliance with respect to the ABDG Program funds. As part of this engagement, the State Broadband Office has prepared this guidance document for subrecipients receiving grant funding for broadband projects.

3. Capital Projects Fund Programmatic Monitoring

Programmatic monitoring reviews will begin following project initiation by the subrecipients. As part of the State Broadband Office's monitoring and compliance process, the State Broadband Office will conduct meetings with the subrecipients and other key personnel to obtain an understanding of their broadband infrastructure project. This will include reviewing key policies governing the Grant Agreement and the CPF / ABDG Program requirements to ensure compliance with applicable regulatory requirements.

4. Subrecipient Monitoring

Pursuant to 2 C.F.R 200.332(d), the State Broadband Office and the State of Arizona as the pass-through entity (recipient) will perform monitoring procedures of subrecipients for the ABDG Program. The frequency of monitoring activities will be based upon an initial risk assessment, as described below.

The objective of subrecipient monitoring is to review the activities of the subrecipient to verify whether the grant funds are used for authorized purposes, subrecipient compliance with Federal and State statutes, regulations, and the terms and conditions of Grant Agreements, and project performance goals are achieved.

4.1 Risk Assessment

The State Broadband Office will perform an initial risk assessment for the ABDG Program subrecipients. This process will develop a baseline assessment of the inherent and specific risks associated with the design and implementation of the planned projects, as well as other project-specific considerations. The risk assessment process may include reviewing information provided as part of the project application(s), data and information collected through questionnaires, invoicing, progress reports, and financial information. Additionally, the State Broadband Office will evaluate program activity, organizational and operational capabilities and experience of project management team(s), planned procurement and contracting approaches to be used in the execution of the work, as well as other program matters.

Below are examples of what the risk assessment may include:

1. Award amount

2. Subrecipient's past experience with broadband projects and similar grant programs
3. Subrecipient's past compliance record with the state / federal grant programs
4. The number of unserved and underserved locations the subrecipient plans to serve
5. Project duration
6. The approximate percentage of land in the proposed area that is environmentally sensitive

The State Broadband Office's risk assessment will influence the type and frequency of periodic monitoring reviews. The State Broadband Office will coordinate with each subrecipient regarding the program / project monitoring activities schedule. Typical program / project monitoring may include, but is not limited to:

- **Reviewing subrecipient reports:** The State Broadband Office will review subrecipient reports, verify compliance with project-specific requirements, and ensure the use of funds for Allowable Project Costs.
- **Conducting Site Visits:** The State Broadband Office may conduct site visits where broadband infrastructure deployment activities are performed to monitor project progress and submit status reports to the State of Arizona and U.S. Treasury.
- **Verifying Project Deliverables:** The State Broadband Office will establish that all project deliverables and milestones identified in the application and the Grant Agreement are met within the specified timelines.
- **Measuring Performance Metrics:** The State Broadband Office will measure and evaluate performance metrics for the project, which includes deployment speed, pricing, the extent of broadband coverage, quality of service, and project impact on the community.
- **Conducting Compliance Reviews:** The State Broadband Office will perform compliance reviews of the project's financial, operational, and procedural aspects to ensure that all project activities are within the scope and budget of the application and the Grant Agreement.

The State Broadband Office, during the testing and monitoring phase of the project, may conduct additional risk assessments if factors become known or change that may impact a subrecipient's risk profile, on an as needed basis. Additional risk monitoring may require subrecipients to provide ongoing information similar to the information that was provided as part of the initial risk assessment, such as data and information collected through questionnaires, invoicing, progress reports, and financial information.

The State Broadband Office will develop a subrecipient monitoring workplan to monitor and evaluate compliance with the regulatory guidance covered in the Grant Agreement, CPF / ABDG Program requirements and requirements addressed in this guide.

4.2 Subrecipient Monitoring Procedures

4.2.1. Planning

Once the monitoring schedule is established, the State Broadband Office will communicate to the subrecipients notifying them of the schedule and providing an overview of the subrecipient monitoring process. Additionally, monitoring notification will be sent to subrecipients within thirty (30) calendar days of their scheduled monitoring kick-off date to provide a general timeline and initial document request list.

The next phase will consist of performing an initial walkthrough with each subrecipient to obtain an understanding of the project, how the project is being managed from the ABDG grant award to reimbursement of Allowable Project Costs, and to determine the expenditure plan for non-expended funds. The State Broadband Office will review the requirements under 2 CFR 200, and whether there are compliance concerns around 2 CFR 200, along with other applicable regulatory requirements. This includes, but is not limited to, verifying the subrecipient is aware of audit requirements per 2 CFR 200.332(f), as well as determining whether procedures noted under 2 CFR 200.332(e) are necessitated to facilitate proper accountability and compliance with program requirements. This will also include verifying an understanding of procurement requirements and supporting documentation.

Overall, the CPF / ABDG Program monitoring activities provide a method for the State Broadband Office to ensure a transparent, accountable, and successful broadband infrastructure deployment process in unserved and/or underserved areas.

4.2.2. Site Visits / Field Work

After conducting kickoff meetings with each subrecipient, the State Broadband Office will obtain the documents requested in the initial document request list and perform compliance testing to verify whether project expenditures are compliant with applicable regulatory requirements, including 2 CFR Part 200. Sample size and procedures performed will vary based on several factors, including the size and complexity of the project, subrecipient's experience and compliance track record on similar projects. Conducting site visits is one of the critical monitoring activities undertaken by the State Broadband Office. Site visits aim to ensure that the broadband infrastructure deployment project is progressing as planned, milestones are met, and subrecipients are adhering to project-specific requirements.

4.2.3. Monitoring Visit Reporting

After each monitoring visit, the State Broadband Office will summarize monitoring results and observations and any identified matters of non-compliance. A draft Monitoring Visit Report will be reviewed with the subrecipients prior to finalizing to confirm that no other documentation is available to address the observed deficiency. A written Monitoring Visit Report will be sent to the subrecipient, along with any recommended corrective actions and a timeline for the subrecipient's response. Subrecipient's response to corrective actions will be reviewed and tracked to ensure compliance.

4.2.4. Follow-Up

The State Broadband Office will perform follow up to verify appropriate corrective actions have been taken by the subrecipient to ensure that the broadband infrastructure deployment project is progressing as planned and is compliant with project-specific requirements. Timing of follow up will vary depending on the number and complexity of issue(s) noted. Follow up activities will be tracked and monitored in accordance with this guide.

4.3 Capital Projects Fund Performance Measures

The Capital Projects Fund Guidance for States, Territories and Freely Associated States specifies project milestones which require additional monitoring procedures. These milestones are based on the projects' percentage of completion, at 20 percent intervals. The State Broadband Office will review the project status reports prepared by the subrecipients on a monthly or other periodic basis. The State Broadband Office will identify projects that meet and / or surpass the required performance measures and project milestones thresholds. Project status reports will be compared to reimbursement / payment requests for the Allowable Project Costs and / or reports provided for U.S. Treasury quarterly reporting for consistency of information and data reported. Documentation required at each threshold will include, but is not limited to, attestations by the subrecipient's Project Engineer as well as site photos (or other evidence) documenting project progression for the reporting period.

4.3.1. Allowable and Unallowable Project Costs

The eligibility of costs incurred by State, local or Tribal Governments is determined in accordance with the provisions of 2 C.F.R. Part 200, Subpart E and the Grant Agreements. Please review these documents, as well as the ABDG Payment Reimbursement Guide for additional information.

4.4 Project Requirements

The CPF program is designed to provide broadband infrastructure assets that enable community members to engage in work, education, and health monitoring activities. In other words, once the construction of a project is completed, the public should have access to it for these purposes. For example, if a project is a community center or library, community members should be able to access computers with high-speed internet service to search for jobs or engage in other work-related activities. Similarly, if a project is a training program or an extracurricular activity, it should aim to provide knowledge and skills that help the community members find employment, develop new skills, or pursue further education.

- **Work:** The project should offer activities that help community members engage in employment, search for employment, and/or develop the requisite skills and knowledge to become employed. This can include career counseling programs, workforce training programs, as well as access to internet websites for job searching and applying.
- **Education:** The project should provide opportunities for community members to acquire knowledge and/or skills. This can be in the form of participating in school, academic programs,

extracurricular programs, social-emotional development programs for students or youths, internships, or professional development programs, or other educational environments.

- **Health Monitoring:** The project should offer services to monitor physical or behavioral health, including telemedicine appointments with healthcare providers or community health screening programs. The project should provide necessary resources for individuals to monitor their health in ways that are affordable and publicly accessible.

To qualify as a capital project, it is essential to show that it directly enables these activities. This means that the result of the capital project should be assets that offer affordable services or are otherwise publicly accessible. The project's function does not have to be exclusively for these activities, as the project can serve other purposes. However, providing assets that enable work, education, and health monitoring activities should be the overall objective of the project to qualify it as a Capital Project.

5. Communications

The communications plan encompasses a flexible communication strategy that informs and engages subrecipients with clear, comprehensive, and ongoing communication with the State Broadband Office. The overarching goal is for subrecipients to remain informed throughout the monitoring process to help drive active participation. The following considerations serve as guiding principles for developing a communication strategy for the subrecipients:

- Support subrecipients' understanding of their role and responsibilities during the project monitoring phase by effectively communicating through a common voice, vision, and platform.
- Share detailed information with subrecipients to allow for the right level of engagement and awareness to lead to a transparent and seamless monitoring process.
- Proactive communication that leads to enhanced participation and commitment from subrecipients.
- Maintain regular engagement by creating an environment where subrecipients feel informed throughout the monitoring phase of the project.
- Develop a communication 'library' of approved templates and materials that can be tailored to different projects and subrecipients, as needed.

The following sections of this document are organized as follows:

- **Guiding principles** – Outlines the State Broadband Office's adherence to a set of guiding principles that will assist in communicating with subrecipients.
- **Communication methods** – Outlines the methods of communication the State Broadband Office will use when communicating with subrecipients. These methods include the program website, phone, e-mail, etc.

5.1 Guiding Principles

The following guiding principles helped formulate the communication strategy for the State Broadband Office:

- Communication with subrecipients will be cordial and professional.
- Communication of outcomes is based on procedures reviewed and approved by the State Broadband Office.
- The outcomes of the monitoring procedures will be shared with the subrecipients on a project-by-project basis, and the State Broadband Office will be responsible for determining any corrective actions that may be required.
- The State Broadband Office will refer to the review as “monitoring” or “monitoring procedures.”

5.2 Communication Methods

The State Broadband Office will communicate with subrecipients through various methods:

- **Phone** – Upon initial outreach, and on as needed basis for follow-up/reminder activities, the State Broadband Office may conduct outbound calls to subrecipients.
- **E-mail** – After initial outreach, further communications may be handled by e-mail.
- **e-Civis Portal**- The State Broadband Office may communicate certain tasks required of subrecipients in the e-Civis Portal.
 - The e-Civis Portal link is https://qn.ecivis.com/GO/qn_home.
- Procedural challenges will be handled by the State Broadband Office as they arise on a case-by-case basis.

5.3 Public Reporting

According to the transparency laws, the Treasury must reveal the names of CPF / ABDG Program subrecipients and the amounts of Capital Projects Fund / ABDG Program grants. The public may also see other details provided by subrecipients in their applications or Grant Agreements. This information will be posted on the Treasury's and usaspending.gov website to ensure transparency in the funding of COVID-19 relief. Additionally, the State Broadband Office may post project related information on its website.

5.4 Compliance Requirement for Construction

All CPF / ABDG Program projects must adhere to relevant national environmental laws and regulations. However, the National Environmental Policy Act generally does not apply to Capital Projects funded by the ABDG Program. Before funding a Capital Project, subrecipients must complete an environmental checklist available on the Capital Projects Fund website to determine whether the project complies with certain environmental laws. Federal environmental review requirements do not apply to Capital Projects that do not involve construction activities.

The CPF / ABDG Program projects must be substantially completed before June 30, 2025. Substantial completion refers to the date when the project can deliver planned services to end-users as intended by the project application and the Grant Agreement. The service operations and management systems infrastructure must be operational when the project attains significant completion. If events beyond the subrecipient's control have delayed project delivery timelines, the subrecipient can request an extension. The State Broadband Office may approve extension requests on a case-by-case basis.

5.5 Other ABDG Rural/Urban Grant Terms and Conditions of General Applicability

- **Changes to the Program.** The State Broadband Office reserves its discretion to modify or change the contents of the ABDG Program. Any modification or change will not modify or change the terms of any executed Grant Agreement without due consideration.
- **Public Records.** Because the State Broadband Office is subject to Arizona's public records laws (A.R.S. §§3 9-101, et seq.), information submitted to the State Broadband Office may be subject to disclosure in response to public records requests. However, the public records laws provide exceptions for business information that, if released, would undermine the subrecipient's competitive position and for proprietary or trademark (or copyright) protected information. The public records laws also permit the State Broadband Office to redact (block out) personal information before documents are released. The State Broadband Office will attempt to preserve the confidentiality of information to the extent permitted by law but cannot guarantee that such information will not be disclosed and is not responsible for the consequences of any such disclosure. Additionally, the State Broadband Office specifically hereby reserves the right to use the following information in its marketing materials, including without limitation in press releases: (i) the name and type of a project, (ii) the name of a Grantee, (iii) the projected economic impact of a project including without limitation the population, households, anchor institutions, and businesses to be served and the extent of capital investment contemplated, (iv) the uses of an ABDG-Rural or ABDG-Urban Program award, and (v) the amount or other nonproprietary terms of a Grant Agreement.

6. Statutory Requirements and Guiding Documents

Monitoring and compliance reviews are designed to address applicable federal and state regulations, program requirements, as well as Grant Agreements, including but not limited to:

6.1 All Programs

1. **Code of Federal Regulations** - [Title 2 Code of Federal Regulations \(CFR\) Part 200](#). 2 CFR 200 is a set of rules and regulations for federal grants that created uniform administrative requirements, cost principles, and audit requirements for Federal awards.
2. **Grant Agreements**

3. **Arizona Commerce Authority** - [Arizona BEAD Five-Year Action Plan](#). Arizona's vision is to provide dependable and affordable high-speed internet services to every community and access to the necessary digital skills, so every resident can fully participate in a digital world.
4. **Arizona Commerce Authority** - [Initial Proposal for the Broadband Equity, Access and Deployment \(BEAD\) Volumes I & II](#). Volume I outlines existing broadband funding within Arizona, the list of the locations designated as unserved and underserved in the FCC National Broadband Map, Arizona's Community Anchor Institutions (CAIs) as defined by the National Telecommunications and Information Administration (NTIA) and the proposed plan for the BEAD challenge process. Volume II outlines the long-term objectives for deploying broadband, closing the digital divide, addressing access, affordability, equity, and adoption issues, and enhancing economic growth and job creation including information developed in the Five-Year Action Plan.
5. **Arizona Commerce Authority** - ACA Broadband Development Grant Program website information and guidance.
6. **Arizona Commerce Authority** – [ACA Uniform Terms and Conditions](#).

6.2 Capital Projects Funds Program

The [U.S. Treasury Capital Projects Fund website](#) contains several helpful documents, including the following:

- 1 **Federal CPF Award Information:**
 - a. [CPF Assistance Listing \(formerly known as CFDA number\): 21.029](#)
 - b. Federal Award Date: February 8, 2022
 - c. Federal Award Identification Number (FAIN): CPFFN0147
- 2 **U.S. Department of the Treasury** – [Capital Projects Fund Guidance](#). This guidance provides a summary of project eligibility and terms and conditions, as well as information about the process for applying for a grant under the CPF program.
- 3 **U.S. Department of the Treasury** – [Capital Projects Fund Frequently Asked Questions \(FAQ\)](#). This document contains answers to frequently asked questions regarding the Capital Projects Fund (CPF). Treasury will be updating this document periodically in response to questions received from stakeholders. Recipients and stakeholders should consult Treasury's CPF Guidance for additional information.
- 4 **U.S. Department of the Treasury** – [Capital Projects Fund Compliance and Reporting Guidance](#). This guidance provides additional detail and clarification about reporting and compliance responsibilities under the CPF program and should be read in concert with the Award Terms and Conditions, the Grant Agreement, the authorizing CPF statute, and other regulatory and statutory requirements, including regulatory requirements under the Uniform Guidance (2 CFR Part 200). Please see the Assistance Listing in SAM.gov under assistance listing number (formerly known as CFDA number), 21.029 for more information.

- 5 **U.S. Department of the Treasury** – [Capital Projects Fund Project and Expenditure Report User Guide](#). This document provides information on using Treasury’s portal to submit the required CPF Project and Expenditure reports.
- 6 **U.S. Department of the Treasury** – [Supplementary Broadband Guidance](#). In response to questions from recipients and internet service providers, Treasury is issuing the following guidance regarding the application of the Uniform Guidance to broadband infrastructure projects.
- 7 **U.S. Department of the Treasury** – [Capital Projects Fund Grant Plan Best Practices](#). This document provides a brief overview of the CPF Grant and Program Plan submission process and identifies several best practices for recipients.
- 8 **U.S. Chief Financial Officers Council’s Program Integrity** – The [Antifraud Playbook](#) provides an overview of practical and actionable guidance to reduce fraud risk.
- 9 **U.S. Government Accountability Office** – Standards for Internal Control in the Federal Government (“[Green Book](#)”).

7. Appendix A: Definition and Acronyms

Term	Definition	Acronym (if applicable)
Applicant	An applicant for funding under the Arizona Broadband Development Grant and / or the Capital Projects Fund Programs.	N/A
Arizona Broadband Development Grant Program	A competitive grant program designed to expand last mile broadband access to underserved and unserved homes and businesses in rural and urban areas of Arizona. The Program is part of the Arizona Commerce Authority's grant plan approved by U.S. Treasury.	ABDG / ABDG Program
Arizona Broadband Development Rural Infrastructure Grant Program	A competitive grant program designed to expand high-speed broadband in the state's thirteen rural counties. The Program is part of the Arizona Broadband Development Grant Program. The Program will extend high-speed internet connectivity to unserved and underserved areas and sources funded from the Capital Projects Fund (CPF) Program under the American Rescue Plan Act (ARPA) of 2021.	ABDG-Rural
Arizona Broadband Development Urban Infrastructure Grant Program	A competitive grant program designed to improve and expand broadband infrastructure in the state's two urban counties. The Program is part of the Arizona Broadband Development Grant Program. The Program will extend high-speed internet connectivity to unserved and underserved areas and sources funded from the CPF Program under the American Rescue Plan Act (ARPA) of 2021.	ABDG-Urban
Arizona Commerce Authority	A department within the State of Arizona tasked with advancing the state's economy through the recruitment of quality companies and jobs for the state of Arizona as well as the expansion of companies already doing business in the state.	ACA

Term	Definition	Acronym (if applicable)
State Broadband Office	An office within ACA tasked with the development and deployment of Arizona’s broadband programs.	SBO
Broadband Internet Service	A service that offers a connection to the Internet with a capacity for transmission at a consistent speed of at least 100 megabits per second (Mbps) downstream and 20 Mbps upstream.	N/A
Broadband Equity, Access and Deployment (BEAD) Program	The Broadband Equity, Access and Deployment Program administered by the National Telecommunications and Information Administration (NTIA) for deployment of broadband infrastructure projects in the state.	BEAD
Capital Projects Fund	Established under Section 9901 of the American Rescue Plan Act of 2021 to allow State and Tribal governments to “carry out critical capital projects directly enabling work, education, and health monitoring.” For more information refer to the U.S. Treasury Guidance for Coronavirus Capital Projects Fund for States, Territories, & Freely Associated States funded through the U.S. Treasury.	CPF
Internet Service Provider (ISP)	An entity that provides subscribers with access to the Internet service.	ISP
Project and Expenditure Report	A monthly or quarterly report to provide information on projects funded, obligations, expenditures, project status, outputs, performance indicators, and other information relative to CPF spending.	P&E
Performance Report	An annual report to provide information on CPF-funded Programs and to describe the outputs and outcomes of Programs.	N/A
Recipient	“An entity, usually but not limited to non-Federal entities that receives a Federal award directly from a Federal awarding agency. The	N/A

Term	Definition	Acronym (if applicable)
	term recipient does not include subrecipients or individuals that are beneficiaries of the award.” (2 CFR Part 200.1)	
State and Local Fiscal Recovery Fund	Part of the American Rescue Plan Act which delivered \$350 billion to State, Local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency. Funded through the U.S. Treasury.	SLFRF
Subaward / Subgrant	“An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.” (2 CFR Part 200.1)	N/A
Subrecipient	“An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.” (2 CFR Part 200.1)	N/A

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