

Indiana BEAD Monitoring Plan

As of September 11, 2025



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Monitoring Framework for Subgrantee Accountability

The IBO has designed a robust and timely monitoring framework to ensure subgrantee accountability throughout the period of performance. This framework aligns with Section IV.C.1.v of the BEAD NOFO, which requires Eligible Entities to establish oversight mechanisms for subgrantees, and incorporates subsequent federal guidance from Uniform Guidance (2 CFR § 200.332), and the June 6, 2025, BEAD Restructured Policy Notice (RPN).

The key components of Indiana's framework include:

- The use of risk tiers to inform monitoring frequency and intensity, consistent with 2 CFR §200.332(c), which directs pass-through entities to evaluate each subrecipient's risk of noncompliance.
- Timely reporting requirements from all subgrantees, in alignment with BEAD NOFO Section IV.C.1.b, and the IBO's Initial Proposal Volume II (Volume II), which requires Eligible Entities to mandate timely subgrantee reporting and establish robust accountability practices. The IBO will require a minimum of semi-annual reporting to fulfill this obligation and promote consistent oversight.
- Reimbursement-based payment structures, including fixed-amount subawards, consistent with 2 CFR § 200.201.
- Ongoing review of performance metrics, milestones, and expenditures, in alignment with BEAD NOFO Section IV.C.1.b, the IBO's Volume II, which requires robust subgrantee monitoring practices and timely reporting, and as reinforced by the June 2025 BEAD RPN's emphasis on performance-based accountability.
- Corrective action protocols and escalation procedures, consistent with 2 CFR §200.339, and outlined in the IBO's Master BEAD Subgrant Agreement, which outlines conditions for remedies for noncompliance in alignment with federal requirements and guidance.

Indiana's monitoring activities are designed to support subgrantees while also ensuring program integrity and compliance. Each subgrantee's responsibilities and performance expectations will be outlined in its executed grant agreement, which incorporates federal compliance requirements from the BEAD NOFO, the Infrastructure Investment and Jobs Act (IIJA), and the Uniform Guidance.

In accordance with 2 CFR § 200.332, the IBO will monitor subawards based on an assessment of each subgrantee's risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward. As further detailed under Pre-Award Risk Assessment below, all provisional subgrantees were initially categorized as low risk during the Prequalification and Application Phases. As provisional awards become final upon approval of Indiana's Final Proposal and contract execution, each subgrantee's risk will be regularly assessed by dedicated IBO staff. Monitoring intensity will adjust depending upon these regular assessments. For example, higher risk subgrantees will be subject to more frequent reviews, enhanced documentation requirements, and tailored oversight activities.

This approach aligns with the BEAD NOFO's directive that Eligible Entities must evaluate each prospective subgrantee's financial, managerial, technical, operational, and legal capacity prior to subaward execution and continue to ensure ongoing compliance throughout the project lifecycle. Subgrantees are expected to submit and maintain documentation, such as letters of credit, audited financial statements, pro forma sustainability analyses, and compliance certifications, consistent with federal and state program requirements.

Pre-Award Risk Assessment

As required by 2 CFR § 200.332(b) and reinforced by the BEAD NOFO (Section IV.D), prior to awarding funds, the IBO conducted a structured risk assessment of all prospective subgrantees through its prequalification process. This prequalification assessment evaluated:

- Financial capability;
- Managerial capacity;
- Technical capabilities;
- Operational capabilities;
- Past performance on federal or state grants; and
- Internal staff capability.

The IBO incorporated risk assessment and identification into the BEAD Prequalification Phase by assessing the organizational, financial, and technical capabilities of prospective subgrantees to ensure funded activities could be carried out in a competent manner and in compliance with all applicable federal, State, and local laws (as defined by NTIA's BEAD NOFO 'Subgrantee Qualifications'). Prospective subgrantees demonstrated their capabilities within the Prequalification Phase through a series of certifications, narrative responses, and document requests that were then analyzed to assess the financial, managerial, and operational capacity to meet BEAD funding obligations. The IBO reviewed application content for completeness, sufficiency, and risk. Based on this evaluation, all subgrantees were initially classified as low risk during the BEAD Prequalification Phase.

An additional round of Pre-Award risk assessments will be conducted prior to executing awards with subgrantees. Subgrantees will be assigned an amended risk level (low, medium, or high) if appropriate, based on the assessment findings. Risk levels will influence monitoring intensity, the required frequency of monitoring reports, and the need for additional documentation or technical assistance. The results of each risk assessment will be reflected in the subaward agreement. Subgrantees deemed high risk may be subject to enhanced reporting, more frequent site visits, or other oversight mechanisms.

As contracts are executed, the contracting process also assesses and controls risk to the State of Indiana by requiring an active State of Indiana Business Registration and an active SAM.gov registration. Finally, as deployment projects begin in earnest, risk will be regularly assessed as dedicated staff fulfill monitoring activities (described further in 'Monitoring Activities').

Monitoring Activities

To ensure that all subgrantees uphold project integrity, the IBO will proactively monitor all subgrantees throughout the duration of their projects to ensure compliance with all BEAD Program requirements. As required under 2 CFR § 200.332(d–f) and the BEAD NOFO (Sections IV.C. and IV.D), and as described in the IBO’s Volume II and the IBO’s Master BEAD Subgrant Agreement, the IBO will conduct ongoing monitoring of subgrantees to assess compliance with all applicable federal, state, and programmatic requirements, ultimately ensuring that the goals and objectives of the subaward are achieved. The frequency of monitoring activities, including reporting and invoice submission, will be determined based on the risk assessments performed by the IBO.

Monitoring will include a mix of desk reviews, performance reviews, and site visits. These activities will be conducted, at a minimum, on a quarterly basis, with increased frequency for higher-risk subgrantees or in response to identified issues. Monitoring activities will include:

- Quarterly progress check-in meetings with the subgrantee;
- Review of subgrantee’s financial and performance reports;
- Review of subgrantee’s audit results; and
- Review to ensure subgrantee’s compliance with applicable laws, the terms of the Grant Agreement and BEAD Program requirements.

The IBO will develop robust monitoring plans for each subgrantee based on their assigned risk level. While monitoring protocols will remain flexible and proportional to project scope and complexity, all subgrantees will be held to consistent core accountability standards to ensure projects are completed on time and limit potential waste, fraud, and abuse of federal funding.

Subgrantee Communication and Technical Assistance

In accordance with 2 CFR § 200.332(e) the BEAD NOFO, and the IBO's monitoring plan set forth above, the IBO will maintain regular, proactive communication with subgrantees to assist with the early identification and resolution of compliance and performance issues. Monitoring will be conducted in a collaborative manner, aligned with the BEAD NOFO's emphasis on program integrity and successful subgrantee execution.

The IBO intends to provide technical assistance to subgrantees, which may include webinars and training sessions on BEAD reporting and compliance requirements, one-on-one technical assistance sessions, targeted sessions for high-risk or underperforming subgrantees, and written guidance clarifying NTIA regulations, audit expectations, eligible expenditures, and other frequently asked questions.

All communications will be documented and retained in each subgrantee's monitoring record, consistent with 2 CFR § 200.334 requirements on record retention and accountability. Frequent communication, including quarterly progress check-in meetings with subgrantees, will be used to assess progress, identify technical assistance needs, and document project or subgrantee-specific challenges. The IBO views monitoring as a cooperative process between the State and its subgrantees. Open dialogue and responsiveness will be encouraged such that issues are quickly identified and that subgrantees have the support necessary to meet programmatic goals.

Corrective Action

In accordance with 2 CFR § 200.339 and 2 CFR § 200.208, the IBO will take corrective action on all significant developments that negatively affect the subaward. Significant developments include Single Audit findings related to the subaward, other audit findings, site visits, and written notifications from a subrecipient of adverse conditions which will impact their ability to meet the milestones or the objectives of a subaward. When significant developments negatively impact the subaward, the subgrantee shall provide the IBO with information on their plan for corrective action and any assistance needed to resolve the situation.

Any corrective action plan will:

- i. Identify the specific noncompliance or deficiency;
- ii. Define clear resolution steps and timelines;
- iii. Outline documentation required for remediation;
- iv. Establish consequences for failure to comply, consistent with the enforcement provisions in 2 CFR 200.339.

The IBO will monitor corrective action plans closely through scheduled follow-ups and additional oversight activities. The subgrantee will receive guidance and tailored support throughout the process to promote timely resolution and sustained compliance.

Closeout and Final Inspection

At the conclusion of each subaward, the IBO will conduct a formal final inspection and closeout process in accordance with 2 CFR § 200.344 to ensure that all contractual and regulatory requirements have been satisfied.

The final inspection will be conducted after the Subgrantee provides notice of completion of the broadband infrastructure project and other construction activities when all construction has been completed, the architect/engineer certified in Indiana has conducted its own final inspection, and any deficiencies have been corrected. The IBO will schedule the final inspection. Representatives of the IBO, the architect/engineer and the Subgrantee must attend the final inspection for the project.

As required under the IBO's Master BEAD Subgrant Agreement and as set forth in 2 CFR § 200.344, the closeout process will serve as the final stage of subrecipient monitoring and will include:

- Verification that all project deliverables, milestones and obligations were met;
- Confirmation that all reports (financial, performance, and other reports required by a subaward) were submitted to the IBO no later than ninety (90) calendar days after the conclusion of the period of performance of the subaward (or an earlier date as agreed upon by the IBO and Subgrantee);
- Review of final technical and financial reports;
- Reconciliation of reimbursed costs and resolution of any outstanding issues or disallowed costs;
- Accounting from the subgrantee for any property acquired with subaward funds or received from the Federal Government in accordance with 2 CFR 200.310 through 200.313, 200.316 and 200.330.

Final payments will be issued only after successful completion of the closeout review. If outstanding issues remain, the IBO may delay closeout or initiate additional oversight actions consistent with federal grant protocols.

Documentation and Continuous Improvement

The IBO will maintain thorough documentation of all monitoring activities, subgrantee communications, findings, and resolutions, in accordance with 2 CFR § 200.334, which requires non-Federal entities to retain financial and programmatic records for a period of at least three years. This documentation shall include site visit logs, quarterly reports, invoice reviews, risk assessments, and corrective action plans developed under the corrective action framework.

To ensure audit readiness, traceability, and consistent oversight across the BEAD portfolio, the IBO will utilize a centralized monitoring system to house subgrantee records, milestone documentation, reporting submissions, and compliance findings. This approach reflects the internal control expectations of 2 CFR § 200.303, which requires recipients to safeguard public funds through sound administrative systems.

To continuously improve its monitoring protocols and adapt to evolving federal guidance, the IBO will:

- Conduct internal reviews of monitoring activities annually;
- Solicit feedback from subgrantees, NTIA program auditors as appropriate;
- Update internal procedures, training materials, and oversight tools;
- Integrate lessons learned from prior risk assessments, CAPs, and emerging compliance trends.

This continuous improvement model helps ensure that the IBO's monitoring framework remains proactive, efficient, and aligned with both state and federal oversight expectations.