



BEAD ADMINISTRATION COMPLIANCE WEBINAR

Milestone Payments for LEO Technology

May 22, 2026

Agenda

1. Overview
2. Contracting
3. Environmental Requirements
4. Procurement and Build America, Buy America (BABA)
5. Reporting
6. Milestone Payment Process
7. Monitoring
8. Project Modifications and Additional Resources
9. Q&A and Feedback



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1. Overview

Why this Webinar Matters

This webinar is designed to help milestone-based* grantees navigate compliance expectations throughout the period of performance.

Webinar Focus Area

- Pre-implementation requirements including contracting and environmental screening
- Overview of grantee requirements at a Federal and State level
- Readiness for milestone payment requests, reporting, and monitoring
- Project modifications and closeout

BEAD Awards at a Glance



\$813.3M

Tennessee BEAD
allocation

43,871

Eligible locations



100%

Planned coverage in
approved Final Proposal

\$402.2M

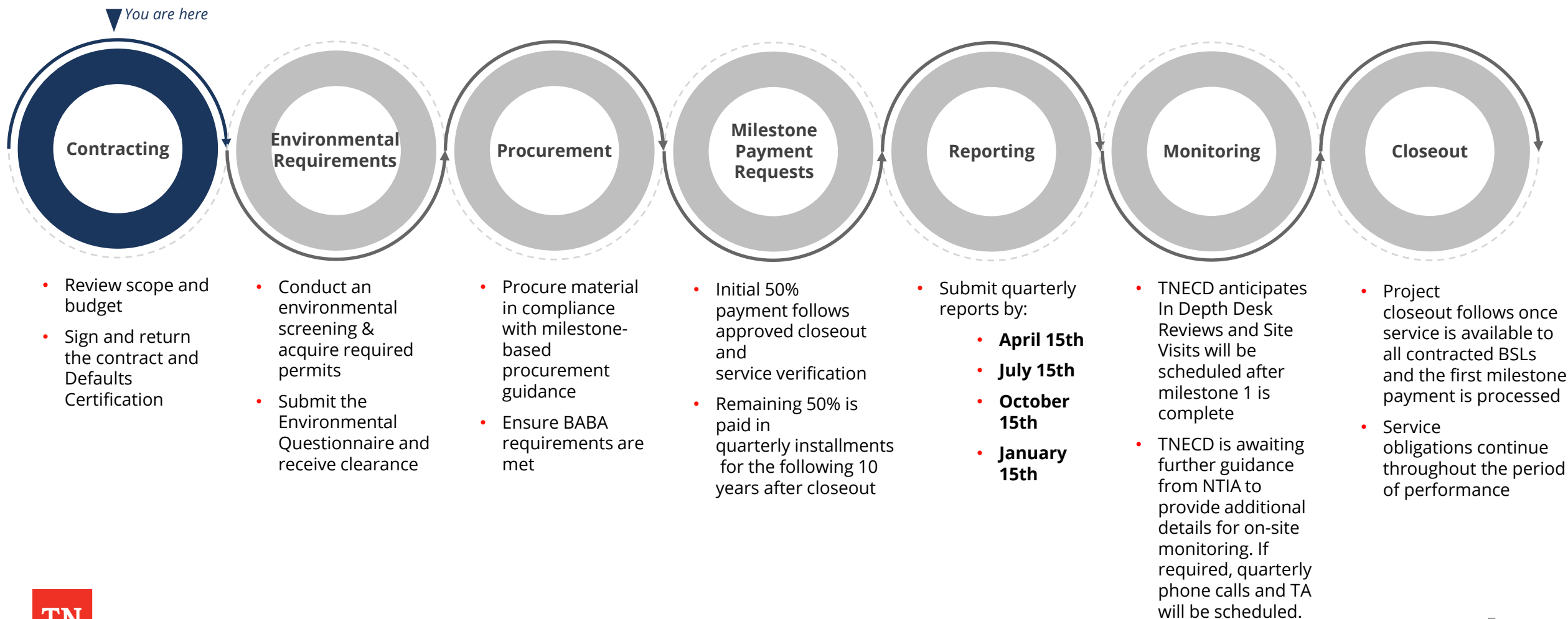
Total deployment costs
(BEAD + match)



* Referred to as “fixed amount subawards” in NTIA guidance

Administration Roadmap

Key actions and deadlines across the period of performance.



Looking Ahead: Transition to GMS

ECD is transitioning to a new **Salesforce Grants Management System (GMS)** in September 2026, which would bring following changes to your interactions with ECD.

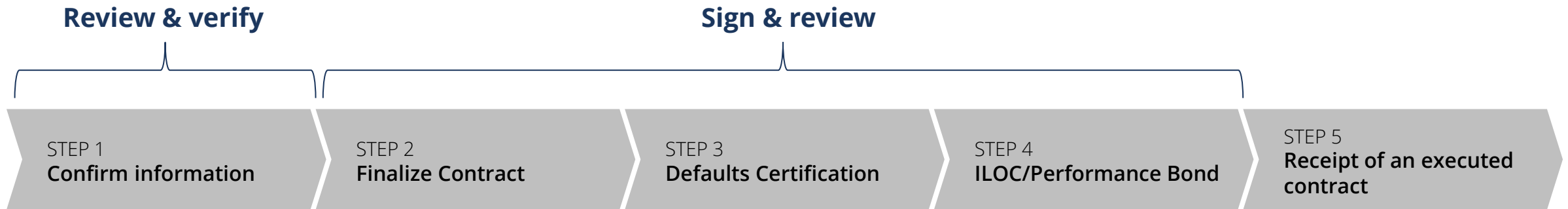


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2. Contracting

Contracting

The designated point of contact will receive a draft contract via email from ECD Legal.



Confirm your:

- Edison ID
- Scoped milestones
- BSL count
- Project area map
- Budget

Once reviewed, return signed contract back by selecting "Reply All" on the initial email

Email defaults certification to ECD.Broadband@tn.gov

Email required irrevocable letter of credit (ILOC)/ performance bond materials to your program manager, if not shared previously

ECD Legal will provide the contract once it has been executed. Save this for your compliance files.

*Copy your program manager
on all communication*

Contract Highlights

The final contract shall include the following key items across the defined sections.

 GOVERNMENTAL GRANT CONTRACT (cost reimbursement grant contract with a federal or Tennessee local governmental entity or their agents and instrumentalities)			
Begin Date You cannot incur expenses before this date	End Date You cannot incur expenses after this date	Agency Tracking # The number of the program internally (budget)	Edison ID The number for this contract, also referred to as a "PO" number
Grantee Legal Entity Name Legal Name of your organization, including a dba, if applicable		Edison Vendor ID The number associated with your entity	
Subrecipient or Contractor ☒ Subrecipient ☐ Contractor	CFDA # Grantee's fiscal year end This is the end of your fiscal year per your application and program		

Section	Description
A	Scope of Services and Deliverables
B	Term of Grant Contract
C	Payment and Conditions
D	Standard Terms and Conditions
E	Special Terms and Conditions
Attachment A	Detailed Project Activities
Attachment B	Project Area Unit Map
Attachment C	Federal Award Identification Worksheet
Attachment D	BEAD Statement of Assurances

Scope & Milestones

Information should **match with the Contracting Tab of the Grant Application** that your organization reviewed in December 2025. Please conduct a thorough review to avoid delays and ensure accuracy.

Technology type

Sample Scope

The grantee shall deploy **Low Earth Orbit (LEO)** Broadband Technology serving the **80 locations in Anderson 1, 25 locations in Anderson 2, and 10 locations in Benton 1** identified in Attachment B. The deployed Low Earth Orbit (LEO) infrastructure will reliably meet or exceed internet speeds of 100/20 Mbps and will be **scalable to a minimum of 100/20 Mbps** with latency of no more than 100 milliseconds. The project shall be complete within 36 months of the contract start date and follow in accordance with the milestones identified within Section C.3.

- The subgrantee shall **provide a milestone schedule identifying specific deadlines and describing how the Subgrantee proposes to meet timing requirements** including, as required, the completion of consultations, the completion of NEPA and Section 106 reviews, and the submission of Environmental Assessments (EAs) or Environmental Impact Statements (EISs) prior to receiving grant funds, unless otherwise approved by TNECD.
- The Grantee shall submit a completed Protecting the BEAD Program from Defaults certification at the time it returns the signed grant contract. No BEAD funds may be released until the certification is received, and the Grantee agrees that the commitments made in the certification remain in effect throughout the extended period of performance for LEO grants.

BSL count for each awarded Project Area Unit (PAU) in the contracted area

Minimum scalability: the highest speed your organization committed to in the awarded application

Milestones: details environmental milestone requirements and the completion of the Protecting the BEAD Program from Defaults Certification

Protecting the BEAD Program from Defaults Certification

NTIA requires all BEAD subgrantees to sign the “Protecting the BEAD Program from Defaults” Certification, as mandated in the BEAD General Terms & Conditions (updated November 2025).

About the certification

- **Purpose:** Confirms the grantee will not require or take additional federal funds to serve the awarded BSLs. This supports program integrity and long-term project viability
- **Timeline:** Required at the time of contract execution. Reimbursements cannot be approved until this certification is received
- **Sensitivity:** NTIA may publicly post or otherwise disclose this certification

Grantee preparation steps & requirements

- **Organization letterhead:** Complete the certification on organization letterhead in PDF format
- **Specific language:** Use the required TNECD language and complete all required fields
- **Signing authority:** Ensure the certification is signed and dated by the Authorized Organization Representative
- **Final submission:** Email the certification to ECD.Broadband@tn.gov and copy your Program Manager when you return your signed contract to TNECD legal

CERTIFICATION LANGUAGE (TO BE PRINTED ON OFFICIAL LETTERHEAD)

Date: _____

To:
Tennessee Department of Economic & Community Development (TN ECD)
Attn: Tennessee ECD Broadband Office
Tennessee Tower, 27th Floor
312 Rosa L. Parks Ave., Nashville, TN 37243

Re: Certification Required Under the BEAD General Terms and Conditions – “Protecting the BEAD Program from Defaults”

As a condition of receiving a Broadband Equity, Access, and Deployment (BEAD) Program subgrant from TN ECD, the undersigned Authorized Organization Representative (AOR) for **[Subgrantee Legal Name]**, including its affiliates, hereby certifies the following:

1. **[Subgrantee]** and any of its affiliates will not require or accept any additional Federal funds to support a BEAD project¹ during the BEAD subgrant agreement's period of performance, extended period of performance, or federal interest period; and
2. **[Subgrantee]** and any of its affiliates will not require or accept any additional Federal broadband service subsidies² for the project(s) and/or Broadband Serviceable Location(s) (BSL(s)) to be served by the subgrant during the BEAD subgrant agreement's period of performance, extended period of performance, or federal interest period, other than any such subsidies that were committed prior to the BEAD subgrant agreement. (This includes, but is not limited to, new operating expenses for any BEAD project(s) or BSL(s)).

I certify that the foregoing is true and correct.

Executed on this ____ day of ____.

Signature: _____
Name: _____
Title (AOR): _____
Organization Name: _____
Address: _____
Phone: _____

¹ 47 U.S.C. § 1702(a)(2)(K) (defining the term “project” as “an undertaking by a subgrantee under this section to construct and deploy infrastructure for the provision of broadband service”).
² For purposes of this prohibition, a “Federal broadband subsidy” is defined as any Federal funds made available to subsidize the provision of broadband service. For example, Federal broadband service subsidies include, but are not limited to, any of the Universal Service Fund (USF) support mechanisms.

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3. Environmental Requirements

Environmental Readiness

Steps required for Environmental Screening and acquiring permits

Environmental Screening

- Submit the streamlined LEO environmental questionnaire with a brief project overview, including scope/nature of activities, general service area, and user terminal deployment approach.
- Attest that the project does not involve trenching, boring, fiber placement, towers, poles, teleports/earth stations, or disturbance to soil, vegetation, waterways, or existing infrastructure.
- Confirm that user terminals will be installed above ground, installation activities are minor and non-invasive, and no ground-disturbing construction is proposed.

Permitting

- Review project to determine if any permits are required
- If applicable:
 - Follow agency processes to complete required applications
 - Save documentation of communications with agencies, application materials, approvals, and permits
 - Remain in compliance with permits
- Continually update your NEPA Project Milestone Schedule with all acquired permits. This will be collected in quarterly reports

Permitting Roundtables

All grantees are invited to join TNECD's quarterly permitting roundtables, which will begin this summer.

What is it?

- The roundtables serve as an opportunity to raise concerns and questions around the environmental and permitting requirements for your project.
- TNECD will use insights from these sessions to escalate your input to relevant agencies.

What will be expected of my organization?

- Join the permitting roundtable sessions prepared with questions or concerns your organization has regarding permitting and environmental requirements.
- As needed, your organization may also provide input through **this form, which will also be published on the [BEAD Program](#) page.**
- At any time throughout your project if you have questions or concerns you need to escalate to TNECD regarding permitting or environmental requirements, please fill out this form. TNECD will closely monitor submissions and will promptly reach out to your organization with a response.



TNECD will publish an **Environmental Screening and Compliance Guide** next month as a resource for completing environmental screening and common permit requirements

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4. Procurement and Build America, Buy America (BABA)

Procurement Readiness

Understanding procurement requirements for milestone-based grantees

1. Milestone-based grantees are not required to comply with procurement standards in Uniform Guidance
2. Grantees must comply with their organization's internal policies
3. Maintain proof of payment and track match as expenses are incurred

Grantee Requirements for BABA

Under Build America, Buy America, grantees must ensure that iron, steel, products made in factories, and materials for construction come from the U.S. Grantee compliance includes the following key areas:

Self-Certification Page

Use the self-certification page on the [Department of Commerce's](#) website to ensure manufacturer's BABA compliance

Key elements of the self-certification list:

- Manufacturer name
- URL to company-hosted page that lists American-made equipment that meets BEAD BABA waiver requirements
- Signature of a company officer

BABA Certification Letter

Obtain and save BABA certifications letters from manufacturers

Key elements of the manufacturer certification letter:

- BABA domestic manufacturing requirement reference
- Equipment information
 - Product Name
 - Product Description (e.g., what it is or what it does)
 - Quantity
- Location of manufacturing;
- Signature of an authorized company representative

Waiver Reporting

Create a reporting tracker on the finished waived electronics used

Key elements of reporting tracker:

- Name of Manufacturer
- Category of electronic product (e.g., router, switch, power system, radio, etc)
- HS Code (10 digit)
- Product Identifier (e.g., Stock Keeping Unit (SKU), Product ID, Part No., etc.)
- Common language description of the product's function
- Country of origin
- Quantity

This will be reviewed during mid-point monitoring. TNECD also may request this information at any point throughout the performance period.

Waiver reporting will be collected during January and July reporting

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5. Reporting

Quarterly Reporting

Details on what to submit and when, for quarterly reports

Key Information	Required Information for Quarterly Reports*
- Quarterly Reporting Cycle - April 15th - July 15th - October 15th - January 15th - Annual Report - The first report will be due July 15th, 2026, if you have an executed contract - Quarterly reports submitted after the deadline will result in a monitoring letter - Quarterly reporting may stop once the closeout report is approved	Collected Each Quarterly Report - Funds and match expended to date - Budget or scope modifications and project extensions (if applicable) - Project capacity status - NEPA Environmental Milestone Schedule (if applicable) January and July Reporting Only - Confirmation of BABA compliance - BABA waived electronics tracker - Number of jobs created and retained - Number of active subscribers - Number of CPEs shipping to BSLs in the reporting period - Served locations report - If location is residential, business, or residential and business - Max advertised upload and download speed - Technology type - Performance measure testing – January only



*Reporting information requested subject to change. TNECD is awaiting further reporting guidance from NTIA

Performance Measures Process – January Reporting

Network performance testing must be done annually in adherence with the [BEAD Policy Notice: Performance Measures for BEAD Last-Mile Networks](#)

- 1. Due Date:** Due January 15th, Annual through entire period of performance
- 2. Must be an FCC reported location:** After the FCC releases the location fabric, grantees will randomly select a sample set of active subscribers for each committed speed tier and technology.
- 3. Random Sampling:** Providers may choose their own method. Providers are encouraged to sample a larger than required sample size in the event a location can't be used.
- 4. Reporting Requirements (template will be provided):**
 - ☐ Speed and latency tests
 - ☐ Methodology used for random sampling
- 5. Publicly Posted:** Aggregate results and speed test methodology must be published on your website. This data is also subject to public records request.

Sample Size

Active Subscribers	Minimum # of Test Locations
50 or fewer	5 locations (if less than 5 subscribers, test all)
51-500	10% of locations
500 or greater	50 locations

Measurement Period

Active Subscribers	Minimum # of Test Locations
Same One Week Period (7 days)	6:00 pm -12:00 am/ each day

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6. Milestone Payment Submission Process

Milestone Payment Submission Process

How to prepare and submit the first milestone payment request. Subsequent payments will be released upon successful completion of the quarterly report for the remaining 10 year period of performance.

❑ **Step 1. Document match as costs are incurred**

Grantees must track BEAD funds and match expended as costs are incurred; this will be collected during quarterly reporting.

❑ **Step 2. Confirm the Milestone is Complete**

Use the executed contract to confirm milestone requirements are met.

❑ **Step 3. Compile the Invoice and Supporting Documentation**

Gather the required supporting documentation for the milestone payment request. Unless other documentation is approved by TNECD, this includes:

- Approved service closeout report demonstrating service availability meeting contracted terms
- Closeout report must be signed/stamped by Professional Engineer Certified in the State of Tennessee
- Additional documentation may include photos and documentation of Customer Premise Equipment, certification of speed and latency tests, network design, and verification of capacity and scalability for BSLs

❑ **Step 4. Submit to TNECD**

Submit the invoice and supporting documentation to ECD.Invoices@tn.gov once the milestone is complete and ready for TNECD verification.

❑ **Step 5. Respond to Questions and Await Payment**

Respond promptly to any clarification or revision requests.



This reflects the current submission process as of this webinar and may change once the new GMS is in place

Milestone Payment #1

The first payment request for milestone-based grantees will be triggered once the following planning activities are complete.

<i>Milestone</i>	<i>Milestone Description</i>	<i>Payment Requested</i>	<i>Acceptable Supporting Documentation</i>
Initial Funds for Service to Contracted Broadband Serviceable Locations (50%)	Demonstration of service availability to all contracted Broadband Serviceable Locations at contracted speed and latency standards. This milestone must be completed within the initial 3 years of the contract (with the option of a 1-year extension with state approved justification).	Maximum of 50% of contracted grant award amount	Approved service closeout report demonstrating service availability meeting contracted terms (Speed, latency, standard installation, capacity, availability). Closeout report must be signed/stamped by Professional Engineer Certified in the State of Tennessee AND/OR other documentation approved by TNECD. Additional documentation may include photos and documentation of Customer Premise Equipment, certification of speed and latency tests, network design, and verification of capacity and scalability for contracted broadband serviceable locations.



The invoicing template will be available soon.

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7. Monitoring

Monitoring Form Review Checklist

These are the categories required for review by the State Comptroller; items in **bold** represent the most common findings in Broadband ARPA programs

- A. Activities Allowed or Unallowed
- B. Allowable Cost/Cost Principles (cost principles not applicable)**
- C. Cash Management (not applicable)
- D. Davis Bacon (not applicable)
- E. Eligibility (Grantee's)
- F. Equipment and Real Property**
- G. Matching, Level of Effort
- H. Period of Performance
- I. Procurement (not applicable)**
- J. Program Income
- K. Real Property
- L. Reporting**
- M. Subrecipient Monitoring (not applicable)
- N. Special Tests and Provisions (speed testing, environmental, NTIA requirements, Fraud Waste Abuse Poster)
- O. Title VI

Equipment Reminders

Rules that apply if you use federal dollars to buy or improve equipment over \$10,000 per unit

Usage of Equipment	Sale or Transfer of Asset
During performance period: • Grantees must follow existing commercial practices for managing equipment purchased with BEAD funds (ex: a bucket truck) • If commercial practices do not exist, comply with 2 CFR 200.313(d) • During monitoring, equipment will be viewed Post performance period: Grantees must follow existing commercial practices for managing equipment. The federal interest period will continue for 10 years after project closeout	During performance period: NTIA approval is required prior to any sale or transfer of assets, and any permitted transfer must ensure the recipient agrees to comply with all applicable BEAD and federal property requirements Post performance period: If you sell, transfer, repurpose the asset and it still has a value over \$10,000, you are responsible for returning those funds to NTIA



See [General Terms and Conditions](#) *Recordation of the Federal Interest in BEAD-Funded Property* for additional requirements on purchasing real property

Title VI and Comptroller Notices

Under Tennessee state law, you are required to post the Comptroller's Fraud, Waste, and Abuse poster, and under federal law, you must also post Title VI nondiscrimination language either via Poster or on your website.

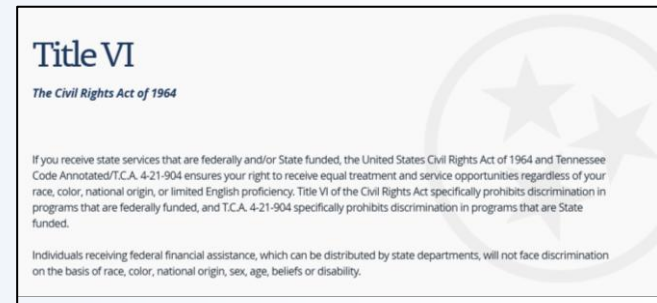
1. Title VI Notice ([Example Found Here](#))
2. Comptroller Notice ([Example Found Here](#))



Language for Prevention of Abuse of Funds Poster:

"This agency is a recipient of taxpayer funding. If you observe an agency director or employee engaging in any activity which you consider to be illegal, improper, or wasteful, please call the state comptroller's toll-free hotline: 1-800-232-5454."

Sample language on website



Required 11 X 17 Poster



Monitoring Process: What to Expect

In-depth desk reviews and site visits will be scheduled based on project progress and risk tier. Typical steps include:

❑ **Step 1. Monitoring Notice**

TNECD sends a notice to fill out monitoring form and request documents through the GMS.

❑ **Step 2. Submit Monitoring Documents**

Grantees provide the requested files by the stated deadline.

❑ **Step 3. Desk Review and/ or Site Visit**

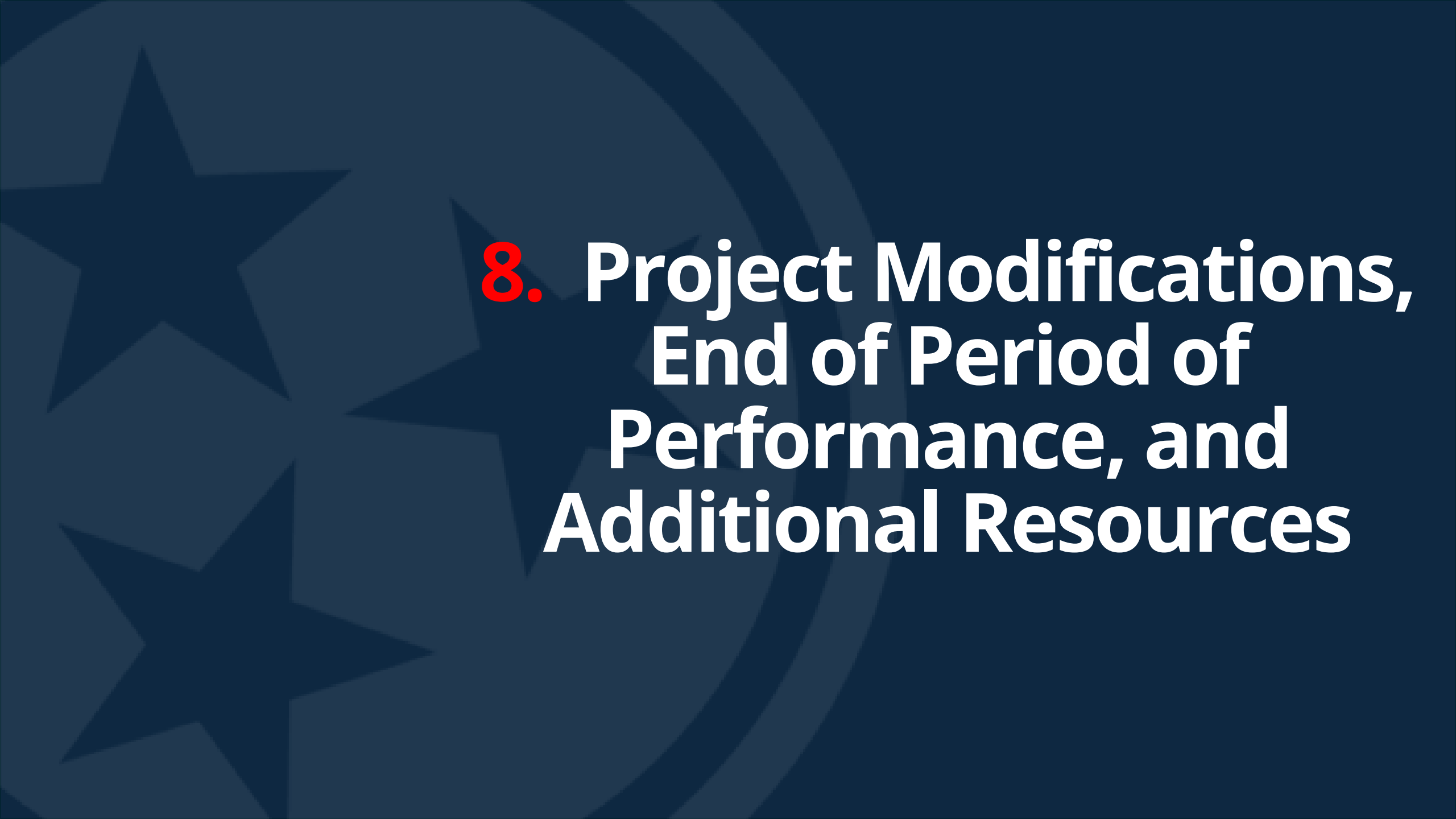
TNECD may complete a desk review, conduct a site visit, or both, depending on the project's complexity. Site visits are used to assess progress and confirm alignment with BEAD requirements.

❑ **Step 4. Monitoring Letter**

All grantees will receive a monitoring letter documenting either full compliance or any identified findings or concerns.

❑ **Step 5. Corrective Action/ Follow- Up**

If findings are issued, grantees submit a response and supporting documentation within 30 days of receipt of the letter.

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8. Project Modifications, End of Period of Performance, and Additional Resources

Contract Amendments & Budget Revisions

Contract amendments delay invoicing and may have to be approved by NTIA before grantees can proceed.

When a Contract Amendment May Be Required

- Changes to:
 - Scoped milestones
 - Technology
 - Match
 - Contract extension
 - Removing 200 BSLs or more than 10% of BSLs (whichever is fewer)
 - Budget line-item descriptions

Submission Process

- Both contract amendments and budget revision requests will be submitted through one consolidated form
- **Do not move forward with the change until approval is received. Certain modifications also require NTIA approval before grantees can proceed**

End of Period of Performance

Key reminders for closeout once the period of performance is complete.

1	Conclusion of Period of Performance	• The period of performance concludes 10 years from the date of your submission of the Milestone 1 payment request, confirming that broadband is available to every BSL in the project.
2	Final closeout submission	• Project/financial closeout. • Conduct final speed and latency test.
3	Closeout approval	• Final payment and release of ILOC/performance bond occur after the TNECD approves of the final quarterly report. • Retain required project documentation for 5 years after the date of your final payment.

How Awardees Can Stay on Track

Key actions for grant administration compliance moving forward.

1. Contracting

- ❑ Conduct a detailed review of your scope and budget before execution. Changes are significantly harder to make after award
- ❑ Once signed, return your contract to legal
- ❑ Submit the Protecting the BEAD Program from Defaults Certification to ECD.Broadband@tn.gov
- ❑ Email your ILOC or performance bond to your PM, if you have not already

2. Environmental Readiness

- ❑ Start preparing for the Environmental Questionnaire
- ❑ Review projects for applicable permits
- ❑ Continually update the NEPA Project Milestone Schedule

3. Procurement and BABA

- ❑ Follow your organization's policies for procurement
- ❑ Ensure compliance with BABA by maintaining manufacturer certifications and tracking waived electronics use

4. Milestone Payment Process

- ❑ Ensure BEAD funds are separately tracked in your accounting system and aligned to budget categories

5. Reporting

- ❑ Set up systems now to collect and track required data in the format required by NTIA (not just internally)
- ❑ Reporting deadlines:
 - April 15th
 - July 15th
 - October 15th
 - January 15th - Annual Report

6. Monitoring

- ❑ Create a dedicated BEAD compliance file and organize documentation in a way that aligns with expected monitoring reviews (e.g., Comptroller-style structure)

Key TNECD Resources

Essential guidance for grantees from TNECD and NTIA.

TN BEAD Program Resources	NTIA Permitting & Environmental Resources	NTIA/ Federal BEAD Resources
• Program page for BEAD updates, awarded areas, final proposal materials, monitoring plan, and environmental documentation. • TNECD BEAD Program Resources	• Current NTIA permitting/ NEPA tools for BEAD compliance and project scoping. • BroadbandUSA- Permitting • NEPA for BEAD • Streamlined Environmental Review & Permitting for Broadband: A Roadmap • Smart Start Part II	• Federal BEAD guidance, policy notices, technical assistance, NEPA tools, and BABA compliance resources. • 2026 BEAD General Terms & Conditions • BEAD FAQ

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9. Q&A and Feedback

FAQs

How does TNECD determine who from my organization receives email communications?

- Primary points of contact from your organization often come from your SmartSimple application, unless you indicate another contact is preferred. TNECD can only share communications, such as webinar invites or program updates, to a maximum of 3 points of contact. If additional recipients are required, you may forward within your organization as needed
- If you have questions on who the contacts are for your organization, or wish to make changes, please email your program manager

When can I expect my contract?

- Grantees can expect contract documents to be shared over email in early June

What will be required when I return my contract?

- Signed contract will be returned to legal
- Protecting the BEAD Program from Defaults Certification will be returned to ECD.Broadband@tn.gov
- If you have not already, please submit your irrevocable letter of credit or performance bond to your PM and cc ECD.Broadband@tn.gov when you return contracting documents

What are TNECD's expectations for a LEO provider to demonstrate its adherence to the 10 business day window of the standard installation requirement?

- Requests where the end user intends to self install or use a third-party installer: The subscriber must receive the CPE within 10 business days
- If professional installation is offered by your organization and selected by the homeowner: The obligation will be met if installation is completed within 10 business days of that request

Let us know how we did! (and log your attendance)

Please mark your attendance on the form by scanning this code.



Link – [Submit Here](#)



Thank you!

Please email

ECD.Broadband@tn.gov

with any additional questions you may
have.